



April 29, 2021

The Honorable Laura Friedman
Member, California State Assembly
State Capitol, Room 6011
Sacramento, CA 95814

**RE: Assembly Bill 1124 – OPPOSE
As Amended April 27, 2021**

Dear Assembly Member Friedman:

On behalf of the Rural County Representatives of California (RCRC), the California Building Officials (CALBO), the California State Association of Counties (CSAC), and the Urban Counties of California (UCC), we respectfully must oppose your Assembly Bill 1124, related to solar energy system permitting.

The Legislature has enacted significant changes over the years to make installation of residential solar more accessible and less burdensome for California residents. Current law prohibits homeowner associations and other organizations from restricting the installation of solar energy systems and requires local jurisdictions to streamline the permitting process for small residential rooftop solar energy systems. Further, local governments must approve a “solar energy system” through an administrative process, with fees statutorily limited for both residential and commercial projects. AB 1124 will expand the types of projects that are subject to these current provisions, though it is unclear to what degree.

Specifically, AB 1124 expands the definition of “solar energy system” to include facilities not installed on a building or structure, thereby arguably making commercial or utility grade solar projects subject to only a ministerial review process by the local jurisdiction. The environmental and community impacts from a large-scale solar project are significant and should be thoroughly evaluated through a process that provides safeguards for local residents.

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Additionally, we have significant concerns with the economic impact of AB 1124 on local building departments and local jurisdictions. By expanding the definition of "solar energy system," the types of solar projects subject to the fee cap is greatly expanded, creating cost pressures for building departments that will have increased duties for reviewing these new projects.

Our organizations continue to support efforts to achieve California's commendable goals relative to climate change. We applaud legislators and their efforts to further these objectives; however, the language in AB 1124 creates ambiguity in both intent and process. Current law recognizes the differences in impact and complexity of rooftop solar energy systems and those systems not attached to a building by creating the streamlined process for only rooftop solar and a ministerial permitting process for those systems attached to a structure. The bill's expanded definition of "solar energy system" beyond just solar carports to large scale solar systems brings unknown consequences. For these reasons we regrettably oppose your bill.

If you should have any questions or concerns regarding our position, please contact Tracy Rhine (RCRC) at trhine@rcrcnet.org, Christopher Lee (CSAC) at clee@counties.org, Kiana Valentine (UCC) at kiana@politicogroup.com, or Brady Guertin (CALBO) at bguertin@calbo.org.

Sincerely,



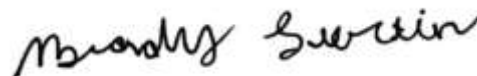
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cc: Members of the Assembly Local Government Committee
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