City of Brea

RECEIVED
JUL 18 2012

July 16, 2012

Ms. Emma Howard
County of Los Angeles
Regional Planning Department
320 W. Temple St., Room 1354
Los Angeles, CA 90012

Dear Ms. Howard:

I am writing in response to your email of June 4, 2012 concerning the June 2012 SEA Ordinance Summary Draft and your request for comments regarding these materials. The City of Brea appreciates this opportunity as a natural outgrowth of LA County's work to update your General Plan and related policies and processes addressing environmentally sensitive lands. The City of Brea had the opportunity to comment on your General Plan efforts in 2004 and I've attached a copy of that correspondence for your reference. I've included this correspondence specifically since many of its comments on goals and policies relate to your current effort for SEA's.

The City of Brea's comments regarding your work to update your SEA ordinance and related processes are consistent with the spirit of our 2004 comments— we greatly appreciate the relationship our jurisdictions have enjoyed and continuing that tradition of intergovernmental cooperation. Considerations of sensitive environmental areas do not stop at political boundaries and the collaborative approach to this issue the County has undertaken is to be commended.

The City of Brea has done extensive research and policy implementation concerning hillside and open space issues since the time of our 2004 letter to the County. Some of our efforts may be of value to the County in your work to amend your SEA Ordinance and related hillside development standards and guidelines. I've enclosed CD's containing our General Plan which includes sections discussing these areas of interest along with a copy of our Hillside Residential development standards and guidelines.

In addition to the County's consideration of Brea's materials within your approach on SEA's, we have the following comments we also wish to offer:

1. The County is encouraged to continue to pursue an approach to a *comprehensive* view of SEA's, as demonstrated in your recent draft document. As it relates to real estate development, we agree that any approach to SEA's must look beyond what may be a single site and acknowledge the interrelationship of habitat areas, wildlife migratory needs, etc.

City Council Don Schweitzer *Mayor* Brett Murdock *Mayor Pro Tem* Ron Garcia *Council Member* Roy Moore *Council Member* Marty Simonoff *Council Member*

Civic & Cultural Center • 1 Civic Center Circle • Brea, California 92821-5732 • 714/990-7600 • FAX 714/990-2258 • www.cityofbrea.net

Recycled Cert no. SCS-COC-001182

2. Pages 4 and 5 – The proposed draft notes that specific definitions as well as some standards and guidelines will be forthcoming in future drafts. We note that the definitions for "Ground Disturbance and Development Activity" and "Minor Modifications," will be important within the context of the County's permit requirements for such defined activities. The City of Brea addressed similar applicability thresholds within our Hillside Residential standards (see Section 20.206.022 , enclosed) and offer our adopted code for the County's consideration and your work on this issue.

3. Page 6, Section C.5 – This section provides an exemption to the County's CUP process for projects which are located " . . . on a parcel or parcels of land where a previously approved conditional use permit has expired." This draft section appears to suggest that prior, but already expired CUPs can be resurrected without the need for a further CUP entitlement. On its surface, this appears inconsistent with your balanced approach to provide development opportunities within SEA's while assuring for the protection of important environmental considerations. For example, if advancements in science have occurred since the time any specific CUP had expired, the County may be well justified to call for a new entitlement review. To that end, perhaps CEQA and its "new information" criterion for project evaluation might be a possible metric to consider within any exemption standards. The City encourages the County to consider all facets of the "expired CUP" exemption question as part of its decision on this important policy action.

4. Page 6, Section D – This section notes that many standards will be forthcoming and will be considered further as comments on the current draft are received. The City of Brea provides our Hillside Residential development standards and guidelines for the County's consideration in your research.

5. The County is encouraged to continue its work to improve the organization and protocol of the SEATAC to help better serve the County's constituents while also offering opportunities to better monitor the cumulative impacts of development within the County's SEA's.

