

From: [DRP LDCC](#)
To: [Susan Tae](#); [Jay Lee](#)
Subject: FW: Comments for wind and solar in Antelope valley
Date: Monday, July 06, 2015 8:05:37 AM
Attachments: [Safety light memo to DPW.doc](#)

Hi Susie/Jay,

This is regarding the Renewable Energy Ordinance, I believe.

Thank you,

Alice Wong, AICP

Principal Planner
Land Development Coordinating Center Section
Department of Regional Planning
320 W. Temple Street, Room 1360
Los Angeles, CA 90012
<http://planning.lacounty.gov/>

Department Front Counter Hours:
M, Tu, Th 7:30am-5:30pm & W 8:30am-5:30pm
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From: Bruce Hatchett [mailto:bruce@energyoptions-wind.com]
Sent: Friday, July 03, 2015 11:56 AM
To: DRP LDCC
Subject: Comments for wind and solar in Antelope valley

Dear staff,

I know the comment period is closed, but you may want to sneak these two comments in the back door.

- 1) The wording for the FAA tower light on a wind turbine has always been unclear. We have applied for the WECS-N permit 15 times and different planners handle it very different ways. The problem is that the FAA does not require a light on structures less than 200 ft tall, but the ordinance in 22.52.1630 A4b says a light that meets FAA requirements is required. Some planners make us install a light even though there is not an FAA standard for it. Some planners agree with Leonard Erlinger and say that since there is no FAA

requirement, no light is required. It would nice if you guys could make it clear.

- 2) Some farmers want a turbine bigger than 50 kW. It seems that your permits only allow a path for turbines less than 50 kW or utility scale. Can you please make a path for turbines that are larger than 50 kW and use the energy on site?

I have a lot more comments and since we have installed most of the wind trubines in LA County. You might want my input. I wished you would have envited me to be part of this conversation. It would have been easy to get my email address of any of the 15 WECS-N applications.

Bruce Hatchett
Energy Options
(661) 209-7987

From: [Hickling, Norm](#)
To: [Jay Lee](#); [Vizcarra, Edel](#)
Cc: [Divita, Daniel](#)
Subject: Fwd: Ban Wind Turbines they interfere with Fire Protection.
Date: Saturday, July 04, 2015 6:09:38 AM

Please see letter below

Sent from my iPhone

Begin forwarded message:

From: Judy Watson <j_a_c_1940@yahoo.com<mailto:j_a_c_1940@yahoo.com>>
Date: July 3, 2015 at 8:18:45 PM EDT
To: Norm Hickling <nhickling@iacbos.org<<mailto:nhickling@iacbos.org>>>
Subject: Ban Wind Turbines they interfere with Fire Protection.
Reply-To: Judy Watson <j_a_c_1940@yahoo.com<mailto:j_a_c_1940@yahoo.com>>

If Kings Canyon residence had not fought and won against two major wind turbine projects, to be built on our mountains, the Power House fire 3 yrs ago, would have devoured our homes. Wind Turbines, prevent fire fighting efforts, enabling choppers from performing water and retardant drops. There is no way aircraft can fly 30 feet from the ground in amongst turbines, in smoke, to do their job. We saw this first hand. We watched the fire growing within half a mile to our homes, as aircraft swooped low to the ground to do their job. Thank you Supervisors for making the right decision back then, you did the right thing. Hope you do the same this time also.

Judy Watson
46460 Kings Canyon Rd.
Lancaster, Calif. 93536
661-724-1563



July 6, 2015

VIA ELECTRONIC MAIL

The Hon. Michael D. Antonovich
Board of Supervisors
Los Angeles County
500 West Temple St
Los Angeles, CA 90012

**RE: Renewable Energy Ordinance, Project No R2014-01160-(1-5);
Hearing Date, July 14, 2015**

Dear Mayor Antonovich and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to provide written testimony on the Renewable Energy Ordinance. For your reference, EHL is Southern California's only regional conservation group. Our primary concern is with the adverse effects of facilities on birds and bats.

General Comments

EHL strongly supports renewable energy but policy-making must also reflect that such facilities often come with a cost to wildlife. Wind turbines, whether utility-scale or "small," pose unavoidable risks to birds and bats flying into the moving blades, with monitoring studies at times reporting gruesome mortality figures. Note that "small" turbines are up to 85 feet in height. Large-scale solar arrays can create reflections that mimic water bodies, also leading to fatal collisions for birds. Solar thermal towers can create light sources that attract insects and birds into fatal thermal chambers.

For these reasons, we strongly concur with the draft Ordinance's strategy of incentivizing small scale, structure-mounted solar projects, like roof-top solar. Such "distributed" energy is the least environmentally harmful – and increasingly the most economical – option. Indeed, due to the practicality of small-scale solar as an alternative to small wind turbines, we would prefer if the latter were prohibited. Nevertheless, our intent in these comments is to ensure hazard reduction and mitigation, so that at harm is minimized.

Wind

Utility-Scale Wind Turbines

Siting is the most important variable in controlling bird and bat mortality from turbines of any size. We are deeply concerned that a requirement for compliance with the *California Energy Commission (CEC) Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development* for utility-scale turbines was removed from recent drafts. Its absence creates a defect in the Ordinance, as *initial site selection* is not otherwise regulated by the Ordinance, while it is a major feature of the Guidelines. It is highly relevant that a recent study done by American Bird Conservancy shows the abject failure of a voluntary approach to turbine siting on the part of industry.¹ Absent mandatory standards, siting in harmful locations has continued unabated for tens of thousands of turbines.

As the most practical way to address the siting issue at this late point in time, we strongly recommend that your Board require that the CEC Guidelines be incorporated as a mandatory element into the Implementation Manual that will accompany the Renewable Energy Ordinance.

Small-Scale Wind Turbines

Endangered Habitats League *acknowledges and supports* the following mitigation measures that are incorporated into the Ordinance for small turbines. These include:

- Setbacks from wetlands, golden eagle nests, and from other biological resources
- Setbacks from ridgelines (which are flyways due to wind updrafts)
- Elimination of nearby perch sites, such as guy wires
- Required findings for minimization of impacts

EHL has submitted into the record substantial information justifying such measures. Their feasibility is shown by the ongoing use of similar measures in San Diego County.

Solar

We recommend that the Ordinance contain siting standards for large-scale solar facilities when not part of the Desert Renewable Energy Conservation Plan (DRECP) master plan. Such standards should prioritize for siting already disturbed areas of low biological value, like fallowed fields.

Regarding the danger of reflections mimicking water bodies from solar facilities, we note and support the requirement in the draft Ordinance for a glare study. Also, we

¹ See:

<http://www.bostonherald.com/business/business_markets/2015/05/advocacy_group_wind_turbine_rules_needed_to_protect_birds>

<http://www.abcbirds.org/abcprograms/policy/collisions/wind_siting.html>

recommend additional ways to reduce reflections and resulting bird collisions.² Feasible mitigation measures for the “pseudo-lake” effect include siting distant from water bodies and wetlands, siting outside of the Pacific flyway, use of dark, non-reflective coatings, and spacing between arrays to reduce contiguous reflections. To further address this issue, we recommend that the following finding (22.52.1665-A1) be modified as follows:

1. The proposed development use is sited and designed and will be constructed in such a way to minimize significant impacts to the environment, including impacts to birds and bats, through appropriate measures including minimizing proximity to perch sites such as transmission lines and towers and by reducing glare, light, and thermal hazards from solar facilities;

Conclusion

We commend the progress made in reducing harm to birds and bats. However, we also recommend incorporation of the CEC Guidelines into the Implementation Manual as well as the additional findings language above. Thank you for considering our recommendations and we appreciate the opportunity to participate in this process.

Yours truly,



Dan Silver
Executive Director

² For documentation of impacts to birds from solar facilities, see, e.g., the August 2013 Monthly Compliance Report, Genesis Solar Energy Project, Avian Reporting Data Table and Forms, pp. 1-11 (182-193 of the pdf) available at:

<http://docketpublic.energy.ca.gov/PublicDocuments/09-AFC-08C/TN200657_20130930T120056_August_2013_Monthly_Compliance_Report.pdf> and Appendix B – Avian and Bat Mortality, and 2013 Yearly Biological Resources Report for Desert Sunlight at:

<<http://www.firstsolar.com/~media/documents/projects/desert%20sunlight/biological%20monitoring/weekly%20biological%20monitoring%20report%203rd%20quarter%20-%20september%202013.ashx>>

Also, see California Energy Commission Report documenting that about 3,500 birds have been killed by the Ivanpah thermal solar generator in one year:

<http://docketpublic.energy.ca.gov/PublicDocuments/07-AFC-05C/TN204258_20150420T145549_Ivanpah_Solar_Electric_Generating_System_Avian_Bat_Monitoring.pdf>

<<http://www.kcet.org/news/define/rewire/solar/solar-plant-likely-killed-3500-birds-in-first-year.html>>

From: [Jeff Olesh](#)
To: [Jay Lee](#)
Cc: [Norm](#)
Subject: REO
Date: Tuesday, July 07, 2015 10:37:02 AM

I support prohibiting Utility Scale Wind Energy development in L.A. County.
Thanks
Jeff Olesh

Sent from my iPad

From: [Paul Henreid](#)
To: [Jay Lee](#)
Subject: Re: LA County Renewable Energy Ordinance Final EIR
Date: Tuesday, July 07, 2015 6:53:47 AM

Thank you Jay! The REO and EIR are shaping up nicely.

Today's front page news says solar is not just for rich whites any more:

<http://www.msnbc.com/msnbc/solar-power-not-just-white-people-any-more>

There are arguments on both sides regarding vegetation aesthetic requirements given the drought. A lot can be done by keeping solar farms away from scenic routes. LA County should be jealous of the wind turbines in Kern. They can be aesthetically pleasing to some. The AV is not only sunny, it is windy - throughout day and night. That's a lot of free, clean energy the largest county in America has not been utilizing.

Paul Henreid, Esq.
landline (661) 724-1930
mobile (925) 457-4358

On Thu, Jul 2, 2015 at 4:56 PM, Jay Lee <JALee@planning.lacounty.gov> wrote:

Hi Paul,

Thank you for commenting on the Draft Environmental Impact Report (EIR) of the Los Angeles County Renewable Energy Ordinance (REO). Your comments have been considered and responded to in the Final EIR, which is now available on our webpage at the following link: <http://planning.lacounty.gov/energy/review>.

A public hearing on the Draft REO and Final EIR will be held before the Board of Supervisors on July 14, 2015. I've attached the Notice of Public Hearing to this email.

Thank you.

Jay Lee, AICP

Regional Planning Assistant II

Community Studies North

Department of Regional Planning

320 W. Temple St., Rm. 1354

Los Angeles, CA 90012

[\(213\) 974-6476](tel:(213)974-6476)

jalee@planning.lacounty.gov

From: [Hickling, Norm](#)
To: [Jay Lee](#); [Jay Lee](#); [Vizcarra, Edel](#)
Subject: Fwd: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind:
Date: Wednesday, July 08, 2015 12:50:12 PM

Please see constituent note below

Sent from my iPhone

Begin forwarded message:

From: Helen Henry <helenhenry@me.com<<mailto:helenhenry@me.com>>>
Date: July 8, 2015 at 3:34:55 PM EDT
To: <Nhickling@lacbos.org<<mailto:Nhickling@lacbos.org>>>
Subject: RE: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind:

7-8-2015

To Whom It May Concern,
Because the industrial wind turbines greatly reduce the fire fighting ability of the helicopters and airplanes there should be no industrial wind installations allowed in Los Angeles County.

