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November 18, 2013

Brianna Menke
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

RE: Draft Hillside Management Ordinance

Dear Ms. Menke:

Bolthouse Properties currently owns numerous parcels in unincorporated Los Angeles County that may be subject to current and future planning efforts implemented by the County's Department of Regional Planning. One such effort is the Draft Hillside Management Ordinance, which was released for review on October 17, 2013. These properties, totaling approximately 4,400 acres lie adjacent to and east of the Cities of Lancaster and Palmdale.

We have reviewed the Draft Hillside Management Ordinance and would like to convey to the County our existing and future interests for our holdings. In particular, our continued interest in maintaining and preserving the agricultural use of our properties as well as protecting our interest for future utility scale renewable energy production facilities and plans for residential development in the Antelope Valley area.

Existing and proposed General Plan Update Land Use and Zoning Designations

In accordance with the 1986 Antelope Valley Area Plan, our land that currently lies within the unincorporated area of Los Angeles County is designated as Non-Urban 1 (N-1), and one parcel is split between N-1 and Commercial. The N-1 designation is intended to, "preserve agricultural uses, limit density, promote clustered development and conserve open space and natural areas," and allows for the development of single-family homes, equestrian and animal uses, and agricultural and related activities. Under this existing designation, Bolthouse Properties is involved in agricultural activities and has future plans for residential development on our lands.

According to the current General Plan Update, all parcels will change to Rural Land 20 (RL20). The RL20 designation allows for the development of single family homes, equestrian and animal uses, and agricultural and related activities, with a maximum density of 1 du per 10 gross acres and a maximum FAR of 0.5. According to our information, the RL20 designation would classify these parcels as part of the County's Rural Preserve. We agree with the County of Los Angeles in that the RL20 land use

designation is appropriate for our properties. We would like to express to the County our support in maintaining these land use designations to protect our existing and future agricultural interests.

Draft Hillside Management Area Ordinance

It is our understanding that the purpose of the Draft Hillside Management (HMA) Ordinance is to ensure that development preserves the physical integrity and scenic value of HMAs, provides open space, and enhances community character by: 1) avoiding development in HMAs to the extent feasible; 2) locating development in the portions of HMAs with the fewest constraints; and 3) using sensitive design techniques. In general, the term HMA applies to any portion of a lot or parcel containing terrain with a natural slope of 25% or greater, however, the ordinance excludes HMAs under a certain size from the Conditional Use Permit requirement. The Ordinance applies to any development being undertaken in an HMA (as defined in the Ordinance), including:

- Construction or expansion of any structure;
- Construction or expansion of any street or highway;
- Construction or expansion of any infrastructure, such as pipes, drainage facilities, telephone lines, and electrical power transmission and distribution lines;
- Grading, such as cut, fill, or combination thereof, including off-site grading;
- Removal of any vegetation, including fuel modification;
- Subdivisions; or
- Lot line adjustments.

Bolthouse Properties understands the value of maintaining our natural biological resources and is committed to responsible development in hillsides that is both environmentally sensitive and safe for residents. However, we are concerned about the potential restrictions to development and additional processes required under the Hillside Development Area Ordinance and how it may affect our current and future agricultural, residential, and renewable energy facility development plans for parcels located in the Antelope Valley area. We have not finished our assessment of how many parcels in our holdings are affected by this Ordinance; nevertheless, we would like to continue our dialogue with the County to improve our understanding of how the HMA Ordinance may affect Bolthouse parcels and to convey any specific interests to staff.

Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,



STEPHAN J. DeBRANCH
Vice President of Development