

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

To: County LUS – SPARC Team – Linda Mawby

From: Chuck Bell, Pres. 760 964 3118 chuckb@sisp.net
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Date: 10/29/16

RE: COMMENTS: DRAFT RENEWABLE ENERGY AND CONSERVATION
ELEMENT (RECE) – EMPHASIS IN RED IN RESPONSE ON
NOVEMBER DRAFT

We would greatly appreciate the inclusion of the following points (in red) that do not seem to be included in the Nov. draft.

GENERAL:

Let's not get all this stuff tucked away hither, yon and wherever in the Dev. Code and General Plan like the community plans goals/policies are intended. The final RE Element needs to be a separate document that can be readily referenced by staff, developers and the public.

This is mostly a policy document – capturing the essence of the Framework Plan and what we have been saying over the years – which is much appreciated. You have been listening. But it doesn't address specific issues critical to our communities – that should be in this document – not spread out in the Development Code or wherever.

Lot of references to CCAs – 'community solar' – micro grids – roof top – parking lot – backyard "point of use" projects, etc. Good.

Needs a policy that RE generation within this County only has to cover the power demand in this County – not using our resources to subsidize/generate power for the rest of s. Calif. that also has sufficient solar resources.

County needs to determine amount of MWs that can be generated on commercial parking lots within the entire County. (An intern could do this with Google mapping).

Some of the “encourage” statements need to be “require/mandate”.
Not enough substance re: protecting property values from misplaced projects.
Needs to be added to “land-use” sections.

Need stronger criteria for water requirements for construction – applicants must specify source(s) and provide approvals. Need more emphasis on “non-potable water” for construction (ie: Mojave Water Agency’s State Water pipelines).

Need a statement/objective re: the Mojave River Basin Adjudication (Judgment) – covering much of the desert region affected by potential RE projects - where water rights are apportioned out – and any consumption over 10 AC’/year requires obtaining (renting/buying) unused water rights from a stipulating party within the Sub-Area where the project is located.

Consider panel heights for industrial-scale projects – ie: no more than 8’ or 12’ at optimum panel tilt.

Does Table 1 more or less preclude industrial-scale wind projects? If so – good.

Public notification of project applications needs to be more expansive – local community groups can help.

Need policy – (in tandem with cooperation with other entities) - County advocate and work with SCE re: helping get PPA’s, etc. for even small projects.

In Chapter 1 – need policy: County needs to require developer/SCE to quantify cost of power to consumers from each industrial-scale solar project.

SPECIFIC:

Goal 2: Need less emphasis on wind energy. Not as reliable or predictable as solar – comes and goes – difficult for grid operators to manage the electrons –

having to decelerate/accelerate peaking plants to accommodate it – thus increasing pollution and GHG from natural gas, etc. generation.

2.4.2: “Require” inclusion of RE facilities for onsite use in new developments.

3.5.1: Soil erosion – needs active “enforcement”. County CE is spread too thin and needs beefing up. There have been numerous violations on the sites of recently built solar PV projects throughout the desert portion of the County. What about no grading/land disturbance during windy spring/winter months? Grading should only be for building and utility slabs. Mounting posts should be drilled and pile driven, leaving the terrain essentially undisturbed and at least some of the native vegetation intact.

3.5.2: “Bonding” for decommissioning/restoration needs to be included in this policy as it is in 4.4.1 (ie: SMARA) – what we have been advocating for years. And - If a plant ceases to produce the planned/permitted amount of power output for any reason – X% of the field is no longer functioning – that it be decommissioned, demolished and land restored – or conveyed to an entity to resume the intended production.

3.9.1: “Local hiring” only really works for smaller “point of use” PV. Industrial-scale projects are and will be unionized with outside workers and vendors – as experienced by IBEW’s use of CEQA to literally force developers into compliance.

4.2: “Disrupt, degrade or alter local hydrology”. This absolutely has to be a siting criterion. With this standard - the 2 existing industrial-scale 20 MW PV projects in Lucerne Valley (now called Lone Valley Solar) wouldn’t have been approved – and the proposed 20MW Solar One’s application next to them (pending County review) would not have been accepted.

4.3.1: “Visual” – Glare from Lone Valley’s panels dominates the view shed within a significant portion of Lucerne Valley. Not easy to mitigate. That’s why location is critical.

4.6: Why not just “avoid” sensitive habitat – not just when “feasible”? Plenty of places to put this stuff with no impacts. Note: So as not to confuse the issue – mitigation “on site” for these projects (especially industrial-scale) is difficult if not

impossible. Mitigation is what occurs (when it can) “on-site”. “Off-site” is not “mitigation” - it is called “compensation or offsets” – and should be required when on-site work isn’t enough to ‘mitigate’ the project.

4.7: “Conservation offsets on public lands” – Good. Could be a fight with CDFW which wanted compensation only on private lands for the West Mojave Plan.

P. 36: “Encourage RE on BLM’s DFA’s”. As is - major problem for us with all the BLM DFA’s proposed in Lucerne Valley. Need stronger adherence to the County/BLM agreement (MOU?) to reconcile the RE Element with the DRECP – to assure DFA’s compatibility with the County’s RE objectives. Also must include in the County/BLM negotiations all the State School Lands that would be available after exchange with BLM for industrial-scale projects – particularly in the vicinity of Johnson Valley/Old Woman Springs Ranch – a major impact on Lucerne and Johnson Valleys – with no or minimal transmission systems – with native desert environments that totally contradict the RE’s (5.2) siting criteria.

P. 37: Siting – in “Industrial Zones”. We don’t want them in our few acres zoned “Regional Industrial”. Takes up valuable, specifically zoned ground that can generate real industry, local jobs, taxes, etc. PV Solar has no real economic value to us – other than what power it can generate. No mention of the specific “PV Solar Zone or Overlay” that we have been advocating (however it looks to be included in our Community Plan). Mostly just siting criteria – so looks like it perpetuates the County’s current position – “in any zone with a CUP” – or maybe only in an “Industrial Zone”? Confusing and unclear. However – the strict siting/environmental/etc. criteria that we have been advocating - that the Element captured - would limit many locations.