Thank You
Helen Henry
16555 West Ave H
Lancaster Ca 93536
805-490-4548

Sent from iCloud

From: [Jack T.](#)
To: [Jay Lee](#)
Subject: Draft Renewable Energy Ordinance - Board Hearing 7/14/15
Date: Wednesday, July 08, 2015 2:08:13 PM

Comment here.

I have a lot on the corner of 225th St. West and Avenue B. No doubt the field next door will be used for a solar ranch sooner or later. The property tax paid for the 16 lots adjacent to 255 is roughly \$15,000/year. For \$50,000 that 1/2 mile of road could be paved = 3.5 years of property taxes. Not a single road has been paved by the county in the far west Antelope Valley. Ever. So we cannot expect the county that takes our money to pave the roads. The county also set the laws up in such a way that a group of neighboring land owners cannot get together and pave a road and divide the costs easily. Now the county wants to install these utilities in our backyard. The least the county can do is force the projects to pave the roads that they will use to get to their construction sites before construction starts and permits are issued. The way that the system is set up I own 50% of the road in the Holiday Valley Estates. In other words 255th St. West is half mine: up to the middle. When the Department of Water and Power was using it to transport water I told them to pave the road or stop using it. Instead of paving the road the DWP bulldozed a dirt road next to their aqueduct. If any solar ranch is going want to use 255th St. West to get to their construction project I will tell them to pave the road.

What I want is pretty simple. I want the roads paved. When I bought my lot I could not drive up to it to see it. I had to park my car 1/2 mile away and walk. The road is beach sand. Cannot drive on it without a four wheel drive. That seems to be the state of most roads in the area. It's a third world country within Los Angeles County.

I am not going to ask you to please pave the road. I don't expect the county to change its ways and use the money it plunders in the far west Antelope Valley to pay for local improvements. I am just going to inform you: if a solar ranch wants to build out there and they think that they are going to use my road: 255th without paving it they got another thing coming.

Jack Tuszynski
APN: 3277-004-015

From: [Karen O'Reilly](#)
To: [Jay Lee](#)
Subject: Draft Renewable Energy Ordinance Project
Date: Wednesday, July 08, 2015 1:49:10 PM

Hello Mr. Lee,

I wish to offer comments regarding the Renewable Energy Ordinance Project.

In general terms, I support renewable energy, particularly wind energy. However, I reside at 32210 Angeles Forest Highway in Acton California and our valley has been VERY HARD HIT by the Tehachapi Renewable Transmission Project. We have already borne the brunt of additional power lines with no financial compensation for the additional noise (wind makes loud noises through the power line wires) as well as VERY noisy conditions during the work. We also have not been given any financial compensation for the devaluation of our homes due to the BLIGHT of power lines.

The Angeles Forest Highway residents do not want to bear any more "improvements" on behalf of the State of California or County of Los Angeles without full financial compensation thus I ask you to take this into account and NOT approve any wind turbines or expansion of supporting infrastructure (power stations, power lines, etc.) in the Acton, Agua Dulce or Palmdale areas.

We have given enough already.

Sincerely,

Karen O'Reilly
Cell 661-236-5967

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From: [Jagadeesh Jyothi](#)
To: [Jay Lee](#)
Subject: Renewable energy
Date: Wednesday, July 08, 2015 2:07:29 PM

Thank you for the update. This is an good ordinance for the L.A. County to use the twelve months sunshine State.

Jagadeesh Jyothi
Sikand Engineering Associates
15230 Burbank Blvd.
Suite # 100
Van Nuys, CA 91411
Office: [818-787-8550](tel:818-787-8550)
Direct: [818-267-6164](tel:818-267-6164)
Fax: [818-901-7451](tel:818-901-7451)

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SIKAND [\(818\) 787-8550](tel:818-787-8550)

From: [Hickling, Norm](#)
To: [Jay Lee](#); [Vizcarra, Edel](#)
Subject: Fwd: Industrial Eind Turbine
Date: Wednesday, July 08, 2015 3:51:44 PM

More input

Sent from my iPhone

Begin forwarded message:

From: <jandmruge@aol.com<<mailto:jandmruge@aol.com>>>
Date: July 8, 2015 at 4:52:02 PM EDT
To: <nstickling@lacbos.org<<mailto:nstickling@lacbos.org>>>
Subject: Industrial Eind Turbine

Dear Norm

I wish to express my feelings about Industrial Wind Trubines.

I support the banning of all Industrial Wind Turbine Projects.

Sincerely,

John and Marian Ruge
46410 Kings Canyon Rd.
Lancaster, Ca. 93536

From: [David K Jefferies](#)
To: [Jay Lee](#)
Subject: Re: Draft Renewable Energy Ordinance - Board Hearing 7/14/15 (REVISED EMAIL)
Date: Wednesday, July 08, 2015 9:25:03 PM

This entire program is a total disgrace to the constitutional concept that "government" reflects the will of the people they claim to represent. The truth is that a group of undereducated politicians have confirmed that they will inflict their absurd concepts which shall be confirmed as government policy regardless of the policies profound lack of 'common sense'.

Point #1: a megawatt generated in the A. V. delivered many miles away, will not 'deliver' a megawatt due to resistance.

Today, the only rational approach is the Elon Musk approach to on sight solar cells powering on-sight battery power.

Residents, know that your local politicals will ever agree to this because you are now "off grid". How can they now tax you to death to fund their vacations, complete medical insurance coverage and comfortable retirement packages ???

This is not about anything other than the usual, they do not care about any citizen. They epitomize "government by government for the benefit of those in government".

Let's set a hearing at a time and place convenient to the people of the A.V., where these self-serving political-thrives can explain themselves?

Sent from my iPhone

On Jul 8, 2015, at 1:38 PM, Los Angeles County Department of Regional Planning
<jalee@planning.lacounty.gov> wrote:

July 2, 2015

The Los Angeles County ("County") Department of Regional Planning ("Department") is currently drafting regulations to guide the development of solar and wind energy in the unincorporated areas of the County. The intent is to provide baseline standards that support and facilitate the responsible development of small-scale systems and utility-scale facilities in a manner that minimizes potential safety and environmental impacts.

Information about the Draft Renewable Energy Ordinance project is available on the Department's project website at the following link:
<http://planning.lacounty.gov/energy>.

**No development is being proposed by the County through this ordinance. It will establish rules for those who wish to develop small-scale systems or utility-scale facilities to produce energy through solar and wind energy.*

Environmental Impact Report

The **Final Environmental Impact Report (EIR)**, which considers the public comments received during the formal public comment review period of the Draft EIR, is now available.

The Final EIR is available on the Department's project website at the following

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link: <http://planning.lacounty.gov/energy/review>. A copy is also available at the DRP Main Office.

The Board may certify the Final EIR at its July 14, 2015 hearing.

Draft Ordinance

Revisions have been made to the version of the Draft Renewable Energy Ordinance provided to the Regional Planning Commission for their April 22, 2015 hearing. The version of the Draft Ordinance that will be provided to the County Board of Supervisors can be found [here](#).

The revisions from the Commission version are shown as double underline and double strikethrough.

Board of Supervisors Public Hearing

On **March 18, 2015**, the RPC conducted a public hearing in the City of Lancaster. 13 members of the public testified and the RPC continued the matter to April 8, 2015. On **April 8, 2015**, the RPC held a continued public hearing in downtown Los Angeles. 2 members of the public testified via remote testimony and the RPC continued the matter to April 22, 2015 as recommended by DRP staff. On **April 22, 2015**, the RPC held a continued public hearing in downtown Los Angeles. 11 members of the public testified via remote testimony. The RPC closed the public hearing and recommended that the Board adopt the REO.

A public hearing on the Draft Renewable Energy Ordinance project and the Final EIR will be held before the County **Board of Supervisors** on Tuesday, July 14, 2015. The meeting is scheduled as follows:

Tuesday - July 14, 2015

9:30am

Kenneth Hahn Hall of Administration

500 West Temple Street

Los Angeles, CA 90012

Remote testimony will also be available at the following location:

Lancaster Library

601 W. Lancaster Blvd.

Lancaster, CA 93534

Contact

Please send your questions and comments regarding the Draft Renewable Energy Ordinance project via email or postal mail to:

Contact: Jay Lee

Email: jalee@planning.lacounty.gov

Postal Mail: Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

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Los Angeles County Department of Regional Planning | 320 West Temple Street 13th Flr | Los Angeles | CA | 90012

From: [David K Jefferies](#)
To: [Jay Lee](#)
Subject: Re: Draft Renewable Energy Ordinance - Board Hearing 7/14/15 (REVISED EMAIL)
Date: Wednesday, July 08, 2015 9:55:33 PM

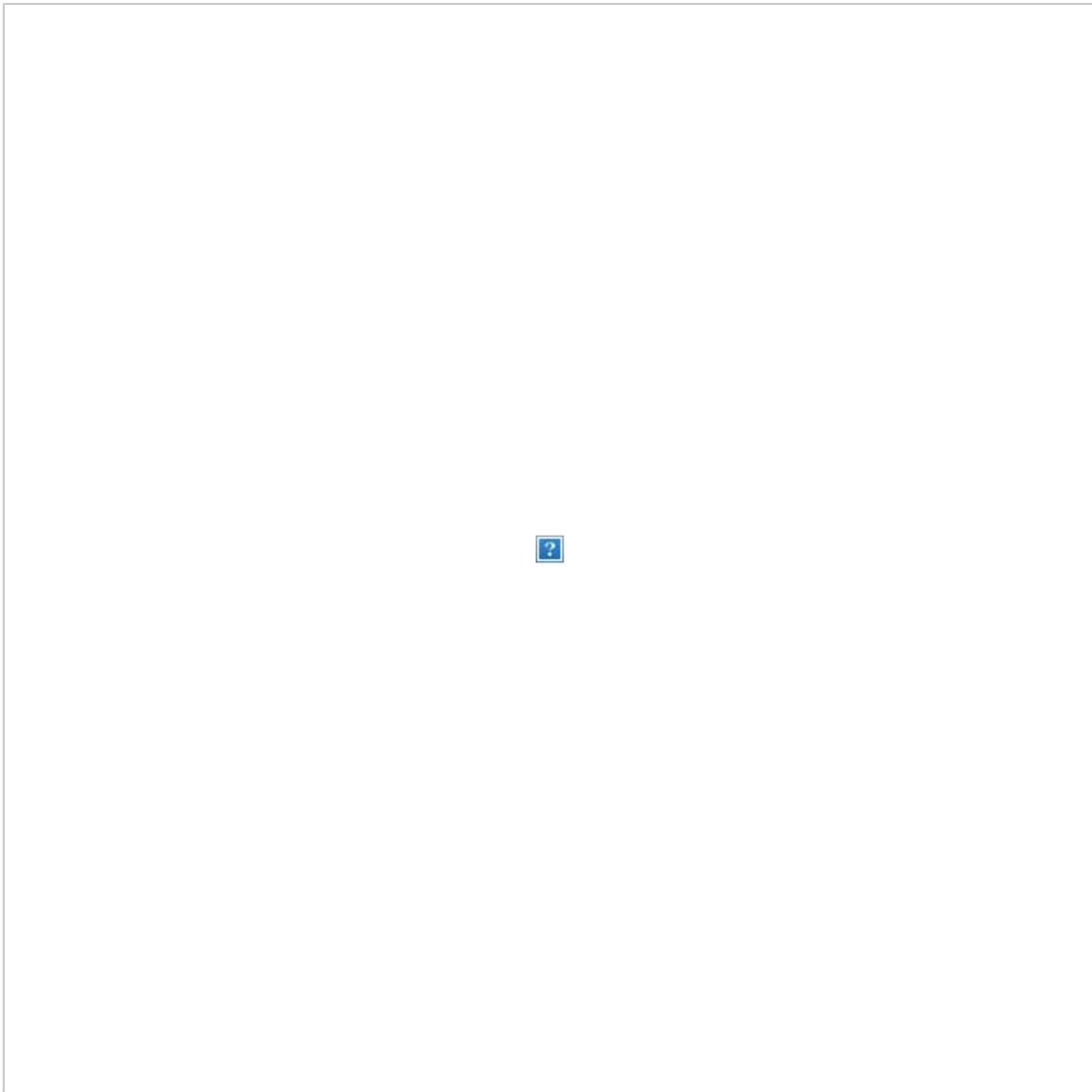
Shall I assume that my comments will ignored. I presume there will no response because I know no one of political power in L. A. County politics.

