



August 4, 2021

Mr. Mark Pestrella, Director
Department of Public Works
County of Los Angeles
Electronic Transmission of four (4) pages to:
mpestrella@pw.lacounty.gov

Subject: Critical Issues to be Resolved Before the Community of Acton Can Support
the County's Proposed Revisions to the Acton Community Standards District.

Reference: Proposed Revisions to the Acton Community Standards District
Project RPPL2018002314

Honorable Director Pestrella;

The Acton Town Council ("ATC") has worked diligently to resolve remaining concerns pertaining to the County's proposed revisions to the Acton Community Standards District ("CSD"); these concerns must be addressed before the Community of Acton can support the County's proposal. A number of our concerns involve matters that fall under the jurisdiction of the Department of Public Works ("DPW"), hence this letter to you. For nearly two years, the ATC had tried to confer with county staff regarding important matters that are central to our CSD concerns. During the Regional Planning Commission Hearing on February 24, 2021, DPW communication equipment malfunctioned, so DPW staff could not address any of the questions or concerns raised by the Commissioners; as a result, the Regional Planning Commission directed DPW staff to respond to Acton Community concerns and coordinate the effort with the Department of Regional Planning ("DRP") and the Department of Parks and Recreation ("DPR"). However, there has been no DPW activity on this front, and we have been informed by DRP staff that the coordination with DPW that was directed by the Regional Planning Commission has not yet taken place. Because the Board of Supervisors will be voting on the Acton CSD at the end of this month, we are out of time to resolve critical community concerns that have been actively raised to DPW, DRP, and DRP staff for nearly 2 years. Therefore, the ATC respectfully request that you help us address the following:

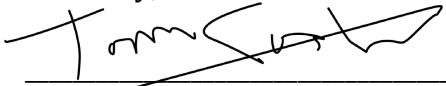
- The ATC would like to coordinate with DPW regarding the methodology that will be used in future to ensure that commercial development in Acton is "local serving" as required by adopted policies set forth in the County General Plan and the Antelope Valley Area Plan ("AV Plan"). We have been informed by DRP that "local-serving" provisions will not be included in the revised Acton CSD because "local-serving" plan policies will be implemented by the Rural Commercial zoning ordinance which (among other things) requires discretionary review for projects that "would generate vehicular traffic requiring the provision of new or additional traffic lights". We have also been informed that, going forward, DPW will be responsible for determining whether a project "would generate vehicular traffic requiring the provision of new or additional traffic lights", thus it is critical that DPW staff confer with us on the development of a reasonable and clearly documented explanation of how this "community-critical" protection will be implemented. We have endeavored to discuss this critical issue with DPW for years, but DPW staff will not respond to our meeting requests. Without a clear understanding of how the County will ensure that future development in Acton achieves the "local serving" policies adopted by the County General Plan and AV Area Plan, the ATC cannot support the revised CSD.
- The ATC would also like to understand the methodology that DPW relies on to secure "right of way" dedications on ministerial developments.
- The ATC would also like to coordinate with DPW on its plan to prevent the expansion of concrete drainage facilities in the Community of Acton and confer with staff on how this plan will successfully implement adopted plan goals and policies that strongly discourage new development which requires urban infrastructure such as concrete curbs and gutters, street lights, and traffic signals. We have been informed by DRP staff that existing protections in the Acton CSD which prevent the use of concrete drainage facilities and other urban infrastructure will be removed and that we must address such issues directly with DPW. We have tried to engage DPW on this issue for a very long time, and we have repeatedly requested the opportunity to coordinate with DPW staff on how to make sure these plan goals and policies are achieved, but our requests have fallen on deaf ears.
- The ATC would also like to coordinate with DPW on its plan for working with DPR, DRP, and other departments to achieve all the trail policies and goals established by the adopted County General Plan and the AV Area Plan. The ATC identifies this as a critical issue because the proposed revisions to the Acton CSD strip out all existing trail provisions and replace them with new provisions that will not achieve adopted trail policies and goals unless there is extensive coordination between DPR, DRP, DPW and the community *which must get underway immediately*. The ATC points

out that the goals and policies adopted by the County General Plan and the AV Area Plan apply to all County activities regardless of which department has jurisdictional authority over the activities. In other words, it is the County *as a whole* that is responsible for ensuring that adopted trail goals and policies are achieved in the Community of Acton; this means that all County departments are obligated to coordinate and work together to achieve them. Too often, County departments "silo" their activities to such an extent that they end up working at cross purposes to each other, and communities like Acton must suffer the consequences. An example of this just came to our attention today. Specifically, the ATC and Acton residents have been trying to work with DPR to find a way to secure a trail that has been open to equestrian uses since the 1800's but was recently fenced off by the property owner. The access route is a mapped "private and future street" that has been offered in dedication to the County and has been used by the public for decades. Yet (and incredibly), a DPW staff member recently suggested to the property owner that he consider having the easements vacated simply because they are 25 years old. The very notion that a DPW staff member would *even consider* recommending that any easement in Acton be vacated is disturbing enough, but for such a recommendation to come at a time when the Community is trying to work with other County agencies to figure out how to preserve access opportunities on the property is simply appalling.

We need DPW and DPR and DRP to work together to achieve Board-adopted plan goals and policies. ***We need DPW and DPR and DRP*** to put an end to the existing decision-making process that is so fragmented, disjointed, and "siloed" that it is materially preventing the achievement of plan goals and policies that were adopted by the Board of Supervisors specifically for the protection of our community. ***We need DPW and DPR and DRP*** to recognize that Board adopted plan goals and policies are binding on all County departments and are not just the responsibility of DRP. The Department of Public Works is just as obligated as the Department of Parks and Recreation to ensure that adopted trail policies are met in the Community of Acton. The Department of Public Works is just as obligated as the Department of Regional Planning to ensure that adopted plan policies pertaining to "local serving" uses, concrete drainage facilities, and other urban infrastructure are achieved in the Community of Acton. In short, we need DPW and DRP and DPR to move together in the same direction and work from the same pages of the adopted County General Plan and AV Area Plan. Currently, we do not perceive that such coordination exists; because of that, the ATC is not confident that the proposed Acton CSD revisions are adequate to secure the protections that our community was promised by the Board of Supervisors when they adopted the County General Plan and the AV Area Plan.

For all the reasons set forth above, the ATC respectfully requests your assistance in putting together a meeting/conference involving DRP, DPW and DPR to address our concerns and cross-coordinate on the future implementation of adopted plan goals and policies. We anxiously await your reply.

Sincerely;



Jeremiah Owen, President
Acton Town Council

cc: The Honorable 5th District Supervisor Kathryn Barger [Kathryn@bos.lacounty.gov]
Anish Saraiya, Planning & Public Works Deputy [ASaraiya@bos.lacounty.gov]
Donna Termeer, Field Deputy [DTermeer@bos.lacounty.gov]
Chuck Bostwick, Assistant Field Deputy [cbostwick@bos.lacounty.gov]
Regional Planning Commissioner Mondugno [comment@planning.lacounty.gov]
Mark Herwick, Department of Regional Planning [mherwick@planning.lacounty.gov]
Richard Marshalian, Department of Regional Planning [RMarshalian@planning.lacounty.gov]