

6.0 GROWTH-INDUCING IMPACTS

6.1 INTRODUCTION

Section 15126(d) of the California Environmental Quality Act (CEQA) Guidelines (14 *California Code of Regulations* [CCR] 15126.2[d]) requires evaluation of a project's growth-inducing impacts. This section discusses the manner in which the Centennial Project could encourage substantial economic or population growth or the construction of additional housing in the surrounding area, either directly or indirectly.

6.1.1 DEFINITION OF GROWTH INDUCEMENT

Section 15126.2(d) of the State CEQA Guidelines defines "growth inducement" as the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. A project can induce unplanned growth by removing infrastructure constraints; providing new transportation access; building infrastructure sized to serve the region; or otherwise attracting growth to the project area that is not assumed in a General Plan or the regional growth projections. Projects are considered to induce growth if they remove obstacles to population growth that would allow for more construction in the area; increase the population or require the construction of new regional-serving facilities that could cause significant environmental effects; and/or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

CEQA does not assume that growth is necessarily beneficial, detrimental, or of little significance to the environment. It also does not require that a project mitigate the effects of induced growth, nor does it require an attempt to stop additional growth. Accordingly, CEQA does not require that an environmental impact report (EIR) provide a detailed analysis of a project's effects on growth, and states that a general analysis is sufficient.¹

6.1.2 SUMMARY

The Project is proposed in response to anticipated growth in the Northern Los Angeles County/Antelope Valley area, and Project development is consistent with the growth projections that have been adopted by the Southern California Association of Governments (SCAG) for the Project area, the Antelope Valley, the North Los Angeles County Subregion, the County, and the region.

The Project is also consistent with the *Antelope Valley Area Plan* (AVAP) and proposes development in the West Economic Opportunity Area (EOA), where the AVAP anticipates future development. The EIR (SCH No. 2014061043) for the AVAP fully evaluated the growth-inducing impacts of buildout of the unincorporated areas of the Antelope Valley, as allowed by the AVAP (LACDRP 2015b). No changes to the AVAP are proposed by the Project that would affect population generation or otherwise lead to additional indirect growth, and no changes to the circumstances under which development would occur have occurred since

¹ See *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 369.

the EIR for the AVAP was certified in June 2015. The portion of the Project site that is located east of 300th Street West is designated as RL2 (1 DU/ 2 ac) in the AVAP; the Specific Plan designates this land as LDR (0-7 du / ac). The AVAP allows for flexibility in land use adjustments, as stated in Chapter 8 (Plan Implementation), Section II.C.3 (West EOA):

In order to allow for more flexibility in the future, detailed site design of specific neighborhoods in this area, a Specific Plan for a Project in the West EOA may be allowed to convert the areas designated as Residential 5 (H5) to General Commercial (CG) or Public and Semi-public (P) designations without amending this Area Plan, so long as the resulting residential densities do not exceed those provided for by this Area Plan and no change in unmitigated significant impacts occur. The Specific Plan may also include provisions for the conversion of residential to commercial areas, provided the amount of planned commercial building square footage does not result in any new unmitigated significant impacts. The Specific Plan shall also stipulate that these provisions (i.e., converting residential to commercial or other designations) are subject to a traffic study that confirms that no new unmitigated significant traffic impacts will occur. Land use adjustments within designations are permitted as part of a Specific Plan provided that the adjustments: 1) do not increase the total number of developable acres, dwelling units, or square footage; 2) increase the total amount of open space and do not decrease the total amount of natural open space; and 3) do not result in unmitigated significant impacts.

Because the Project is consistent with the allowable land uses and development densities/intensities in the AVAP and because the EIR for the AVAP adequately analyzed the growth-inducing impacts of the AVAP, the proposed Project would not have any growth-inducing impacts that were not previously analyzed in that certified EIR. As such, the Project would not be considered growth-inducing related to planned growth in the region. However, because the Project site is currently largely vacant and the Project would substantially increase population and housing relative to the existing site conditions, it is reasonably foreseeable that future unplanned development may occur along the eastern fringes of the Project site, where physical constraints to development are less than to the north and south.

6.1.3 SECTION FORMAT

Due to its nature, this section is organized differently than other sections in this document. It is organized as follows:

- Introduction
 - Definition of Growth Inducement
 - Summary
 - Section Format
 - References
- Existing Regional Trends
- Growth Constraints Near the Project Site
- Growth Inducement Potential

- Potential Growth-Inducing Impacts
 - Removal of Obstacles to Growth
 - Expansion of Public Services
 - Economic and Population Expansion or Growth
 - Establishment of Precedent-Setting Action
- Project Impacts
- References

6.1.4 REFERENCES

The main references used in this section include the AVAP (which designates areas for development in the unincorporated areas of the Antelope Valley) and the EIR for the AVAP (which provides buildout projections for population, housing and employment and discusses the growth-inducing impacts of the AVAP). The analyses in this document also uses SCAG's 2016 Adopted Growth Forecasts and the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). All references cited for preparation of this analysis are listed in Section 6.7.