Thanks to your totally uninformed and careless attitude about what is best for northern L. A. County residence, your actions took my homes value of \$550,000.00 and reduced its value to \$160,000.00. Oh, on the sidebar, why to fail to report on the increase in San Joaquin Valley Fever cases caused by your irresponsible actions???

DKJ

Sent from my iPhone

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July 2, 2015

The Los Angeles County ("County") Department of Regional Planning

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From: artfx@roadrunner.com
To: [Jay Lee](#)
Cc: [Carl Iannalfo](#); [Jeffrey Hillinger](#); [Tom Fidger](#); [Norm Hickling](#)
Subject: Project No. R2014-01160 Renewable Energy Ordinance
Date: Thursday, July 09, 2015 10:28:34 AM
Attachments: [Southeast Antelope Valley CSD Amendment Re Alternative Energy Applications 063011.docx](#)
Importance: High

Mr. Lee,

I receive a Notice of Public Hearing about changes to Title 22 concerning small scale wind and solar energy applications.

You should know that the residents of Littlerock and Sun Village, collectively known as the Southeast Antelope Valley Community Standards District, submitted an Omnibus Amendment to its standards more than FIVE YEARS AGO! Since that time we have heard nothing from Mr. Bruckner or anyone else for that matter. As part of that amendment is a section on both solar and wind applications which I have attached for your review. A key portion of that section states that the permit fee should be no more than \$175.00 payable to one agency of LA County - and only one inspection should be required.

I would appreciate it you would make our feelings and our amendment known to the Board of Supervisors at the July 14, 2015 meeting and that we have been waiting for more than five years for some action.

Thank you.

William Guild
Former President of the Littlerock Town Council

Southeast Antelope Valley Community Standards District

F. Alternative Energy Applications

Definition: Alternative Energy Applications are encouraged in this CSD as another extension of rural freedoms available to all residents. Such alternate energy systems will help all residents become more energy efficient, will help lessen the power demands on public utilities, and will offer extra power for the county grid when power demands on the grid are near maximum levels. Alternative Energy Applications are a win-win situation for all concerned. Typically, alternative energy may either be solar or wind type systems, yet as technology improves, other sources may also prove applicable for home uses. While alternative energy sources have become cheaper over time, bureaucratic regulations and permit fees have become excessive. Therefore, it is necessary to include an Alternative Energy Bill of Rights for this CSD.

Alternate Energy Bill of Rights

Right #1

Alternative energy systems shall be installed to provide the lowest cost for residents and ratepayers in this CSD taking into account all applicable costs.

Right #2

There shall be no restrictions on solar or wind powered installations for any reason other than pre-existing health and safety concerns.

Right #3

There shall not be any added paperwork for connecting a solar or wind powered system as long as it is comparably sized to the structure's existing electrical service. If there is no "interconnection" paperwork, for example, for a 3-ton air conditioner installation, there should be no paperwork for a 3kw alternate energy system.

Right #4

There shall not be any demand charges, standby fees, or extra expenses for net metering. Net metering customers put power into the grid when electricity is most needed.

Southeast Antelope Valley Community Standards District

Right #5

There shall not be a separate inspection for building departments, fire departments, utilities and rebate administrators, etc. One and only one, jurisdictional inspection shall be required for an alternate energy system installation.

Right #6

The permit fee for any alternative energy system should \$175.00 payable to one agency of Los Angeles County. This is in line with the fee charged by the City of Lancaster, California, for a VAWT (Vertical Axis Wind Turbine) system. (Note: Current LA County permit fee for such a wind turbine can be as high as \$10,000.00 ó not a particularly good incentive to encourage more economical energy production.)

Residents of this CSD may select for their personal use on their own lot or parcel of land any alternate energy system that meets their individual requirements. Residents who opt for alternate energy systems should place them in a location that minimizes their visual impact to their neighbors.

NOTE: This amendment does not address major alternative energy systems, called utility scale installations, that may be proposed and developed by outside energy contractors. Residents of the CSD, however, encourage Los Angeles County agencies to keep such permit and licensing fees to a minimum in order to ensure the possibility of continuing lower cost utilities throughout the Antelope Valley.

From: [Helen Henry](#)
To: [PublicHearing](#); nhinkling@iacbos.org; [Vizcarra, Edel](#)
Subject: RE: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind:
Date: Wednesday, July 08, 2015 12:30:35 PM

7-8-2015

To Whom It May Concern,
Because the industrial wind turbines greatly reduce the fire fighting ability of the helicopters and airplanes **there should be no industrial wind installations allowed in Los Angeles County.**

Thank You
Helen Henry
16555 West Ave H
Lancaster Ca 93536
805-490-4548

Sent from iCloud

From: MnJGrant@aol.com
To: [PublicHearing](#)
Subject: PROJECT NO. R2014-02159-(All Districts)
Date: Wednesday, June 24, 2015 6:52:26 PM

Mitch Glaser,

I vote YES on Subject above.

Thank you.

John Grant

From: [Three Points-Liebre Mountain Town Council](#)
To: [Vizcarra, Edel](#); [Hickling, Norm](#)
Cc: [PublicHearing](#)
Subject: Renewable Energy Ordinance, Project No. R2014-01160-(All Districts)
Date: Wednesday, July 08, 2015 6:49:28 PM
Attachments: [Three Points TC REO BOS Letter.pdf](#)

Dear Mr. Vizcarra and Mr. Hickling,

Our town council respectfully submits comments regarding the Renewable Energy Ordinance (REO) for hearing on July 14th. We are appreciative of previous ordinances supported by Mayor Antonovich and the Board of Supervisors that prohibit ground-mounted utility-scale renewable energy in Significant Ecological Areas, and also prohibit ground disturbance and grading for those projects in all areas of the county. The REO can further refine suitability of small and large scale projects that have the potential to affect our rural residents, and we present our suggestions in our attached letter with hopeful anticipation that they will be included in the ordinance.

Yours truly,
Susan Zahnter
Vice President
661.724.2043



Three Points-Liebre Mountain Town Council
P. O. Box 76
Lake Hughes, CA 93532
www.threepointstowncouncil.com
3pointsliebremountain@gmail.com
661.724.2043

7 July 2015

SENT VIA EMAIL

Board of Supervisors
County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012
PublicHearing@bos.lacounty.gov

Dear Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe,

Subject: Renewable Energy Ordinance, Project Number R2014-01160-(All Districts)

On behalf of our town council, I state unequivocally, we are not in favor of any aspects of the proposed Renewable Energy Ordinance (REO) that allow ground-mounted industrial utility-scale renewable energy, as we have seen first-hand the detrimental effects to Northern Los Angeles County's rural communities, and another more dire example, Kern County's proliferation of utility-scale renewable energy. While the proposed REO is countywide, our communities will continue to be targeted for this type of industrial development, while other areas, like the Santa Monica Mountains and coastal communities have stringent protective land use plans that protect their "rural villages," views from trails, significant ridgelines, and other viewshed areas. The North County residents deserve the same protections. We have several concerns and requests regarding changes that have not been included in the latest version of the REO which would impart some protections to our rural residents.

- Prohibit Utility-Scale Wind Energy development. This would address Town Councils with Community Standards Districts (CSDs) that have height requirements overridden by Part 15 of the REO, and protect all communities from similar serious ill-effects caused by 500 foot tall wind turbines. Residential structures have height restrictions; how can the County allow 50 storey structures among areas where people live?
- Prohibit or limit Ground-Mounted Utility-Scale projects. There are significant impacts that cannot be mitigated for residents: lower property values, inadequate landscaping, inadequate dust control, health threats like Valley Fever, damage to natural environments and habitats, and viewshed. Ironically, wind and solar energy proponents push 'facts' that say windmill projects and solar arrays actually preserve habitat, when the habitat or environments preserved may

prove deadly, and/or unsuitable to many creatures and human habitation due to disturbances that include barotrauma (to bats), collision and death of birds, shadow flicker, ice throw, vibration, fencing of open spaces, noise, water and soil pollution, "lake effect," introduction of invasive non-native botanical species, increased human activity, and disruptive nighttime lighting. Add to those the seriousness and difficulty fighting fires near turbines, solar arrays, and powerlines, and many other project components whose effects need careful evaluation and have not been addressed adequately to date.

