

*Los Angeles
World Airports*

July 11, 2014

Carl Nadela, AICP
Regional Planner
Los Angeles County
Department of Regional Planning
320 W Temple Street Room 1354
Los Angeles, CA 90012

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Executive Director

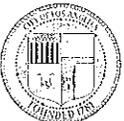
Dear Mr. Nadela,

Thank you for the opportunity to comment on the Los Angeles County Antelope Valley Areawide General Plan Update. The Los Angeles World Airports (LAWA) is a proprietary department of the City of Los Angeles that owns and operates the Los Angeles International Airport, LA/Ontario International Airport, Van Nuys Airport, and Palmdale Regional Airport (PMD). LAWA owns over 17,000 acres of land within the Antelope Valley Areawide General Plan and would to preserve the future possibility to develop a regional airport. As a major property owner LAWA has a keen interest in the outcome of the Plan Update.

We are writing this letter to submit comments about the future zoning so that we can help facilitate the interim use of the property, such as renewable energy use and the possibility of a future airport down the line. Specifically, we would like to recommend that the County create a more uniform zone for the LAWA owned Palmdale properties that would be consistent with the M-2.5 zone because it would allow for heavy-industrial (airport) uses that occur in nearby airports, and is appropriate to low-intensity industrial and agricultural zones found here.

Among other uses, LAWA maintains existing leases on the property for light industrial and for agricultural uses. LAWA also believes that there is an opportunity to pursue potential renewable energy uses as interim projects. The airport M-2.5 zone could also be appropriate for the lots across LAWA property so that it creates sufficient flexibility and the range of land uses continues to include heavy renewable energy interim uses, agriculture and future airport facilities. LAWA recognizes that area west of the Little Rock Wash may be constrained by biological and environmental constraints.

As indicated in our letter on June 2, 2014, LAWA acknowledges and supports the County DRP's goal to bring consistency and predictability to the



development of renewable energy facilities. Revisions of the draft ordinance should consider M-2.5 zones for ministerial review or site plan review for energy projects, consistent with the policy decision made for M-1.5 and M-2 zones. It is important to note 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.

Where special permits are required, applicants should be given the flexibility to apply for a Master Permit across large amounts of property with implementation on individual parcels over time. Water use should be analyzed in reference to existing and alternative uses. For example, water demand for a concentrated solar thermal plant may be substantial in some scenarios but is actually lower than existing alfalfa growing operations or like agricultural uses.

Finally, LAWA would like to work with County staff to understand how the Significant Environmental Area (SEA) Ordinance area can be crafted in a way that can accommodate roadway construction issues that may arise should there ever be the full build out of the airport.

Thank you for allowing us to comment on this environmental document. For your reference, we have attached our previous letters on these related subjects here for your reference (see attached).

It has always been LAWA's sincere pleasure to work the County DRP team on important planning initiatives impacting the Antelope Valley. If we can provide any further information or support, please do not hesitate to contact us at (424) 646-5186.

Sincerely,

Mariana Valdivia
FOR

Lisa Trifiletti
Director of Environmental & Land Use Planning
Los Angeles World Airports

Attachments:

Letter to Thuy Hua dated June 4, 2014

Letter to Chair Valadez dated February 26, 2014

Letter to Connie Chung, AICP dated October 4, 2014



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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.



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,

A handwritten signature in black ink, appearing to read "Lisa Trifiletti". The signature is fluid and cursive. Below the signature, the letters "MV" are written in a smaller, simpler font.

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



February 26, 2014

Esther Valadez, Chair
Regional Planning Commission
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

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Vice President

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Jackie Goldberg
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Matthew M. Johnson
Dr. Cynthia A. Telles

Gina Marie Lindsey
Executive Director

Dear Chair Valadez,

Los Angeles World Airports (LAWA) is thankful for the meetings and cooperative relationship we have had with Department of Regional Planning staff. We are glad to offer the following comments in regards to the County of Los Angeles proposed General Plan Update, the Antelope Valley Plan Area Update, the Renewable Energy Ordinance, and the Significant Environmental Area Ordinance (SEA). These comments reiterate those made to staff and we remain confident that we can collectively find solutions that address all our concerns. LAWA is a proprietary department 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).

General Plan Update

LAWA remains agnostic in terms of the changes proposed outside its properties. Consistent with regional planning documents and stakeholder consensus LAWA has consistently pursued the long-term development of PMD. LAWA will continue to pursue this vision but must caution that potential downzoning, enlargement of SEAs, and other land use restrictions presently contemplated by County DRP may have an indirect effect of reduction in demand for a future airport in the Antelope Valley.

