Los Angeles LADWP Department of Water & Power

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July 24, 2014

RECEIVED
AUG 04 2014
BY:

Ms. Emma Howard
Department of Regional Planning
Los Angeles County
320 West Temple Street, Room 1354
Los Angeles, CA 90012

Subject: Draft Significant Ecological Area Ordinance – March 25, 2014

Dear Ms. Howard:

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review and provide comments on the March 25, 2014 draft of the Los Angeles County Significant Ecological Area (SEA) Ordinance, as well as the response provided for the comment LADWP made on Draft 3 of the SEA Ordinance. While Draft 4 of the SEA Ordinance included an exemption for utilities regulated by the California Public Utilities Commission, an exemption mentioning utilities is noticeably absent from the current Draft 5. Due to the lack of a utility exemption in Draft 5 of the SEA ordinance, we feel the need to reiterate our comment made on Draft 3 of the Ordinance.

The final language of the SEA Ordinance should include an exemption from ordinance provisions for the installation, operation and maintenance of utility infrastructure. This exemption should be extended to publicly owned utilities not regulated by the California Public Utilities Commission. Such an exemption would not limit efforts to conserve significant ecological areas and practice responsible development. The activities carried out by LADWP undergo an extensive review of potential environmental impacts and determination of any necessary mitigation methods with assistance from biologists and other resource specialists. These activities are crucial to maintaining a safe and reliable infrastructure capable of delivering water and power to millions of Los Angeles County residents.

Since we last commented on the Draft SEA Ordinance, we have not been contacted to discuss the impact that the SEA Ordinance update will have on local governments who maintain land within Los Angeles County. It is important that these discussions occur prior to the decision on final SEA Ordinance language in order to avoid limiting the capacity of local governments to provide continued safe and reliable water and energy resources to Los Angeles County residents and businesses.

If you have any questions or need to notify LADWP of any meetings planned to discuss updates to the SEA Ordinance, please contact Eduardo Cuevas at (213) 367-6376 or Eduardo.cuevas@ladwp.com

Sincerely,

Nadia Parker for

Charles C. Holloway
Manager of Environmental Planning and Assessment

EC:dms
c: Mr. Eduardo Cuevas

111 N. Hope Street, Los Angeles, California 90012-2607 *Mailing address:* Box 51111, Los Angeles, CA 90051-5700
Telephone: (213) 367-4211 www.LADWP.com