- There are no setbacks, landscaping, or buffer zones that will protect viewshed, property values, or livability anywhere. Setbacks and landscaping have not, to date, adequately mitigated impacts to residents from utility-scale solar projects, and it is impossible to mitigate impacts from utility-scale wind projects.
- Noise. Insert language that would limit and enforce noise levels to that of existing ambient noise levels for quiet rural areas, usually between 10-24dB, at the property line, not the nearest habitable dwelling. No one should have to listen to their neighbors' wind turbines or operational noise, from their homes, barns, or outdoor use areas. The current 60dB single noise event allowance is unacceptable for rural communities. There is neither a requirement for any projects to produce noise data prior to permit approval, nor a follow-up evaluation post-construction to ensure compliance with noise protection to pre-project ambient noise levels.
- Add language that specifically limits small-scale energy projects, or those for "primarily on-site" use to allow no more than 50% above average use exported to the grid, or production of no more than 150% of total on site energy use. This *might* limit the footprint of most "primarily on-site" small-scale projects to less than the 2.5 acres per five acre parcel currently allowed "by right," and protested in previous letters as excessive. Any project contemplating sale of energy through a Power Purchase Agreement should require a CUP. There are continuing concerns that covering 2.5 acres of 5 acre parcels with solar panels would cause significant impacts, in addition to that of industrial-scale solar projects, throughout rural communities and language is needed to limit ground-mounted solar projects' effects on neighboring single family use parcels in rural areas with 5+ acre lot sizes. So far, we have seen nothing that will enforce limits to small-scale use, especially since there are companies that look for owners of smaller properties who set up power purchase agreements for solar energy on five acre minimums. Create and add language that limits on-site ground mounted projects to one quarter acre of coverage—enough for eight homes!
- Specific requirement that landscape plans use native vegetation and seeds locally sourced, with the exception of non-invasive windbreak trees. The REO allows "drought tolerant" non-native landscaping. Some projects have used oleander (drought tolerant but poisonous to livestock and wildlife). Native vegetation and non-invasive windbreak trees can provide dust control and cover for indigenous and migratory birds, and further improve habitat and viewshed surrounding large solar projects.
- Dust Control, Air Quality Monitoring, Valley Fever. No monitoring equipment exists for Western Antelope Valley solar projects to determine efficacy of dust control plans. The only air monitoring station is positioned in Lancaster on Division Street. Back-up plans should be

required in the REO. Otherwise, projects are not willing to spend more money on landscaping or dust control plans post-construction once they have a CUP. Valley Fever will continue as an increasing threat. Valley Fever soil testing must be required to determine danger of dust-borne illness to all residents, construction workers, livestock and other animals in proximity of proposed projects, and across the north county. Suitable methods of dust control shall not be toxic or polluting, and shall not cause diminishment of air, surface water, or groundwater quality after becoming airborne or waterborne. Adequate measures to restrict fugitive dust air pollution and spread of Valley Fever should be required at any time during construction and throughout the life of any project.

- Minor Conditional Use Permits (MCUP). The REO seeks to change the requirements of an MCUP for all projects, not just those related to renewable energy. A public hearing may or may not be required (judgment of Hearing Officer), and signage and noticing requirements of 22.60.175 (REO page 92/96) are removed. Reinstate Section 22.60.175—Posting of signage, and affirm first class letter notification to surrounding property owners of projects' application and public hearing to previously required 500 feet. An MCUP is allowed for modification of significant ridgelines related to CSDs and non-conforming lots, utility-scale structure mounted wind projects, and small-scale wind towers. There is currently no appeal to the Board of Supervisors for any MCUP, including those for Temporary Met Towers, small-scale wind RE, and structure-mounted Utility-Scale RE. The impact of these projects and infringement on CSDs could be considerable, and should have an appeals option to the BOS. Any “utility-scale” project of any size should undergo a CUP discretionary review and provide notice and opportunity for public input to evaluate impacts to the community and environment.

We appreciate the opportunity to provide input toward the final version of this Renewable Energy Ordinance and respectfully request the changes enumerated in this letter. Our council's interests lie in protecting our community from inappropriate renewable energy development while encouraging distributed rooftop generation that will contribute greatly to the preservation of not only our rural lifestyle, but the environment that makes it available to us and enjoyment for visitors to our area.

Sincerely,



Susan Zahnter
Vice President

CC: Fifth District Field Deputy Norm Hickling, Supervisor Antonovich's Planning Deputy Edel Vizcarra

From: [richard.zahnter](#)
To: [Vizcarra, Edel](#); [PublicHearing](#); [Hickling, Norm](#)
Subject: Fw: Important Renewable Energy Ordinance Hearing, Letters and Testimony requested
Date: Thursday, July 09, 2015 1:21:58 PM

Date: July 9, 2015

From:
To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe

RE: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind: There should be no industrial wind installations allowed in Los Angeles County. There are no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewshed areas and threatened species. State and Federal agencies have in fact recognized that Los Angeles County is not “a place of opportunity” for wind projects. That recognition is reflected in the Preferred Alternative of the Desert Renewable Energy Conservation Plan (DRECP) proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

The DRECP Executive Summary, states that there are “Opportunities for dispersed [industrial] solar development” in seven counties, including Los Angeles. However, when listing “Opportunities for dispersed wind development” Los Angeles County is not included. In addition, on page 116 of Chapter 11.3, Preferred Alternative, Table 19.a “Technology Type by County” lists only solar for Los Angeles County (page 28).

Additionally, industrial utility-scale wind energy projects would not be an

allowed use in the Santa Monica Mountains Local Coastal Program, due to infringement on required preservation outlined in the document listing scenic resource protection policies that “apply to all other areas that are on, along, or within, or visible from scenic routes, public park lands, trails . . . that offer scenic vistas of the mountains, canyons, coastline and other unique natural features for the permanent protection of their habitat and open space values” (SMMLCP, Policies LU-34, LU-35). The rest of the county gets “mitigation” in the form of landscaped buffer zones and setbacks that prove far from adequate in protecting viewshed from private and public trust lands and private properties exposed to the industrial nature of large-scale renewable energy projects.

Industrial Wind Fire Hazard: One of our most serious concerns is the fire hazard posed by utility-scale wind energy positioned along our mountains and grassland areas, all considered “Extremely High Fire Hazard Areas.” Research confirms a serious level of threat by wind turbines (detailed in an article found at www.fireengineering.com.)

Several important points to consider in allowing utility-scale wind projects: Wind turbines are industrial facilities subject to a full range of emergencies such as fire, entrapments, electrical accidents, falls, and even hazmat; turbines are full of various fuels like electrical cables, plastics, combustible metals, and petroleum based fluids and lubricants; lightning strikes to turbines can ignite fires; mechanical friction in moving parts and electrical short circuits can cause fire; fire can spread to surrounding areas readily from burning fuels, metals, and plastics; responding fire departments may normally be several miles away and have to travel over roads that quite often require all-wheel-drive vehicles; primary limiting factors to fire department intervention are the height of the fire and the extremely limited vertical access.

Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFAA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

Inadequate Landscaping/ Viewshed: There should be a moratorium on new industrial solar installations in the Antelope Valley until adequate native drought tolerant landscaping is demonstrated at an existing solar installation, is shown to protect against wind-driven dust events, and actually buffers the viewshed from the degrading industrial qualities of ground-mounted large-scale renewable energy projects. Thus far, landscaping plans have not delivered adequate results. The Renewable Energy Ordinance only requires “conceptual landscape plans” using native and non-native drought tolerant plants, and offers nothing new. It has proven difficult to disguise the visual effects of large-scale solar projects, and there is no way to adequately landscape or mitigate viewshed destruction for wind turbines, even with setbacks stipulated in the ordinance. Community involvement in viewscape, landscape, and dust control issues is a must.

Dust Control: Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM₁₀ and PM_{2.5} levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to *additional* particulates that have caused unsafe driving conditions, dust bowl conditions, and health effects to those residents in the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health from dust, and especially Valley Fever.

Valley Fever: Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties. Observation of dust events emanating from SCE's TRTP transmission access roads proves this point.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: "There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities." This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from *Coccidioidomycosis*."

Avian Protection: Impose a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect. Wind turbines are known killers of birds and bats, and while there are setbacks stipulated in the ordinance, they still pose a danger to avifauna. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

MCUP: Minor Conditional Use Permits (MCUPs), as written in the Draft

Renewable Energy Ordinance, limit the public's right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

Any utility-scale energy production sent "offsite" in any zone, and those projects requiring a MCUP are relieved of the public signage process detailed in Los Angeles County Planning and Zoning Ordinance Section 22.60.175. The REO further exempts MCUPs from the noticing requirements to adjacent landowners and the public in 22.56.030 as seen stricken from the revised April 7th Draft REO on pages 74 and 75. The current County Ordinance requires notification, signage, and opportunity for adjacent land owners and interested parties the opportunity to request a public hearing. This leads to the question of whether the Minor Conditional Use Permit process is being revised through this ordinance, or if exemption of noticing applies only to this REO. If it is being revised through this ordinance, the public should be informed specifically that this is the case. Members of the public should be able to receive appropriate noticing by mail, by signage, request a hearing, and have the right to appeal to their elected officials any project that requires a MCUP or a CUP.

Acreege limits for ground mounted residential use solar:

On-site ground mounted solar should be limited to one quarter acre of coverage; this is enough to power 8 homes. This would qualify as "primarily off-site" use and would then be "utility-scale" according to Regional Planning's determination of 50% on-site use for small scale, a "by right" permitting process with no MCUP or CUP. There is no justification for the proposal to allow up to 2.5 acres of ground mounted solar for residential use in all zones. Allowance of 2.5 acres open the door to installations that masquerade as on-site use but are really intended to generate income through off-site energy sales. (Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and

arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique rural community atmosphere, and health, happiness and welfare of residents.

Noise: The human environment contains a variety of noise sources that can affect the way people live and work and, generally, negatively impact quality of life. Excessive levels may result in physiological effects such as hearing loss, speech interference, and sleep interference, as well as behavioral responses, such as increased neighborhood annoyance and dissatisfaction. Excessive noise can also negatively impact wildlife. Studies have shown that disruption caused by noise can be injurious to an animal's energy budget, reproductive success, and long-term survival.

Title 12 (12.08.390) of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to "maintain quiet in those areas which exhibit low noise levels." The Ordinance divides receptor properties into the categories, but does not include a very quiet rural noise zone. The Proposed maximum noise level of 60 decibels in the Renewable Energy Ordinance is inappropriate for rural areas. As the chart from the Los Angeles County Noise Ordinance indicates, the 60dB single event noise limit for the operation of solar and wind facilities matches that of commercial and industrial noise levels (55dB, 60dB, and 70dB). The ambient noise level in quiet rural areas is 10dB to 24dB, and up to 50dB in more developed *urban* residential areas. There is no reason to subject adjoining properties to any additional noise levels beyond measured ambient noise levels. The Renewable Energy Ordinance should require private property, noise sensitive lands and land uses, wildlife /habitats, and public lands be shielded from excessive noise; and require renewable energy development projects to demonstrate

that no adverse noise effects on adjacent uses will occur from the project; that provisions for preservation of quiet ambient noise levels be required by all renewable energy projects.

Social/Environmental Justice: Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have “rural villages”, and recreational viewshed areas extensively protected by the county’s Santa Monica Mountains Local Coastal Program’s Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent residents and those without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive renewable energy projects.

Yours truly,

Richard Zahnter, Sr.
P.O. Box 786
Lake Hughes, CA. 93532

11 July 2015

Honorable Mayor Antonovich and Supervisors Solis, Ridley-Thomas, Kuchl and Knabe:

My name is Jeff Olesh. As a Los Angeles County resident for six decades, I appeal upon your appointed duties to hear my voice regarding the forth coming implementation of green energy regulations in the unincorporated LA County area. Specifically, I refer to REO (Renewable Energy Ordinance) which is to come before your purview forthwith.

