



California Wind Energy Association

September 17, 2026

Department of Regional Planning
Attention: Community Studies North Section
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Via Email to: RenewableEnergy@planning.lacounty.gov

Re: Comments on Notice of Preparation of Draft Program EIR for the Renewable Energy Ordinance Update

To Whom It May Concern:

The California Wind Energy Association (“CalWEA”) is a 26-year-old industry trade association. Our members are focused on operating and developing wind energy resources within and directly interconnected to California’s electrical grid, capturing related economic and workforce benefits for California. CalWEA appreciates this opportunity to comment on the scope and content of the forthcoming Draft Program Environmental Impact Report (Program EIR) for the Renewable Energy Ordinance (REO) Update pursuant to the Notice of Preparation dated August 3, 2026.

The Program EIR Should Analyze a Utility-Scale Wind Alternative for Portions of the Western Antelope Valley

CalWEA respectfully requests that the Department analyze an ordinance alternative that would allow utility-scale wind energy facilities, subject to a conditional use permit, in limited, defined areas of the western Antelope Valley (west of Lancaster) where a project demonstrates an adequate commercial wind resource¹ and compliance with site-specific standards. CalWEA proposes a Wind Energy Alternative Area that is generally south of the Kern County line, west of 100th Street West in the Antelope Valley, west and north of Highway 14 between Palmdale and Acton, north of the Angeles National Forest, and east of 250th Street West, as depicted in the map appended to these comments, below. Areas

¹ Wind speeds greater than 6.5 m/s at a typical hub height of 105m are developable. Most of the area within CalWEA’s proposed Wind Energy Alternative contains such speeds.

already developed with incompatible uses, or subject to legally enforceable conservation easements that prohibit wind development may be excluded from this area. Early coordination with the Department of Defense Siting Clearinghouse and formal FAA review can address any military conflicts. Other conservation designations and voluntary planning strategies should inform site-specific review in this area, rather than operate as automatic exclusions. CalWEA estimates that suitable remaining land in our proposed Wind Energy Alternative Area could support up to 1.5 gigawatts of wind energy capacity—well below the 2,375 to 7,193 megawatts of potential in northern Los Angeles County identified in the 2014 draft Desert Renewable Energy Conservation Plan, as explained in CalWEA’s appended April comments. The Program EIR should independently evaluate and refine this 1.5-GW estimate using parcel-level wind-resource, environmental, land-use, and transmission screening.

Analyzing this alternative would remedy the failure of the REO Update Technical Study to respond to the Los Angeles County Board of Supervisors’ directive to “Evaluate the ban on utility-scale wind energy and make a recommendation based on market and environmental factors on whether it should be allowed on a discretionary basis in certain zones.”² CalWEA explained in its April 10, 2026, comments that the Technical Study’s reliance on the existing prohibition itself and on high-level transmission-planning assumptions did not satisfy that directive. Those comments are appended.

The Technical Study’s own findings reinforce the need for this analysis. Table 2-4 identifies 345 MW of projected utility-scale wind in the Greater Tehachapi resource region, which includes approximately 582,680 acres of unincorporated Los Angeles County; Figure 4-3 maps commercial-quality wind resources along the County’s northern boundary; and the Study states that feasibility depends on wind speed, acreage, grid proximity, soil conditions, and distance from sensitive uses.³ Table 3-9 shows a \$224 million net present value for a 100-MW wind facility, while Table 3-12 shows local economic benefits from new jobs and County revenues through permitting and taxation. Yet Aspen excluded utility-scale wind from its screening because the current ordinance prohibits it and because of an asserted “lack of projected need in unincorporated Los Angeles County.”⁴ Those rationales do not substitute for the market-and-environmental evaluation the Board directed.

Because the public-review draft ordinance retains a categorical prohibition on utility-scale wind despite the Technical Study’s findings and its clear shortcomings, the Program EIR should evaluate at least one reasonable alternative that removes the blanket ban and allows wind by conditional use permit in defined zones. It should compare that alternative

² Aspen Environmental Group, *Renewable Energy Ordinance Update Technical Study*, prepared for the Los Angeles County Department of Regional Planning (March 2026), p. 4.

