



Richard Claghorn, Principal Planner
Department of Regional Planning
Los Angeles County
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Electronic Transmission of three (3) Pages to:
rclaghorn@planning.lacounty.gov

April 18, 2023

Subject: Acton Town Council Comments on the Proposed RV Park Discussed at Pre-Application Counseling meeting on March 28, 2023.

Reference: PRJ2023-000095, RPPL2023000147.

Dear Mr. Claghorn;

The Acton Town Council discussed the referenced 184-space RV Park proposed in Acton at the community meeting convened on April 3 and concluded that it would be prudent to share with you some of the comments and concerns that were raised regarding this project. In the interest of brevity, these comments are presented in a list format; we respectfully request that you share these comments with the applicant so that full disclosure is achieved.

The Project has the Potential to Significantly and Adversely Impact Groundwater Supplies.

The Acton Town Council understands that the project consists of 184 new RV campsites, a pool, a pond/lake, a restaurant, a clubhouse, and other amenities which will require significant water resources to maintain. According to documents filed with the Los Angeles County Regional Water Quality Control Board, an existing large RV park operating at 20% - 25% capacity in Acton and supporting approximately 200 RV spaces often uses more than half a million gallons of water per day or more; it is anticipated that the proposed RV Park will present a similar water demand. Accordingly, the Acton Town Council is substantially concerned about the impacts that this project will have on existing water supplies in the community. At the Pre-Application Counseling meeting on March 28, the applicant indicated that water for the project will be provided by a private well; if true, then the project will extract substantial amounts of groundwater from the area and thus profoundly affect groundwater levels and well yields in Shannon Valley (the residential neighborhood located upgradient from the proposed project where residents are entirely reliant on individual domestic wells that have experienced dwindling yields for more than a decade). During the meeting, County staff recommended that the applicant consider connecting the project to a new water line that was recently constructed by Waterworks District 37; however, this will result in groundwater depletion elsewhere in Acton if the District increases local groundwater extract rates to support the project. The potentially significant impacts to local groundwater levels that is posed by the project must be addressed in the environmental analysis that is performed for the project.

The Proposed Block Wall is Not Permitted Under the Acton Community Standards District

The Acton Town Council understands that the applicant may propose the construction of a block wall on the perimeter of the project site to attenuate noise; however, such construction is not permissible under the Acton Community Standards District. Specifically, the “Community Wide Development Standards” established by County Code Section 22.302.060 (G) only permit open-type perimeter fencing and further require that at least 70 percent of the entire fence area remain non-view-obscuring; solid lineal sections must be primarily for structural purposes or provide minor architectural design features. The importance of this particular code requirement is demonstrated by the fact that it was specifically identified as a “major provision” in the staff analysis that was prepared for the Acton Community Standards District when it was adopted in 1995 (see Ordinance 95-0060 adopted November 21, 1995). Furthermore, the Acton Community Standards were adopted with the intent that deviations would generally not be permitted and would only be considered under the most extreme circumstances where there is a demonstrated need for the deviation to enable the project to proceed. Such circumstances are not presented by the proposed project which is capable of proceeding without a block wall.

The Proposed Project will Require a Detailed Traffic Study

The proposed project presents a number of significant traffic hazards, not the least of which is that it’s location on Sierra Highway (a two-lane major commuter corridor) will result in frequent traffic interruptions caused by the turning actions of large, lumbering, slow moving recreational vehicles onto and off of Sierra Highway where vehicle speeds typically exceed 65 miles per hour in both directions. The stretch of Sierra Highway where the project is located is already dangerous because of high vehicle speeds and the existing, awkwardly configured Red Rover Mine Road freeway interchange with its short and dangerous “yield” entry point on the west-bound lane. Travelers who are unfamiliar with the area are often confused by the non-standard configuration of the interchange and they frequently drive onto the freeway offramps from Sierra Highway. The proposed project will significantly exacerbate existing traffic hazards by introducing numerous, frequent, and slow-moving recreational vehicles onto Sierra Highway at this (already dangerous) location. These concerns, along with a “line of sight” study and a traffic signal warrant analysis, must be fully addressed in the environmental analysis that is prepared for the project.

The County Has Shown Itself to be Incapable of Enforcing Recreational Vehicle Park Permits

The Community of Acton already supports three existing Recreational Vehicle Parks all of which operate in violation of the County Code and even their own permit conditions. For instance, the 1,000 Trails Park has operated without a Conditional Use Permit for nearly two decades and the “Action Camp” operates year-round even though it is only authorized to operate a limited number of months per year. Many people have established residences at all three RV Parks in Acton even though this is explicitly prohibited by County Code Section 22.140.490. The County has demonstrated that it is singularly incapable of bringing Recreational Vehicle Parks in Acton into compliance with either the County Code or their own permit conditions; the Acton Town Council has every reason to believe that this appalling trend will continue to persist. Such a disturbing fact pattern is not conducive to garnering Community support for the development of a fourth RV Park Project in Acton.

The Proposed Park is Inherently Inconsistent with Adopted County Planning Documents

According to the Applicant, the RV Park is intended to serve travelers along the 14 freeway; this is inherently at odds with the stated intent of non-residential land uses in Acton which (as set forth in the adopted Antelope Valley Area Plan) is to serve local residents and not freeway travelers. The Acton Town Council is having difficulty reconciling these two diametrically opposed principals.

The Project Cannot Include Outdoor Storage of Recreational Vehicles

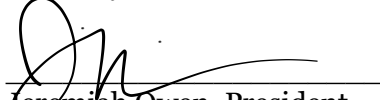
Though it was not mentioned during the Pre-Application Counseling meeting on March 28, the Acton Town Council anticipates that the project may include an outdoor recreational vehicle storage yard because such facilities are included in other recreational vehicle parks in the community of Acton. However, it must be pointed out that such uses are not permitted on agriculturally zoned property even with a Conditional Use Permit, so no such use can be established as part of the proposed project.

Conclusion

As expressed above, the Acton Town Council has a number of concerns with the proposed project; we are taking the time to outline these concerns to you now (at the beginning of the approval process) in the hope that they will be factored into the County's consideration of the project.

If you have any questions or require further information, please do not hesitate to contact us at atc@actontowncouncil.org.

Sincerely;



Jeremiah Owen, President
The Acton Town Council

Copy to:

Russ Bryden, Division Head for LA County Waterworks [RBryden@dpw.lacounty.gov]
Elaine Kunitake, Senior Civil Engineer with LA County Public Works [EKunitake@dpw.lacounty.gov]
Ciara Barnett, Principal Engineer with LA County Public Works [CBarnett@dpw.lacounty.gov]
Josh Svensson, Senior Civil Engineer with LA County Public Works [JSvensson@dpw.lacounty.gov]
Josephine Gutierrez, Senior Civil Engineer with LA County Public Works [JGutierr@dpw.lacounty.gov]
Terri Alex Management Specialist with LA County Public Works [TAlex@dpw.lacounty.gov]