

From: [David Revelt](#)
To: [Thuy Hua](#)
Subject: Proposed Renewable Energy Ordinance
Date: Saturday, October 26, 2013 3:42:01 PM

Ms. Hua:

We are writing regarding the draft, LA County Renewable Energy Ordinance we found at the following link: <http://planning.lacounty.gov/energy>.

Our company specializes in developing small-scale, ground-mounted solar photovoltaic projects that are 2-10 MWs in size. These projects are sited on 20-100 acres of land, and require minimal (if any) upgrades to the existing electrical grid.

We are developing two projects in north Los Angeles County on A-2 zoned land, and would like to develop other small projects where possible. Small, distributed-generation projects are highly-favored in California (particularly for solar) because small projects serve the local community with local energy, and minimize the need to upgrade and maintain the transmission and distribution system.

A major impediment to our Los Angeles County projects is the time and expense involved in the CUP process. Under existing zoning, and the proposed draft renewable energy ordinance, a ground-mounted solar system (of any size) generating off-site energy is required to go through an extensive CUP process. The effect of this zoning is to discourage small projects and ensure that only large projects (which can afford greater time and expense for permitting) will be constructed in the County.

While we certainly recognize the need for a thorough CUP review for large-scale solar projects (e.g. 200+ acres), and wind projects using large turbines, small-scale photovoltaic projects have a much smaller footprint, require less grading (generating less dust and requiring less water), require fewer upgrades (if any) to the utility system (such as new, off-site transmission lines), and have a smaller visual impact to the community. Because of their fewer impacts, small, ground-mounted photovoltaic projects should not be subject to the same, extensive review process.

Stated differently, under the current zoning, a 1 MW solar project on a roof might be permitted in 2 months, while the exact same 1 MW project located on the ground right next to the building could take 18 months (9x longer) to permit.

The Cities of Lancaster and Palmdale (both just a few miles away) permit small, solar projects under a Site Plan Review process (with MNDs for CEQA) in as little as 2-4 months with great success.

Based on this information, would Planning please consider separating small-scale, ground-mounted solar photovoltaic projects from the much larger category of "Utility-Scale Renewable Energy Facility, Ground-Mounted," and allow these small projects to be permitted under a Site Plan Review process rather than a full CUP.

We appreciate you considering our comments. We are available to discuss at your convenience. -
David

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