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Sent via Email

Emma Howard  
SEA Program  
Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

**Comments on the Los Angeles County December 2012 Draft Significant Ecological Area Ordinance**

Dear Ms. Howard:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and comment on the Los Angeles County December 2012 Draft Significant Ecological Area (SEA) Ordinance. SoCalGas has natural gas infrastructure, which includes appurtenant and support facilities including, but not limited to valve, metering, pressure-limiting stations, cathodic protection equipment, and aerial and ground markers, as well as telecommunications equipment and access roads within and near the proposed SEAs. Please find our comments below for your consideration.

General Comment:

The proposed SEA Ordinance would impose conditional use permit requirements on development, including the operation and maintenance of existing utility infrastructure, in any area where potential ground disturbance would occur within the proposed SEA. As currently drafted, utility activities would not be exempt from the proposed requirement unless deemed necessary for fire and hazard safety. The proposed ordinance imposes conditions that are not feasible for utility company activities. Specifically, the prohibition of materials (e.g. barbed wire) that are used to prevent unauthorized entry into private property, and the proposed designated setbacks from protected resources. Security and safety are a major concern for SoCalGas; therefore, the use of barbed wire is necessary to protect unauthorized access to company infrastructure and to protect the public from entering into potentially unsafe areas. Some of the designated setbacks will impeded the location of utility infrastructure alignments along the safest corridor.

The SEA Ordinance should also provide exemptions for operation and maintenance of existing utility infrastructure. The SEA Ordinance should also include a streamlined permitting process for any necessary facility improvements in order to ensure safe and reliable natural gas service to the people living and working in the County of Los Angeles.

Comment #1: SoCalGas requests that an exemption from a Conditional Use Permit be included within section 22.52.2620(H). The exemption should allow for the continued maintenance and operations of natural gas pipeline facilities within the significant ecological areas. Specifically, the U.S. Department of Transportation requires us to have areas near our facilities and pipelines to be clear of vegetation and obstructions.

Comment #2: SoCalGas requests that an exemption from a Conditional Use Permit be included within section 22.52.2620(H) for necessary infrastructure installation or replacement of a natural gas pipeline and/or appurtenant facilities for an approved development.

Comment #3: SoCalGas requests that an exemption from a Conditional Use Permit be included within section 22.52.2620(H) for the replacements and upgrades of existing utility infrastructure required to comply with pipeline integrity and safety requirements, to meet increased demand, or to ensure system reliability.

SoCalGas appreciates your consideration of the above comments. Should you have any questions please feel free to contact me at (213) 244-5817.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Chuang', with a stylized flourish at the end.

James Chuang  
Environmental Specialist  
Southern California Gas Company