Los Angeles
World Airports

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June 4, 2014

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Dr. Cynthia A. Telles
Gina Marie Lindsey
Executive Director

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

Dear Ms. Hua,

Los Angeles World Airports (LAWA) has great appreciation for the various meetings and the mutual cooperation we have had with Department of Regional Planning staff over the past several of years. We are writing this letter to reaffirm our comments and positions in regards to the County of Los Angeles proposed Renewable Energy Ordinance. These commentaries reiterate those made to staff and we remain confident that we can collectively find solutions that address all our concerns. As a proprietary department (LAWA), of the City of Los Angeles that owns and operates Los Angeles International Airport, LA/Ontario International Airport, Van Nuys Airport, and has future plans to develop Palmdale Regional Airport (PMD). LAWA acknowledges and supports the County's goal to bring consistency and predictability to the development of renewable energy facilities.

LAWA's main concern with the draft Renewable Energy Ordinance in its current form (i.e., second draft of proposed ordinance) is that, according to Table 22.52.1620-A, Utility-Scale Ground-Mounted Renewable Energy facilities would be prohibited in areas zoned A-1 Light Agriculture. LAWA feels strongly that renewable energy development is a very worthy and compatible use within such agricultural areas, and the draft ordinance offers no basis for why it should be prohibited. Should the County have concerns about potential land and development compatibility issues associated with such renewable energy development in areas zoned A-1, such issues, if any, could be better evaluated, addressed, and likely resolved if subject to a Conditional Use Permit (CUP) requirement. An outright prohibition of this type of renewable energy facility in A-1 areas does not serve the County or the environment, especially in a day an age when a true need for access to clean alternative/renewable energy exists.

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Additionally, the final ordinance should consider M-2.5 zones for ministerial review or site plan review for renewable Utility-Scale Ground-Mounted Renewable Energy projects. The M-2.5 zone is a heavy-industrial (airport) use zone that occurs only surrounding airports and does not appear to pose the residential-adjacency issues found in low-intensity industrial and agricultural zones. If the goal of the ordinance is to promote renewable energy operations while protecting residential uses from adjacency impacts, encouraging such uses where the impacts do not occur is a logical policy tool. For long range plans PMD could serve as a future regional airport; however, for the short term, LAWA is evaluating for renewable energy use, in the interim, and other economically productive limited-time uses on the property. This zone – M-2.5 - creates a synergetic land use for the property, its intended function, and the ability to use it for clean, renewable energy.

It has always been LAWA's sincere pleasure to work the County DRP team on important planning initiatives impacting the Antelope Valley such as the Renewable Energy Ordinance. If you have any questions or comments regarding these declarations or if LAWA can provide any information that will be beneficial to your planning efforts, please do not hesitate to contact us at (424) 646-5186.

Thank you,

Lisa Trifiletti
Director of Environmental & Land Use Planning
Regional Planning & Environmental Assessment

cc: Christopher Koontz
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