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November 25, 2013

Ms. Thuy Hua
Los Angeles County Department of Regional Planning
320 W Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Comments on the County of Los Angeles Draft Renewable Energy Ordinance

Dear Ms. Hua:

Thank you for the opportunity to comment on the draft Renewable Energy Ordinance. Staff has reviewed the materials and has identified several issues, each of which is addressed below.

1. The City supports the requirements of Section 22.52.1620 that any project requiring a Conditional Use Permit or Minor Conditional Use Permit shall be reviewed by both United States Air Force Plant 42 and Edwards Air Force Base. On Page 8 of the proposed Ordinance, United State Air Force Plant 42 is only identified as "Air Force Plant".

2. Section 22.52.1650 Standards for Small-Scale Wind Energy Systems, subsection E, requires the top of any small-scale wind energy system to be located at least 50 vertical feet and 50 horizontal feet from a significant ridgeline identified in the General Plan. A similar requirement is not identified within Section 22.52.1660 Standards for Ground-Mounted Utility-Scale Renewable Energy Facilities. As ground-mounted utility-scale renewable energy facilities, such as wind turbines, can be up to 500 feet in height, this creates potentially significant impacts to significant ridgelines and appears to be inconsistent with the draft Town and County Plan Policy COS 5.6: Restrict development on buttes, and designated significant ridgelines by requiring appropriate buffer zones. Aesthetic impacts from such uses on significant ridgelines

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should be more carefully considered prior to adoption of the proposed ordinance.

3. The ridgelines of the Sierra Pelona, Ritter and Portal Ridge form the City of Palmdale's skyline views and are all considered a scenic backdrop within the Environmental Resources element of the City's General Plan. As the Antelope Valley Area Plan - Town and Country has not yet been adopted by Los Angeles County, staff cannot verify whether the ridgelines identified by City staff are consistent with those identified by Los Angeles County as being significant.

Should you require any additional information, please feel free to contact me at (661) 267-5200.

Sincerely,

Susan Koleda

Susan Koleda, AICP
Senior Planner