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November 26, 2018

Los Angeles County Board of Supervisors
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RE: Oppose the City-sized "Centennial" Sprawl Development in L.A. County

Dear Los Angeles County Board of Supervisors,

Thank you for the opportunity to provide comments on the Centennial Specific Plan (Specific Plan No. 02-232). The Tejon Ranch Corporation proposes to construct a new city, Centennial, at the western end of the Antelope Valley, adjacent to the Angeles National Forest.

If completed, the project would result in the construction of 19,333 housing units, and more than 8 million square feet of infrastructure, commercial, and other forms of non-residential development.

Centennial exemplifies the worst aspects of 20th century sprawl: it would disproportionately increase air pollution, traffic and greenhouse gas emissions while destroying thousands of acres of irreplaceable natural resources. As explained in more detail below, we ask the Los Angeles County Board of Supervisors to deny the issuance of project-level entitlements.

The undersigned organizations support the development of affordable housing in Los Angeles County that is consistent with smart growth principles and thoughtful urban planning. Specifically, we favor development on previously disturbed land within the current boundaries of urban areas. Sites that are suitable for development result in the densification of the County's urban areas, and should be located close to existing mass transportation infrastructure. Los Angeles County development should also focus on ensuring the availability of affordable housing that is close to existing jobs. Lastly, the construction of new housing should not result in the destruction of diverse, irreplaceable habitats that the residents of Los Angeles County continue to value and cherish. The Centennial Project fails at nearly every measure of smart urban development.

The Centennial Project Represents 20th Century-Style Sprawl Development

The residents of Centennial would have to endure exorbitantly long commutes to the nearest urban centers, located 35 to 65 miles one-way from the project, mostly on Interstate 5. The draft environmental impact report (DEIR) for the project indicates the average one-way vehicle trip length from the project would be 45 miles, resulting in an increase of more than 600 million vehicle miles traveled per year on already congested freeways – or over 2,400 trips around the earth's equator every year. This amounts to the addition of more than 75,000 vehicle trips per day to area roadways. The residents of Los Angeles County already endure some of the longest commutes in the nation, and Centennial would make this situation even worse.

The project is located less than 10 miles from the junction of the state's two largest earthquake faults, the Garlock and San Andreas. Simulations indicate this area would be severely affected by major earthquakes on the San Andreas Fault. The project site is also notoriously windy and would suffer from a high threat of wind-driven wildfires. The project's remote location means that Los Angeles County would bear the responsibility of providing emergency services to this remote area when catastrophic events occur. The taxpayers of Los Angeles County will be on the hook to pay for the cost of providing the public services that this

far-flung development will require. Simply put, the Centennial Development is poorly sited, in a remote and dangerous location.

The Centennial Project Negates Efforts to Reduce Greenhouse Gas (GHG) Emissions

The construction of the project, daily vehicle trips by residents, and the loss of carbon sequestration in currently-intact habitats would all adversely impact California's ambitious and much needed goals of reducing GHG emissions. The EIR does not adequately analyze, disclose, and mitigate for the emission of GHGs. At a minimum, Centennial's developers should adopt zero-net GHG emissions as have other projects in the County. Approval of the Project would be a huge step backward in the County and state's efforts to combat the climate crisis.

The Centennial Project Negates Efforts to Reduce Air Pollution in Southern California

Air pollution, particularly in the form of Particulate Matter (PM) 2.5 and 10, is already consistently above acceptable state and federal thresholds in the Antelope Valley. Future residents of Centennial would have to endure the immediate and long-term health effects of living in an area with poor air quality. Given that much air pollution is associated with vehicle emissions, the increase in vehicle miles traveled will result in a significant decrease in regional air quality.

The Centennial Project Will Destroy Irreplaceable Habitat for Plants and Animals

The area that would be developed to build Centennial is among the last places in the Antelope Valley where pronghorn "antelope" roam. The endangered California condor routinely soars above the project site. The Centennial site is currently home to breeding colonies of the tricolored blackbird. It is a species that has already lost more than 90% of its habitat, and was just designated as a Threatened Species by the State of California on April 19, 2018. Additional rare and threatened wildlife present on the project site include the American badger, burrowing owls, northern harriers, loggerhead shrikes, California legless lizards, and countless species of migratory birds. The Centennial Project represents a major threat to wildlife species that have been adversely affected by development in other parts of Los Angeles County.

Californians flock to the Antelope Valley Poppy Preserve to marvel at the displays of spring wildflowers. The area slated for development on Centennial has displays of wildflowers that easily rival the Poppy Preserve. Even more precious is the extensive native, perennial grassland that exists on the project site. This iconic California grassland, which has already been eliminated across much of California, is present on thousands of acres of the Centennial. The site is also home to at least ten species of oaks, and numerous species of rare plants. The intact habitats of Centennial are a living laboratory of evolution that cannot be replaced if lost.

The western Antelope Valley is also well known as a place of ecological transitions. As the junction between the Mojave Desert, Transverse Ranges, and the Tehachapi Mountains, Centennial features prominently in the future of the region's biodiversity. In this era of climate change, transitional areas such as this play an important role as biological corridors, ensuring that plants and animals have a place to go as environmental conditions change. These biological resources serve to emphasize that this is an intact ecosystem that fosters relationships between plants, animals, and their environment. These habitats also provide valuable ecosystem services, such as the recharge of groundwater resources and the sequestration of greenhouse gases. Now more than ever, Los Angeles County should serve as a leader in the conservation of intact, functioning ecosystems.

We encourage the residents of Los Angeles County and Board of Supervisors to take a stand against Centennial — an antiquated, sprawl-style development that places the profits of a corporation ahead of the needs of the people of Los Angeles County. We support appropriate development in Los Angeles County that is consistent with modern urban planning principles. A vote in favor of the Centennial Specific Plan is a vote against logic and counter to the needs of the County's residents. A vote against Centennial is a vote for sound planning decisions and for the conservation, in perpetuity, of irreplaceable habitats.

We strongly recommend the Board of Supervisors to reject the Centennial Specific Plan. Once again, thank you very much for the opportunity to provide comments on this project.

Sincerely,

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