6.2 EXISTING REGIONAL TRENDS

The Project site is located in the North Los Angeles County Subregion, as identified by the SCAG. This SCAG subregion includes the Cities of Lancaster, Palmdale, and Santa Clarita, as well as the unincorporated Santa Clarita and Antelope Valley areas. SCAG projects that Los Angeles County and the North Los Angeles County Subregion will experience substantial growth between 2012 and 2040 (SCAG 2016c). The Project site is located in traffic analysis zones (TAZs)² where future growth is expected (SCAG 2012e, 2016b). Future growth in the County is expected to occur as infill development in urban centers, as well as new development on vacant lands.

Section 5.9, Population, Housing, and Employment, discusses population, housing, and employment projections for the region, Los Angeles County, North Los Angeles County, Antelope Valley, and TAZs 20280000 and 20281000, which include the Project site. Concurrent with the projected increases in housing and population in these TAZs (SCAG 2012c), the economic base in these TAZs is expected to grow, as the largely vacant Project site is developed to include future commercial, light manufacturing, public service, and residential uses. The proposed Project is consistent with the household and employment projections for the area that includes the Project site in the SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2012e) and 2016 RTP/SCS (SCAG 2016a). The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds the SCAG projections for 2040. The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purpose only, and is advisory and non-binding. As such, the

² SCAG divides the entire region into traffic analysis zones (TAZs) as a basic geographic unit for its growth projections.

exceedance of population growth projections at the Project site on a TAZ level is not considered a significant adverse impact.

The AVAP regulates development within the unincorporated areas of the Antelope Valley, including the site. At buildout, the EIR for the AVAP estimates a resident population of 405,410 people; a housing stock of 106,180 units; and an employment base of 134,351 jobs (LACDRP 2015b). The AVAP focuses future development in Economic Opportunity Areas (EOAs) as a means to accommodate growth and development in the Antelope Valley while preserving the rural character and ecological resources of the surrounding areas. The Project site is located within the West EOA. The Project is also consistent with the allowable development for this area, based on the Land Use Policy Map in the AVAP.

6.3 GROWTH CONSTRAINTS NEAR THE PROJECT

On June 17, 2008, the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Conservation Agreement) with Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club (Resource Groups). The Conservation Agreement covers the site and allows Tejon Ranch Company and its development partners to pursue approvals for developing portions of the Ranch, including the Project site, while providing for the designation of permanent open spaces and the dedication or sale of conservation easements over approximately 240,000 acres of the Ranch (approximately 90 percent of the Ranch). In exchange for the preservation of open space areas, the Natural Resources Defense Council, the Sierra Club, Audubon California, the Planning and Conservation League, and the Endangered Habitats League will not oppose the development of the Tejon Industrial Complex, Tejon Mountain Village, Grapevine, and the Centennial Project. This agreement would preclude future development in other areas of Tejon Ranch to the north and southeast of the site. In preventing development throughout much of the Ranch property, the Conservation Agreement creates a barrier to development and other improvements within the approximately 240,000 acres of open space set aside in the Agreement, thus limiting future development within the vicinity of the Project site. The boundaries of Tejon Ranch-owned lands are depicted in Exhibit 3-2, Project Vicinity Map, in Section 3.0, Environmental Setting.

The San Gabriel Mountains and the Angeles National Forest are located south of the Project site. This area is subject to physical and government ownership constraints. The Los Padres National Forest and the Hungry Valley State Vehicular Recreation Area to the west of the site—which, together with the Angeles National Forest, total approximately 2.6 million acres—are expected to remain undeveloped. The 93,000-acre Wind Wolves Preserve (west of Interstate [I] 5 in the Tehachapi Mountains) is also expected to remain as permanent open space (The Wildlands Conservancy 2016). Some lands in the area are also owned by the Bureau of Land Management and the State Department of Parks and Recreation and are unlikely to be developed.

