

From: [KIERNAN, SCOTT E NH-03 USAF AFMC 412 TW/XPO](#)
To: [Thuy Hua](#)
Cc: [Hulse, David S CIV NAVFAC SW](#); [PERRY, MICHELLE R NH-03 USAF AFMC 412 CE/CENPL](#); [Peacher, Kimberly N CIV NAVFAC SW, ESWD](#); [NEITZEL, KENNETH C GS-13 USAF AFMC AFLCMC/OL-AE Plant 42/AM](#); [HUGHES, TIMOTHY W GS-14 USAF AFMC AFLCMC/OL-AE Plant 42](#)
Subject: RE: AF Comments: Draft Renewable Energy Ordinance
Date: Wednesday, May 28, 2014 3:07:06 PM

Thuy,
I am providing some additional comments that relate to development around a military airfield. Please give consideration to amending the terminology to include military requirements into the scoping process and ultimately into the ordinance.

As stated in the draft document:
A utility-scale renewable energy facility shall not be located within the Runway Protection Zone of any airport, as depicted in the county's airport land use plans. 2. A utility-scale renewable energy facility shall not penetrate the imaginary surfaces (primary, approach, transitional, horizontal, and conical surfaces) defined by the FAA Federal Aviation Regulations Part 77 to protect the use of navigable airspace."

It is important to note that military aircraft fly with a different purpose when compared to civil aviation. To ensure safety of flight, the DoD operates an enhanced safety area as published in DoD regulations.

To ensure the additional protection is preserved it would be relevant to state the military requirements, in addition to the FAR part 77 requirements, relating to imaginary surfaces (primary, approach, transitional, horizontal, and conical surfaces) and Accident Potential Zones (APZ) for land use near military airfields with a reference to an Air Installation Compatible Use Zone (AICUZ) study. The purpose of an AICUZ is to protect the public's health, safety, and welfare while preventing incompatible development from degrading the operational capability of military air installations in meeting national security. An AICUZ will define Clear Zones and APZs, and may include noise contours based on the aircraft that operate at the particular installation.

Example: An Air Force class "B" runway would have the following requirements; a Clear Zone of 3000', APZ-1 of 5000' and APZ II of 7000' for a total protection area that spans 15,000 feet in length from the end of each runway. This is approximately twice the length of a typical FAA designated runway safety area.

Open to any questions from your end..

VR,
Scott

Scott Kiernan
Sustainability Officer/
Encroachment Prevention Mgmt
412 TW/XPO, Edwards AFB
O: (661) 277-3792
C: (661) 810-6662

-----Original Message-----

From: Thuy Hua [<mailto:thua@planning.lacounty.gov>]
Sent: Wednesday, May 21, 2014 11:31 AM
To: 'Peacher, Kimberly N CIV NAVFAC SW, ESWD'
Cc: KIERNAN, SCOTT E NH-03 USAF AFMC 412 TW/XPO; Hulse, David S CIV NAVFAC SW
Subject: RE: AF Comments: Draft Renewable Energy Ordinance

Kimberly,

Thank you for your comments. They will be included as a part of the scoping comments.

Best,
Thuy

-----Original Message-----

From: Peacher, Kimberly N CIV NAVFAC SW, ESWD [<mailto:kimberly.peacher@navy.mil>]
Sent: Monday, May 05, 2014 12:13 PM
To: Thuy Hua
Cc: KIERNAN, SCOTT E NH-03 USAF AFMC 412 TW/XPO; Hulse, David S CIV NAVFAC SW
Subject: RE: AF Comments: Draft Renewable Energy Ordinance

Hello Thuy,

As previously mentioned we had only a few comments below from our last review of the draft ordinance back in November 2013. Recently I saw that the DEIR preparation notice came out. To the extent required please include a discussion in the DEIR of our military operations and the need for coordinated review of all projects in and around military operating areas.

Please let me know if you have any questions. Thank you.