³ *Id.* at p. 58.

⁴ *Id.* at p. 59.

with the proposed ordinance and the no-project alternative, and should formulate project objectives broadly enough to encompass the Board's express directive and the County's renewable-energy, carbon-neutrality, reliability, and economic-development goals. If the County rejects a wind-permissive alternative, the Program EIR should explain the basis for doing so.⁵

At a programmatic level, the wind alternative should address aesthetics and aviation lighting; birds, bats, habitat connectivity, and other biological resources; noise and shadow flicker; wildfire and emergency response; construction traffic and oversized components; agricultural and other compatible land uses; cultural and Tribal cultural resources; transmission and interconnection; and decommissioning and financial assurance. Each later utility-scale project would remain subject to a discretionary permit and project-level CEQA review, allowing parcel-specific surveys, avoidance, mitigation, monitoring, and adaptive management.

Comments on Proposed Regulations for Wind Energy Development

The proposed standards and regulations pertaining to the development of utility-scale wind energy facilities studied in the Program EIR should be reasonably crafted in the following ways:

1. Given the extensive, successful experience with wind energy development in the Kern County portion of the western Antelope Valley, the Planning Department should use as practical starting points the current Kern County Zoning Ordinance, including Chapter 19.64, the Wind Energy (WE) Combining District; Kern County's site-specific application of that wind-energy overlay to base zones in areas with suitable commercial wind resources; and environmental reviews conducted by the Kern County Planning and Natural Resources Department for specific projects. Los Angeles County should adapt those approaches for currently available turbine technology and current aviation, biological, and fire requirements.
2. The regulations should expressly allow and encourage FAA-approved Aircraft Detection Lighting Systems where technically feasible, subject to the project's ability to obtain approval for ADLS from the FAA. These systems activate aircraft warning lights on wind turbines only when an aircraft enters a defined area. This technology reduces warning-light usage by more than 95% on average, preserving dark skies without compromising aviation safety.⁶

⁵ State CEQA Guidelines, Cal. Code Regs., tit. 14, §§ 15126.6, 15168.

⁶ See Federal Aviation Administration, Advisory Circular 70/7460-1M, *Obstruction Marking and Lighting* (Nov. 16, 2020); MidAmerican Energy Company, "MidAmerican Expanding Aircraft Detection Systems at Wind Farms" (Feb. 18, 2026), available at:

3. The regulations should avoid one-size-fits-all requirements for perimeter walls, fencing and vegetation clearing or management, which may conflict with the California Department of Fish and Wildlife's species- and site-specific requirements. Instead, project-specific plans developed in consultation with the Los Angeles County Fire Department, the California Department of Fish and Wildlife, and, where applicable, the U.S. Fish and Wildlife Service should address security, wildlife movement, habitat protection, and fire prevention.
4. Wind energy projects should not be categorically prohibited in Significant Ecological Areas, or in areas identified by the Antelope Valley Regional Conservation Investment Strategy ("RCIS"), as these projects have a small permanent direct-disturbance footprint and roads and wind turbine pads can be carefully micro-sited to avoid sensitive environmental areas. A national-laboratory study found an average permanent direct impact of approximately 0.3 hectare per MW, even though turbines are spaced across a substantially larger project area.⁷ Rotor-swept areas, roads, and project operations can nevertheless affect birds, bats and habitat, and those potential effects should be addressed through site-specific surveys, avoidance, micro-siting, operational measures where warranted, monitoring and adaptive management. Utility-scale wind projects in these areas would remain subject to discretionary permitting and project-level CEQA review. Aspen itself describes the RCIS as "voluntary, non-regulatory, and non-binding."⁸ It should therefore guide conservation planning and mitigation rather than operate as an automatic land-use exclusion.
5. Wind energy projects should not be categorically prohibited in Very High Fire Hazard Severity Zones.⁹

A hazard-zone designation should trigger closer project-specific review and enforceable fire-safety conditions, not replace that review. The Program EIR should also examine the operating and fire-incident history of existing California wind projects located in mapped High and Very High Fire Hazard Severity Zones, rather

<https://www.midamericanenergy.com/newsroom/2026-aircraft-detection> (accessed Sept. 11, 2026).

