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Directors

Wendy Reed      Richard Montijo, Chief Biologist      Gary Moll  
Gail Lofdahl      Don Davis      Brenna Humann      Bob Large

January 3, 2011

Attn: Thuy Hua, AICP, Senior Planner  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

[via email: thua@planning.lacounty.gov](mailto:thua@planning.lacounty.gov)

**re: Renewable Energy Ordinance**

Thuy, Bruce, Breanna, and Whom It May Concern:

Thank you for the invitation and opportunity for Antelope Valley Conservancy representative and president Wendy Reed to meet with you, on November 30, 2011, to discuss your Department's development of a Renewable Energy Ordinance. The AVC Board of Directors appreciates any efforts by the County to ensure that renewable energy projects do not result in negative impacts to ecosystem functions and resources held in the public interest.

It is the belief of the Directors of our Board that certain items discussed at the meeting warrant written comment:

1. The County of Los Angeles General Plan, Conservation and Open Space Policy, and Special Management Areas Policy provide for restricted uses within and contiguous to any Significant Ecological Area (SEA), so as to sustainably preserve ecosystem function, wildlife dispersal, and genetic diversity dispersal for future generations. SEA locations are appropriate for, and have been targeted with vast public and other funding for habitat preservation, toward achievement of the County Plans and Policies. The location of renewable energy plants within and contiguous to SEAs appears diametrically opposed to such Plans and Policies. Therefore, it is the opinion of our Board that any Renewable Energy Ordinance should identify renewable energy as a "nonconforming use" under its current Policies, and prohibit renewable energy siting within or in proximity to an SEA.
2. Regarding Wind Energy Projects: A buffer distance of one-and-a-half times the height of a wind generation unit would appear to be insufficient to prevent visual and audio disturbance to neighbors and wildlife; disturbance to and interruption of natural behaviors of plants and animals including human beings; and public safety concerns in the event of mechanical failure or fire, especially during a wind event. Although Mrs. Reed stated at the meeting that she was refraining from comment on the Noise section of the matrix due to her lack of knowledge on the subject, subsequent research leads our Board to voice concern. The research literature shows that direct noise, shadow "flicker", and vibration and low frequency emissions can impact distances from three

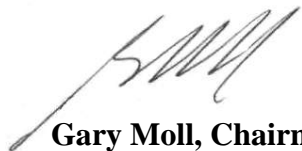
miles to over ten miles. Light, sound, and vibration have been scientifically documented as impacting a variety of plant and animal species, including human beings, although the extent of such impacts is not quantified. According to ornithologists and biologists appearing before SEATAC in 2011, as well as the voiced opinions of expert biologists seated on SEATAC, the current state of scientific research is inadequate to evaluate or anticipate the impacts on humans or wildlife from “flicker”, FAA-required lights, and the audio and sub-audio emissions of large wind turbines. Therefore, the buffer distance from homes, from public facilities such as schools, hospitals or roads, and from preserved natural areas and wildlife dispersal areas is critically important to be more than adequate, so as to prevent irreparable damage or loss of life. It would appear that further scientific research or information gathering is necessary before the County can assert, with any measure of certainty, the sufficiency of a buffer distance.

3. Lastly, the fencing of energy plants thwarts wildlife and genetic material dispersal, and interferes with watershed function, as discussed at the meeting. The massive acreage of the facilities discourages the ability for wildlife to detour around the facility. Thus a buffer, at property perimeter and watershed resources would appear to be critical, although a buffer of 1,500 feet as discussed at the meeting may be inadequate, depending on the circumstances and surrounding property uses. Along well-traveled highways, lack of buffers or inadequate buffers would provide inadequate passage for wildlife, and tend to funnel wildlife onto the public right of way, a situation unsafe for both wildlife and vehicular traffic on the road. The County’s support of habitat preservation and adequate dispersal between preserved lands is the preferred solution to this issue.

Antelope Valley Conservancy is a public benefit corporation that preserves and stewards native habitats and watershed resources in the Antelope-Fremont Valleys Watershed and the upper Santa Clara River Watershed, and has worked in close partnership with Los Angeles County Department of Parks and Recreation for over 25 years. Antelope Valley Conservancy is the only northern Los Angeles County conservancy that is authorized by the California Department of Fish and Game to hold mitigation lands and conservation easements.

AVC will look forward to receiving and commenting upon the Draft Renewable Energy Ordinance once it is issued. Thank you for your time, your consideration of our opinions, and your commitment to prudent regional planning in Los Angeles County.

Respectfully Submitted,  
By Resolution of the Board of Directors  
**ANTELOPE VALLEY CONSERVANCY**



**Gary Moll, Chairman**

cc: Bruce Durbin, Supervising Regional Planner, OSS  
Norm Hickling, Deputy to Supervisor Michael D. Antonovich  
Shirley Imsand, Ph.D., SEATAC Coordinator