

Correspondence Received

			The following individu	als submitted comments on agenda item:
Agenda #	Relate To	Position	Name	Comments
4-D.		Oppose	Adriana Talamantes	I respectfully request the board reject the surplus declaration. The equestrian district deserves to be preserved, it's environment and open space needs to be protected. The land needs to remain public for the community just like it was originally said it would. Allowing this land to fall into private developer's hands will only hurt the community causing urban displacement and erosion of the equestrian culture that has been here for many years.
			Alexandra Parra	Resident of area and wants more green areas
			Clara Solis	These parcels in Avocado Heights have a clear public purpose. Avocado Heights is a community with a very high need park deficit per the Countywide Park needs assessment. These parcels should be used for the community as open space and possibly as a small neighborhood park.
			cristian reynaga	Hello Board of Supervisor, I am proud and grateful to be a homeowner in Avocado Heights & kindly ask that we oppose declaring this special properties as surplus and instead designate them as an equestrian park that can provide trees for a better environment & a safe place to work horses out. This space can also serve as a safe place for emergencies, during the LA fires I was fortunate enough to open my private ranch / horse stable to shelter evacuated horses. This space can be used to build a few horse round pens that can also be used for emergencies. This space is also near the SGV River and can serve as a safe place for the wildlife nearby. Also being close to the freeways and city of industry, the trees can really help purify the air. The county has a unique opportunity to create an amazing space that can impact the quality of life of residents for generations to come. Thank you.
			Daniel Talamantes	
			Duncan McKee	Duncan McKee 738 S. 3rd Avenue Avocado Heights, CA 91746 (626) 330-5123 Dear Los Angeles County BOS Members and Staff: On behalf of the residents and business owners in Avocado Heights, Bassett, City of Industry, Hacienda Heights, La Puente, North Whittier and surrounding communities we want to assert our opposition to declaring the properties located at 892 and 898 S. 3rd Avenue in Avocado Heights as surplus property. We are opposed to the abandonment of the long-term plan to develop the properties as a passive nature park and urban farm/community garden to benefit senior citizens, veterans, school children and anyone that may realize positive effects from the enjoyment and therapeutic outcomes from the location. The statement in the letter from the LACDA that: "After careful consideration and numerous attempts to facilitate the nature park, it was determined that

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Our family has lived on 3rd Avenue since 1947. Construction of our unique historical home along with a sister house closer to the 892 and 898 properties was started in 1919 and completed in 1923 of poured in place concrete along with a water tower that served the water needs of unincorporated La Puente and what is now City of Industry. There is nothing comparable to this Museum/ Botanical Garden anywhere this side of the Huntington Library. It is an absolute jewel that we have been preserving, planning and evolving for over 30 years to make available for the greater public good. We are currently expanding to develop an urban farm educational program that will serve local schools in the Bassett, Hacienda La Puente and Whittier school districts as well as any other districts that we can accommodate. We are additionally in the process of growing a variety of fruit and vegetables to be donated to local food banks and those in need. Several nearby colleges and universities have expressed an interest in partnering in this endeavor as have numerous senior groups, college students and nonprofit organizations. These two properties would be ideal to help facilitate and expand the scope of this operation. Any current access to these two parcels is by way of an antique private road that is over 100 years old which is owned and maintained by our family and other property owners.

We are respectively asking the BOS to require the separation of these two parcels from the proposal and to initiate a review with consultation directly with invested stake holders to explore the feasibility of developing and maintaining this beautiful and valuable location for the greater benefit of the many. Our family has been working on this for over 30 years and has invested considerable resources towards our long term plan. No one from the County has consulted with us except when I discussed this with Norma Garcia-Gonzalez prior to the County purchasing the property. Athens tipping fees that are supposed to be going towards a community benefit fund could be one source of funding to make this happen along with grants to multiple non-profits that have expressed an interest in this project.

We would like to invite the supervisors to visit so that they can see firsthand the potential to develop this into a wonderful lasting resource that is worthy of preservation.