Thus, vacant land near the site that may be developed in the future would be limited to privately-owned parcels and areas that are not designated for preservation as open space. Exhibit 3-4, Local Area Constraints, included in Section 3.0, Environmental Setting, depicts

the locations of many of these constraints in relation to the Project site boundary. In addition to the open space constraints, other development constraints in the Project area include the steep slopes and rugged terrain in the Tehachapi Mountains to the northwest and the San Gabriel Mountains to the south, and the San Andreas Fault that runs through these mountains (CDOC 1974a, 1974b). This is discussed further in Section 5.1, Geotechnical. Wildfire hazards that may constrain development are discussed in Section 5.3, Hazards and Hazardous Materials. This area also contains environmentally sensitive areas, such as the San Andreas Significant Ecological Area (SEA), as discussed in Section 5.7, Biological Resources.

An additional constraint to development is water supply in the Antelope Valley. The Antelope Valley Groundwater Basin, which was determined to be in overdraft, is regulated in accordance with a Court-approved adjudication Judgment and Physical Solution entered in December 2015. The purpose of the Antelope Valley Adjudication Judgment and Physical Solution is to allow for groundwater use in a manner that avoids overdraft and fosters sustainable beneficial uses by limiting production to the basin's total sustainable yield of approximately 110,000 acre-feet per year (afy). Tejon Ranch is a party to the Judgment and Physical Solution entered by the Superior Court and has been allocated an overlying production right of 1,634 afy. All of Tejon Ranch's overlying right allocation will be provided to and utilized by the Project. Although water supply is not a constraint for the proposed Project, as described in Section 5.18, Water Resources, other future development projects in the area would be constrained if their development was not anticipated in the AVAP and/or the Court-approved adjudication Judgment and Physical Solution (California Superior Court 2015; see Appendix 5.18-E).

Another constraint is the Antelope Valley Area Plan and related provisions of the County General Plan, which focus new urban development in designated locations, including the Project site which is in the West EOA. Development located outside this and other areas designated for future development could occur only if the Board of Supervisors made a policy choice to amend the Antelope Valley Area Plan to allow development at greater densities than currently allowed according to the AVAP's land use designations.

6.4 GROWTH INDUCEMENT POTENTIAL

When considering the growth constraints to development in the vicinity of the Project site, as discussed in Section 6.3 above, the Project may prompt further growth in three general areas:

- Areas west of the Project site from Quail Lake, along State Route (SR) 138 to the I-5, and northward along the eastern side of I-5 to Gorman would potentially be influenced by development of the proposed Project. Also, development of the adjacent Gorman Post Ranch has been proposed in this area.
- Areas east of the Project site along the SR-138 corridor, which are also included in the West EOA designated in the Antelope Valley Area Plan.
- Areas east of the Project site (e.g., the area near Neenach and toward the cities of Lancaster and Palmdale) that are outside the West EOA.

As shown on Exhibit 3-1, Regional Location, in Section 3.0, Environmental Setting, growth to the north and south of the Project site will be precluded due to the Tejon Ranch Conservation Agreement and its provision for up to 240,000 acres of open space slated for permanent preservation. Specifically, this Conservation Agreement involves only Tejon Ranch property, and includes land both south and north of the proposed Project site. The Conservation Agreement serves to prevent development within much of the Ranch property, not including the Tejon Mountain Village and Tejon Industrial Complex projects, and creates a barrier to development and other improvements within the approximately 240,000 acres of open space set aside in the Agreement, thus limiting future development in the vicinity of the Project site. As previously discussed, the Angeles National Forest and Los Padres National Forest lands provide a substantial barrier to development to the south of the Project site.

6.5 POTENTIAL GROWTH-INDUCING IMPACTS

Pursuant to Section 15126.2(d) of the State CEQA Guidelines, an EIR must discuss the ways in which the proposed Project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. An EIR should not assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. For the growth-inducing analysis, impacts would be considered significant only if the reasonably foreseeable growth could result in significant effects on the environment. This discussion of the potential growth-inducing effects of the Project uses four growth-inducing criteria:

1. Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Each growth-inducing criterion is discussed below.

1. **Removal of Obstacles to Growth.** While the Project does include the construction of new infrastructure facilities and provisions for new access to the area north of SR-138, the infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Centennial Project.

No new electrical production plants or natural gas facilities are part of the proposed Project and no new electrical/gas production facilities are required to support the development of the proposed Project, although 50% of the Project's total electric energy demand (i.e. household, business, civic/institutional, recreational, and public facilities) must be met by onsite renewable energy. This renewable energy generation

would be used by the Project; therefore, the Project would not provide any additional power/gas supplies or eliminate a power-related obstacle to growth.