Major infrastructure improvements to increase access to the Palmdale Airport, such as the Caltrans/Metro High Desert Corridor are also essential to airport development and should be reflected in the General Plan. It is important to state that the current jobs and population statistics do not justify profitable commercial air service and the fact that under any scenario LAWA will maintain a need for interim uses that will provide economic benefit from LAWA's Palmdale land holdings. LAWA believes the General Plan and Area plan can work together to facilitate both interim and long-term uses at PMD.

Antelope Valley Area Plan Update

The Antelope Valley Area Plan's current and proposed zoning is inconsistent across LAWA's Palmdale property. As you know, LAWA has long range plans to use the entire property for a future regional airport and short term interim plans for renewable energy use and other economically productive interim uses. LAWA also maintains existing leases on the



property for light industrial and agricultural uses. Inconsistent zoning may lead to frequent entitlement requests which are costly and time-consuming to process, both for County DRP and for LAWA. Specifically, Agricultural zoning on certain lots within the LAWA owned property is inconsistent with potential renewable energy interim uses and more importantly with future airport uses. The airport M-2.5 zone could potentially be an appropriate zone for all lots across the LAWA property if the range of land uses included heavy agriculture, light and heavy industrial, renewable energy and future airport facilities.

Renewable Energy Ordinance

LAWA acknowledges and supports the County's goal to bring consistency and predictability to the development of renewable energy facilities. Revisions of the draft ordinance should consider M-2.5 zones for ministerial review or site plan review for energy projects, consistent with the policy decision made for M-1.5 and M-2 zones.

It is important to note 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.

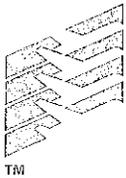
Where special permits are required, applicants should be given the flexibility to apply for a Master Permit across large amounts of property with implementation on individual parcels over time. Water use should be analyzed in reference to existing and alternative uses. For example, water demand for a concentrated solar thermal plant may be substantial in some scenarios but is actually lower than existing alfalfa growing operations or like agricultural uses.

Significant Environmental Area (SEA) Ordinance

LAWA acknowledges that resource management and habitat preservation is subject to a constantly evolving regulatory landscape. In addition to complying with the County's SEA Ordinance, potential development of PMD is subject to habitat regulations from the regional water quality control board, the State Department of Fish and Game, the United States Fish and Wildlife Service as well as multiple responsible and trustee agencies that all participate in the CEQA and NEPA process. LAWA's ability to develop PMD and create economic activity is dependent not only on the constraints of the SEA Ordinance but also the ability (or inability) of the SEA process to align with instructions and regulations from the resource agencies.

LAWA supports the defined timelines and responsibilities in the draft ordinance. Based upon our initial reading of the ordinance, the proposed entitlement process will provide greater certainty and timely outcomes than the current oftentimes-unruly SEA review process. LAWA's concerns with the proposed ordinance pertain primarily to the proposed mapped area boundaries themselves, as well as the ability to develop essential roadways and infrastructure through SEA areas.

Road construction, particularly for roads and facilities anticipated in the General Plan, through the SEA will also be necessary for the full build-out of a commercial airport. Construction of such essential infrastructure should be given deference and expediting in the SEA review process. Two for one habitat set-aside provisions may not be appropriate for public works projects, particularly as road construction will still result in large contiguous parcels and provisions for wildlife undercrossing or tunnels may be incorporated into roadway design.



Los Angeles
World Airports

October 4, 2013

Connie Chung, AICP
Supervising Regional Planner
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

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Dear Ms. Chung,

Eric Garcetti
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Gina Marie Lindley
Executive Director

Los Angeles World Airports (LAWA) is pleased to offer the following comments in regards to the County of Los Angeles Department of Regional Planning's (County DRP) Proposed General Plan Update, the Antelope Valley Plan Area Update, the Renewable Energy Ordinance, and the Significant Environmental Area Ordinance. LAWA is a proprietary department 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).

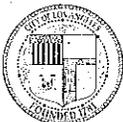
General Plan Update

In order to provide a guiding and effective planning document, the County DRP should provide a defined vision for PMD in the General Plan Update. This should include but is not limited to the development of projected facility requirements and capacity, economic growth and future demographics that will either facilitate or hinder airport development. Consistent with regional planning documents and consensus LAWA has consistently pursued the long-term development of PMD. LAWA will continue to pursue this vision but must caution that potential downzoning, enlargement of SEAs, and other land use restrictions presently contemplated by County DRP may have an indirect effect of reduction in demand for a future airport.

