TO: John Gutwein  
Land Use Regulation Division  
Department of Regional Planning  
Attention Emma Howard

FROM: Anthony Nyivih  
Land Development Division  
Department of Public Works

PRELIMINARY DRAFT SIGNIFICANT ECOLOGICAL AREA AND HILLSIDE MANAGEMENT AREA ORDINANCE

Thank you for the opportunity to review the Preliminary Draft Significant Ecological Area (SEA) and Hillside Management Area (HMA) Ordinance dated November 10, 2011. Our understanding is that the intent of the SEA and HMA Conditional Use Permit is not to preclude development but to allow limited, controlled, development that does not jeopardize the unique biotic diversity within the County. The SEA Ordinance requires that certain development activities be reviewed by the SEA Technical Advisory Committee.

The following are our comments for your consideration:

**General Comments**

1. 22.56.215.J.5: "New roadways or access corridors within the proposed development activity, including fire roads, are designed, etc."
   - Revise to clarify that this section applies to new roadways.

2. 22.56.216.E.3 and 22.56.216.E.4, "Site Features Exhibits: The following exhibits, each of the same size and scale, showing the natural topography of the site at no more than 10-foot contour intervals:"
3. 22.56.216.E.5, "Proposed Grading: Site plans and tentative maps, as applicable, showing the proposed grading including the natural and finished elevations of all slopes to be graded and future roads and slopes."

- Revise to include future road and slopes.

4. 22.56.216.F.1.ii: The permissible improvements to open space does not include access roads.

- Revise to include access roads as permissible improvements.

If you have any questions regarding the general comments, please contact Steve Burger at (626) 458-4923 or sburger@dpw.lacounty.gov.

**Development Services**

1. Section 22.56.215.D.3 and 22.56.216.D.5: Should be changed to "less than 5,000 cubic yards, etc." Also the yardage threshold should be clarified; cut, fill, or a combination of the two.

2. Section 22.56.216.F.5.b: Should be included to "and be designed with earth-tone materials as approved by the Department of Regional Planning."

3. Section 22.56.216.F.6: Should be included to "that blend into the surrounding contours as approved by the Department of Regional Planning."

4. Section 22.56.216.F.7: Should be included to "materials having Light Reflective Values (LVR) of 35 percent or less as approved by the Department of Regional Planning."

5. Section 22.56.216.B.1: Recommend setting minimum acreage threshold for defining the HMA.

If you have any questions regarding the development service comments, Items 1 through 5, please contact Steve Burger at (626) 458-4923 or sburger@dpw.lacounty.gov.

6. Section 22.56.216.F.1.c.ii: Should include flood control facilities. We have some examples of debris basins within open-space lots (Miscellaneous Transfer Drain No. 1647).

7. Section 22.56.216.F.1.b.iv: "Natural Watercourses" should be defined to ensure proper implementation.
If you have any questions regarding development services, Items 6 and 7, please contact Christopher Sheppard at (626) 458-4921 or csheppard@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Ruben Cruz at (626) 458-4910 or rcruz@dpw.lacounty.gov.