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HACIENDA HEIGHTS, CA 91745

## The Hacienda Heights Improvement Association

November 18, 2013

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

Dear Ms. Menke,

The Board of Directors of the Hacienda Heights Improvement Association (*HHIA*) appreciates the opportunity to provide comments on the Los Angeles County Hillside Management Area Ordinance and Hillside Design Guidelines. The north-facing slopes of the Puente Hills, which rise above our community not only provide an attractive backdrop but, with rural roads and trails winding through the area, offer a wonderful opportunity for recreation and nature study for our residents.

The Puente Hills above our community, because of their geologic makeup, mixing weak permeable layers with impermeable soils which collect groundwater at the base of the overlying formations, are notoriously unstable. Major slides have occurred in and near Hacienda Heights, including one which blocked three eastbound lanes of the Pomona Freeway shortly after its completion, and the slide which blocked Montellano Avenue for ten years before the County completed a major repair with high retaining walls to stabilize the area. A thorough review of hillside geology should be included in application exhibits required for submittal prior to considering a permit which requires any cutting of slopes in the Puente Hills. We strongly recommend that no earthwork be allowed on or immediately below slopes greater than 25 degrees, or across any slope that slopes downhill in the direction of the dip of the underlying formations.

*HHIA* strongly supports the aesthetic goals of the ordinance and design guidelines. The suggested limitation of retaining wall heights to six feet in hillside areas is especially important. While high retaining walls may give great views to those who build them, they create significant eyesores and block views for all who live below. Similarly, steep slopes below building pads often are ignored by owners who live above them. We suggest imposing a requirement, that retaining walls and slopes steeper than 3:1 below building pads be planted with native shrubs at the developer's or builder's expense, including sufficient drip irrigation to assure that these plants survive until their root systems are hardy enough to carry them through our rainless summers.

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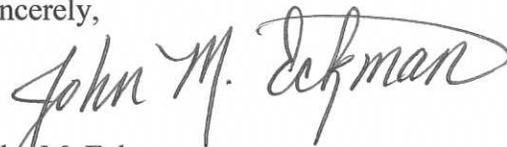
While all of the guidelines listed in the Hillside Design Guidelines represent important ways to minimize adverse impacts of hillside projects, we believe the proposed requirement of meeting only two or three of these guidelines in each category is far too lenient. As an example, a recently constructed project in Hacienda Heights features a retaining wall of approximately 25 feet. This single feature alone substantially negates nearly all of the remaining guidelines in the Design Best Practices section. While we understand that projects may not be able to meet all guidelines, some of which may not even be applicable to a given project, we believe a more reasonable approach to discourage harmful hillside impacts is to expect compliance with all applicable guidelines. Where compliance is not possible, project proponents should be required to both state reasons why compliance cannot be achieved and describe measures they will employ to mitigate impacts of noncompliance. This approach will not only create an expectation that hillside protection is of utmost importance to County Regional Planning, but will also place the burden on the proponent to demonstrate project acceptability.

We believe the Conditional Use Permit exemption for grading less than 20,000 cubic yards should be revised to be proportional to lot size up to a maximum of 20,000 cubic yards. Cut and fill quantities totaling 20,000 cubic yards would be excessive on a one or two acre lot.

We believe housing densities listed in the Hacienda Heights Community Plan adequately limit unacceptable housing densities in our hillside areas and should be stringently followed. We strongly support the limitation of one dwelling unit per ten acres in the hillsides west of Turnbull Canyon Road, although it is apparent that many lots are much smaller than this acreage. However, the area retains much of its natural appearance and is quite attractive and useful to native flora and fauna which inhabit the Puente-Chino Hills Wildlife Corridor. We recommend that this requirement be used as a minimum density standard in all County areas containing native land slopes of 25 degrees or higher.

Thank you again for the opportunity to provide these comments. If you have any questions regarding our comments or concerns, I can be reached at (626) 543-8087 or by Email at [John.Eckman@sce.com](mailto:John.Eckman@sce.com). You may also contact *HHIA*'s Environmental Chairperson, Mr. Jeff Yann, at [jkyann@roadrunner.com](mailto:jkyann@roadrunner.com) or by phone at (626) 968-4572.

Sincerely,



John M. Eckman  
*HHIA*  
President

cc: Mr. Don Knabe, Supervisor, 4<sup>th</sup> Supervisorial District  
Mr. Dickie Simmons, Field Deputy  
*HHIA* Board of Directors