⁷ Paul Denholm, Maureen Hand, Maddalena Jackson & Sean Ong, National Renewable Energy Laboratory, *Land-Use Requirements of Modern Wind Power Plants in the United States*, NREL/TP-6A2-45834 (Aug. 2009), pp. 11–12, available at: <https://www.nrel.gov/docs/fy09osti/45834.pdf>

⁸ Note 1 *supra* at p. 65.

⁹ While CalWEA is not providing comments on other provisions of the Program EIR for the REO Update related to solar or battery storage, this should not be taken as an endorsement of those provisions. For example, as with wind energy projects, properly built and maintained lithium-ion battery storage facilities should not be effectively categorically prohibited. Rather, they should be permitted if they meet the requirements needed to reduce risks to acceptable levels.

than treating the hazard designation itself as evidence that wind development is unsuitable.

The Program EIR should evaluate potential ignition sources and emergency-response constraints and establish performance measures such as a fire-protection and emergency-response plan approved by the Los Angeles County Fire Department; all-weather access, turnarounds and fuel breaks; turbine and electrical inspection and maintenance; construction fire prevention; site-appropriate vegetation management; detection, communications and shutdown protocols; and water supply where warranted. In evaluating residual risk, the Program EIR should also consider whether controlled access, project roads, on-site personnel and monitoring, project-funded fire-response capabilities, and on-site water supplies would improve early detection and emergency response. Those benefits should be demonstrated for a particular project, not assumed.

California State Parks' environmental review of the Gonzaga Ridge Wind Repowering Project illustrates the appropriate approach: the agency evaluated the project's actual features in a mapped high-fire-risk area and found its wildfire impact less than significant. That example does not establish that every wind project is safe; however, it demonstrates that categorical prohibition is unnecessary when project-level CEQA review and enforceable conditions can address site-specific risk.¹⁰

CalWEA appreciates the Department's attention to these comments.