V/R,
Kimberly N. Peacher
Intergovernmental Planner
NAVFACSW Intergovernmental Branch AM-3
1220 Pacific Hwy, San Diego, CA 92132
DSN 522-1187 COM 619-532-1187
kimberly.peacher@navy.mil

-----Original Message-----

From: KIERNAN, SCOTT E NH-03 USAF AFMC 412 TW/XPO [<mailto:scott.kiernan@us.af.mil>]
Sent: Tuesday, November 26, 2013 10:44 AM
To: Hua, Thuy
Cc: HUGHES, TIMOTHY W GS-14 USAF AFMC AFLCMC/OL-AE Plant 42; PERRY, MICHELLE R NH-03 USAF AFMC 412 CE/CENPL; HASELTINE, SUSAN B NH-03 USAF AFMC 412 CE/CEVA; ARENSEN, STEVEN L GS-14 USAF HAF AFCEC/SAF/IEE REO SF; PADO, JOSEPH E GS-13 USAF AFMC HQ AFMC/A7NX
Subject: AF Comments: Draft Renewable Energy Ordinance

Hi Thuy,

I am providing a submission of recommendations from the Air Force on the Los Angeles County Draft Renewable Energy Ordinance. As always, thanks for allowing us to be part of the process.

If you have questions or comments, please contact me.

VR,

Scott-----

Scott Kiernan
Sustainability Officer/
Encroachment Prevention Mgmt
412 TW/XPO, Edwards AFB
O: (661) 277-3792
C: (661) 810-6662

Section 3 (Page 3 of 21) - Recommend an adjustment to refer to the energy use by the principle use on the subject or adjoining parcel.

Section 22.52.1610 (B) (Page 6 of 21) - Recommend addressing applicability of standards to applications filed prior to ordinance enactment, but not yet approved.

Section 22.52.1620(A) (Page 7 of 21) - Recommend integration of subject subsection with 22.52.1660(B) to improve and expansion of applicability of civilian aviation reviews in 1660(B) to both small scale wind energy systems and utility scale renewable energy facilities, ground mounted. Request location map required under 22.52.1620(A)(1) identify GPS coordinates (and/or latitude/longitude) and elevation for each wind tower with blade extension.

Section 22.52.1620(A)(1) (Page 8 of 21) - Section 22.52.1620(A)(1) paragraph line 5 on pg. 8: change Air Force Plant to read Air Force Plant 42.

Section 22.52.1620(A)(2) (Page 8 of 21) - Section 22.52.1620(A)(1) requires the Department of Regional Planning provide notice to aviation related agencies 60 days in advance of the scheduled decision by the Reviewing Authority. This section however requires that a response be provided 30 days following the distribution of notice for it to be considered by the Reviewing Authority. Since most conditional use permits are statutorily required to be subject to public hearing, any written testimony should be of-record and subject to consideration by the Reviewing Authority. We recognize that earlier submittal of response will permit proper consideration of any objection within a staff report; however consideration by the Reviewing Authority should be afforded for any comments submitted prior to a decision.

Section 22.52.1460 (A) and (C) (Pages 9 and 10 of 21) - Department of Air Force recommends the adoption and application of standards adopted by the Federal Aviation Administration on 20 June 2011 (<http://www.faa.gov/dsp/FAA/2011-06-24/html/2011-15746.htm>) for future publication in Advisory Circular No. 70/7460-1 recommending that meteorological towers less than 200 Feet AGL be marked with alternating bands of aviation orange and white paint and that high visibility sleeves be installed on the outer guys with high spherical marker balls of aviation orange color. Towers greater than 200 feet AGL remain subject to FAA review jurisdiction.

Section 22.52.1460(F)(Page 11 of 21) - Recommend consideration of new micro turbine technology which provides for attachment and integration of wind energy technology onto habitable structures. The current definition of wind tower does not appear to have a sufficient distinction which would permit multiple uses of this technology.

General comment: Section 22.52.1650(C)(2)(Page 13 of 21) - the requirement for a fenced enclosure of guy wire anchors appears unnecessary. Similar requirements are not imposed on power pole guys anchors.

General comment: Section 22.52.1660(G)(Page 16 of 21) - Minimizing the removal of vegetation for ground mounted utility scale solar electrical generating facilities is not consistent with industry best practices. Vegetation within a solar array can represent a wildfire safety risk and hazard to fire suppression efforts. Recommend mandatory use of dust suppressants and soil stabilizers as provided for under this subsection 4 during construction and operation, including periodic renewal of application as may be required to control fugitive dust emissions as a conditional use requirement.