Thank you for the opportunity to comment. Duncan McKee

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Edlin Simental	I grew up in the San Gabriel Valley, and I oppose designating 842 and 848 S. 3rd Avenue in Avocado Heights as surplus property.
	Communities throughout the San Gabriel Valley, including Avocado Heights, have limited access to open space and parks. Avocado Heights is identified as a Very High Need zone for parks in the County's Parks Needs Assessment. These parcels hold the rare opportunity to fill this critical gap in a neighborhood with severe deficits.
	Designating this land as surplus property takes away opportunities for recreation and community building that our area desperately needs. Public land should stay public. These parcels should be preserved for their potential to serve as a community park, agriculture site, or nature area where families can gather and recreate, consistent with the community's needs and with community input.
	Please reject the designation of these parcels as surplus property and preserve this land for public use. Thank you.
Eric Pacheco	For the last 40+yrs he have continued to lose much need trails and equestrian properties and even rezoning issues restrict us on what we are allowed in the san gabriel valley for benefit to yourselves and not the people that have appointed you to serve, protect the community. Land, school's being sold for "affordable housing" That is honestly not affordable or needed. stop shaping for the developers that have contributed to some of you in "support" and shape it to where we can have green space for the future to have a healthy growth, environment. Many of you do not even live in the area and are ok with it for the reason it does not affect you directly. I care for our kids and future, stop selling out and start helping us please. warehousing, un needed housing is creating chaos withing the community and will only create a larger problem. We will continue to look into and expose corruption withing city member's and the people contributing to them.
Giovana Mondragon	Declaring surplus on land that can give us back some much needed green space is abhorrent. Especially when the biggest polluter in town was just given a slap on the wrist fine and leave us to deal with the toxic fallout
Jessica Vallejo	Greetings. Our growing community in Avacado Hts. needs more green space. About 2 years ago an 80 unit low income housing apartment building was built and that means more families in Avacado Heights. Having 1 park for our neighborhood is not adequate for our community. We need more green space for the children to play, for those who struggle with mental health to have an area of reprieve, for the with horses to ride Feedly. More green space is vital for our community to thrive. We live in an equestrian area and doing the opposite of what that means is detrimental to our equestrian existence. Please hear the people and be just to us. Thank you for your time.



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Joel Chavez	I oppose to the allocation of these properties to other than using them for the benefit of the equestrians in this neighborhood, and allowing this properties to serve as a recreational area and access to the links with other equestrian areas in the San Gabriel Valley!			
Jorge Del Real Carlos	Great afternoon Supervisors, my name is Jorge Del Real Carlos amd I strongly oppose item 4D. Avocado heights is a park scares community and removing it from open space for community residents opposes and contradicts the LA county plan for 2035. Its designed to expand and preserve open land. I urge you to vote NO on item 4D and do the right thing for our community.			
Jose E Martinez	Me opongo a qué se vendan los terrenos a propiedad privada, queremos que sean parques públicos para nuestras familias.			
Juan Sandoval	I am against the privatization in any way shape or form of the public land that is acres near the San Jose Creek. I believe every disadvantaged community deserves parks and the people of Avocado Heights have supported us against the privatization of Glenelder School. The entire East San Gabriel Valley deserves parks and it is an abomination that the few areas we've been told are going to become parks, are instead being sold off to the highest bidder.			
Lorena Benitez	Me opongo a la venta de estos terrenos para uso privado. Necesitamos áreas de recreación para nuestros miños y adolescentes, yo estoy a favor de continuar con el proyecto de hacer un parque y área pública estos terrenos. PARQUE PUBLICO SI PROPIEDAD PRIVADA NO			
lucia cruz	I opposed the selling of this surplus land to a private developer. We need open land for our communities This land was supposed to turned in to a park for children and the whole community. We as voters were never consulted during this decision making. We, voters, want a park since it is located next to a horse trail which benefits the entire community. We do not need a private developer to turn it into condos. The U.S. loses about 1.5 million acres of natural land each year to development. As we lose more land, its effects will be devastating for homeowners, animals and future generations. Condos will destroy our environment which in the long run only benefits developers. I hae yet to see developers who are stealing our land, live in the condos they want to build.			
Michael Belongie	Please use this land for the reason it was *originally* purchased, (public open space), rather than declaring it "surplus property". Thank you for your consideration.			
Samuel Barragan	The possible loss of the 892 and 898 3rd Street properties would be a considerable setback for Avocado Heights and the surrounding equestrian neighborhoods. It's likely that these lots will be acquired by a development			