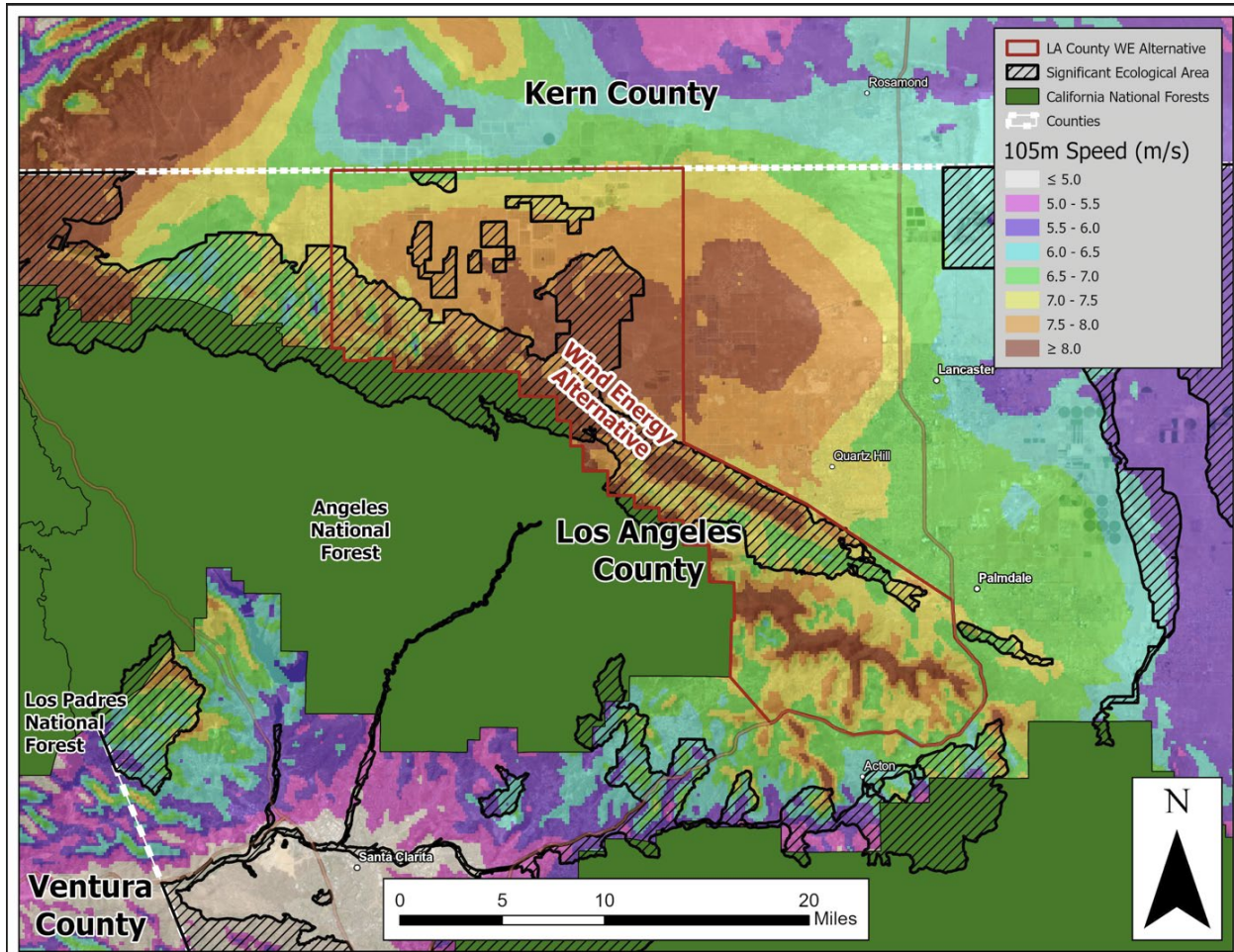
Sincerely,



Nancy Rader
Executive Director

¹⁰ California Department of Parks and Recreation, Draft Environmental Impact Report for the Gonzaga Ridge Wind Repowering Project, SCH No. 2018101047 (Oct. 2019), § 3.10, PDF p. 316; Notice of Determination, available at <https://parks.ca.gov/pages/980/files/microsoft%20pdf.pdf> (certifying the Final EIR and approving the project).

CalWEA's Proposed Wind Energy Alternative Area





California Wind Energy Association

April 10, 2026

Mark Herwick
Supervising Planner
Department of Regional Planning
Los Angeles County
320 West Temple Street
Los Angeles, CA 90012

Via email

Re: Comments on Renewable Energy Ordinance Update Technical Study

Dear Mr. Herwick,

The California Wind Energy Association (“CalWEA”) is a 26-year-old industry trade association. Our members are focused on operating and developing wind energy resources within and directly interconnected to California’s electrical grid, and on capturing related economic and workforce benefits for California.

Northern Los Angeles County hosts the strongest undeveloped, grid-accessible wind energy resources in the state, which are particularly valuable because they are proximate to major load centers. That same wind resource area, on the Kern County side immediately across the border from LA County, hosts over 3,500 MW of utility-scale wind capacity, accounting for 57% of California’s total wind energy production.¹ Yet, there is only one single utility-scale turbine operating on the LA County side of the line solely due to differing county land-use policies.

Therefore, we are very pleased that, in April 2024, the Los Angeles County Board of Supervisors (“Board”) mandated a comprehensive update to its 2016 Renewable Energy Ordinance (“REO”), which set forth regulations to “guide and manage” renewable energy development in unincorporated LA County, which entirely banned utility-scale wind energy development.² In its REO update mandate, the Board provided a number of considerations aimed at revising the ordinance, with a focus on utility-scale renewable energy,³ including the following:

¹ California Energy Commission, Utility-Scale Renewable Generation Totals by County: 2024. Available at: <https://caenergy.maps.arcgis.com/home/item.html?id=ebaa092f258e4408988913bb0cf360ec>.

