



## City of Brea

January 25, 2013



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

**SUBJECT: Draft Hillside Management Area (HMA) Ordinance for the unincorporated areas of Los Angeles County**

Dear Ms. Menke:

I am writing in regard to the subject issue to provide comments from the City of Brea. Thank you for the opportunity to comment on the County's draft ordinance. We greatly appreciate the relationship our jurisdictions have enjoyed and continuing that tradition of inter-governmental cooperation. This is particularly important in the consideration of hillside issues, where our jurisdictions share a common border within a constrained hillside environment.

The City of Brea has done extensive research and policy implementation concerning hillside development issues. These efforts culminated in the adoption of our Hillside Residential development standards. I've enclosed a copy of our Hillside Residential (HR) zoning code for your reference.

The City of Brea's goals for its hillsides share many of the values expressed within your "Purpose" section of the draft HMA ordinance, including a vision to protect scenic hillside areas and to avoid excessive grading of these valuable resources. To that end, the City took a direction with our development standards for hillside lands which incorporates a high level of specificity. This, we feel, is the best approach to realize the vision expressed within hillside goals and to provide for predictable outcomes for any future development projects.

The City of Brea respects Los Angeles County's authority to determine the correct approach for your HMA standards. Our review of your draft ordinance suggests you are considering a more flexible approach to development standards as compared to our jurisdiction. Brea's work with hillside standards has evolved over time and it has been our experience that a more generalized

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Ms. Brianna Menke

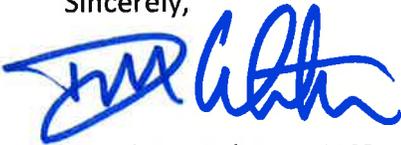
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approach can result in too much ambiguity and the need for code interpretation by land owners, staff, and decision makers. Ultimately, this can severely compromise the ability of your ordinance to implement development projects which are consistent with your vision for hillside lands. We too realize the value in some flexibility within development codes, but would urge the County to consider a higher level of specificity within your proposed development standards. This, we feel, is an important step to assure that any future development will be consistent with your stated vision for hillside lands. We offer our HR code as an example of such specificity, for your consideration.

Thank you again for the opportunity to comment. Please feel free to reach me at (714) 990-7674 if you should have any questions regarding our comments.

Sincerely,



David M. Crabtree, AICP  
Community Development Deputy Director

cc: Tim O'Donnell, City Manager  
Eric Nicoll, Community Development Director