



CATALINA ISLAND CONSERVANCY

A responsible steward of its lands through a balance of conservation, education and recreation

Ms. Brianna Menke
Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

February 4, 2013

Dear Ms. Menke:

The Catalina Island Conservancy (Conservancy) recognizes the importance of the county's Hillside Management and Significant Ecological Area ordinances within the Title 22 - Planning and Zoning. These ordinances are designed to limit or avoid the deleterious impact to coastal resources. We agree that an awareness of the risks and environmental impacts of building in designated areas should be paramount to the design of the development areas.

With this in mind, the Conservancy would like to provide some general and specific comments on the "Draft Hillside Management Area Ordinance", dated December 6, 2012.

For example, the draft's provisions regarding to "Applicability" (i.e. Section 3. Section 2256.215. B.) contains language that is too broadly written or remains too open-ended. The practical effect of such language is that activities not envisioned by, or expressly identified in, the draft, could nevertheless be deemed subject to the ordinance following its adoption.

Another concern with "C. CUP Application" provision is that it provides the Director with too much discretionary control (and without any guidance whatsoever) over the types of information that would be deemed "necessary for adequate evaluation" of the application. The draft language also gives the Director the open-ended discretion to require additional site photographs beyond the six photographs expressly stated in the draft. We believe that granting such discretionary power without any further guidelines or parameters specified in the draft, could needlessly subject applicants to unwarranted delays in their applications without providing any accountability.

With regards to the provisions in the draft that enumerate the "exceptions" to requiring a Conditional Use Permit (CUP), Catalina Island's unique topography is such that much of the land within the Conservancy's control has a natural slope of 25% or greater (see "B.2.a."). Also, what is meant in proposed exclusion "B.2.b." by "Complete application filed prior to effective date of the ordinance updating this section..."? Does that mean a "complete application" or an "approved application"?

Finally, there is language contained throughout the draft provisions which, we believe, fails to take into account the unique nature of Catalina Island and the Conservancy's mission. As such, we strongly feel that this language will have the unintended consequence of extremely limiting the Conservancy's ability to provide important infrastructure improvements that will further its conservation, education and recreation missions, as well as serve the Island and its residents and visitors for decades to come.

Thank you for your consideration of these comments. If you have any questions, I can be reached at (562) 437-8555 x237 or by email at nhazard@catalinaconservancy.org.

Best regards,
Natalie Hazard