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	firm and transformed into more housing, which does not meet the needs of our community. We should instead focus on enhancing open green spaces dedicated to equestrian pursuits. These spaces could serve as a crucial platform for agricultural initiatives and rodeo programs, ultimately benefiting both our community and its younger generations.				
Samuel Brown	I am submitting comments in strong opposition to the proposed declaration of the County-owned parcels at 842 and 848 South 3rd Avenue, Avocado Heights as "surplus land." This action is inconsistent with multiple legally binding policies within the Los Angeles County General Plan 2035, violates the County's obligations under State environmental justice and climate statutes, and disregards the documented park and open-space deficit affecting the East San Gabriel Valley. I. The County Cannot Declare the Parcels "Unnecessary for Public Purposes" Because General Plan Policy Requires Their Conservation for Open Space and Agriculture Under California law, a General Plan carries the force of law, and all County actions must be consistent with it. ("Lesher Communications v. Walnut Creek, 52 Cal.3d 531 (1990)"). The proposed "surplus" designation is inconsistent with the following mandatory General Plan policies: Open Space Element (OS) OS 1.1 (Park Provision in High-Need Areas): Requires the County to expand park and open-space resources in communities with the highest need. OS 1.3 (Use of Public Land for Open Space): Directs the County to prioritize the conversion of publicly owned parcels into parks, agriculture, and green infrastructure where feasible. OS 2.2 (Prioritizing Disadvantaged Communities): Mandates investments in recreation, green space, and nature-based climate interventions in communities overburdened by pollution and heat. Healthy Communities Element (HC) HC 4.1 – HC 4.4: Requires the County to reduce health inequities by increasing access to parks, shade, cooling, and nature in communities with high pollution burdens, extreme heat, and environmental injustice indicators. Land Use Element (LU) LU 6.3 (Protection of Rural and Equestrian Communities): Obligates the County to preserve rural, semi-rural, agricultural, and equestrian areas and prevents the introduction of incompatible development in those districts. Conservation and Natural Resources Element (CN) CN 1.4 (Local Agricultural and ensure viable				



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speculative or incompatible residential development plainly violates these policies.

The County cannot lawfully declare property "no longer necessary for public purposes" when multiple adopted policies affirm the opposite.

II. The Parcels Serve a Public Purpose Under State Environmental Justice Requirements

The County is required by State law to prioritize environmental justice communities.

SB 1000 (Gov't Code § 65302(h))

Requires counties to:

reduce pollution burdens,

increase access to parks and green space,

improve public health in disadvantaged communities, and

meaningfully involve community residents in land-use decisions. SB 535 & AB 1550 (Health & Safety Code §§ 39711–39715)

Classify Avocado Heights and the East San Gabriel Valley as disadvantaged and low-income communities for purposes of climate and environmental

and low-income communities for purposes of climate and environmental investment.

Under these laws, the County is required to direct green infrastructure, cooling, shade, and open-space investment to this community, not sell public land that could serve those purposes.

Thus, a surplus declaration is inconsistent with State-mandated EJ obligations.

III. ÅB 465 and State Urban Agriculture Law Require the County to Consider Food Production and Community Agriculture First

Under AB 465 (Urban Agriculture Incentive Zones), counties are encouraged—particularly in low-income communities—to preserve and repurpose vacant or underutilized land for:

local agriculture;

community gardens;

food-system resilience; and

nature-based environmental benefits.

842 and 848 S. 3rd Avenue are ideally suited for these uses:

flat, contiguous acreage

located in established agricultural zoning

historically understood as suitable for garden/agricultural use positioned within a rural equestrian corridor

adjacent to a community with limited food access

Disposing of the land without evaluating these uses would be a failure to comply with the purpose and intent of AB 465.