² “Renewable Energy Ordinance Update Technical Study,” Prepared for Los Angeles County Department of Regional Planning, Aspen Environmental Group (March 2026), at p. 2.

³ *Id.* at p. 3.

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Evaluate the ban on utility-scale wind energy and make a recommendation based on market and environmental factors on whether it should be allowed on a discretionary basis in certain zones.⁴

In response, your department commissioned a technical study by Aspen Environmental Group (“Aspen study”), which was released last month. That study entirely failed to conduct the wind energy evaluation requested by the Board. CalWEA respectfully requests that you require Aspen to remediate this important shortcoming of its study as soon as possible.

The Aspen study states that utility-scale wind was not included in its screening analysis, citing three reasons:

- a transmission planning report by the California Independent System Operator (“CAISO”) projected only 345 MW in the Greater Tehachapi resource area, which encompasses a portion of northern Los Angeles County;
- the current prohibition on utility-scale wind; and
- a lack of projected need in unincorporated Los Angeles County.⁵

As explained below, Aspen’s decision to exclude utility-scale wind from its analysis on these grounds is erroneous and fails to meet the Board’s request to evaluate this important resource.

Aspen did not evaluate the potential of utility-scale wind energy in LA County

The Aspen study cites CAISO’s 20-Year Transmission Outlook in stating that there is “*no projected new capacity* for utility-scale solar or utility-scale wind in the Greater LA resource region ... due to *insufficient resource potential* in this region to support these technologies at a utility scale.”⁶ First, this “analysis” fails to accurately account for the potential capacity reported by CAISO, which, as the Aspen study notes, was 345 MW.⁷ This alone is a significant amount of clean energy capacity worthy of study.

Second, Aspen failed to explore the basis for the figure in CAISO’s report, which it attributed to “insufficient resource potential.” CAISO itself did not perform an analysis of wind resource potential. The 2024 CAISO report cited by Aspen relies on a joint-agency resource assessment informed by land-use screens prepared by the California Energy Commission (“CEC”).⁸ The CEC’s land-use screens are based on high-level models that are not validated by on-the-ground surveys. CalWEA has previously informed the CEC and the California Public Utilities Commission (“CPUC”) that these models are overbroad, screening out areas with high-quality wind resources where on-

⁴ *Id.* at p. 4.

⁵ *Id.* at p. 89.

⁶ *Id.* at p. 19. Emphasis added.

⁷ *Id.* at Table 2-4.

⁸ “CAISO 2024 20-Year Transmission Outlook Update” at p. 15. CAISO references the [2021 SB 100 Joint Agency Report](#) (“SB 100 report”) which, in turn, states that it uses “the resource portfolio provided by the CPUC for use in the 2023-2024 transmission planning process.” (SB 100 report at p. 17) That CPUC portfolio, in turn, relies on resource assessments grounded in the California Energy Commission’s land-use screens. See CPUC Energy Division’s [Final 2023 Inputs and Assumptions](#), October 5, 2023, at p. 58.

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the-ground surveys may indicate that the site is appropriate for wind project development.⁹ This is particularly true given the small land footprint of wind projects and the ability to carefully micro-site wind turbines.

CalWEA has demonstrated that the CEC's land-use screens would have prevented the development of almost 40% of the wind projects now operating on the Kern County side of the Antelope Valley-Tehachapi wind resource area (see CalWEA Figure 1, attached). These projects received land-use permits after review under the California Environmental Quality Act ("CEQA"), which included extensive site surveys and post-operational monitoring. Therefore, Aspen should not have relied on the CAISO report (or underlying documents) to determine wind resource potential on the LA County side of this resource area.

