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

April 22, 2014

SEA Program
c/o Emma Howard
Regional Planning Department Floor 13
320 W. Temple Street
Los Angeles, CA 90012

RE: SEA Program Update

Dear Ms. Howard,

Bolthouse Properties currently owns numerous parcels in unincorporated Los Angeles County that will be subject to the Los Angeles County General Plan Update in the Antelope Valley region. 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. All of these properties, with exception of one, are currently and actively being farmed. Bolthouse Properties has been farming these properties since at least the 1990s, with some of our farming activities extending back for decades.

We have reviewed the RPC Staff Report dated April 10, 2014 and corresponding attachments and would like to convey to the County our existing and future interests for our holdings and concerns regarding the potential impacts on these interests due to the expansion of the SEA boundary and update of the Program.

Existing and Proposed Significant Ecological Areas

It is our understanding that the Antelope Valley Significant Ecological Area, located in the central portion of the Antelope Valley primarily east of the Cities of Palmdale and Lancaster, is proposed to expand significantly. The SEA, "an ecologically important land or water system that supports valuable habitat for plants and animals integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County," is an important land use policy to encourage conservation and species protection in Los Angeles County.

Bolthouse Properties understands the value of maintaining our natural biological resources and agrees that the current SEA meets several SEA designation criteria and supports many regional biological values. However, we are concerned about the expansion of the Antelope Valley SEA and how it may

affect our current and future agricultural, residential, and renewable energy facility development plans for parcels located in or transecting the boundaries of the Proposed SEA. Specifically, we have the following concerns that we respectfully request be considered prior to approval of the SEA Program:

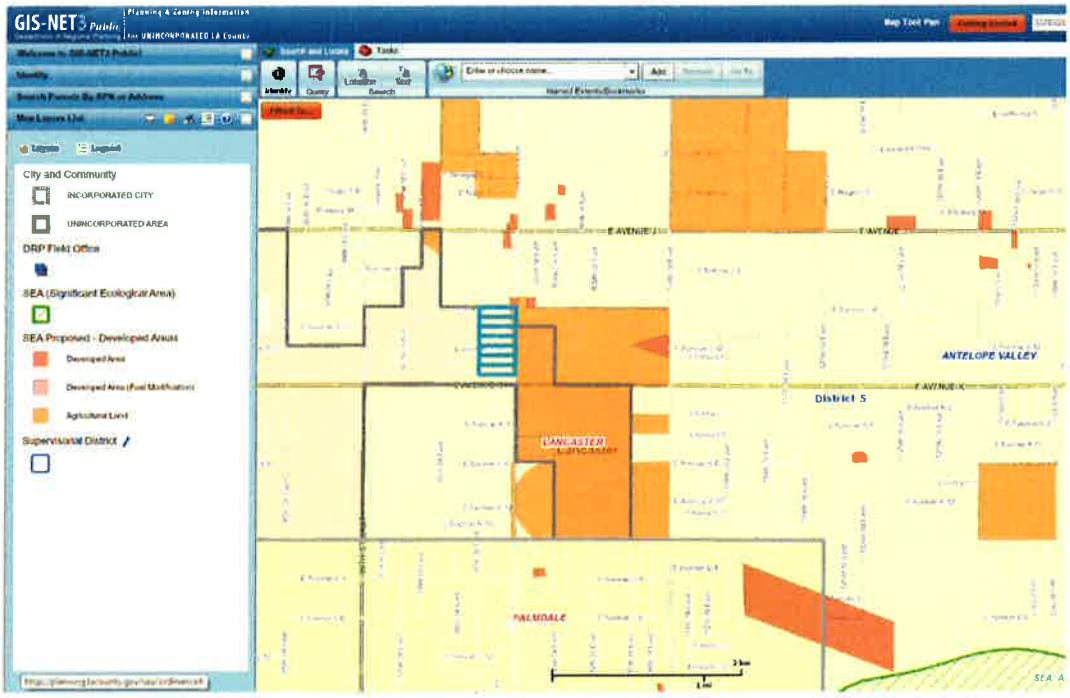
1) Potential Mapping Errors and Properties Optioned for Solar Energy Projects

The expansion of the SEA boundary has most significantly impacted properties owned by Bolthouse located generally along Avenue K from approximately 100th to 110th Streets. These properties were not previously included in the SEA boundary and are located on the far western edge of the expanded SEA in this location. We believe some of the properties in this location may be included due to mapping errors. We previously requested an analysis from County staff to identify affected properties. The following properties were identified by the County as included in the proposed SEA boundary.

Assessor Parcel Numbers	Location
3376026009	Lancaster
3376026008	Lancaster
3376026007	Lancaster
3376026006	Lancaster
3376026005	Lancaster
3376026004	Lancaster
3376026003	Lancaster

The figure below depicts the above listed properties as shown on the SEA Proposed – Developed Areas layer on the County's GIS-Net3 mapping system. If you look closely, the boundary of the "Agricultural Land" does not coincide with parcel boundaries, but overlaps a small portion of the listed properties. When a GIS based analysis is conducted, these properties are being included within the proposed SEA boundary.

Bolthouse Properties owns a total of 34 parcels in this area totaling approximately 380 acres. These 34 parcels, which include the above listed properties, have been under contract for over two years for options to develop utility scale solar projects. Bolthouse Properties has been working diligently with the County, State and utility companies to further pursue these solar options. As a considerable amount of time and capital has been invested pursuing these solar options, we would like to request that the County carefully review the SEA boundary in this location. We believe it should be adjusted to remove the above listed properties.