IV. The Countywide Parks and Recreation Needs Assessment Identifies a Severe Park Deficit in the East San Gabriel Valley

The 2016 Countywide Parks Needs Assessment categorizes the East San Gabriel Valley—including Avocado Heights—as a:

"Very High Need"

zone for parks and green space, with:

some of the lowest per-capita park acreage in Los Angeles County,

extreme tree-canopy deficiency, significant heat-island exposure,

Surplus Land Designation for 842 & 848 S. 3rd Avenue, Avocado Heights

To: Los Angeles County Board of Supervisors

From: Daniel Talamantes, UC Davis Professor, Avocado Heights Resident

Date: December 2, 2024

Re: Agenda Item 4-D – OPPOSE Surplus Designation

Dear Supervisors,

I am writing to strongly oppose Agenda Item 4-D, which would declare County-owned parcels at 842 and 848 S. 3rd Avenue in Avocado Heights as "surplus land" for private development.

When these parcels were originally discussed, residents, planners, and County staff understood them as future open space—potentially a small community park, urban agriculture site, or nature-based public asset. Our neighborhood has almost no accessible green space, despite being surrounded by heavy industrial land uses and major transportation corridors. Now, the County is proposing the opposite: converting land that has long been discussed as a community resource into private development.

This would be a betrayal of our community and a violation of environmental justice principles.

Recent community-based cumulative impact research conducted in and around the City of Industry shows that Avocado Heights residents are exposed to a dense cluster of industrial facilities, warehouses, trucking corridors, rail lines, and legacy polluters, including the long-operating lead battery smelter now known as Ecobat (formerly Quemetco). The study documents that homes, schools, churches, stables, mobile home parks, and informal daycares often sit immediately adjacent to multiple pollution sources, with residents facing overlapping exposures to diesel exhaust, volatile organic compounds, toxic metals, noise, dust, and extreme heat. Regulatory databases only capture a fraction of these sources, and many of the places where children, elders, and workers spend their time are entirely missing from official inventories.

This is not just a data problem; it is environmental racism. The East San Gabriel Valley—including Avocado Heights, La Puente, and Hacienda Heights—is a predominantly working-class community of color ranked among the most burdened areas in statewide environmental screening tools, with a long history of discriminatory land use decisions and immigration enforcement that compounds environmental stress. Residents live with a cumulative overlay of industrial

emissions, freeway traffic, past and present waste facilities, and warehouse logistics—all centered in and around the City of Industry—while having minimal access to basic amenities like parks, shade, and clean, safe outdoor space.

The County's own Parks Needs Assessment identifies Avocado Heights as a "Very High Need" area for parks and open space. At the countywide scale, Los Angeles averages roughly 4 acres of parkland per 1,000 residents—already below the peer-city median—while many high-need communities, including Avocado Heights, fall well under that figure, reinforcing that additional loss of potential open space here would deepen an existing inequity rather than a neutral trade. The East San Gabriel Valley community questionnaire and ground-truth fieldwork identified just 9 parks and 18 green spaces in total, serving a population of approximately 13,000 residents, which translates to less than 1.5 acres of parkland per 1,000 residents.

These parcels represent one of the last realistic opportunities to provide our community with:

Space for children and youth to play safely outdoors, away from truck traffic and industrial yards

Community gardens and urban agriculture to improve food access, soil health, and community resilience

Shade, trees, and vegetated areas to reduce urban heat, filter air pollutants, and provide mental and physical health benefits Habitat restoration and native vegetation that support pollinators, birds, and other wildlife while stabilizing soil and capturing stormwater Preservation of the rural, agricultural character that defines Avocado Heights and connects residents to land-based cultural practices

These green functions are not symbolic. The City of Industry's industrial landscape contributes pollutants to local airsheds, streets, and drainage systems that flow toward the San Gabriel River and recharge the underlying aquifer. Vegetation and healthy soils in open spaces can intercept airborne particles, capture dust and metals in leaf surfaces and litter, slow and filter stormwater runoff, and reduce the amount of contaminated sediment that enters storm drains and channels. Trees and deep-rooted plants stabilize banks and unpaved areas, reducing erosion and helping trap pollutants before they reach the river, while permeable soils and vegetated swales promote cleaner groundwater recharge rather than rapid, dirty surface runoff. In a landscape dominated by pavement, rooftops, and warehouse yards, every remaining patch of open ground matters for the health of the San Gabriel River and the aquifer that so many communities

depend on.

