



## Leighton and Associates, Inc.

A LEIGHTON GROUP COMPANY

August 1, 2014

To: County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

Attention: Mr. Richard Bruckner

Subject: Pending Hillside Management and Significant Ecological Area Ordinance Hearings

The Los Angeles County General Plan 2035 includes two ordinances within it: the Significant Ecological Area (SEA) and Hillside Management Area (HMA). These two ordinances will drastically affect any future housing needs and job creation within the County of Los Angeles if adopted as presented. The amount of land area within the county that these two ordinances encompass is vast. The effect of each of these ordinances will significantly hinder population and economic growth within the County. The effects of these ordinances have not fully been studied with sound documentation and environmental review to identify their impacts or to justify their benefit.

Los Angeles County has a number of Area Plans that are pending adoption or currently being reviewed. It makes little sense to move forward and adopt revised SEA and HMA ordinances while these Area Plans are not approved. The SEA and HMA ordinances should be put on hold until all Area Plans that are pending are adopted. Once these Area Plans are adopted the same standards from these Area Plans can be inserted into the SEA and HMA ordinances so as to ensure consistency between governing documents. This will make the documents consistent with one another as well as help guide the residents living within these Area Plans. I ask that you delay the SEA and HMA hearings until the full impacts of each adopted and pending Area Plan can be studied.

The full environmental impacts of the Significant Ecological Area and Hillside Management Area Ordinances cannot be measured while there are a number of Los Angeles County Area Plans pending review and adoption. The County and its residents

will be better served if the SEA and HMA ordinances were reviewed separately from the General Plan, with their own individual environmental and economic impact analyses and their own separate forum of open public debate.

I ask that the Planning Commission enact a continuance on any further discussion on the SEA and HMA Ordinances until such time as all Area Plans in process have been reviewed and adopted by both the Regional Planning Commission and the Board of Supervisors. In this way, when the SEA and HMA Ordinances are considered they can be brought into conformance with the adopted Area Plans.

Respectfully submitted,

LEIGHTON AND ASSOCIATES, INC.



Gareth I. Mills, PG, CEG  
Managing Director

Cc: Supervisor Antonovic



Leighton