I am the Treasurer and an elected Board Member of the Lake Elizabeth Mutual Water Company, as well as a Board Member for the Transition Habitat Conservancy. It is my honor and privilege to be able to serve these two entities. They are both unpaid positions and are important and necessary civic duties, Given this, and the concerns that come from their respective responsibilities, I have a few concerns for you to consider in regards to the REO and its impact upon our rural community and Los Angeles County in general.

I would like to acknowledge and thank you for including the ban on renewable energy in the SEAs.

WIND

I support a ban on wind energy development in Los Angeles County due significantly to fire protection concerns and also loss of bird life. My personal experience during the Power House fire was that there were no ground crews deployed at my cabin during the fire – however, the air support was able to save not only my home and much of my property, but also able to save at the least 800 acres of protected land. Had there been wind turbines of the magnitude suggested, these aerial drops could not have occurred and a lot more of homes and properties would have been lost. Thank you Supervisor Antonovich for your immediate action in support of aerial fire protection. To reiterate, if the Nextera/Blue Sky project had been allowed, between 6 - 8 wind turbines would have been sited in the immediate surrounding area of my home and another 90 or so towers in the west Antelope Valley making sure that aerial fire suppression is an unavailable option.

SOLAR

I respectfully request a moratorium on utility scale solar due to the following reasons: The lake effect, loss of foraging habitat for birds, wildlife in general, and a general loss of biodiversity as evidenced by loss of natural foraging habitat .

WATER

Water quality is addressed in the REO. The sections and subsections are not comprehensive at this point. Quarterly checks for water quality and water table level for utility scale renewable energy projects by a state licensed hydrologist should be included in the ordinance - this is paramount given our current global, state and local situation.

Thank You

Jeff Olesh
(661) 466 -3057

From: [Doug and Terry Mullens](#)
To: [PublicHearing](#); [Vizcarra, Edel](#); [Hickling, Norm](#)
Subject: Proposed Los Angeles County Renewable Energy Ordinance
Date: Sunday, July 12, 2015 1:43:19 PM

Date: July 12, 2015

From: Doug and Terry Mullens
46920 67th St W
Lancaster CA 93536

**To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas,
Kuehl,
and Knabe,**

RE: Proposed Los Angeles County Renewable Energy Ordinance

Industrial Wind: There should be no industrial wind installations allowed in Los Angeles County. There are no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewshed areas and threatened species. State and Federal agencies have in fact recognized that Los Angeles County is not “a place of opportunity” for wind projects. That recognition is reflected in the Preferred Alternative of the Desert Renewable Energy Conservation Plan (DRECP) proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

The DRECP Executive Summary, states that there are “Opportunities for dispersed [industrial] solar development” in seven counties, including Los Angeles. However, when listing “Opportunities for dispersed wind development” Los Angeles County is not included. In addition, on page 116 of Chapter 11.3, Preferred Alternative, Table 19.a “Technology Type by County” lists only solar for Los Angeles County (page 28).

Additionally, industrial utility-scale wind energy projects would not be an allowed use in the Santa Monica Mountains Local Coastal Program, due to infringement on required preservation outlined in the document listing scenic resource protection policies that “apply to all other areas that are on, along, or within, or visible from scenic routes, public parklands, trails . . . that offer scenic vistas of the mountains, canyons, coastline and other unique natural features for the permanent

protection of their habitat and open space values” (SMMLCP, Policies LU-34, LU-35). The rest of the county gets “mitigation” in the form of landscaped buffer zones and setbacks that prove far from adequate in protecting viewshed from private and public trust lands and private properties exposed to the industrial nature of large-scale renewable energy projects.

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Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

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Dust Control: Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM₁₀ and PM_{2.5} levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

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The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, and protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

MCUP: Minor Conditional Use Permits (MCUPs), as written in the Draft Renewable Energy Ordinance, limit the public’s right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

Any utility-scale energy production sent “offsite” in any zone, and those projects requiring a MCUP are relieved of the public signage process detailed in Los Angeles County Planning and Zoning Ordinance Section 22.60.175. The REO further exempts MCUPs from the noticing requirements to adjacent landowners and the public in 22.56.030 as seen stricken from the revised April 7th Draft REO on pages 74 and 75. The current County Ordinance requires notification, signage, and opportunity for adjacent land owners and interested parties the opportunity to request a public hearing. This leads to the question of whether the Minor Conditional Use Permit process is being revised through this ordinance, or if exemption of noticing applies only to this REO. If it is being revised through this ordinance, the public should be informed specifically that this is the case. Members of the public should be able to receive appropriate noticing by mail, by signage, request a hearing, and have the right to appeal to their elected officials any project that requires a MCUP or a CUP.

Acreage limits for ground mounted residential use solar:

On-site ground mounted solar should be limited to one quarter acre of coverage; this is enough to power 8 homes. This would qualify as

“primarily off-site” use and would then be “utility-scale” according to Regional Planning’s determination of 50% on-site use for small scale, a “by right” permitting process with no MCUP or CUP. There is no justification for the proposal to allow up to 2.5 acres of ground mounted solar for residential use in all zones. Allowance of 2.5 acres open the door to installations that masquerade as on-site use but are really intended to generate income through off-site energy sales. (Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique rural community atmosphere, and health, happiness and welfare of residents.

Noise: The human environment contains a variety of noise sources that can affect the way people live and work and, generally, negatively impact quality of life. Excessive levels may result in physiological effects such as hearing loss, speech interference, and sleep interference, as well as behavioral responses, such as increased neighborhood annoyance and dissatisfaction. Excessive noise can also negatively impact wildlife. Studies have shown that disruption caused by noise can be injurious to an animal's energy budget, reproductive success, and long-term survival.

Title 12 (12.08.390) of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to “maintain quiet in those areas which exhibit low noise levels.” The Ordinance divides receptor properties into the categories, but does not include a very quiet rural noise zone.

The Proposed maximum noise level of 60 decibels in the Renewable Energy Ordinance is inappropriate for rural areas. As the chart from the Los Angeles County Noise Ordinance indicates, the 60dB single event noise limit for the operation of solar and wind facilities matches that of commercial and industrial noise levels (55dB, 60dB, and 70dB). The ambient noise level in quiet rural areas is 10dB to 24dB, and up to 50dB in more developed *urban* residential areas. There is no reason to subject adjoining properties to any additional noise levels beyond measured ambient noise levels. The Renewable Energy Ordinance should require private property, noise sensitive lands and land uses, wildlife /habitats, and public lands be shielded from excessive noise; and require renewable energy development projects to demonstrate that no adverse noise effects on adjacent uses will occur from the project; that provisions for preservation of quiet ambient noise levels be required by all renewable energy projects.

Social/Environmental Justice: Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have “rural villages”, and recreational viewshed areas extensively protected by the county’s Santa Monica Mountains Local Coastal Program’s Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent residents and those without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive renewable energy projects.

Yours truly,

Doug Mullens

Terry Mullens

From: pinecanyonhoney1@verizon.net
To: [Vizcarra, Edel](#); [PublicHearing](#); [Hickling, Norm](#)
Subject: REO Ban on Wind Turbines in Antelope Valley
Date: Sunday, July 12, 2015 4:07:55 PM

Date: July 12, 2015

From: Karen Plemmons, Three Points Resident and Secretary of the Three Points Liebre Mountain Town Council

To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe

RE: Proposed Los Angeles County Renewable Energy Ordinance

Industrial Wind: There should be no industrial wind installations allowed in Los Angeles County. There are no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewshed areas and threatened species. State and Federal agencies have in fact recognized that Los Angeles County is not “a place of opportunity” for wind projects. That recognition is reflected in the Preferred Alternative of the Desert Renewable Energy Conservation Plan (DRECP) proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

The DRECP Executive Summary, states that there are “Opportunities for dispersed [industrial] solar development” in seven counties, including Los Angeles. However, when listing “Opportunities for dispersed wind development” Los Angeles County is not included. In addition, on page 116 of Chapter 11.3, Preferred Alternative, Table

19.a “Technology Type by County” lists only solar for Los Angeles County (page 28).

Additionally, industrial utility-scale wind energy projects would not be an allowed use in the Santa Monica Mountains Local Coastal Program, due to infringement on required preservation outlined in the document listing scenic resource protection policies that “apply to all other areas that are on, along, or within, or visible from scenic routes, public park lands, trails . . . that offer scenic vistas of the mountains, canyons, coastline and other unique natural features for the permanent protection of their habitat and open space values” (SMMLCP, Policies LU-34, LU-35). The rest of the county gets “mitigation” in the form of landscaped buffer zones and setbacks that prove far from adequate in protecting viewshed from private and public trust lands and private properties exposed to the industrial nature of large-scale renewable energy projects.

Industrial Wind Fire Hazard: One of our most serious concerns is the fire hazard posed by utility-scale wind energy positioned along our mountains and grassland areas, all considered “Extremely High Fire Hazard Areas.” Research confirms a serious level of threat by wind turbines (detailed in an article found at www.fireengineering.com.) Several important points to consider in allowing utility-scale wind projects: Wind turbines are industrial facilities subject to a full range of emergencies such as fire, entrapments, electrical accidents, falls, and even hazmat; turbines are full of various fuels like electrical cables, plastics, combustible metals, and petroleum based fluids and lubricants; lightning strikes to turbines can ignite fires; mechanical friction in moving parts and electrical short circuits can cause fire; fire can spread to surrounding areas readily from burning fuels, metals, and plastics; responding fire departments may normally be several miles away and have to travel over roads that quite often require all-wheel-drive vehicles; primary limiting factors to fire department intervention are the height of the fire and the extremely limited vertical access.

Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFAFA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

Inadequate Landscaping/ Viewshed: There should be a moratorium on new industrial solar installations in the Antelope Valley until adequate native drought tolerant landscaping is demonstrated at an existing solar installation, is shown to protect against wind-driven dust events, and actually buffers the viewshed from the degrading industrial qualities of ground-mounted large-scale renewable energy projects. Thus far, landscaping plans have not delivered adequate results. The Renewable Energy Ordinance only requires “conceptual landscape plans” using native and non-native drought tolerant plants, and offers nothing new. It has proven difficult to disguise the visual effects of large-scale solar projects, and there is no way to adequately landscape or mitigate viewshed destruction for wind turbines, even with setbacks stipulated in the ordinance. Community involvement in viewscape, landscape, and dust control issues is a must.

Dust Control: Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM₁₀ and PM_{2.5} levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure

and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to *additional* particulates that have caused unsafe driving conditions, dust bowl conditions, and health effects to those residents in the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health from dust, and especially Valley Fever.

Valley Fever: Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties. Observation of dust events emanating from SCE's TRTP transmission access roads proves this point.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: "There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities." This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from *Coccidioidomycosis*.”

