

## **CPUC/BLM – EIR/EIS SCOPING – COOLWATER-LUGO TRANSMISSION PROJECT**

### **Statement of the Lucerne Valley Economic Development Assoc. (LVEDA)**

Chuck Bell. Pres. [chuckb@sisp.net](mailto:chuckb@sisp.net) 760 964 3118

P. O. Box 193

Lucerne Valley, CA 92356

### **ENVIRONMENTAL ISSUES:**

Scenic: Precludes (especially BLM's alt. routing) the locally supported designation of Hwy 247 (Barstow Rd.) as a 'State Scenic Highway' – one of if not the last roads in California eligible for said status.

Construction water: Amounts/sources/impacts. Local groundwater basin is in significant overdraft and adjudicated. Need to obtain untreated State Project Water via existing pipeline that runs through the area. Contact Mojave Basin Watermaster for info: 760 946 7026

Biology: Typical desert resources (tortoise/raptors/impacts from towers, roads, etc). Whether a new corridor or upgrade of existing lines – the southern route passes through a critical eco-tone/transition zone from mountain to desert – interference with big horn sheep/large predators ie: cougars/etc.

Cultural: Vast area along the north slope of the S. B. Mountain range has significant resources and known sites – to be avoided – but never mapped for public info.

Desert View Substation: Totally inconsistent with the land-use and residential integrity of that portion of Apple Valley – growth inducing not only for high population numbers that the Town of Apple Valley does not support in its General Plan – but also induces growth and local placement of future industrial-scale renewable energy (solar/wind) projects that are also inconsistent with said land-uses. (See general statement below).

Land Use: Just the submission of this project to CPUC/BLM trumps and dilutes all the other RE plans in process – creating a corridor of potential RE projects before we know where they should be placed. (See last para below).

Traffic: Depending on the routes selected for construction/material hauling vehicles – which depend on where said materials will be obtained - a significant impact on commercial and other areas of Lucerne Valley would occur – particularly the 4 way stop in the center of town – requiring mitigation and our involvement.

Property Values: Quantify the local and regional values of residential property adversely affected by both the transmission lines and substation – a known and well documented consequence of these types of projects.

Environmental Justice: The region affected by this project currently is used for significant transmission of power to the LA Basin and SCE's grid – we produce most of the cement and limestone used in s. Calif.- have to deal with significant truck traffic on 2 lane highways providing said products as well as being a corridor for long-haul trucking – accommodate the majority of OHV recreation in our adjacent “Open” areas for s. Calif. – currently providing enough products/electricity transmission/services, etc. for s. Calif. In addition - our relative ‘affordability’ has created some demographic-related impacts (social effects/high demand for certain services/etc.) that other communities have not experienced – at least to our extent. Other areas need to bear some of this burden – (ie: Lancaster/Palmdale that **wants** a transmission line that would be a valid alternative to this one).

Alternatives: BLM's proposed alternative along the Hwy 247 (Barstow Rd.) alignment would obviously have to most scenic impact. A corridor east of Barstow Rd. would pass through a BLM-designated Area of Critical Env. Concern – not just for tortoises. THE FAVORED ALTERNATIVE should be the proposed Clearview Line from the Harper Lake/Abengoa solar plant through Lancaster and Palmdale to collect the industrial-scale solar power they are building and advocating – a corridor they want! The CPUC's or CAISO's initial rejection of that alternative was not based on substantive resource data or rationale.

## **GENERAL STATEMENT OF OUR OPPOSITION – PROJECT NEED - CONSEQUENCES**

Project Description quotes: “The Barstow .....Lucerne Valley.....areas have been identified to be rich solar and wind resource areas.....The purpose of the Proposed Project is to provide additional transmission capacity needed in the .....Lucerne Valley areas to support large-scale

renewable generation development.....” Said statement likely references the draft DRECP’s Development Focus Areas (DFAs) – totally engulfing and surrounding Lucerne Valley in all 6 alternatives – formulated with no local stakeholder participation – inferring that solar/wind all over the place is a “done deal”. **It’s not!** The potential MW generation that SCE cites in its application is too speculative and locally opposed to constitute rationale for this transmission project – with some of the proposed RE projects still ‘in study’ - or withdrawn, ‘on hold’, not economically viable, etc. As such – if the potential for “renewable” generation in Lucerne Valley is one of the primary reasons for this transmission project – it is based on a failed premise - not much will come from here – thus SCE and PUC need to re-think the need for and benefit of this project.

This application should be shelved, at least until regional RE plans are completed. The State’s draft DRECP (an ‘energy plan’ - certainly not a ‘conservation plan’) is due sometime this summer. BLM’s West Mojave Plan update isn’t completed yet. San Bernardino County’s Renewable Element to the General Plan (and community zones for industrial scale projects) won’t be in draft form for probably more than a year. We are dealing with too many individual projects – too many ‘parts’ before we understand the consequences of the ‘whole’ – a systemic, dysfunctional series of reactions with no real PLAN to guide us – to determine the best places for this stuff with the least environmental/land-use/social damage.

This project is an inefficient, circuitous and costly path to get Abengoa’s Mojave Solar Project into PG&E’s grid. Our area accommodates enough transmission corridors and related infrastructure to serve s. California’s urban areas. SCE and PG&E need to find an alternative path.

IF THIS COOLWATER/LUGO TRANSMISSION LINE IS APPROVED PRIOR TO COMPLETION AND ADOPTION OF ALL THESE PENDING PLANS – IT WILL EITHER TRUMP SAID PLANS OR UNDULY INFLUENCE THEM – WASTING THE TIME AND MONEY SO SPENT – BECAUSE BY VIRTUE OF ITS EXISTENCE, ALIGNMENT AND SUBSTATIONS - IT WILL DETERMINE WHERE INDUSTRIAL SCALE RENEWABLES ARE SITED – WHERE PPA’S WILL BE THE EASIEST TO

OBTAIN – AT THE EXPENSE OF WHAT WAS INTENDED TO BE GOOD,  
REGIONAL PLANNING - JUST MORE TAILS WAGGING THE DOG.