



Antelope Valley Air Quality Management District  
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**Eldon Heaston, Executive Director**  
In reply, please refer to AV0614/056

June 2, 2014

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

**RE: RENEWABLE ENERGY ORDINANCE – DRAFT APRIL 2014**

Ms. Hua:

The Antelope Valley Air Quality Management District (District) has reviewed the RENEWABLE ENERGY ORDINANCE – DRAFT APRIL 2014. The District has comment on (C)(1) and (C)(4) in Section 22.52.1660 Standards for Ground-Mounted Utility-Scale Renewable Energy Facilities.

**(C)(1) Non-opaque fences may be permitted.** The District recommends that wind fencing (opaque fencing) is required for project perimeters to reduce wind speed through the project site. Reduction in wind speeds will assist in limiting fugitive dust generation across the site.

**(C)(4) Existing drought-tolerant native or non-native vegetation approved by the staff biologist shall be retained, or new such vegetation shall be planted along fencing, unless determined infeasible or inappropriate by the Hearing Officer.** Using drought tolerant native and *drought tolerant* non-native vegetation as a requirement reduces the amount of irrigation to establish and maintain vegetation. Project sites without irrigation systems would be required to haul greater amounts of water for non-drought tolerant vegetation causing an increase in associated vehicular emissions throughout the duration of the project.

Thank you for the opportunity to provide comment on this planning document. If you have any questions regarding our comments, please contact Vickie Rausch at (661) 723-8070 x 4 or [vrausch@avaqmd.ca.gov](mailto:vrausch@avaqmd.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Bret Banks", written over a white background.

Bret Banks  
Operations Manager