Major infrastructure improvements to increase access to the Palmdale Airport, such as the Caltrans/Metro High Desert Corridor should also be reflected in the General Plan. It is important to state that the current jobs and population statistics do not justify profitable commercial air service and the fact that under any scenario LAWA will maintain a need for interim uses that will provide economic benefit from LAWA's Palmdale land holdings. LAWA believes the General Plan and Area plan can work together to facilitate both interim and long-term uses at PMD.

Antelope Valley Area Plan Update

The County DRP Antelope Valley Area Plan Update's current and proposed zoning is inconsistent across LAWA's Palmdale property. As you know, LAWA has long range plans to



use the entire property for a future regional airport and short term interim plans for a renewable energy use. LAWA also maintains existing leases on the property for light industrial and agricultural uses. Inconsistent zoning may lead to frequent entitlement requests which are costly and time-consuming to process, both for County DRP and for LAWA. Specifically, Agricultural zoning on certain lots within the LAWA owned property is inconsistent with potential renewable energy interim uses and more importantly with future airport uses. The airport M-2.5 zone could potentially be an appropriate zone for lots across the LAWA property if the range of land uses included heavy agriculture, renewable energy and future airport facilities. Areas west of the Little Rock Wash are priorities for consistent zoning as properties east of the wash contain biological and access constraints.

Renewable Energy Ordinance

LAWA acknowledges and supports the County DRP's goal to bring consistency and predictability to the development of renewable energy facilities. Revisions of the draft ordinance should consider M-2.5 zones for ministerial review or site plan review for energy projects, consistent with the policy decision made for M-1.5 and M-2 zones.

It is important to note 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.

Where special permits are required, applicants should be given the flexibility to apply for a Master Permit across large amounts of property with implementation on individual parcels over time. Water use should be analyzed in reference to existing and alternative uses. For example, water demand for a concentrated solar thermal plant may be substantial in some scenarios but is actually lower than existing alfalfa growing operations or like agricultural uses.

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LAWA supports the defined timelines and responsibilities in the draft ordinance. Based upon our initial reading of the ordinance, the proposed entitlement process will provide greater certainty and timely outcomes than the current oftentimes-unruly SEA review process. LAWA's concerns with the proposed ordinance pertain primarily to the proposed mapped area boundaries themselves, as well as the ability to develop essential roadways and infrastructure through SEA areas.

Road construction, particularly for roads and facilities anticipated in the General Plan, through the SEA will also be necessary for the full build-out of a commercial airport. Construction of such essential infrastructure should be given deference and expediting in the SEA review

process. Two for one habitat set-aside provisions may not be appropriate for public works projects, particularly as road construction will still result in large contiguous parcels and provisions for wildlife undercrossing or tunnels may be incorporated into roadway design.

It is unclear how the SEA ordinance relates to master plans or projects that involve multiple entitlements at an early programmatic stage. It is essential to LAWA that once a project is cleared, the entitlement should not lapse or change during the long range 25+ year development timeframe for an airport.

In regards to the proposed SEA map itself LAWA anticipates that the areas within our land holdings east of the Little Rock Wash (the wash) will be protected habitat areas in the eventual full development of PMD as a commercial airport. Any SEA designation west of the wash will have impacts on that future airport feasibility. LAWA will continue to review and comment on the technical details of the proposed maps and habitat types in the coming months.

Where areas are set-aside as mitigation or permanent open-space, a Conservancy or other mechanism must be established to transfer liability and maintenance for the parcel.

Conclusions

It has been LAWA's sincere pleasure to work the County DRP team on these important planning initiatives impacting the Antelope Valley. It is our hope that your multiple plan updates will reflect a unified zoning and land use scheme for the Palmdale Regional Airport that allows for seamless future airport development as well as economically beneficial interim uses. If you have any questions regarding these comments or if LAWA can provide any information that will be beneficial to your planning efforts, please do not hesitate to contact us at (424) 646-7690.

Thank you,

A handwritten signature in black ink, appearing to read "Christopher Koontz". The signature is fluid and cursive, with a long horizontal stroke extending to the right. There is a small "MV" mark below the signature.

Christopher Koontz
Chief of Airport Planning I
Regional Planning & Environmental Assessment