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Sent via Email

Brianna Menke
Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

Comments on the Los Angeles County December 2012 Draft Hillside Management Area Ordinance

Dear Ms. Menke:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and comment on the Los Angeles County December 2012 Draft Hillside Management Area (“HMA”) Ordinance. SoCalGas has natural gas facilities (storage fields, transmission and distribution lines, and related appurtenant facilities) within and near the hillside management areas of Los Angeles County (County). Please find our comments below for your consideration.

General Comment:

The proposed HMA Ordinance would impose conditional use permit requirements on development in any area with a natural slope of 25 percent or greater. Utility company activities would not be exempt from the proposed requirement. The proposed ordinance imposes conditions that are not feasible for utility company activities. Specifically, the “permanent dedication of at least 70 percent of the gross area of development to open space” is not feasible for natural gas facilities. The HMA Ordinance should provide an exemption for maintenance of existing facilities. The Ordinance should also include a streamlined permitting process for any necessary facility improvements in order to provide safe and reliable natural gas service to the people living and working in the County.

Comment #1: SoCalGas requests that an exemption from a Conditional Use Permit within section 22.56.215(B)(2) that allows for the continued maintenance and operations of natural gas pipeline facilities within the hillside management areas be included.

Comment #2: Please include in section 22.56.215(D), a design standard that allows for utility activities to occur in Non-Urban, Rural, or Open Space designated zoning that does not include the requirement of permanent dedication of at least 70 percent of the gross area of development to open space.

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