November 12, 2013

Mr. Richard J. Bruckner
Director of Planning
Department of Regional Planning
320 West Temple Street, Room 1390
Los Angeles, California 90012

Attention: Mr. Thuy Hua, Regional Planner

Dear Mr. Bruckner:

REVIEW COMMENTS
DRAFT RENEWABLE ENERGY ORDINANCE
(LOS ANGELES COUNTY CODE, TITLE 22)

The Los Angeles County Sheriff’s Department (Department) submits the following review comments on the Draft Renewable Energy Ordinance (Ordinance), dated October 2013, and proposed amendments to Title 22 of the Los Angeles County Code (Title 22). The proposed Ordinance and revised Title 22 will guide the development of renewable energy projects in unincorporated County territory by providing 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. Neither the proposed Ordinance nor any proposed amendment to Title 22 includes provisions for any site-specific development project.

The proposed Ordinance and proposed amendments to Title 22 were reviewed by the Department’s Aero Bureau for potential impacts to flight operations. Aero Bureau’s review comments are attached hereto (see correspondence from Captain Andres Ramirez, dated October 9, 2013) and summarized below:

Aero Bureau recommends the inclusion of heliports, particularly those used and/or operated by law and fire protection agencies, among aircraft facilities to be protected by Title 22. As site-specific development projects are proposed in the future, the project proponent should identify and consult with affected law and fire protection agencies to ensure that the integrity of established approach and departure airspace used by those agencies are maintained. With advanced notice, Aero Bureau personnel can be available for consultation regarding the Department’s heliport interests.

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Furthermore, Title 22 should identify solar panel-produced glare as a potential hazard to flight operations, and require mitigation measures (non-glare producing materials, orientation of panel array, etc.) to address such potential impacts.

Thank you for including the Department in the review process for the proposed Ordinance and proposed amendments to Title 22. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. E13-068. You may also contact Mr. Miyoshi, via e-mail, at lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

[Signature]

Gary T.K. Tse, Director
Facilities Planning Bureau
COUNTY OF LOS ANGELES
SHERIFF’S DEPARTMENT
A Tradition of Service Since 1850

DATE: October 9, 2013

OFFICE CORRESPONDENCE

FILE NO.

FROM: ANDRES RAMIREZ, CAPTAIN
AERO BUREAU

TO: GARY TSE, DIRECTOR
FACILITIES PLANNING BUREAU

SUBJECT: DRAFT RENEWABLE ENERGY ORDINANCE

The purpose of this office correspondence is to address the request made by the Los Angeles County Department of Regional Planning (DRP) to review the Draft Renewable Energy Ordinance and provide comments. Below you will find review comments provided by Flight Safety Sergeant Jonathan Brick from my staff.

On page 15, B. Aviation Safety, they mention protecting airspace around airport runways, however, there is nothing specific to protecting the approach and departure airspace for the heliports owned and operated by the Sheriff and County Fire. They do mention protecting navigable airspace in the next paragraph as defined in part 77 of the FAR’s, however, part 77 specifically excludes heliports so that won’t help us. My suggestion is to include a statement that nothing will be built that will penetrate the established approach and departure airspace of any Sheriff or Fire heliport. The dimensions of that airspace shall be provided by the agency operating the heliport in question.

Should you have any further questions, you may contact Sergeant Brick at (562) 421-2701.

AR:JEB:jb