

LOS ANGELES COUNTY RESPONSES TO DOCKET NO. 12-GREP-1

1. At this time Los Angeles County does not have any provisions within its Zoning Ordinance or General/Community Plans that address issues related to the development of renewable energy. We would like to develop an Energy Element within the County's General Plan Update and prepare and enact amendments to the County's Zoning Ordinance. We would also propose to develop a document for both staff and applicants that would establish guidelines and best management practices for renewable energy project development. It should also be noted that Los Angeles County has never participated in the creation of a Habitat Conservation Plan. We may wish to address issues related to creation of such plans within planning documents.
2. Within Los Angeles County there is a need to develop new provisions to be added to the County's Zoning Ordinance, to develop policies that will be incorporated into the Countywide General Plan Update and the Update to the Antelope Valley Area Plan. Although the update process is currently underway, Energy Elements have not as yet, been developed for inclusion within these plans.
3. County Planning Departments cannot unilaterally develop plans and ordinances. The aforementioned must be reviewed at public hearings and ultimately they must be adopted by the Board of Supervisors. Subsequently staff can internally develop policies with regard to the implementation of the adopted Zoning Ordinances and General/Community Plans. Opposition from some community groups within the Antelope Valley portion of the County to the adoption of plans and ordinances which may appear to encourage the development of renewable energy projects can be anticipated. Other community groups will support the development of renewable energy projects if more stringent regulations are adopted. While staff resources are available to develop and/or revise plans and ordinances, two major financial barriers are the cost of preparing Environmental Impact Reports (EIRs) as well as the cost of conducting extensive nighttime and weekend public outreach meetings in a portion of the County which is a two-hour drive from Departmental Headquarters in downtown Los Angeles.
4. The renewable energy development community has repeatedly asked for the establishment of guidelines and regulations at the forefront of their project design efforts. Under the current approach the developer can be required to comply with conditions which are developed late in the public hearing process.
5. The largest cost item for the adoption of any plan or ordinance is the cost for preparing the EIR. An EIR is currently being produced with regard to the update of the General Plan and Antelope Valley Area Plan. Additional expenditures would be required to prepare the additional renewable energy element for each of the plans. At this time Los Angeles County has not yet initiated development of the Programmatic EIR to accommodate the adoption of a Renewable Energy Ordinance.
6. Four renewable energy projects have been approved and permitted:
 - i. Alpine Solar | solar energy | 835 acres | 92 MW

- ii. Antelope Valley Solar | solar energy | 1,238 acres | 156 MW
- iii. AV Solar Ranch One | solar energy | 2,100 acres | 230 MW
- iv. Bluefire Ethanol | biomass conversion | 10 acres

An additional 26 projects are currently pending. Project approval/permitting process currently takes 12-24 months.

- 7. Los Angeles County has successfully processed one cross-jurisdictional renewable energy project with Kern County. We would anticipate consulting with Kern County regarding the development of renewable energy ordinances and plans. We would partner with conservancies regarding the implementation of mitigation requirements and/or the development of habitat conservation plans.
- 8. A county's ability or lack of ability to fund the preparation of EIRs required for the development of renewable energy ordinances and plans should be a consideration. It can be assumed that rural counties will confront the greatest cost challenges. The level of the county's participation in the DRECP process should also be a consideration.
- 9. The counties outside the DRECP boundary should not be funded through the subject program.
- 10. County staff can benefit greatly from training that will educate them with regard to the types of technology being proposed to be included within renewable energy projects and the actual construction processes required to complete the project. It should be noted that County staff have traditionally little or no involvement with energy-related issues because they lack jurisdiction over public utilities.