Recent research clearly illustrates why County-owned parcels like 842 & 848 S. 3rd Avenue are critical for environmental mitigation in the East San Gabriel Valley. Galindo's study found that the Union Pacific City of Industry Intermodal Facility produces among the highest diesel emissions in the region, with surrounding neighborhoods such as Avocado Heights and La Puente facing consistently high cumulative exposure. The report also documents that Valley Boulevard and industrial corridors have almost no functioning tree canopy, and that previous greening attempts failed due to the absence of recycled water (purple pipe), necessary irrigation, and effective maintenance. Because state law limits the use of potable water for irrigation and no recycled water infrastructure exists in these areas, most public right-of-way spaces are effectively blocked from spending on green infrastructure.

Research reveals that fractured jurisdiction and the inability of any single agency—including the City of Industry, water districts, and Union Pacific Railroad—to take ownership has paralyzed greening and environmental remediation efforts for years. In his systems analysis, Galindo demonstrates that vegetation, when properly implemented, not only reduces toxic particulate matter and CO exposure by substantial margins but also serves essential functions for stormwater management, heat mitigation, habitat restoration, and soil stabilization. Due to these barriers, the study concludes that County-owned land—without the complexities and restrictions of right-of-way and fragmented governance—offers one of the only feasible options for meaningful green buffer creation, climate adaptation, and public health protection in the region.

Converting these parcels to private development would do three kinds of harm:

Increase local traffic, noise, and built density in a neighborhood already surrounded by industrial facilities and regional logistics operations Permanently remove land that could function as a local green buffer, mitigating cumulative impacts from the City of Industry's industrial zones and the legacy of Ecobat/Quemetco

Undermine trust in County commitments, signaling that promised public benefits in frontline communities can be quietly reversed when development pressures arise

Declaring these parcels "surplus" directly contradicts:

LA County General Plan 2035 policies, which call for protecting agricultural zoning, expanding open space, and prioritizing park access

and climate resilience in disadvantaged communities

State environmental justice laws—including SB 1000, SB 535, and AB 1550—designed to prevent the removal of public benefits from communities already experiencing disproportionate environmental burdens

Designating these parcels as "surplus" would constitute a discretionary land use decision that is inconsistent with the General Plan's open space, health, and environmental justice policies, and therefore risks violating the requirement that County actions remain consistent with the General Plan.

Because the County's 2035 General Plan is the legally controlling blueprint for land use in unincorporated areas, any decision to designate 842 and 848 S. 3rd Avenue as "surplus land" must be treated as a discretionary action that remains consistent with adopted policies to protect agricultural zoning, expand open space, and prioritize parks, climate resilience, and pollution-burden reduction in disadvantaged communities like Avocado Heights. Under CEQA, the County cannot segment that surplus determination from its reasonably foreseeable physical consequences: removing one of the last viable sites for open space and green infrastructure in a heavily overburdened corridor will predictably exacerbate cumulative air quality, heat, and water-quality impacts, directly undermining the General Plan's environmental justice and public health objectives. If the Board proceeds as though this is a minor administrative step rather than a policy choice with environmental significance, it risks a CEQA challenge on two fronts: first, for failing to prepare an adequate cumulative impact analysis that accounts for existing industrial burdens and sensitive receptors documented by community-based research; and second, for approving a project that is inconsistent with the General Plan's protective policies without making and supporting explicit findings of consistency in the administrative record.

SB 1000 requires jurisdictions to identify and reduce the unique or compounded health risks in disadvantaged communities; removing planned open space in a documented high-burden area runs counter to this statutory mandate and exposes the County to claims that it is failing to implement SB 1000 in good faith.

Avocado Heights is designated as one of Los Angeles County's eleven Green Zone Districts, a status that reflects the area's disproportionate exposure to multiple industrial pollution sources and incompatible land uses. The Green Zones Program establishes stricter land use policies and development standards within these districts to advance environmental justice by buffering sensitive uses

such as residences, schools, parks, and daycare centers from pollution. The designation imposes requirements for landscaping, setbacks, and operational controls on industrial and commercial facilities to reduce pollution and protect public health. As a Green Zone community, Avocado Heights faces structural barriers but also holds a recognized priority for targeted investment and restorative land use planning.

