



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN
Chief Engineer and General Manager

January 29, 2013

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

FEB - 7 2013

Dear Ms. Menke:

Comments on Preliminary Draft Hillside Management Area (HMA) Ordinance

The Sanitation Districts of Los Angeles County (Districts) appreciate this opportunity to review and submit comments on the Draft Hillside Management Area (HMA) Ordinance prepared by the Los Angeles County Department of Regional Planning (Regional Planning) and dated December 6, 2012. The Districts are a confederation of 23 special districts that operate and maintain regional wastewater and solid waste management systems for approximately five million people residing in 78 cities and unincorporated portions of Los Angeles County.

The Districts agree that development activities within HMAs should be regulated to protect public health and safety and understand Regional Planning's desire to protect the aesthetic value of HMA areas. We have reviewed the draft ordinance and offer the following comments:

1. The Districts currently operate three landfills in hilly areas within Los Angeles County. These sites provide an essential public service and the vegetation and topography of these sites has largely been disturbed. To avoid confusion about whether the HMA ordinance would apply to these facilities, we request that the following exemption be added to Section 3.B.2: "Projects within a landfill's permitted site boundary for landfills operating at the effective date of the ordinance upgrading this Section."
2. Buried public utilities result in minimal aesthetic impact. To avoid unnecessary regulation, we suggest the following revisions to Section 3.B.1: "The provisions of this Section shall apply to the following projects, including related on-site and off-site improvements such as grading, roads, ~~sewer lines, water lines,~~ and drainage facilities, if the project is wholly or partially located within an HMA. **The provisions do not apply to buried utilities.**"
3. In Section 3.C.3.a, we suggest replacing the requirement "as determined by a licensed civil engineer, licensed land surveyor, or registered geologist" with "as determined by a credible source" because identification of slope categories is likely to be completed with Geographic Information System (GIS) software using underlying data (e.g., digital terrain model) prepared by a credible source such as Los Angeles County or a private company with expertise in such data preparation.

4. In Section 3.D.1.c.iv, we suggest providing a definition of “natural watercourse.” During a storm, there can be a large number of flowlines on a property, but only a small portion may actual be notably channelized and few or none may carry water outside of storm events. The text should clearly indicate which of these flowlines would be regulated and require a buffer.
5. In Section 3.D.5.a, please add the following text to the first sentence: “where appropriate based on the geology and geotechnical considerations.” There will be areas where enhancing percolation would be detrimental to slope stability or foundation stability and a LID design would be inappropriate. We further suggest providing a definition for “Low Impact Development (LID) standards” or a reference to a specific standard since a variety of LID concepts/requirements/regulations exist. Last, please clarify the intent of the final sentence of this subsection. Since swales are created for drainage, it is not clear what “designed as landscape ... or recreational feature” means.
6. In Section 3.D.5.b, please consider removing or clarifying the text “built to blend into the topography and surrounding landscape.” With culverts and detention basins, there is usually a limited number of ways to design such features and the typical design is unobtrusive. It is unclear how the referenced text would impact the typical design. Matching colors seems appropriate if there is a potential for much of the drainage feature to be visible. However, if the drainage feature is situated where most of the feature would only be visible to someone flying overhead, we recommend that the color requirement be dropped. To this end, we suggest the following revised text: “...shall be designed with earth-toned materials **to the extent practicable where more than 25 percent of the design feature would be visible from a street, home or business.**”

If you have any questions regarding this comment letter, please contact Wendy Wert at (562) 908-4288, extension 2737, or by e-mail at wwert@lacsdsd.org.

Very truly yours,

Grace Robinson Chan



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Supervising Engineer
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cc: Wendy Wert