



2000 Oak Street, Suite 250 • Bakersfield, CA 93301  
Ph: (661) 323-4005 • Fax: (661) 323-4006  
www.BolthouseProperties.com

November 21, 2013

Thuy Hua  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

**RE: Draft Renewable Energy Ordinance**

Dear Ms. Hua:

Bolthouse Properties currently owns numerous parcels in unincorporated Los Angeles County that will be subject to current and future planning efforts implemented by the County's Department of Regional Planning. One such effort is the Renewable Energy Ordinance, which was released for draft review on October 3, 2013. These properties, totaling approximately 4,400 acres lie adjacent to and east of the Cities of Lancaster and Palmdale, and many of them are located in the proposed enlargement of the Antelope Valley Significant Ecological Area.

We have reviewed the Draft Renewable Energy Ordinance and would like to convey to the County our existing and future interests for our holdings. In particular, our continued interest in maintaining and preserving the agricultural use of our properties as well as protecting out interest for future utility scale renewable energy production in the proposed Antelope Valley SEA.

**Existing and proposed General Plan Update Land Use and Zoning Designations**

In accordance with the 1986 Antelope Valley Area Plan, our land that currently lies within the unincorporated area of Los Angeles County is designated as Non-Urban 1 (N-1), and one parcel is split between N-1 and Commercial. The N-1 designation is intended to, "preserve agricultural uses, limit density, promote clustered development and conserve open space and natural area," and allows for the development of single-family homes, equestrian and animal uses, and agricultural and related activities. Under this existing designation, Bolthouse Properties is involved in agricultural activities and has future plans for residential development on our lands. Under the County's current zoning, these parcels are zoned A-1, A-2, and C-3.

According to the Revised NOP for the General Plan Update, all parcels will change to Rural Land 20 (RL20). The RL20 designation allows for the development of single family homes, equestrian and animal uses, and agricultural and related activities, with a maximum density of 1 du per 10 gross acres and a maximum FAR of 0.5. According to our information, the RL20 designation would classify these parcels as part of the County’s Rural Preserve. We agree with the County of Los Angeles in that the RL20 land use designation is appropriate for our properties. Under the County’s proposed zoning, these parcels will all be zoned A-2. We would like to express to the County our support in maintaining these land use designations to protect our existing and future agricultural interests.

**Draft Renewable Energy Production Priority Map & Renewable Energy Ordinance**

It is our understanding that the Draft Renewable Energy Production Priority map, which was publically introduced at a community meeting on June 18, 2011, has been retracted due to concerns raised by stakeholders. In place of the Draft Renewable Energy Production Priority Map, the County has developed the Draft Renewable Energy Ordinance. This ordinance establishes regulations and permit requirements that support and facilitate the development of small-scale renewable energy systems and utility-scale renewable energy facilities in a manner that minimizes potential safety and environmental impacts. It is our understanding that based on the Draft Renewable Energy Ordinance the following permit requirements apply to Bolthouse properties:

	Zoning Designation		
	A-1	A-2	C-3
Small-Scale Solar Energy System	SPR	SPR	SPR
Utility-Scale Renewable Energy Facility, Ground-mounted	N/A	CUP	CUP
Utility-Scale Renewable Energy Facility, Structure-mounted	SPR	SPR	SPR
SPR= Site Plan Review CUP= Conditional Use Permit N/A= Not Applicable			

Bolthouse Properties currently has land under option to be developed as utility-scale solar energy projects. This land, which consists of approximately 1,570 acres, is further described below:

- 32 parcels totaling 320 acres located in the northeast corner of the City of Lancaster.
- One 160 acre parcel located southwest of the E Palmdale Blvd. and 165<sup>th</sup> Street E intersection.
- Four parcels totaling 1,090 acres southeast of the E Avenue P and E Palmdale Blvd. intersection.

Bolthouse Properties has and continues to work diligently with the County, State, and utility companies to further pursue these solar options. In fact, the options that apply to the 320 and 1,090 acre areas have been under contract for over two years. As a considerable amount of time and capital has been invested in pursuing these solar options, we would like to request that the County of Los Angeles continue to take these options into consideration when preparing the final Renewable Energy Ordinance. By protecting the future development of utility-scale solar power, the County and Bolthouse

Properties will mutually benefit by implementing the Energy goals and policies in the Draft Antelope Valley Area Plan and encouraging the development of a clean and renewable source of energy.

Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,



STEPHAN J. DeBRANCH  
Vice President of Development

CC:

Kimiko Lizardi, Environmental Science Associates

Arlene Granadosin, Environmental Science Associates