

Friends of Antelope Valley Open Space
Concerned Citizens of Western Antelope Valley
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4 February 2013

SENT VIA EMAIL

Los Angeles County Regional Planning
Brianna Menke, bmenke@planning.lacounty.gov
320 West Temple Street Room 1354
Los Angeles, CA 90012

Dear Ms. Menke,

RE: December 2012 Draft Hillside Management Area Ordinance

Thank you for the opportunity to review the draft HMA Ordinance. We are interested in preserving hillsides, significant ridgelines, as well as scenic and environmental resources. CCWAV and FAVOS have reviewed the document and have a few questions and comments outlined below.

- Single lots subject to HMA Ordinances appear to be excluded from Section B. Piecemeal development should be a concern, as even Single Family Residences, collectively, will have similar or even worse impact over time that multiple lot developments have on hillsides.
- Agricultural uses other than “community gardens” are not included in the HMA Ordinances, and could be more injurious to hillsides than other forms of development or use.
- Agricultural uses could be considered a “commercial” use, involve substantial change to native vegetation, and should not be allowed to satisfy areas required to remain as “open space”.
- There are no provisions specifically mentioned for utility-scale renewable energy in hillside areas.
- Is it really appropriate to allow areas currently defined as “open space”, such as parks, gardens, golf courses, cemeteries, sanitary landfills, flood control channels, land under utility power lines, (and possibly areas around wind turbines and free-standing solar panels), and any other “open space” use on 25 percent slopes with requirements for preserving natural and native trees and vegetation. These are uses described under the current GP 1980.
- We would like to suggest definitions for open space in hillside areas be specifically defined for HMAs, SEAs, suburban and urban areas, since parks, golf courses, cemeteries and the like, would seem more appropriate “open space” areas in some places rather than others.

- Section D, 1.a.-- “At least 70 percent of the gross area of the project site within a Non-Urban, Rural, or Open space land use designation shall be open space. At least 25 percent of the net area of the project site within any other land use designation shall be open space.” Here is where suitable and acceptable uses and a definition of open space appropriate to land use designation would be helpful in achieving stated purpose of this ordinance. How would zoning affect this requirement?
- There is no discussion of densities, only “Land Division Projects.” How was the figure of 40 acres plus or minus determined, and how would “separate,” non-contiguous open space be allowed?
- We are not sure that dedication of open space to a Home Owner's Association is adequate protection for natural hillside areas. At least non-profit land conservation organizations are committed to holding and monitoring mitigation land—perhaps not so with HOAs.
- Streets, drainage features and infrastructure should not be counted as satisfying the percentage of open space requirements, due to disturbance of natural areas for such infrastructure.

Again, we appreciate the opportunity to participate in the process of planning for the future of the unincorporated areas of Los Angeles County.

Sincerely,



Susan Zahnter
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