

**LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)**

To: John Oquendo  
County Planning

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**RE: ORD MT. SOLAR SCOPING – (Supplemental to LVEDA’s participating comments in the ‘North Slope Community’ letter)**

John:

Some of these comments will duplicate what’s in our communal letter. Been busy and not much time left to comment further.

The Initial Study does a fairly good job in assessing impacts and significance – but misses important ones too.

Following are our summary notes:

**GENERAL:**

(As we discussed before) – the ‘Community’ is Lucerne Valley – not Kramer Junction.

The site is within the jurisdiction of the Colorado WQCB – not Lahontan.

Any fencing with slats for ‘visual buffering’ needs to be engineered to withstand high wind shear – otherwise will just blow over.

**SCENIC:** We appreciate the IS’ recognition of the ‘scenic value’ of Barstow Rd. and its environs – and our on-going effort to get it designated as a “State Scenic

Highway” – but it doesn’t reflect total (solar and Calcite) intrusions/disruptions – especially with all the high-rise structures. They are not “low vertical profile”.

**WATER:** Wells/pumps need to be functional before any ground disturbance. The Agincourt/Marathon (now Lone Valley Solar) projects used 50 acre’ – and the const. supt. told us it needed an additional 20 ac’ in order to deal with the flying dirt problem – so that would be @ 70 ac’ and that was only on about 200 acres. Ord Mt. will likely need more than 75 ac’ of construction water – even with less grading requirements. One mitigation to reduce fugitive dust would be limiting construction to the less-windy summer and fall months. Even though more distant from the site – certain amounts of construction water can be obtained from the Mojave Water Agency’s Morongo Pipeline that traverses s. Lucerne Valley – non potable State Water – in lieu of semi-potable groundwater on site. Even on-site groundwater would have to be treated for panel washing due to its high dissolved solids. Just because the owner has available water rights to rent or sell to the project – impacts to the already stressed aquifer need to be assessed – along with any adverse affects on residential wells in the region.

**AIR QUALITY:** Not one solar project to date in the desert portion of the County has complied with County Dev. Code or MDAQMD regulations – and neither entity has done an acceptable job in responding to complaints of blowing dirt. This project will be in violation from time to time – with especially PM10 (and smaller particles) affecting residents.

**BIOLOGY:** Salt bush in that area is a climax plant community – not just ‘in succession’ to climax. There will be more displacement of rodents, etc. than expressed in the IS. What about the panels’ “lake effect” on waterfowl, etc. – especially within the flyway? Need more analysis of affect on the nearby Ord Mt. ACEC/DWMA.

**GLARE/AESTHETICS:** Solar panel glare is not thoroughly addressed. It will be visible from most of Lucerne Valley – as it is from the two projects on Camprock Rd. Said glare commands the view shed and thus a major scenic/aesthetic adverse impact.

**HYDROLOGY:** I might have missed it – but didn't see any analysis of runoff/ponding/flooding from the panels' impervious surfaces – just reference of other structures, roads, etc. Where are those concentrated flows going to go?

**TRAFFIC:** Traffic analyses need to include Bear Valley Rd. and Hwy 18 where most workers and equipment will traverse – not just Hwy 247. And of course construction traffic coming through the town of Lucerne Valley (Hwy 18 to Barstow Rd.) – especially impacts to the 4 way stop. Or alternate routes? How much of the traffic would come from the LA ports (southwest) – from the I-15 or I-40 then south on Barstow Rd.?

For the solar plant – need to work with Caltrans to install (even if just temporary) northbound right-turn lanes – and even a left-turn lane depending on how much traffic comes from the north. For the Calcite Substation construction – northbound left-turn lanes should be considered – and even a right-turn pocket depending on volume of southbound construction-related traffic.

**LAND USE/PLANNING:** How did “Land Use/Planning” get shined on? This affected community might not be considered “community” in the typical urban-oriented perspective (where all the consultants come from) – but it sure as hell is for those that live there. Land-use issues – what's best to go where – have been front and center in all these renewable energy comments and fights over past years. That's what the Solar Ordinance, RECE, DRECP, etc. etc. are supposed to be all about. THIS MUST BE ASSESSED IN THE EIR – AND DEFINITELY CONSIDERED 'SIGNIFICANT'. Especially with our Lucerne Valley Community Plan about to be finalized.

**ALTERNATIVES:** An alternative land-use to solar could feasibly be low water-use tree crops – more in line with the goals and land-use character of our community.

**POPULATION GROWTH:** Based on what has occurred near every other solar project: No need to worry about “inducing population growth”. This project (solar and Calcite) will only 'induce' displacement of existing residents – moving the heck out of there – assuming of course their property values haven't devalued to the point of not even being able to sell.

**CUMULATIVE IMPACTS (all of which have to be included):** We got 20 MW Agincourt/Marathon – 2 separate locations currently in operation on over 200 acres – which are now called Lone Valley Solar on the west side of Camprock Rd. Two currently being processed: Solar One’s EIR pending for a 20 MW (200 acre) project on the east side of Camprock Rd. - and the 60 MW, 484 acre NextEra (Ord Mt. Solar) recently filed for the north valley area. 8 Minute Energy’s potential 200 MW PV project recently filed on 640 acres+ – with more application work required – north of Lucerne Dry Lake and west of Barstow Rd. (applicants of which we recently met with). The Aurora/Sorrel 2000 acre (200MW) project off Lucerne Cutoff currently filed with and being processed by the State Lands Commission staff as lead agency (which doesn’t much care about local concerns – with those parcels likely going to BLM per the DRECP exchanges). And now it looks like the old Chevron Solar on BLM east of town might be revived as Celtic Solar? And we all know Lucerne Valley is in the sights of DRECP’s target for DFA’s. Plus we have numerous State Lands sections specified in the DRECP for solar development to help fund the State Teacher’s Fund.

All this and SCE is actively working on its proposed Calcite Substation within our existing Community Plan area – apparently signing up prospects for PPAs – some of which we are aware of and at least two that SCE cannot yet divulge. These are all certain to be more local projects to be connected to Calcite whether on private, BLM or State Lands. **These potential projects and the Calcite Substation itself would generate major cumulative, significant, negative impacts.** Plus SCE is upgrading its northern Pisgah/Lugo transmission line through Lucerne Valley to accommodate more MWs – thus more potential options for more local PPAs.