2) Additional Properties not Previously Included and Optioned for Solar Energy Projects

The following additional properties have been impacted by the expanded SEA boundary:

APN#	Location	SEA Proposed-Developed Area (as shown in GIS)
3376022004	County	Agricultural Developed Area
3376022005	County	Agricultural Developed Area
3376022006	County	Agricultural Developed Area
3376022016	County	Agricultural Developed Area
3376022017	County	Agricultural Developed Area
3376022018	County	Agricultural Developed Area
3378005006	County	Agricultural Developed Area
3378005001	Lancaster	Agricultural Developed Area
3378005002	Lancaster	Agricultural Developed Area
3378005004	Lancaster	Agricultural Developed Area
3378005005	Lancaster	Agricultural Developed Area

Approximately six of the properties listed in this table (all located within unincorporated County) are included in the 34 parcels discussed in #1 above. This land is optioned to develop utility scale solar projects. We request an explanation and evidence to support the expansion of the SEA boundary in this area. As stated in #1 above, these properties have been under contract for over two years for options to develop utility scale solar projects. Bolthouse Properties has been working diligently with the County, State and utility companies to further pursue these solar options. As a considerable amount of time and

capital has been invested pursuing these solar options, we are concerned about their inclusion in the expanded SEA boundary.

3) Clarification of Review Process

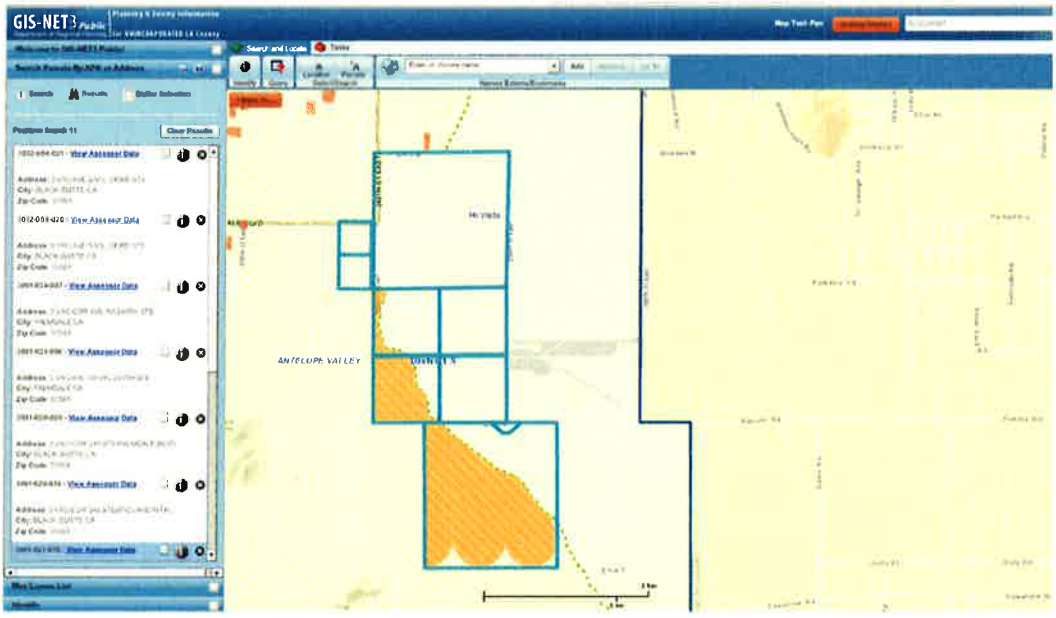
Most of the properties that are owned by Bolthouse, that are within the SEA boundary are identified as Agricultural Developed Areas on the SEA Development Map and therefore it is our understanding that they qualify for Site Plan Review. As stated previously, one of our concerns is to protect our interests in the future development of utility scale solar projects on our land. Please confirm the review process and standards we would be subject to for a utility scale solar project on land entirely within Agricultural Developed Areas.

Please clarify the review process and standards we would be subject to for a utility scale solar project on land that is not identified as Developed or Agricultural Developed Land on the SEA Development Map.

4) SEA Boundary Adjustment and Properties Optioned for Solar Energy Projects

The properties listed below were previously identified by the County as being included in the proposed SEA boundary. However, it appears only two of them are included in the latest proposed SEA boundary.

APN#	Location	Included in Proposed SEA (as shown in GIS)	SEA Proposed-Developed Area (as shown in GIS)
3091021018	County	No	
3091020019	County	No	
3091020020	County	No	
3091024006	County	No	
3091024007	County	Yes	Agricultural Developed Land
3032004020	County	No	
3032004021	County	Yes	Agricultural Developed Land



The two properties are considered Agricultural Developed Lands. The SEA boundary bisects the properties and it is unclear why they have been delineated in this way.

These two properties, along with other adjacent properties totaling approximately 2,020 acres have been under contract for over two years for options to develop utility scale solar projects.

Bolthouse Properties has been working diligently with the County, State and utility companies to further pursue these solar options. As a considerable amount of time and capital has been invested pursuing these solar options, we would like to request that the County review the SEA boundary in this location and that it be adjusted to remove these properties.

5) Process for SEA Boundary Adjustments

We request that the County consider including a provision in the SEA Program that would allow properties to be removed from the SEA boundary without being subject to a lengthy or expensive review process. If properties, such as those above, are located on the edge of the SEA boundary, and/or where development or long-term use of the property has diminished its value as suitable habitat or as a valuable ecological area, and/or where mapping errors have occurred, property owners should have a mechanism to remove the properties from the SEA designation without incurring significant costs or a significant investment of time.

We appreciate the County's consideration of our concerns and requests as they pertain to the SEA Program. Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,

BRAD DeBRANCH, Project Planner for
STEPHAN J. DeBRANCH
Vice President of Development
Bolthouse Properties, LLC

Cc: Kimiko Lizardi, ESA