

# *Windsor Pacific LLC*

*530 South Lake Avenue #810*

*Pasadena, California 91101*

*Telephone (213) 712-2357*

June 23, 2014

## VIA E-MAIL

David McDonald  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, California 90012

Re: Draft HMA Ordinance

Dear Mr. McDonald:

Thank you for this opportunity to comment on the draft HMA Ordinance. Windsor Pacific LLC owns several parcels within the boundaries of the Santa Clarita Valley Area Plan - the One Valley One Vision Plan. The Draft HMA Ordinance is fundamentally inconsistent with the Santa Clarita Valley Area Plan.

Regional Planning staff who prepared the Santa Clarita Valley Area Plan performed a parcel-by-parcel analysis in connection with the preparation of the land use policy map of the Area Plan. I believe that transcripts of the hearings would show that Mitch Glaser told the Planning Commission as much, on at least one occasion. The parcel-by-parcel analysis included factors directly relevant to hillside management, such as topography. The analysis also included factors that are related to topography, such as existing roadways, proximity to services, etc. which are driven significantly by topography. The overall density of the unincorporated area of the Santa Clarita Valley was reduced on the basis of this analysis by the adoption of the Area Plan, and some density was re-directed to other areas of the Valley.

In one place, the draft HMA Ordinance states it "does not determine maximum allowable density." But the draft HMA Ordinance is so ambiguous, and its standards so subjective, that the HMA Ordinance cannot be viewed as a reasonable refinement of allowable density. It basically ignores the density analysis already performed in connection with the Area Plan.

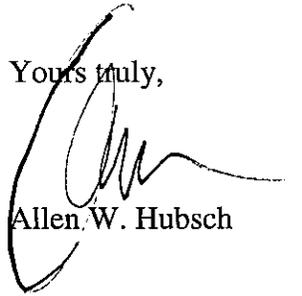
The parcel-by-parcel analysis in the Santa Clarita Valley Area Plan should take precedence over the vague generalities in the draft HMA Ordinance. The HMA Ordinance should include a more proactive statement affirming the work performed by staff, the Planning Commission and the Board in connection with the Santa Clarita Valley Area Plan, along the lines of the following: "For HMAs within the Santa Clarita Valley Area Plan, this Ordinance shall be

Department of Regional Planning  
June 23, 2014  
Page 2

interpreted and applied in all respects to effectuate the densities determined to be appropriate in such Area Plan, including as shown on the land use policy map adopted with such Area Plan."

Thanks again.

Yours truly,

A handwritten signature in black ink, appearing to read "Allen W. Hubsch". The signature is stylized with a large initial "A" and a long horizontal flourish extending to the right.

Allen W. Hubsch