Avian Protection: Impose a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect. Wind turbines are known killers of birds and bats, and while there are setbacks stipulated in the ordinance, they still pose a danger to avifauna. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

MCUP: Minor Conditional Use Permits (MCUPs), as written in the Draft Renewable Energy Ordinance, limit the public’s right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

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(Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique

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Karen Plemmons

From: [Paul Schmidt](#)
To: [PublicHearing](#); [Hickling, Norm](#); [Vizcarra, Edel](#)
Subject: Antelope Valley REO
Date: Sunday, July 12, 2015 2:08:44 PM

Paul Schmidt
39826 Calle Clavelito
Green Valley, CA 91390

12 June 2015

Dear Supervisors:

I am sending this letter in order to voice my opinion regarding solar and wind development in the Antelope Valley (REO). I have called this place home for over twenty years and have been an LA county resident for my entire life - pushing fifty years. You will have by now read many testimonials for this side or that...all I can attest to is the fragility and beauty of our desert. North LA county has the Poppy Reserve for a reason as well as many parks, national monuments and just plain open land which serves wildlife and humans in a symbiotic relationship - a treasure of biotic landscape and homeland. I hope that these facts are taken into account when making your decision regarding our last undeveloped open space. Many before me have sighted studies and numbers - they are at my fingertips - I will not repeat them - but as an Eagle Scout and high school teacher and a father of four I urge the board to consider the natural beauty of the Antelope Valley for future generations and to consider the implications of impacting our environment. Please make the right decision and vote to keep our last bastion of open LA County space **open**.

Respectfully,

Paul Schmidt



COUNTY OF LOS ANGELES BOARD OF SUPERVISORS

Mike Antonovich

Don Knabe

Sheila Kuehl

Mark Ridley-Thomas

Hilda Solis

RE: Los Angeles County Proposed Renewable Energy Ordinance

On behalf of the Los Angeles County Boards of Real Estate (LACBOR), we support the County's desire to establish an ordinance for the purpose of addressing the impacts specific to utility-scale solar and wind energy projects, such as glare, noise, and dust, through the proposed Zoning Code amendments to establish baseline development standards where none currently exist.

We believe it is appropriate that utility scale energy facilities are prohibited in SEA's.

However, we do have the following concerns with the draft ordinance being presented for approval:

1. The ordinance does not address the importance of placing renewable energy projects on previously disturbed lands where possible. We encourage the County to develop a policy that will promote and provide incentive for any renewable energy development to take place on previously disturbed land.
2. Require the use of recycled water for construction and maintenance of these operations. Potable water is extremely limited in the desert and should not be used for the purposes which are required to construct and/or maintain renewable energy facilities.
3. Valley Fever is already on the rise due to increases in blowing sand and dust in the Antelope Valley. The highest incidence of Valley Fever in Los Angeles County is found in the Antelope Valley. At a minimum, this ordinance should require extensive soil testing for Valley Fever spores at prospective sites for utility scale projects.
4. A provision for community input on each project must be included in the requirements for approval.
5. All projects should be in compliance with the Community Standards District (CSD) closest to the location in which it will be constructed.

6. Requirements for approval of renewable energy development must be no less than they would be for construction of a residence or business.

Rural residents have been subjected to the placement of industrial, utility scale projects covering many hundreds of acres in their rural residential communities. Previously developed projects have had serious deleterious effects on residents in local communities, including visual blight, excessive blowing sand, dust and debris, lower water pressure and increased respiratory health problems such as allergies, asthma, and Valley Fever.

We hope that there will be a discussion by the Board of Supervisors at this point concerning social justice for rural residents, as there have been serious impacts to the health and welfare of people living in areas where renewable energy projects have been installed. Renewable energy projects do not enhance their surrounding areas in any way, often run contrary to previously agreed upon community standards for development and create serious health and welfare problems for local residents. Although we continue to support the proposed ordinance and the development of green energy, we firmly believe the needs of the communities and residents proximate to these types of installations should receive greater consideration before new projects are approved.

Sincerely,

A handwritten signature in black ink, appearing to read 'Weston LaBar', written over a light blue rectangular background.

Weston LaBar
Association Executive

Date: 10 July 2015

From: Susan Zahnter
P.O. Box 786
Lake Hughes, CA 93532

SENT VIA EMAIL

To: Mayor Antonovich, and Supervisors, Solis, Ridley-Thomas, Kuehl, and Knabe

Subject: Renewable Energy Ordinance, Project No. R2014-11060-(All Districts)

Residents of the Northern Los Angeles County have been deeply affected by utility-scale renewable energy. While the Renewable Energy Ordinance (REO) is countywide, our communities will continue to be targeted for this type of industrial development, while other areas, like the Santa Monica Mountains and coastal communities have stringent protective land use plans that protect their "rural villages," views from trails, significant ridgelines, and other viewshed areas. The North County residents deserve the same.

Ground-mounted Industrial Utility-scale Wind Energy Development should be prohibited from Los Angeles County . This would address concerns from Town Councils with Community Standards Districts that have height requirements overridden by Part 15, and protect all communities from similar, and additional significant impacts caused by 500 foot tall wind turbines. Residential structures have height restrictions; how can the County allow 50 storey structures among areas where people live? There are no setbacks, landscaping, or buffer zones that will protect viewshed, property values, or livability anywhere. Setbacks and landscaping have not adequately mitigated impacts to residents from utility-scale solar projects, and will it will be impossible to mitigate impacts from utility-scale wind projects.

Please protect rural peace and quiet by inserting language in the REO that would limit and enforce noise levels to that of existing ambient noise levels for quiet rural areas, usually between 10-24dB, at the property line, not the nearest habitable dwelling. No one should have to listen to their neighbors' wind turbines, utility-scale turbines, or other operational noise from their homes, barns, or outdoor use areas. The current 60dBA single noise event allowance is unacceptable for rural communities, and exposes residents to urban noise levels. Rural areas' ambient noise level is between 10-24dBA. There is neither a requirement for any projects to produce noise data prior to permit approval, nor a follow-up evaluation post-construction to ensure compliance with noise protection to pre-project ambient noise levels.

I have concerns about how Regional Planning will administer small-scale solar projects and the possibly large footprint they are allowed, in the REO, by right, with only a ministerial review. Please limit "primarily on-site use" to allow no more than 50% above average use exported to the grid, or production of no more than 150% of total on-site energy use. This *might* limit the area of most "primarily on-site use" small-scale projects to less than the 2.5 acres per five acre parcel currently allowed "by right," and protested in previous letters as excessive. I also have continuing concerns that covering 2.5 acres of 5 acre parcels with solar panels would cause serious impacts to neighboring rural properties and throughout rural communities, compounding the effects of industrial-scale solar projects. Language is needed to limit ground mounted solar projects' effects on adjacent Single Family Residence parcels, no matter what the zoning. The sale of energy would easily pay for the installation of panels, a CUP, and provide income to the landowner. Two and a half acres would power 55 homes. A one quarter acre limit would power 8 homes. I acknowledge that the 2.5 acre maximum coverage of 5 acre lots "by right" is targeted at commercial and manufacturing land use and active agricultural operations, so why not change zoning in the ordinance for those purposes?

Please make a specific requirement that landscape plans use native vegetation and seeds locally sourced, with the exception of non-invasive windbreak trees. This will help protect native plants in unique high desert landscapes, and also publicly and privately preserved lands, from invasive weed species that are so easily spread when soil is disturbed. The REO allows "drought tolerant" non-native landscaping. Some projects have used oleander (drought tolerant but poisonous to livestock and wildlife). Native vegetation and non-invasive windbreak trees can provide dust control and cover for indigenous and migratory birds, and further improve habitat and viewshed surrounding large solar projects.

Currently, no monitoring equipment exists for the Western Antelope Valley Solar projects to determine efficacy of dust control plans, and the only air monitoring station is positioned in Lancaster on Division Street. Back-up dust control and landscaping should be required through the REO to replace any unsuccessful plans in a timely fashion. Otherwise, projects are not willing to spend more money on landscaping or dust control plans post-construction, or once they have a CUP. Require air quality monitoring pre- and post construction to determine efficacy of dust control measures. Require enforcement of viable landscaping that visually buffers industrial solar plants and at the same time, controls fugitive dust. The Antelope Valley is a non-attainment area with regard to particulates in the air, but renewable energy projects should not be allowed to create a worsening of air quality and threaten public health.

Valley Fever spores are carried in the air along with dust, so along with adequate dust control via landscape plans and serious erosion prevention, Valley Fever soil testing must be required to determine danger of dust-borne illness to all residents, construction workers, livestock, and other animals in proximity of proposed projects, and across the North County. Suitable methods of dust control should not be toxic or polluting, and should not cause diminishment of air, surface water, or groundwater quality after becoming airborne or waterborne. Adequate measures to restrict air pollution and spread of Valley Fever should be required at any time during construction or the life of the project.

The REO seeks to change the requirements of an MCUP for all projects, not just those related to renewable energy. A public hearing is now required for a MCUP, but signage requirements are eliminated. Reinstate the signage and affirm first class letter notification to surrounding property owners of projects' application and public hearing. An MCUP is allowed for modification of significant ridgelines related to CSDs, non-conforming lots, utility-scale structure mounted wind projects, and small-scale wind towers. There is currently no appeal to the Board of Supervisors for any MCUP, including those for Temporary Met Towers, small-scale wind RE, and structure-mounted Utility-Scale RE. The impact of these projects and infringement on CSDs could be considerable, and should be allowed appeal to the BOS.

Yours Truly,

A handwritten signature in cursive script, appearing to read "Susan Zahnter".

Susan Zahnter

From: [Melanie Postell](#)
To: [Jay Lee](#)
Subject: Renewable Energy Ordinance, Project No. R2014-01160
Date: Friday, July 10, 2015 11:18:45 AM

Dear Mr. Lee,

I believe that utility scale wind projects should be banned in LA County

Our West Antelope Valley area was damaged by the Powerhouse Fire in 2013, and previously had been part of NextEra's 13,000 acre utility scale wind project. Had that wind project been developed the firefighters would have been unable to drop fire retardant from <100 feet above the ridge line. Instead the fire would have burned far more than the 30,000 acres that it did burn, and many more houses in the area would have burned. 500 foot wind towers should never be built in wildfire prone areas.

Additionally, I encourage a moratorium on industrial solar until adequate provisions are established that protect air quality, endangered wildlife and rural residents.

Thank you.

Sincerely,

Melanie Postell

PO Box 761

Lake Hughes, CA 93532

661-338-0818

FROM: Margaret Rhyne on behalf of Friends of Antelope Valley Open Space

TO: Jay Lee, jalee@planning.lacounty.gov

RE: Draft Renewable Energy Ordinance

DATE: July 9, 2015

Thank you for the opportunity to again comment on the proposed Los Angeles County Renewable Energy Ordinance. We would like to express our support for the provisions in the proposed ordinance that limit ground disturbance; exclude power tower and parabolic concentrator type solar projects; require guy-wire free meteorological towers; and improve small animal permeable fencing requirements.

Utility-Scale Wind

We also applaud the proposed exclusion that was included in the Town and Country Plan, of industrial, utility-scale wind and solar renewable energy in Significant Ecological Areas. Concerning utility-scale wind, we urge that the REO strengthen this prohibition. There are in fact no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewsheds and threatened species. Therefore we believe that utility-scale wind should be banned throughout Los Angeles County.

State and Federal agencies have in fact recognized that Los Angeles County is not “a place of opportunity” for wind projects. That recognition is reflected in the Preferred Alternative of the **Desert Renewable Energy Conservation Plan (DRECP)** proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service in 2014.

