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**RE: Los Angeles County Renewable Energy Ordinance**

Ms. Hua,

On behalf of the RCD of the Santa Monica Mountains, we thank you for the opportunity to comment on the Draft Renewable Energy Ordinance for Los Angeles County.

We have reviewed the ordinance and are concerned that it does not provide adequate guidance on natural resource protection measures to project proponents when siting and developing renewable energy projects. In particular we are concerned with impacts that include: direct loss of wildlife species and their habitat, increase in exotic plant species associated with the clearing of large areas or for a new network of roads, large areas of soil disturbance and vegetation clearing, creation of large impervious surfaces and associated runoff.

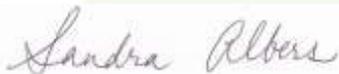
While we support the ordinance requirement to follow the “*California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development*”, we recommend that it also require all proposed projects to do the following in order to more adequately address the impacts previously stated:

1. Follow the best management practices found in Chapter 3 of *U.S. Fish and Wildlife Service Wind Turbine Guidelines Advisory Committee Recommended Guidelines (2010)* titled “Site Construction: Site Development and Construction Best Management Practices” and “Retrofitting, Repowering, and Decommissioning Best Management Practices”. This guidance document is a collaboration among various federal, state, tribal, wind industry and conservation groups. It includes recommended voluntary guidelines to be used by all prospective developers of land based wind energy projects.

2. Follow the guidelines in Section 23 of *Best Management Practices for siting, developing, operating, and monitoring renewable energy in the Intermountain West: A Conservationist's Guide (2012)* titled "Best Management Practices for Wildlife and Habitat for Solar and Wind Development on Western Lands." These include BMPs for all birds, bats, general wildlife and site hydrology. This document is useful for wisely choosing sites for utility scale wind and energy projects proposed in areas outside of the built environment, as well as the permitting, construction and operation of these facilities in the West.

While the documents do not provide detailed mitigation strategies for habitat loss or fragmentation, they do provide useful and up to date guidelines for consideration of our natural resources when siting and developing new projects. We recognize the need for renewable energy development in the County, but wish for them to be done according to the highest standards for resource protection with regard to wildlife species, native habitats and soils, water quality and conservation.

Sincerely,



Sandra Albers  
Conservation Biologist