Thank you for the opportunity to comment. Please feel free to reach me at (714) 990-7674 if you should have any questions regarding our comments. We look forward to further collaboration on these important issues as the County works through

Sincerely,

Tim O'Donnell
City Manager

cc: Honorable Mayor and City Council
Eric Nicoll, Community Development Director
David Crabtree, AICP, Community Development Deputy Director

(LOG #51)

City of Brea

RECEIVED
JUN 7 2004

June 1, 2004

Mr. James Hartl
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Re: **Los Angeles County General Plan Update Program**

Dear Mr. Hartl:

The City of Brea appreciates the opportunity to comment on the Los Angeles County General Plan Update Program. As you may know, the City worked effectively with Los Angeles County to annex one of the County's unincorporated island neighborhoods into the City of Brea. This action necessitated the adjustment of the Los Angeles/Orange County boundary and we appreciated the cooperative approach taken by all the parties involved that resulted in the furtherance of good governance and the efficient distribution of municipal services. As properties in Los Angeles County that are adjacent to the City of Brea are considered for development, it will continue to be important to consider how these properties will best be served, what the impacts to the City of Brea will be, and what relationship our jurisdictions will have in the processing of any applications. The following comments are offered in the interest of continuing in the tradition of intergovernmental cooperation that our agencies have historically enjoyed.

Land Use Goal L-1: Land used efficiently to accommodate the needs of an expanding population.

Under this goal the County has established policies that seek to reduce development in non-urbanized areas. The City of Brea supports these policies, especially as they pertain to the large tracts of environmentally-sensitive, wildlands that comprise much of the property adjacent to the City's northern Sphere of Influence boundary.

Land Use Goal L-2: Development compatible with surrounding neighborhood character and the natural environment.

The City of Brea supports this goal and its associated policies, especially as they pertain to the large tracts of environmentally-sensitive, wildlands that comprise much of the property adjacent to the City's northern Sphere of Influence boundary.

City Council John Beauman, *Mayor* · Bill Lentini, *Mayor Pro Tem* · Roy Moore, *Councilmember* · Bev Perry, *Councilmember* · Marty Simonoff, *Councilmember*
Civic & Cultural Center • 1 Civic Center Circle • Brea, California 92821-5732 • 714/990-7600 • FAX 714/990-2258

Land Use Goal L-3: Effective inter-jurisdictional coordination and collaboration in land use planning.

We support this goal and look forward to working with the County of Los Angeles in processing applications for development for properties that are adjacent to the City of Brea or its Sphere of Influence. I have included a copy of the City of Brea's General Plan so that you may more efficiently coordinate your goals and policies.

Conservation/Open Space Element Goal O-5: A rich variety of biological resources protected in a cooperative manner between private land owners, the environmental community and public agencies to utilize the land in such a way as to preserve and improve its biological value well into the future.

As a jurisdiction that shares a boundary with Los Angeles County in an area that contains large tracts of undeveloped and environmentally-sensitive land, we support the policies that support this goal.

Conservation/Open Space Element Goal O-6: An established network of open space areas providing connectivity between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains and the southwestern extent of the Mojave Desert to the Puente-Chino Hills.

The proposed Puente Hills Significant Ecological Area (SEA 18) is adjacent to the City of Brea's Sphere of Influence. The City supports the preservation of this sensitive area.

Conservation/Open Space Element Goal O-8: Undeveloped hillsides and ridgelines that physically define local communities.

The City of Brea is deeply committed to the preservation of significant ridgelines and to the aesthetic resources of the hillside areas that form the scenic backdrop to the City of Brea. We support the policies that seek to protect these unique vistas and habitats and would welcome the opportunity to be involved in the processing of projects that may impact these resources.

Conservation/Open Space Element Goal O-10: An interconnected network of local parks, regional recreation areas, and trail systems, to meet the recreational needs of county residents.

The enclosed City of Brea General Plan contains a Trails Plan that includes trails that could connect to areas adjacent to our boundary with Los Angeles County. The City of Brea supports interconnected trails and recreational resources.

Thank you again for the opportunity to comment on the Los Angeles County General Plan Update Program. Please contact me at (714) 990-7674 if we can provide you with any additional information.

Sincerely,

Tim O'Donnell

Tim O'Donnell
City Manager