The DRECP Executive Summary, states that there are “Opportunities for dispersed [industrial] solar development” in seven counties, including Los Angeles. However, when listing “Opportunities for dispersed wind development” **Los Angeles County is not included**. In addition, on page 116 of Chapter 11.3, Preferred Alternative, Table 19.a “Technology Type by County” **lists only solar** for Los Angeles County (page 28). We believe that the proposed L.A. County Renewable Energy Ordinance should align with the CEC, CDFW and U.S. Fish and Wildlife and ban industrial utility-scale wind energy installations throughout the county.

Dust Control

Dust control plans at existing solar installations continue to be inadequate. While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to *additional* particulates that have caused unsafe driving conditions, dust bowl conditions, and detrimental health effects to residents of the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health, degradation of rural living conditions, and reduced road safety due to dust storms.

Valley Fever

Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are currently not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: "There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities." This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from *Coccidioidomycosis*."

Avian Protection

We urge a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect caused by existing solar facilities. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, and other important wildland linkages. It provides habitat for species protected by state federal law including golden eagles, burrowing owls, tricolor blackbirds, Swainson's hawk, and California condors. "Lake effect" is a documented threat to avian life that was unknown before the widespread installation of ground mounted solar facilities in the desert. It is now a recognized phenomenon that from the air and from long distances, birds and bats mistake the reflective glare from solar panels for water sources. They are killed from collisions with the panels; from entrapment underneath; and from the exhaustion caused by veering hundreds of miles from their usual migratory paths in the expectation of finding water. These deaths have been documented at First Solar and NextEra solar facilities in the California desert.

Social/Environmental Justice

Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have "rural villages", and recreational viewshed areas extensively protected by the county's Santa Monica Mountains Local Coastal Program's Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. **However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining**

Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent residents without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive industrial energy projects enjoyed by other residents of the county.

Alternatives

Increased incentives for distributed solar that produces energy where it is consumed combined with a renewed emphasis on energy conservation can meet the need for reducing carbon emissions without destroying important natural habitats; exacerbating the inequality of impacts to less-affluent communities; or increased costs and vulnerabilities associated with long distance electrical transmission. Just this week, both the Federal Government and large utilities have urged renewed emphasis on distributed generation (DG). On July 8, the Federal Government proposed a program to provide added incentives for installation of rooftop solar in poorer communities. (*Obama backs plans to bring 300 MW of solar to poorer US households*, www.pv-magazine.com/news.)

The next day, two giant public utilities, PG&E and SCE, urged California to include DG in its Renewable Energy Portfolio Standards. AB 350, currently under discussion in Sacramento, seeks to increase RPS goals for renewables to at least 50% by the end of 2030. However only utility-scale renewables are counted towards achieving these goals. According to a spokesperson for SCE,

"SB 350 ignores DG as a GHG strategy in the RPS construct ... as a result SB 350 picks technology winners and losers, maintains inequities to the disadvantage of utility customers, ignores operability issues, and will lead to unnecessary costs... State policy must better align with utilities to advance DG as a strategic solution for carbon reduction." (see *California: Utilities urge for DG solar to count towards 50% renewables goal*, www.pv-magazine.com/news)

Conclusion

We agree with the DRECP and **urge a ban on industrial wind** in Los Angeles County. We urge a **moratorium on industrial solar** until adequate provisions are established that protect air quality, endangered wildlife and rural residents and the potential for distributed generation is included in renewable energy goals and fully realized through effective incentives for all citizens.

Thank you for the opportunity to comment,

Margaret Rhyne. m.rhyne@verizon.net

On behalf of Friends of Antelope Valley Open Space

From: kathywangsgard@aol.com
To: [Jay Lee](#)
Subject: Renewable Energy Ordinance Project
Date: Monday, July 13, 2015 11:49:09 AM

I am writing about the upcoming issue with large scale wind turbines in L.A. County and especially here in the Antelope Valley.

Please add my voice to NOT approve of these large scale wind projects, as well as the solar projects.

They are not environmentally friendly as many hope or say they are. They will eventually cause our energy prices to increase. (Germany as well as other European countries ahead of us in this endeavor are struggling with this. Their elderly on fixed incomes spend their winter days in public buildings to stay warm).

Wind turbines are detrimental to bird and bat populations. It looks like even solar is as they cause what is called, "Lake Affect". They are a visual blight to those of us who live here. I could name many other issues as far as the environment, but for the sake of brevity I'll end here.

Thank you,
Sincerely,
Kathy Wangsgard

From: jill@baystranslations.com
To: [Jay Lee](mailto:Jay.Lee@lacbos.org); evizcarra@lacbos.org; nhickling@lacbos.org
Cc: m.rhyne@verizon.net; ontishima1775@gmail.com; [Bertrand Bays](#); [Carol Hill](#); [Cody](#); equibert2@verizon.net; [J Olesh](#); [RJ Goodman](#); [S & R Olney](#); sabermutt@gmail.com; [Vern Biehl](#); [WEndy Walker](#); wsmarriott@gmail.com
Subject: Comments from Friends of Antelope Valley Open Space
Date: Monday, July 13, 2015 6:12:47 AM
Attachments: [FAVOS REQ July 2015.pdf](#)

Dear Mr. Vizcarra and Mr. Hickling,

We at Transition Habitat Conservancy strongly support all the comments in the letter from FAVOS. Our organization has purchased 2,466 acres to date in LA County's Significant Ecological Area in the West Antelope Valley in the last 3 years for conservation.

We have been a strong partner with LA County in implementing permanent conservation on LA County's designated Significant Ecological Areas, and the ideas presented in the attached letter, if implemented, would ease some of the many challenges we face in that effort.

Sincerely,

Jill Bays, President

Transition Habitat Conservancy

760 868 5136

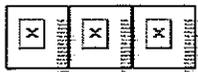
Jill@transitionhabitat.org

Po Box 720026

Pinon Hills, CA 92372

Jay Lee

From: Dawn North [dawniebird1701a@hotmail.com]
Sent: Monday, July 13, 2015 10:24 PM
To: Vizcarra, Edel; PublicHearing; Hickling, Norm
Subject: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind



Date: July 13th, 2015

From: Dawn North
To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe

RE: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind: There should be no industrial wind installations allowed in Los Angeles County. There are no areas in the county where industrial wind installations can be placed without severe detrimental consequences for rural residents, recreational resources, valued viewshed areas and threatened species. State and Federal agencies have in fact recognized that Los Angeles County is not “a place of opportunity” for wind projects. That recognition is reflected in the Preferred Alternative of the Desert Renewable Energy Conservation Plan (DRECP) proposed by the California Energy Commission, California Department of Fish and Wildlife, Bureau of Land Management, and the U.S. Fish and Wildlife Service.

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Industrial Wind Fire Hazard: One of our most serious concerns is the fire hazard posed by utility-scale wind energy positioned along our mountains and grassland areas, all considered “Extremely High Fire Hazard Areas.” Research confirms a serious

level of threat by wind turbines (detailed in an article found at www.fireengineering.com.) Several important points to consider in allowing utility-scale wind projects: Wind turbines are industrial facilities subject to a full range of emergencies such as fire, entrapments, electrical accidents, falls, and even hazmat; turbines are full of various fuels like electrical cables, plastics, combustible metals, and petroleum based fluids and lubricants; lightning strikes to turbines can ignite fires; mechanical friction in moving parts and electrical short circuits can cause fire; fire can spread to surrounding areas readily from burning fuels, metals, and plastics; responding fire departments may normally be several miles away and have to travel over roads that quite often require all-wheel-drive vehicles; primary limiting factors to fire department intervention are the height of the fire and the extremely limited vertical access.

Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

Inadequate Landscaping/ Viewshed: There should be a moratorium on new industrial solar installations in the Antelope Valley until adequate native drought tolerant landscaping is demonstrated at an existing solar installation, is shown to protect against wind-driven dust events, and actually buffers the viewshed from the degrading industrial qualities of ground-mounted large-scale renewable energy projects. Thus far, landscaping plans have not delivered adequate results. The Renewable Energy Ordinance only requires “conceptual landscape plans” using native and non-native drought tolerant plants, and offers nothing new. It has proven difficult to disguise the visual effects of large-scale solar projects, and there is no way to adequately landscape or mitigate viewshed destruction for wind turbines, even with setbacks stipulated in the ordinance. Community involvement in viewscape, landscape, and dust control issues is a must.

Dust Control: Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM₁₀ and PM_{2.5} levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to *additional* particulates that have caused unsafe driving conditions, dust bowl conditions, and health effects to those residents in the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health from dust, and especially Valley Fever.

Valley Fever: Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties. Observation of dust events emanating from SCE's TRTP transmission access roads proves this point.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: "There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities." This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from *Coccidioidomycosis*."

Avian Protection: Impose a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect. Wind turbines are known killers of birds and bats, and while there are setbacks stipulated in the ordinance, they still pose a danger to avifauna. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

MCUP: Minor Conditional Use Permits (MCUPs), as written in the Draft Renewable Energy Ordinance, limit the public's right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently

unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

Any utility-scale energy production sent "offsite" in any zone, and those projects requiring a MCUP are relieved of the public signage process detailed in Los Angeles County Planning and Zoning Ordinance Section 22.60.175. The REO further exempts MCUPs from the noticing requirements to adjacent landowners and the public in 22.56.030 as seen stricken from the revised April 7th Draft REO on pages 74 and 75. The current County Ordinance requires notification, signage, and opportunity for adjacent land owners and interested parties the opportunity to request a public hearing. This leads to the question of whether the Minor Conditional Use Permit process is being revised through this ordinance, or if exemption of noticing applies only to this REO. If it is being revised through this ordinance, the public should be informed specifically that this is the case. Members of the public should be able to receive appropriate noticing by mail, by signage, request a hearing, and have the right to appeal to their elected officials any project that requires a MCUP or a CUP.

Acreage limits for ground mounted residential use solar:

On-site ground mounted solar should be limited to one quarter acre of coverage; this is enough to power 8 homes. This would qualify as "primarily off-site" use and would then be "utility-scale" according to Regional Planning's determination of 50% on-site use for small scale, a "by right" permitting process with no MCUP or CUP. There is no justification for the proposal to allow up to 2.5 acres of ground mounted solar for residential use in all zones. Allowance of 2.5 acres open the door to installations that masquerade as on-site use but are really intended to generate income through off-site energy sales. (Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique rural community atmosphere, and health, happiness and welfare of residents.

Noise: The human environment contains a variety of noise sources that can affect the way people live and work and, generally, negatively impact quality of life. Excessive levels may result in physiological effects such as hearing loss, speech interference, and sleep interference, as well as behavioral responses, such as increased neighborhood annoyance and dissatisfaction. Excessive noise can also negatively impact wildlife. Studies have shown that disruption caused by noise can be injurious to an animal's energy budget, reproductive success, and long-term survival.

