Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

April 17, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Brianna Menke, Regional Planning Assistant II
Community Studies North Section

SUBJECT: LOS ANGELES COUNTY GENERAL PLAN UPDATE
"HILLSIDE MANAGEMENT AREA" ORDINANCE
PROJECT NO. 02-305-(1-5)
APRIL 23, 2014 – AGENDA ITEM #6c
*** SUPPLEMENTAL MEMO ***

As a follow up to the memo dated April 10, 2014 and in reference to the above matter, please find attached additional public correspondence and stakeholder recommendations that have been received.

CORRESPONDENCE RECEIVED

Since the release of the public hearing draft, the Department of Regional Planning has received two public comment letters as of April 17, 2014. Please see Attachment 1.

Should you have any questions, please contact Brianna Menke at (213) 974-6476 or bmenke@planning.lacounty.gov.

Attachment 1: Public Comment Letters

Attachment 1

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

John L. Scott, Sheriff

April 9, 2014

Mitch Glaser, AICP, Supervising Regional Planner
Community Studies North Section
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Attention: Ms. Brianna Menke

Dear Mr. Glaser:

REVIEW COMMENTS
2014 PUBLIC HEARING DRAFT – HILLSIDE MANAGEMENT AREA ORDINANCE
(LOS ANGELES COUNTY CODE, TITLE 22)

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the 2014 Public Hearing Draft (2014 Draft) of the Hillside Management Area Ordinance (HMA Ordinance). The 2014 Draft of the HMA Ordinance was released on March 24, 2014, and reflects changes to previous drafts of the HMA Ordinance.

Revisions contained in the 2014 Draft of the HMA Ordinance appear to be technical and organizational, but do not seem to affect policies contained in the HMA Ordinance itself. Accordingly, the Department concludes that previously submitted review comments remain pertinent (see attached correspondence dated November 20, 2013, and February 15, 2013). Although no further comment will be submitted at this time, the Department reserves the right to further address this matter if the 2014 Draft of the HMA Ordinance is subsequently revised.

Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Tracking No. E14-020. You may also contact Mr. Miyoshi via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

JOHN L. SCOTT, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

RECEIVED
APR 14 2014
BY:

lester

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

November 20, 2013

Mitch Glaser, AICP, Supervising Regional Planner
Community Studies North Section
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Attention: Ms. Brianna Menke

Dear Mr. Glaser:

REVIEW COMMENTS
2013 DRAFT HILLSIDE MANAGEMENT AREA ORDINANCE
(LOS ANGELES COUNTY CODE, TITLE 22)

The Los Angeles County Sheriff's Department (Department) reviewed the 2013 Draft Hillside Management Area Ordinance (2013 HMA Ordinance). The 2013 HMA Ordinance is an updated Draft of the 2012 Hillside Management Area Ordinance (2012 HMA Ordinance), which was reviewed by the Department earlier this year (see attached correspondence, dated February 15, 2013).

Following a comparative analysis of the 2013 HMA Ordinance, and 2012 HMA Ordinance, the Department concludes that previously-submitted review comments remain applicable. Although no further comment will be submitted at this time, the Department reserves the right to further address this matter if the 2013 HMA Ordinance is subsequently revised.

Thank you for including the Department in the review process for the 2013 HMA Ordinance. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Tracking Number 13-070. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Lacey D. Baca, Sheriff

February 15, 2013

FEB 21 2013

Mitch Glaser, AICP
Supervising Regional Planner
Community Studies North Section
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Attention: Ms. Brianna Menke

Dear Mr. Glaser:

REVIEW COMMENTS
DRAFT HILLSIDE MANAGEMENT AREA ORDINANCE
TITLE 22 OF THE *LOS ANGELES COUNTY CODE*

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Hillside Management Area Ordinance (Ordinance). The proposed Ordinance will amend Title 22, Planning and Zoning, of the *Los Angeles County Code* by establishing regulations for development activities within Hillside Management Areas (HMA) to ensure such activities do not unduly threaten the future existence of underlying ecological systems located therein. The purpose of the proposed Ordinance is not to preclude development within HMAs, but to maintain and possibly enhance the County's scenic and environmental resources.

The proposed Ordinance is not expected to significantly impact the Department's operations or resources. However, to the extent possible, emergency access for Department personnel, vehicles, and equipment must be maintained through HMAs in order to protect public health, safety, and welfare.

The Department has no other comment at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Ordinance.

Thank you for including the Department in the environmental review process for the proposed Ordinance. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to

Facilities Planning Bureau Tracking Number 12-075. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Ramirez Canyon Park
5810 Ramirez Canyon Road
Malibu, CA 90265
Phone (310) 589-3230 Fax (310) 589-2408

April 16, 2014

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

Comments on the Draft 2013 Hillside Management Area Ordinance
Released March 24, 2014

Dear Ms. Menke:

The Mountains Recreation and Conservation Authority (MRCA) provides the following comments regarding the draft Hillside Management Area (HMA) Ordinance, released on March 24, 2014. The MRCA has previously commented on the draft released on October 17, 2013. However, we feel that our previous comments were not adequately addressed. We recommend that our previous comments be incorporated into the latest draft of the HMA Ordinance, along with the following comments.

Infeasibility of a Dedication of Conservation Easement

The infeasibility of a dedication of a conservation easement, as stated in subsection G.3.c must be better defined to ensure that all applicants have demonstrated satisfactory effort in finding a willing non-profit organization or public entity to accept and maintain a conservation easement. We recommend removing the following strikeout text and adding the following underlined text to subsection G.3.c to provide this clarification:

> For ownership and maintenance by a home owner's or property owner's association, dedication ~~or~~ <u>of</u> a conservation easement as provided herein is infeasible <u>only when it is demonstrated that there are no conservation-oriented non-profit organizations and government entities, such as a county, city, state, federal, or joint powers authority willing to accept the dedication of conservation easement</u>; and

To reiterate our comment on the previous draft of the HMA Ordinance, the MRCA is among one of the many public agencies in the County that is dedicated to the preservation and management of open space, parklands, watershed lands, trails, and wildlife habitat. It is in our interest to fulfill the purpose of the HMA Ordinance by accepting all conservation easements that applicants are willing to dedicate pursuant to this Ordinance.

We appreciate your consideration in our comments. We look forward to continued collaboration with the County as this General Plan and HMA Ordinance process moves forward. Please retain our agency on your email/mailing lists for the General Plan, HMA Ordinance, SEA Ordinance, and related documents. If you have any questions, please contact Paul Edelman of our staff by phone at (31) 589-3230, ext. 128, or by email at paul.edelman@mrca.ca.gov.

Sincerely,

Pau Edelman
Chief of Natural Resources and Planning