From: Los Angeles County Department of Regional Planning [<mailto:thua@planning.lacounty.gov>]
Sent: Wednesday, October 16, 2013 2:40 PM
To: KIERNAN, SCOTT E.NH-03 USAF AFMC 412 TW/XPO
Subject: Community Meeting - Draft Renewable Energy Ordinance

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October 16, 2013

Good afternoon,

Community Meeting

A community meeting has been scheduled to discuss the Draft Renewable Energy Ordinance. We will be providing an overview of the ordinance contents, project status, and answer questions specific to the proposed regulations. We encourage you to review the draft and invite you to attend the community meeting scheduled as follows:

Saturday - October 26, 2013

9:00am

Antelope Valley College - Performing Arts Theater

3041 W Avenue K

Lancaster, CA 93536

The closest parking lots on campus to the Performing Arts Theater are Lots 3 and 5. Daily parking permits cost \$0.50 and are available at vending machines found in each lot. Parking without a permit may result in a \$33 parking citation. A map to the meeting location is provided here <http://r20.rs6.net/oa.jsp?e=001QvHFJwuea-bKQ9B0gn4D-brWa7MkwvBTPSghXN-SAfjucMkg8-17mmwt33U1PKsUnjMCXsRn9wL_r1oC8h-wYaf_nBUFPBBL68hPwiWxOj15uTmYDqMoEquU5KND_fscYho3Nk_Qe5tzfwXTL1EPg6RQzGuAix7zV9k3NOqKufu0usoi3HhNASzUrxpMFDyYiDQYpIkUjzY38PULDBLEe5MemsfxStHrVOXWoyDaxZUVDiWc-bgN2vXd4Q5jMjzPn9mKb2vuGkxVl_IVG4BRDleBrSE85m27MIBS8DZVDppA9hFiSEo_ZDrUhr-XtqQBCBrpMsOF15yZR8kjh> .

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Ordinance*

The Los Angeles County Department of Regional Planning is currently drafting regulations to guide the development of renewable 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. The Draft Renewable Energy Ordinance is now available for public review and comment. It is available for download at <http://planning.lacounty.gov/energy> <http://r20.rs6.net/oa.jsp?e=001QvHFJwuea-aEyELGH2JgaZS9TPj-AWld-ZvqNLuJ6fj72FCEB16fjBTN-tole_uGWzNg-IP_Q89m_qLUFc4SjSGCWD47vOoFJB4PZ_5HAHYnVGxoAj3_A0Elws7oY7L_ZjyUL0ZZwdCKCzeTwNq96MHhbW-OAKYxnrjApmQ0jxMNIa9YUuL_8pJenWDPf0FaVIUOT9f1Mh57PVDZUniqFurPzkdM4asUkc7U5Kvnhv66Uj53jCfcETcSwlNbnQXjgE9GsWQGRKeyUwXtnnCZOj_D6EEn-xxFSQDQu4=>>, with a direct link provided here <http://r20.rs6.net/oa.jsp?e=001QvHFJwuea-Zmh-PwXZGu3CRa6itRa2gtGA2Ae_YT1vcaUo08B3fauXztDhWvc4k5C3Ghin8DIQwJ9svkDENVV2JwMsf_DpRCWE2wJaCOB-zlRFM7SPRxxW-dF8uMGA60ilwv4kPFDXyYhCZJbh0dq2NcLNntUm_NRWcRT6ui9N2lylJv8bN7xLtrgrHxMO0HK0aIS2TBE44fa1ebQ564flM_bhbSepJvXbdVQ9cTHM7pnyc5OQxGZy7oZskABHjhjchwTlyAMw800Y80aSkOCGOMY2-Qdzd6_wJn53GACcyN9fnMZEj1Em_yisTzkZrdSwT5jz5AerccnRnzqjvQ9NUeJIED6FwL48=>> .

*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 using renewable resources such as solar and wind.

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Contact

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

Contact: Thuy Hua
Email: thua@planning.lacounty.gov
Postal Mail: LA County Department of Regional Planning
320 W Temple St 13th Flr
Los Angeles, CA 90012

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