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November 25, 2014

Renewable Energy Ordinance
c/o Jay Lee
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Re: Renewable Energy Ordinance and Significant Ecological Area Boundary

Dear Mr. Lee:

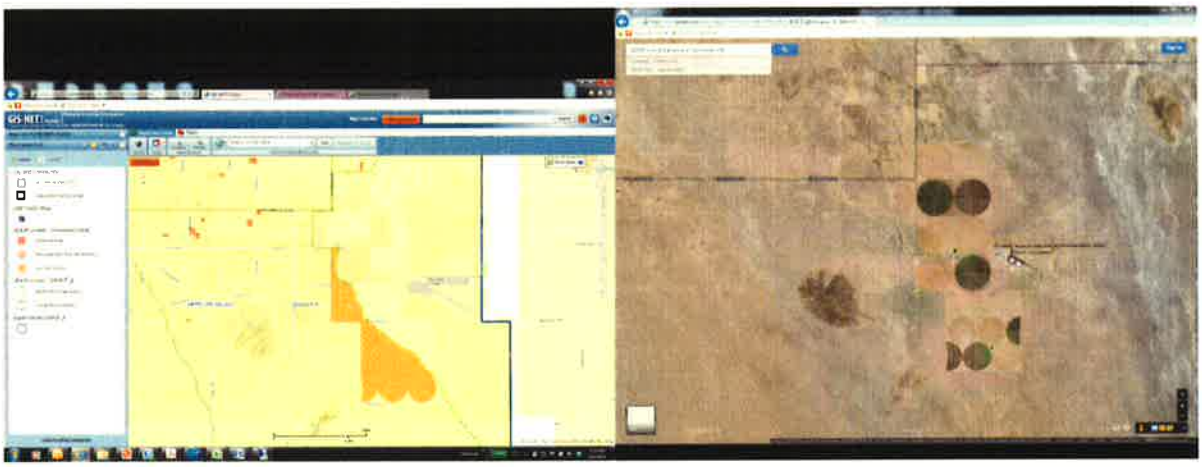
Thank you for taking the time to speak with our planner on November 6, 2014 regarding the Renewable Energy Ordinance. As discussed, we are submitting this letter as a follow up to that conversation, to provide additional information regarding our affected properties and to serve as a formal record of our concerns.

Bolthouse Properties owns approximately 4,400 acres in Los Angeles County. 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. Many of our properties are located in the proposed enlargement of the Antelope Valley Significant Ecological Area (SEA).

We have been closely monitoring the update of the County's General Plan and have submitted multiple letters expressing our concerns. To date, our letters have primarily focused on the expansion of the SEA boundaries and our desire to protect our interests in the future development of utility-scale solar facilities on our land. With the release of the 2nd Draft Renewable Energy Ordinance (REO) and the accompanying memo dated October 23, 2014 to the Regional Planning Commission, we have additional concerns about the impacts to our properties as follows:

1) We have two properties located along the edge of the SEA boundary.

APN#	Location	Included in Proposed SEA (as shown in GIS)	SEA Proposed-Developed Area (as shown in GIS)
3091024007	County	Yes	Agricultural Developed Land
3032004021	County	Yes	Agricultural Developed Land



These two properties are considered Agricultural Developed Lands. The SEA boundary bisects the properties, so that only a portion of the properties falls within the SEA. 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. Also, as shown in the above aerial, these properties are in active agricultural use and are highly disturbed. They are also located at the edge of the SEA boundary.

The memo dated October 23, 2014 that accompanied the 2nd Draft of the REO indicates that the Ordinance is currently being revised, but it states that the "...the Ordinance <u>will</u> prohibit utility-scale solar and wind facilities within Significant Ecological Areas as they are where the County's most valuable resources have been identified."

We are concerned about the provisions that will be added to prohibit utility-scale solar facilities within SEA boundaries and how that will impact the above listed properties, where only a portion of the property is within the SEA. We respectfully request that the County review these concerns as the REO provisions are being drafted and provide details regarding the impacts to our properties.

We are happy to meet with staff to discuss the matter further. Also, please do not hesitate to contact me or our planning consultant, Kimiko Lizardi, directly with any questions.

Sincerely,

STEPHAN J. DeBRANCH
Senior Vice-President of Development
Bolthouse Properties, LLC

SJD:nv

cc: Brad DeBranch, Bolthouse Properties
Kimiko Lizardi, ESA
Emma Howard, LA County SEA Program