

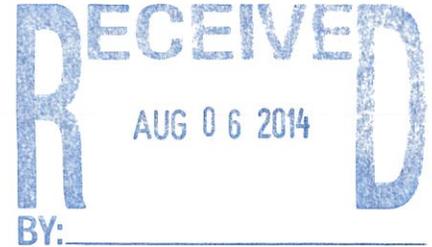


John E. Scott, Sheriff

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



July 17, 2014



Mr. Richard J. Bruckner, Director of Planning
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Attention: Thuy Ha

Dear Mr. Bruckner:

REVIEW COMMENTS
INITIAL STUDY AND NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
RENEWABLE ENERGY ORDINANCE
PROJECT NO. R2014-01160 (1-5)

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the Initial Study (IS) and Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), dated April 30, 2014, for the Renewable Energy Ordinance (Project). The proposed Project will amend Title 22 of the Los Angeles County Code (Title 22) to establish regulations, definitions, and development standards for renewable energy systems and facilities in unincorporated areas within Los Angeles County.

According to Section 15 of the IS/NOP, the proposed Project is expected to have a less than significant impact on the Department (see Page 45/52). Although the proposed Project excludes site specific development and will not result in a substantial increase in the Department's service population, the Department respectfully disagrees with the IS/NOP's assessment. For the reasons stated below, the Department expects the proposed Project to have a potentially significant impact unless certain mitigation measures are implemented.

In November 2013, the Department reviewed the Draft Renewable Energy Ordinance and expressed concern that heliports are not among aircraft facilities protected by Title 22. Accordingly, the Department recommended the inclusion of heliports, particularly those used and/or operated by law enforcement and fire protection agencies, to the list of aircraft facilities protected by Title 22 (see attached correspondence dated

November 12, 2013). Also, as site-specific development projects that include meteorological towers are proposed, the project proponent should identify and consult with affected law enforcement and fire protection agencies to ensure such towers pose no threat to existing heliport approach and departure corridors. Lastly, the DEIR should identify solar panel-produced glare as a potential hazard to flight operations, and require mitigation measures (non-glare producing materials, orientation of panel arrays, etc.) to address such potential impacts.

The Department has no further comment at this time, but we reserve the right to submit additional comments when subsequent environmental documents for the proposed Project, including the DEIR, have been completed and circulated for public review.

Should you have any questions regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Project No. E14-029. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

JOHN L. SCOTT, SHERIFF

A handwritten signature in black ink, appearing to read "Gary T.K. Tse". The signature is written in a cursive, somewhat stylized font.

Gary T.K. Tse, Director
Facilities Planning Bureau

Mr. Bruckner

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July 17, 2014

GTKT:LM:lm/jh

Attachment

c: David Culver, Assistant Director, Facilities Planning Bureau (FPB)
Meghan Wang, Principal Facilities Project Manager, FPB
Lester Miyoshi, Departmental Facilities Planner, FPB
Chrono
(EIR- Renewable Energy Ordinance)