In the state-federal process that led to the federal Desert Renewable Energy Conservation Plan¹⁰ ("DRECP"), for which Aspen Environmental Group provided extensive support,¹¹ Northern LA County was identified as a major "Development Focus Area" for wind and solar resources in the "Preferred Alternative" that was proposed by state and federal agencies in 2014, before private land was eliminated from the DRECP's scope. (See CalWEA Figure 2, attached.) That alternative identified between 2,375 MW and 7,193 MW of wind development potential in LA County, depending on the discount factors applied for potential restrictions.¹² The wind resource potential is depicted (but not discussed) in Figure 4-3 of the Aspen study.¹³

Aspen improperly relies on the current wind prohibition to exclude utility-scale wind energy from its analysis

As noted above, the Aspen study states that due to "the current prohibition on utility-scale wind, this analysis instead focuses on optimizing the siting of small-scale wind."¹⁴ Citing the current prohibition as a reason not to analyze utility-scale wind directly contradicts the Board's directive to "evaluate the ban on utility-scale wind energy," as the study states on page 4. Aspen's decision on this point is inexplicable.

Aspen improperly relies on "lack of projected need in unincorporated Los Angeles County" to exclude utility-scale wind energy from its analysis

This stated rationale¹⁵ is not further explained and makes no sense in the context of the Board's motion titled "Accelerating Renewable Energy Development and Promoting Community Resiliency in Los Angeles County," as it mandated a comprehensive update to the REO,¹⁶ as well as the County's aspirational goal of achieving carbon neutrality by 2045. To achieve that goal, "Los Angeles County must have adequate renewable energy resources to equitably and reliably transition to a

⁹ See, e.g., [CalWEA Comments on Busbar Mapping](#) (September 5, 2025) at p. 4.

¹⁰ See: <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan>

¹¹ See <https://www.aspeneg.com/projects/desert-renewable-energy-conversion-planning?rq=drecp>.

¹² Draft DRECP and EIR/EIS (August 2014) at Appendix F-1, p. F1-5 (Box 1).

¹³ Aspen report at p. 46.

¹⁴ *Id.* at p. 89.

¹⁵ *Ibid.*

¹⁶ *Id.* at p. 3.

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fossil fuel-free economy.”¹⁷ Re-evaluating the REO and its wind prohibition is one way to ensure adequate renewable energy resources.

Because Aspen excluded utility-scale wind from its analysis, it did not provide Planning Department Staff with any information with which to meet the Board’s request to “make a recommendation based on market and environmental factors regarding whether wind energy development should be allowed on a discretionary basis in certain zones.” The Aspen study states, in the context of a case study in Kern County, that, “[t]he feasibility of utility-scale wind development within unincorporated Los Angeles County would depend on locating a site that meets the suitability requirements for this technology, specifically: sufficient wind speed, available acreage, grid proximity, suitable soil conditions, and sufficient distance from sensitive uses.”¹⁸ Because Aspen excluded utility-scale wind from its analysis, its study fails to properly address these issues or address them at all.

Per above, there is ample evidence that suitable wind resource speeds and acreage exist in the Antelope Valley. Moreover, there are numerous grid interconnection points in the area. Regarding market factors, there is substantial interest among California load-serving entities in procuring wind energy, whose production profile complements daytime solar output. However, there is a severe lack of wind energy development in California, primarily due to hostile permitting environments in areas with commercial-grade wind resources near the existing grid. Los Angeles County’s wind prohibition is a prime example of this.

Regarding environmental factors, as noted above, wind energy projects have a small land footprint and can be carefully micro-sited to avoid sensitive environmental areas. Therefore, the County should consider whether, or to what extent, wind energy development may be compatible with its Significant Ecological Areas (SEAs). Figure 4-10 shows limited “Environmentally Sensitive Sites” which have “ecological significance” in the Antelope Valley area, compared with the “irreplaceable biological resources” in the much larger SEA in this area (Figure 4-12). How the two designations relate is not explained in the Aspen study.

CalWEA encourages you to require Aspen to immediately reconduct its assessment of utility-scale wind energy resources in view of the information above. CalWEA would be pleased to assist you or Aspen in this effort.