Environmental justice is not achieved by issuing statements; it requires aligning land use decisions with the lived realities of frontline residents and the ecosystems they depend on. In Avocado Heights, this means recognizing that:

The cumulative industrial footprint of the City of Industry, including long-standing facilities such as Ecobat/Quemetco, has created a complex mixture of air, soil, noise, and heat stressors that cannot be addressed by regulating single sources in isolation

Sensitive receptors in our community are not only formal schools or hospitals, but also small congregations, informal childcare, stables, nurseries, and mixed-use homes, invisible to standard regulatory datasets Open space, trees, and community agriculture on County-owned parcels are not amenities—they are vital infrastructure for health, climate adaptation, and pollution mitigation

In light of the well-documented cumulative impacts in this corridor—including multiple overlapping pollution sources and sensitive receptors identified through community-based research—treating these parcels as "surplus" without securing mitigation or replacement open space ignores substantial evidence in the record and undermines the County's obligation to consider cumulative environmental and health risks when making land use decisions.

East San Gabriel Valley residents have repeatedly demonstrated their capacity to document and understand complex exposure patterns, identify regulatory gaps, and propose practical solutions. What is missing is the political will to act on long-standing evidence and fulfill commitments to communities like Avocado Heights.

For these reasons, the County must keep 842 and 848 S. 3rd Avenue in public hands for their originally envisioned purposes: community agriculture, open space, climate resilience, and cultural preservation. This decision is not only about two parcels; it is about whether Los Angeles County will stand with frontline communities living in the shadow of the City of Industry's industrial landscape and support the ecological systems—soil, vegetation, and waterways—that help clean and protect our shared environment.

Justice means keeping promises to overburdened communities and investing in the ecological and social infrastructure they need to survive and thrive. Please vote NO on Agenda Item 4-D.

Respectfully submitted,
Daniel Talamantes
4th Ave, La Puente, California

Duncan McKee

738 S. 3rd Avenue

Avocado Heights, CA 91746

(626) 330-5123

Dear Los Angeles County BOS Members and Staff:

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The statement in the letter from the LACDA that: "After careful consideration and numerous attempts to facilitate the nature park, it was determined that the development of a nature park was infeasible" is inaccurate. No one ever contacted us to discuss anything about alleged attempts to facilitate or develop the nature park; this is simply not true information being communicated to the BOS.

Our family has lived on 3rd Avenue since 1947. Construction of our unique historical home along with a sister house closer to the 892 and 898 properties was started in 1919 and completed in 1923 of poured in place concrete along with a water tower that served the water needs of unincorporated La Puente and what is now City of Industry. There is nothing comparable to this Museum/ Botanical Garden anywhere this side of the Huntington Library. It is an absolute jewel that we have been preserving, planning and evolving for over 30 years to make available for the greater public good. We are currently expanding to develop an urban farm educational program that will serve local schools in the Bassett, Hacienda La Puente and Whittier school districts as well as any other districts that we can accommodate. We are additionally in the process of growing a variety of fruit and vegetables to be donated to local food banks and those in need. Several nearby colleges and universities have expressed an interest in partnering in this endeavor as have numerous senior groups, college students and nonprofit organizations. These two properties would be ideal to help facilitate and expand the scope of this operation.

Any current access to these two parcels is by way of an antique private road that is over 100 years old which is owned and maintained by our family and other property owners.

We are respectively asking the BOS to require the separation of these two parcels from the proposal and to initiate a review with consultation directly with invested stake holders to explore the feasibility of developing and maintaining this beautiful and valuable location for the greater benefit of the many. Our family has been working on this for over 30 years and has invested considerable resources towards our long term plan. No one from the County has consulted with us except when I discussed this with Norma Garcia-Gonzalez prior to the County purchasing the

property. Athens tipping fees that are supposed to be going towards a community benefit fund could be one source of funding to make this happen along with grants to multiple non-profits that have expressed an interest in this project.

We would like to invite the supervisors to visit so that they can see firsthand the potential to develop this into a wonderful lasting resource that is worthy of preservation.

Thank you for the opportunity to comment.

Duncan McKee