Title 12 (12.08.390) of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to “maintain quiet in those areas which exhibit low noise levels.” The Ordinance divides receptor properties into the categories, but does not include a very quiet rural noise zone. The Proposed maximum noise level of 60 decibels in the Renewable Energy Ordinance is inappropriate for rural areas. As the chart from the Los Angeles County Noise Ordinance indicates, the 60dB single event noise limit for the operation of solar and wind facilities matches that of commercial and industrial noise levels (55dB, 60dB, and 70dB). The ambient noise level in quiet rural areas is 10dB to 24dB, and up to 50dB in more developed *urban* residential areas. There is no reason to subject adjoining properties to any additional noise levels beyond measured ambient noise levels. The Renewable Energy Ordinance should require private property, noise sensitive lands and land uses, wildlife /habitats, and public lands be shielded from excessive noise; and require renewable energy development projects to demonstrate that no adverse noise effects on adjacent uses will occur from the project; that provisions for preservation of quiet ambient noise levels be required by all renewable energy projects.

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Yours truly,

Dawn North

Jay Lee

From: Cassidy Skelton [cassidy.skelton@yahoo.com]
Sent: Monday, July 13, 2015 10:00 PM
To: Vizcarra, Edel; PublicHearing; Hickling, Norm
Subject: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind

Date: July 13, 2015

From:

Cassidy Skelton

To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe

RE: Proposed Los Angeles County Renewable Energy Ordinance

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Yours truly,

Cassidy Skelton
47078 Kings Canyon Road
Lancaster, CA 93536

Jay Lee

From: Rosalyn Skelton [princessrosalyn@gmail.com]
Sent: Monday, July 13, 2015 9:43 PM
To: Vizcarra, Edel; PublicHearing; Hickling, Norm
Subject: Proposed Los Angeles County Renewable Energy Ordinance Industrial Wind

Date: July 13, 2015

From:

Rosalyn Skelton

To: Mayor Antonovich, and Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe

RE: Proposed Los Angeles County Renewable Energy Ordinance

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areas, all considered “Extremely High Fire Hazard Areas.” Research confirms a serious level of threat by wind turbines (detailed in an article found at www.fireengineering.com.) Several important points to consider in allowing utility-scale wind projects: Wind turbines are industrial facilities subject to a full range of emergencies such as fire, entrapments, electrical accidents, falls, and even hazmat; turbines are full of various fuels like electrical cables, plastics, combustible metals, and petroleum based fluids and lubricants; lightening strikes to turbines can ignite fires; mechanical friction in moving parts and electrical short circuits can cause fire; fire can spread to surrounding areas readily from burning fuels, metals, and plastics; responding fire departments may normally be several miles away and have to travel over roads that quite often require all-wheel-drive vehicles; primary limiting factors to fire department intervention are the height of the fire and the extremely limited vertical access.

Furthermore, aerial firefighting would be hindered in a field of wind turbines, and would exclude the use of multiple high-capacity loads of retardant from large air tankers. Air tankers typically make retardant drops from a height of 150 to 200 feet above vegetation and terrain, at air speeds from 125 to 150 knots (American Helicopter Services and Aerial Firefighting Association at AHSFA.org). Without high-capacity loads of retardant from large air tankers, uncontrolled wildfire would devastate our rural communities.

Inadequate Landscaping/ Viewshed: There should be a moratorium on new industrial solar installations in the Antelope Valley until adequate native drought tolerant landscaping is demonstrated at an existing solar installation, is shown to protect against wind-driven dust events, and actually buffers the viewshed from the degrading industrial qualities of ground-mounted large-scale renewable energy projects. Thus far, landscaping plans have not delivered adequate results. The Renewable Energy Ordinance only requires “conceptual landscape plans” using native and non-native drought tolerant plants, and offers nothing new. It has proven difficult to disguise the visual effects of large-scale solar projects, and there is no way to adequately landscape or mitigate viewshed destruction for wind turbines, even with setbacks stipulated in the ordinance. Community involvement in viewscape, landscape, and dust control issues is a must.

Dust Control: Up until now, no dust control plan has proven adequate in controlling wind-driven dust events. Extensive research indicates that exposure to outdoor PM₁₀ and PM_{2.5} levels exceeding current air quality standards is associated with increased risk of hospitalization for lung and heart-related respiratory illness, including emergency room visits for asthma. Airborne Particulate Matter (PM) exposure is also associated with increased risk of premature deaths, especially in the elderly and people with pre-existing cardiopulmonary disease. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Besides reducing visibility, the acidic

portion of PM (nitrates, sulfates) can harm crops, forests, aquatic and other ecosystems.

While all the wind-driven dust events cannot be blamed solely on permitted utility-scale solar projects, they have substantially contributed to *additional* particulates that have caused unsafe driving conditions, dust bowl conditions, and health effects to those residents in the Antelope Valley. With cyclic droughts and more solar projects instead of agricultural production (which prevents erosion while under planting conditions), rural residents will be subjected to continued and increasing threat to their health from dust, and especially Valley Fever.

Valley Fever: Valley Fever has increased five hundred and forty-five percent in the last decade in the Antelope Valley. Continued soil disturbance from construction of solar projects will drive this percentage higher. While projects are not permitted to remove existing vegetation, they are allowed to grade roads and set-up areas and must maintain a fire safe area around buildings and transmission/gen-ties. Observation of dust events emanating from SCE's TRTP transmission access roads proves this point.

The Renewable Energy Ordinance does not require soil testing for Valley Fever spores on prospective small or large-scale solar and wind energy project sites. Los Angeles County Department of Public Health Epidemiologist, Dr. Ramon Guevara, has stated in his response letter to Renewable Energy Ordinance Draft 2: "There are no standards of criteria here for what is acceptable in terms of amount and duration of resultant dust, measurements of dusts, and rules for feasibility and appropriateness of vegetation preservation, planting, and maintenance. These should be put forth with processes to involve the surrounding communities." This has not appeared in the REO.

Residents of the Antelope Valley deserve concrete, detailed dust monitoring and control plans in place (with reports available to the public) and these should include air quality monitoring stations in the vicinity of projects required in the permitting process that will determine the levels of particulate matter in the air, reflecting the success or failure of vegetation-based dust control techniques and soil binding products, to protect the population from *Coccidioidomycosis*."

Avian Protection: Impose a moratorium on new industrial solar installations in the Antelope Valley until adequate on-site studies of existing solar installations are conducted by qualified, independent biologists to quantify avian death due to lake effect. Wind turbines are known killers of birds and bats, and while there are setbacks stipulated in the ordinance, they still pose a danger to avifauna. The Antelope Valley is home to an Audubon designated Globally Important Bird Area, the Pacific Flyway, protected migratory and locally indigenous birds, including Bald and Golden Eagles, and California Condors protected by state and federal law.

MCUP: Minor Conditional Use Permits (MCUPs), as written in the Draft Renewable Energy Ordinance, limit the public's right to be informed and make comments, and should not be permissible for any utility-scale, or energy produced from wind or solar development. The MCUP allows accessory uses of a substantial nature currently unchanged in this Draft REO--such as so-called small scale solar energy system covering 2.5 acres of a 5 acre parcel, Modification of Significant Ridgeline protections, structure mounted utility-scale wind energy facilities, and temporary met towers.

Any utility-scale energy production sent "offsite" in any zone, and those projects requiring a MCUP are relieved of the public signage process detailed in Los Angeles County Planning and Zoning Ordinance Section 22.60.175. The REO further exempts MCUPs from the noticing requirements to adjacent landowners and the public in 22.56.030 as seen stricken from the revised April 7th Draft REO on pages 74 and 75. The current County Ordinance requires notification, signage, and opportunity for adjacent land owners and interested parties the opportunity to request a public hearing. This leads to the question of whether the Minor Conditional Use Permit process is being revised through this ordinance, or if exemption of noticing applies only to this REO. If it is being revised through this ordinance, the public should be informed specifically that this is the case. Members of the public should be able to receive appropriate noticing by mail, by signage, request a hearing, and have the right to appeal to their elected officials any project that requires a MCUP or a CUP.

Acreage limits for ground mounted residential use solar:

On-site ground mounted solar should be limited to one quarter acre of coverage; this is enough to power 8 homes. This would qualify as "primarily off-site" use and would then be "utility-scale" according to Regional Planning's determination of 50% on-site use for small scale, a "by right" permitting process with no MCUP or CUP. There is no justification for the proposal to allow up to 2.5 acres of ground mounted solar for residential use in all zones. Allowance of 2.5 acres open the door to installations that masquerade as on-site use but are really intended to generate income through off-site energy sales. (Visit <http://pristinesun.com/utility.html> for information regarding small landowner and business related solar equipment leasing and arrangement of Power Purchase Agreements). This could be a loophole that allows utility-scale RE in rural communities with only a building permit and no public review. The REO should further refine use by zone, and average usage of a Single Family Residence. We are not opposed to commercial, manufacturing, or industrial areas using their properties and rooftops for utility-scale renewable energy generation, but wish to protect what is left of our rural lifestyle, unique rural community atmosphere, and health, happiness and welfare of residents.

Noise: The human environment contains a variety of noise sources that can affect the way people live and work and, generally, negatively impact quality of life. Excessive levels may result in physiological effects such as hearing loss, speech interference, and sleep interference, as well as behavioral responses, such as increased neighborhood annoyance and dissatisfaction. Excessive noise can also negatively

impact wildlife. Studies have shown that disruption caused by noise can be injurious to an animal's energy budget, reproductive success, and long-term survival.

Title 12 (12.08.390) of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to "maintain quiet in those areas which exhibit low noise levels." The Ordinance divides receptor properties into the categories, but does not include a very quiet rural noise zone. The Proposed maximum noise level of 60 decibels in the Renewable Energy Ordinance is inappropriate for rural areas. As the chart from the Los Angeles County Noise Ordinance indicates, the 60dB single event noise limit for the operation of solar and wind facilities matches that of commercial and industrial noise levels (55dB, 60dB, and 70dB). The ambient noise level in quiet rural areas is 10dB to 24dB, and up to 50dB in more developed *urban* residential areas. There is no reason to subject adjoining properties to any additional noise levels beyond measured ambient noise levels. The Renewable Energy Ordinance should require private property, noise sensitive lands and land uses, wildlife /habitats, and public lands be shielded from excessive noise; and require renewable energy development projects to demonstrate that no adverse noise effects on adjacent uses will occur from the project; that provisions for preservation of quiet ambient noise levels be required by all renewable energy projects.

Social/Environmental Justice: Rural residents of coastal Los Angeles County and the Santa Monica Mountains, have "rural villages", and recreational viewshed areas extensively protected by the county's Santa Monica Mountains Local Coastal Program's Land Use Plan. Its stringent provisions will undoubtedly eliminate threats from industrial wind or solar in these areas. However, no similar protection exists for rural residents and valued viewsheds of the canyons and northern slopes of the San Gabriel Mountains or adjoining Mojave Desert portion of Los Angeles County. This perpetuates social injustice of the existing conditions where less affluent residents and those without resources to oppose large renewable energy projects are being subjected to the majority of impacts and damage to quality of life—including threat of ill health, and loss of property values created by industrial wind and solar installations. This is socially and economically indefensible. Rural communities of the Antelope Valley deserve the same protections from intrusive renewable energy projects.

Yours truly,

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