Sincerely,



Nancy Rader
Executive Director

cc: Lorraine Acuna, Regional Planner, Community Studies North

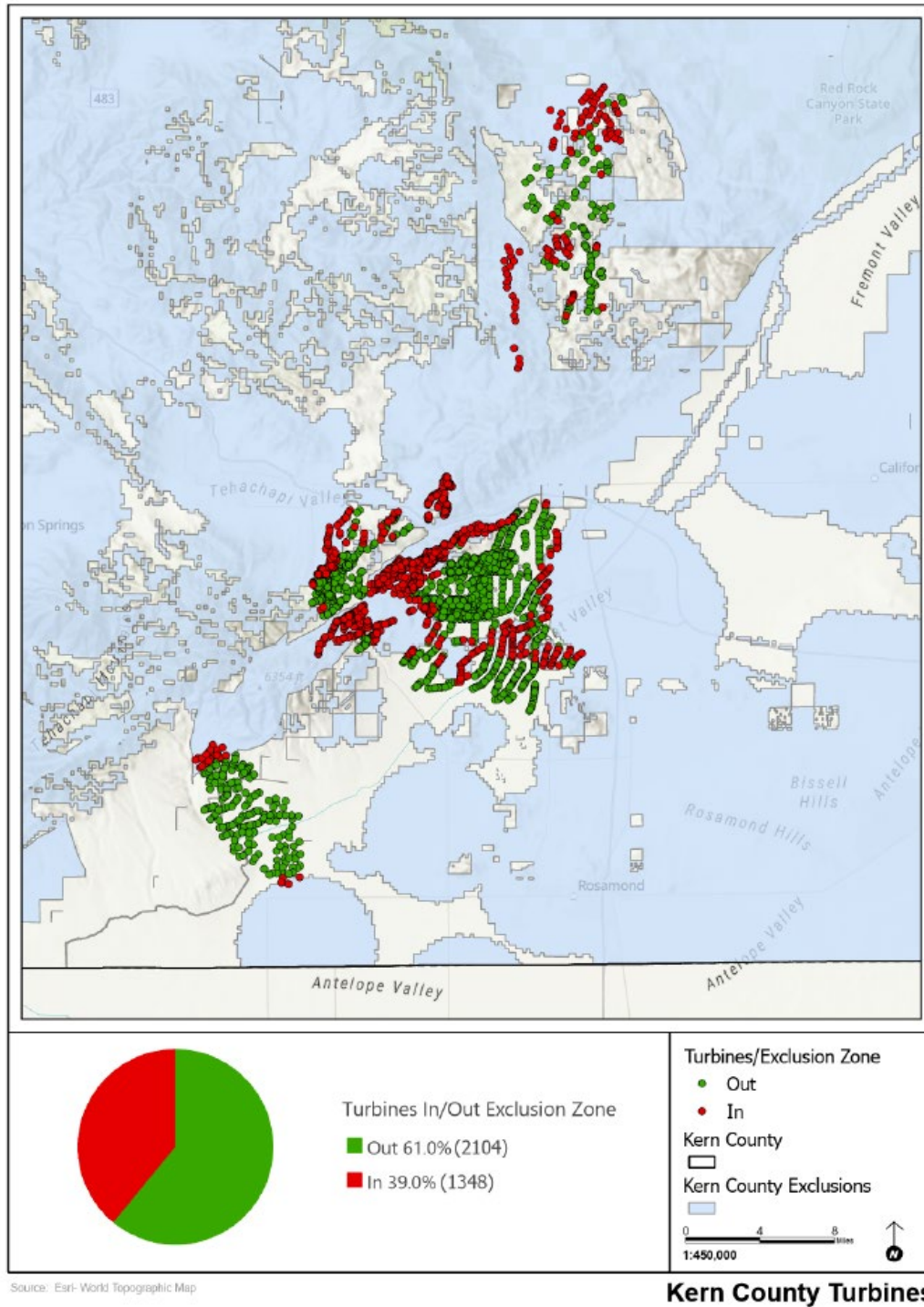
¹⁷ *Id.* at p. 5.

¹⁸ *Id.* at p. 58.

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CalWEA Figure 1. Permitted, operating wind turbines in Kern County would have been excluded by CEC environmental screens.

Source: CalWEA, using CEC environmental screens.



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CalWEA Figure 2. DRECP map showing proposed renewable energy Development Focus Areas in 2014 Preferred Alternative

Source: 2014 Draft DRECP and EIR/EIS

