January 11, 2012

TO: Mitch Glaser  
Community Studies Section  
Department of Regional Planning

Attention Emma Howard

FROM: Steve Burger  
Land Development Division  
Department of Public Works

PRELIMINARY DRAFT SIGNIFICANT ECOLOGICAL AREA AND  
HILLSIDE MANAGEMENT AREA CONDITIONAL USE PERMIT ORDNANCE

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

The following comments are for your consideration and relate to the environmental document only:

**Hazards-Flood/Water Quality**

1. Per 22.56.215.B.1 and 22.56.215.B.2, there are two definitions given for SEAs and Ecological Transition Areas, a narrative description and the areas delineated on the map. There are many areas in the County of Los Angeles that would potentially meet the definition and are not delineated on the included map. If an area is found to meet the narrative definitions, but it is not depicted in the map, will it be required to comply with the Ordinance?

2. Section 22.56.215.D.3: Should be changed to read "Grading project of less than 5,000 cubic yards of earthwork."
3. Section 22.56.216.B.1: HMAs are defined as "any terrain with a natural slope of 25 percent or greater." Please clarify if there is a minimum size/acreage at 25+ percent to avoid unnecessary regulation on sites with only very small portions of sloped land that are not truly "hillsides."

4. It appears that Public Works activities are not exempted from the proposed HMA regulation, potentially creating unnecessary burden on Public Works' maintenance and construction activities. Section 22.56.216.D should have an exemption for public facilities and infrastructures.

5. Section 22.56.216.D.5: Should be changed to read "Grading project of less than 5,000 cubic yards of earthwork."

If you have any questions regarding the hazard flood/water quality comments, please contact Joshua Svensson at (626) 458-7157 or jsevensson@dpw.lacounty.gov.

Drainage

1. Section 22.56.216.F.1.b.iv: "Natural Watercourses" needs to be defined somehow. Any flowline from a ridge could be considered a natural watercourse.

2. 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).

If you have any questions regarding the drainage comments, please contact Christopher Sheppard at (626) 458-4921 or csheppard@dpw.lacounty.gov.

Other-Programs Development

1. Why are Significant Environmental Resource Areas not being addressed in this revision?

If you have any questions regarding the programs development comment, please contact Steve Milewski at (626) 458-4988 or smilewski@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.