

To: Planning Commission and Staff

From: Lucerne Valley Economic Development Assoc. (LVEDA)  
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RE: **PRELIMINARY COMMENTS – DRAFT RENEWABLE ENERGY AND CONSERVATION ELEMENT**

Following comments per our cursory review only. More to follow later.

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. 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 "point of use" projects, etc. Seems the County willing to support. Good.

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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).

Talks about decommissioning/restoration/bonding. Good.

Not enough substance re: protecting property values from misplaced projects.

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. No reference to the County/BLM agreement (MOU?) to reconcile the RE Element with the DRECP? Major problem.

P. 37: Siting – in “Industrial Zones”- over 10MWs? Even a 5 MW is a pretty big project. We don’t want them there. Takes up valuable 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 for us. No mention of the specific “PV Solar Zone or Overlay” that we have been advocating. 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.

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.

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 the native vegetation intact.

Need stronger criteria for water requirements for construction – applicants specify source(s) and provide approvals. Need more emphasis on “non-potable water” for construction.

County needs to determine cost of power to consumer from each major solar project.

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.

Need policy – County advocate and work with SCE re: helping get PPA’s, etc. for even small, ‘point of use’ projects.