Water supplies are limited in the proposed Project area. The Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley adjudication Judgment and Physical Solution and State Water Project (SWP) supplies secured for Project use and imported to the site under an agreement with the Antelope Valley – East Kern Water Agency (AVEK). The Project is designed to have a balance between demand and supply, and will not generate “extra” potable water that could be used to support additional growth in the area. Also, the Antelope Valley adjudication Judgment and Physical Solution limits the amount of growth in the area due to limited water supplies.

While the Project does propose two wastewater reclamation facilities (WRFs), they are designed to accommodate the proposed Project only and would not treat wastewater from the surrounding area. Due to limited wastewater treatment facilities in the Project’s surrounding area and due to the restricted size of wastewater reclamation plants proposed as part of the Project, growth is not anticipated to be induced as a result of the wastewater reclamation plants associated with the Project.

SR-138 provides the main access from the Lancaster/Palmdale area to I-5. The SR-138 is planned for expansion by Caltrans, as discussed in Section 5.10, Traffic, Access and Circulation, and is not related to the proposed Project. While new roads are a part of the infrastructure supporting the proposed Project, these roads are internal to the Project site. The roads would provide new access in an area (the proposed Project); however, they are limited to the boundaries of the Project site and are not sized to support regional traffic flows. Except for providing access to the SR-138, the Project roads would not provide access to other areas outside the Project boundaries. At the Project site, the construction of roads, water treatment and delivery systems, sewers, two wastewater reclamation facilities, and utilities would not be sized to accommodate growth beyond that which is proposed for the Centennial Project.

However, future nearby landowners could propose to connect to or build upon the Project’s infrastructure to serve future development in the surrounding area. Such proposals would be subject to environmental analysis pursuant to CEQA, and any approvals of future development would be at the discretion of the lead agency.

- 2. Expansion of Public Services.** Housing being built as part of the Project will only support the anticipated needs of this new community. New housing will bring in a new population base. This population will require support services such as fire and police protection, libraries, schools and employment opportunities. The Project will be adding fire and police stations, libraries, and schools to support the anticipated population associated with the Project. However, the services being provided are scaled such that these services will support the anticipated population only. Additional population in areas nearby or surrounding the Project would require

additional support services. Thus, the Project will not provide services to support additional growth beyond what is expected for the Project.

However, nearby landowners could benefit from the proximity of new services available at Centennial, which could, in turn, prompt them to seek approvals for additional development. Such proposals would be subject to environmental analysis pursuant to CEQA and any approvals of future development would be at the discretion of the lead agency.

- 3. Economic and Population Expansion or Growth.** The Project will increase the population within the boundaries of the Project site. The total anticipated increase in population generated by development of the Project (i.e., 57,150 people) represents approximately 4.81 percent of the projected population increase (1,188,600 persons) for the County as a whole between 2020 and 2040, and would represent approximately 23.38 percent of the SCAG growth projections for the North Los Angeles County Subregion for the same period. The Project is also consistent with the population and housing projections included in the AVAP, where 311,920 new residents and 81,441 new dwelling units are expected within the unincorporated areas from 2013 to 2035 (LACDRP 2015b).

The Project is consistent with demographic projections in the 2012–2035 RTP/SCS at the TAZ level, where as many as 68,641 new residents are expected between 2012 to 2035 (refer to Table 5.9-5 in Section 5.9 of this EIR) in the two TAZs that cover the Project site, of which 57,150 persons would be residents of the Project. The Project is consistent with the household and employment projections in the 2016–2040 RTP/SCS at the TAZ level, where 22,225 new households and 23,877 new jobs are projected from 2012 to 2040. The 2040 household projections at the TAZ level in the 2016 RTP/SCS are consistent with the proposed Project’s buildout estimates. The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds the SCAG projections for 2040. The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purpose only, and is advisory and non-binding. As such, the exceedance of population growth projections at the Project site on a TAZ level is not considered a significant adverse impact. Population, housing, and economic growth relative to the SCAG RTP/SCS would be less than significant as it relates to the exceedance of regional population projections.

The Project would accommodate a projected demand for residential development in the North Los Angeles County Subregion. Development allowed by the proposed Project would also include shopping, entertainment, recreation, institutional, and health care uses. These uses would serve the residential development on the site and the existing residential uses near the site. The increased employment opportunities and businesses in the area could, in turn, induce growth locally and/or regionally to support visitors to the area that are not residents of the Centennial Project.

Long-term growth, should it occur, would primarily be in the form of an economic response to the presence of an increased resident population and employment opportunities that would occur on the Project site and that, in turn, could incrementally increase the area's demand for local goods and services. As the proposed Project would result in the introduction of residents and its associated demand for goods and services and since the Project would create new employment opportunities in the Project's commercial and business park areas, Project implementation would have the potential to induce regional economic growth.

