



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN
Chief Engineer and General Manager

November 18, 2013

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

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 October 17, 2013. 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 two 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.D: "Projects within a landfill's permitted site boundary for landfills operating at the effective date of the ordinance upgrading this Section." This comment was also made in our January 29, 2013 comments on the December 6, 2012 draft ordinance.
2. Buried public utilities, such as pipes, result in minimal aesthetic impact. To avoid unnecessary regulation, we suggest the following revisions to Section 3.B.2.c: "Development means construction or expansion of ~~any~~**above-ground** infrastructure, such as ~~pipes, drainage facilities,~~ telephone lines, and electrical power transmission and distribution lines." A similar comment was also made in our January 29, 2013 comments on the December 6, 2012 draft ordinance.
3. In Section 3.E.3.a.i, 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. This comment was also made in our January 29, 2013 comments on the December 6, 2012 draft ordinance.

4. We believe the process outlined in Section 3.D.2.d should apply to all local agencies. As such, we request the following changes: "Development to be undertaken by the **public agency** County, provided...the following procedure: the **agency or lead County Department** shall..."
5. We suggest the following addition to the definition of "Improved Open Space" in Section 3.B.4: "**h. any site features that provide passive recreation.**"
6. We appreciate the intent of the Draft Hillside Design Guidelines (Guidelines) and the definition of substantial compliance that requires meeting a specified number of best practices (BPs) from each of five sections. However, we are concerned that certain types of projects will be mostly or entirely not applicable with a particular section. For example, a drainage or power transmission project may not involve any buildings which would make all of Section 4 not applicable. Please provide accommodation for projects where most or all of a section's BPs are not applicable.
7. When facilities will not be highly visible and discernible, there should not be a requirement for more attractive designs or materials, which would unnecessarily add costs. In Section 2.10 of the Guidelines, we suggest the following revisions: "Use...and storm gutters **when such facilities would be highly visible and discernible from a street, residence or business.**" In Section 2.11 of the Guidelines, we suggest the following revisions: "Use attractive designs and materials for any fencing used to enclose public facilities (such as debris and retention basins), **especially** when such facilities are in highly visible locations and/or are designed as "multi-purpose" site features."

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

Very truly yours,

Grace Robinson Chan



Bryan Langpap
Supervising Engineer
Planning Section

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