4. **Establishment of a Precedent-Setting Action.** Approval of the proposed Project would require the approval of an amendment to the Highway Plan Policy Map in the *County of Los Angeles General Plan* and an amendment to the AVAP Highway Plan in the *Antelope Valley Area Plan* to include the internal roadway network. The Project would also require a zone change for the adoption of the *Centennial Specific Plan*. However, given that the Specific Plan's regulations would apply only in the Specific Plan area, the proposed Project would not be considered growth inducing with respect to a precedent-setting action.

6.6 PROJECT IMPACTS

As discussed in Section 5.9, Population, Housing and Employment, the Project would lead to growth in employment, housing, and population on largely vacant land that is consistent with the household and employment growth projections for the area in SCAG's 2012–2035 RTP/SCS and 2016–2040 RTP/SCS (SCAG 2016b, 2016c, 2012a, 2012b).

The Project is also consistent with the AVAP and proposes development in the West EOA, where the AVAP anticipates future development. The EIR (SCH No. 2014061043) for the AVAP fully evaluated the growth-inducing impacts of buildout of the unincorporated areas of the Antelope Valley, as allowed by the AVAP (LACDRP 2015b). The only amendment to the AVAP proposed by the Project is the inclusion of the internal roadway network into the AVAP Highway Plan. This amendment would require a corresponding amendment the Highway Plan Policy Map in the *County of Los Angeles General Plan* to also show the proposed internal roadway network. These roadways would establish the circulation network that would serve the development contemplated by the AVAP but would not change land use designations; increase the allowable development; or decrease open space areas. Also, no changes to the circumstances under which development would occur have occurred since the EIR for the AVAP was certified in June 2015. Therefore, the Project, as planned, would not result in significant growth-inducing impacts related to approved County and regional plans.

Notwithstanding these constraints on additional development in the Project vicinity, the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant adverse indirect growth-inducing impact.

6.7 REFERENCES

- California Department of Conservation (CDOC). 1974a (July 1). Special Studies Zones – Lebec Quadrangle. Sacramento, CA: CDOC.
- . 1974b (July 1). Special Studies Zones – La Liebre Ranch Quadrangle. Sacramento, CA: CDOC.
- California, State of. 2009. *California Code of Regulations* (Title 14, Natural Resources; Division 6, Resources Agency; Chapter 3, Guidelines for Implementation of the California Environmental Quality Act). Sacramento, CA: the State.
- California Superior Court. 2015 (December). *Antelope Valley Groundwater Cases [Proposed] Judgement and Physical Solution* (Santa Clara Case No. 1-05-CV-049053). Los Angeles, CA: Superior Court of the State of California, County of Los Angeles – Central District.
http://www.sccourt.org/complexcivil/105CV049053/volume4/234671e_ExhibitxAxxxxProposedxJudgmentxandxPhysicalxSolution.pdf(Appendix 5.18-D).
- Los Angeles County Department of Regional Planning (LACDRP). 2015a (June). *Antelope Valley Area Plan: Town & Country*. Los Angeles, CA: LACDRP.
<http://planning.lacounty.gov/tnc>.
- . 2015b (March). *Final Environmental Impact Report, Los Angeles County General Plan Update, County of Los Angeles*. Los Angeles, CA: LACDRP.
<http://planning.lacounty.gov/generalplan/eir>.
- . 2015c (May 27, last accessed). Los Angeles County General Plan 2035. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan>.
- Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal. App. 4th 342, 369.
- Southern California Association of Governments (SCAG). 2016a (April 7). *The 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. Los Angeles, CA: SCAG. <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.
- . 2016b (April). Final 2016–2040 RTP/SCS – Demographics and Growth Forecast Appendix. Los Angeles, CA: SCAG.
http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.
- . 2016c (April 13). 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction. Los Angeles, CA: SCAG. http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf.

- . 2012a (April). 2012 Regional Transportation Plan/Sustainable Communities Strategy –Growth Forecast Appendix. Los Angeles, CA: SCAG.
http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf.
 - . 2012b. 2012 Adopted Growth Forecast (an excel spreadsheet). Los Angeles, CA: SCAG.
<http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>.
 - . 2012c. Growth Forecast by Subregion. Los Angeles, CA: SCAG.
- The Wildlands Conservancy. 2016. Wind Wolves Preserve. Oak Glen, CA: The Wildlands Conservancy. http://www.wildlandsconservancy.org/preserve_windwolves.html.

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