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

To: Linda Mawby/Terri Rahhal/Karen Watkins – County Planning Dept.

 Bd. of Supervisors

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**RE: COUNTY RENEWABLE ENERGY AND CONSERVATION ELEMENT (RECE)**

The final RECE draft incorporates many of our concerns expressed over the past few years. We appreciate the County ‘listening to us’. (We especially thank Terri Rahhal, Karen Watkins, and Linda Mawby for their responses and working with us).

The “Coalition” letter sent separately explains our position in detail. Following is a summary of the changes we request: (RECE quotes in *italics*. Our emphasis underlined).

Large scale solar thermal and wind projects are totally unacceptable within the County (and BLM/State Lands) jurisdictions – therefore must be explicitly prohibited.

We advocate that the ultimate County-wide RE supply be no more than the County’s electrical demand – not subsidizing the rest of s. Calif. which has plenty of sunshine.  It should be a stated objective in RECE for private, BLM and State Lands.

“Ground mounted accessory solar” might need more than 70 kwh – especially for point-of-use by farms, etc. which might need more power for pumps, etc.  Need to be able to match power with on-site need.

We totally agree with *“Prohibit development of utility-oriented RE projects within the boundaries of existing community plans”. “Establish exclusion areas in the Development Code regulations for renewable energy development…….. for additional exclusion areas, such as new community plan areas………”.* **However**:

“Utility-Oriented RE” is defined as ‘more than 60 acres and more than 10 MWs’ - generating more than 50% of its output for use outside the local area – by connection to the grid. “Community Oriented Solar” (CORE) is defined as just less than 50% exported via the grid – the reminder staying with the community.  At least on paper – this could conceivably allow a multitude of 60 acre solar projects within a community plan area – a lot of power for export – thus basically ‘utility scale’ in nature**.**

Assuming it’s the County’s intent to only allow “real” Community-Oriented projects in a community plan area – the RECE needs to be amended to eliminate confusion - simplify the criteria – to eliminate potential interpretations contrary to its intent – by allowing only community PV solar projects that provide no more than 5-10% of its power to the grid for export – all the remainder specifically designated for said community – preferably via local, existing distribution systems and substations. (A small portion for export could help pay for such systems). CORE projects also must conform to specific siting criteria – must have community buy-in – mostly likely applied for by a community organization.

(As an example of a CORE project: Lucerne Valley received a $10K credit from the Fed. Dept. of Energy’s “Sunshot Initiative” to help us gear up for a local community based solar project.  Concept is to start out with @5 MWs- and maybe expand.  We have a good location for it – and are meeting with SCE re: the ability to get the electrons directly to our local substation via existing or maybe new transmission lines – bypassing the grid.  This is consistent with the Element).

While the following statement in RECE is intended to apply only to the 5 areas specified in the Bd.’s resolution (2016-20) – it isn’t sufficient to curtail projects on BLM and State Lands that could swamp Lucerne Valley with bad projects – nullifying the intent and purpose of RECE. *“Specific RE development standards and siting criteria shall be stated in the Development Code. In addition to qualitative siting standards in the Code, this Element encourages utility-oriented RE development on federal land in DRECP Development Focus Areas (DFAs), specifically those supported for this purpose by Board of Supervisors resolution.  Private lands adjacent to the supported DFAs will also be considered suitable, barring presence of environmental constraints to development”.*

For the 5 geographical areas deemed “suitable” for industrial scale PV solar by Bd. resolution – we need to establish specific “Solar PV Zones” or “Overlay Districts” - via policy in RECE and mapped for the County General Plan – per specific siting criteria. Everyone then knows what goes where and what doesn’t.  No need for zone change applications, etc. Said Resolution needs to be included in the RECE text. (Might consider adding Daggett to the ‘acceptable’ list where many other energy projects and fallowed ag. lands exist).

Via the DRECP - Lucerne Valley is targeted with BLM DFAs and potential industrial-scale solar projects on a multitude of State (School) Lands – diluting RECE’s ‘protection’ of private lands from large-scale projects. RECE needs a section outlining policies and processes that the County ‘will’ engage in with BLM (per its existing MOU) – and the State Lands Commission -aligning/reconciling DFA’s and State Lands projects with RECE – working with both agencies re: land exchanges, etc. Community representatives absolutely need to be included in this process.

*“Large utility-scale RE generation projects – 10 megawatts or more* ***–*** *on private land in the unincorporated County will be limited to the site-types below, in addition to meeting criteria established herein and in the Development Code in the unincorporated County”:* Assuming this statement applies only to those remote, 5 geographical areas defined in the Bd.’s Resolution

2016-10 – not in community plan areas – some of the listed criteria don’t apply since many of the features don’t exist in those regions.

*“Fallow, degraded and unviable agricultural lands” –* generally don’t exist in the 5 specified areas. However - this alone should not be a consideration w/o factoring other criteria.  Some fallowed ground is in some form of stabilization and recovery – or better used for other types of development (ie: low water use orchards, etc.) – and could be adjacent to incompatible land-uses.

 *“Industrial zones proven to not conflict with economic development needs”.* This criterion is subject to discretion and interpretation.  Problem solved with Solar Zones or Overlays. We need to keep our limited industrial zones available for real economic benefit – permanent jobs – increased assessed values – tax revenue - etc. (not what solar farms provide).

*“Site RE generation facilities in a manner that will avoid, minimize or substantially mitigate adverse impacts to sensitive habitats, and cultural resources, surrounding land uses, and* ***scenic viewsheds”.***

We are working on a State Scenic designation for Hwy 247 (Old Woman Springs and Barstow Roads).  We would hope the County, BLM and State Lands Commission would make decisions consistent with said potential future status.

**Note:  We are concerned that RECE might not do us much good in light of the utility-scale solar projects currently in place or in process – therefore not subject to RECE - the barn door open and horses gone**.  We got 20 MW Agincourt/Marathon – 2 separate locations in operation – 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 project on the east side of Camprock Rd. - and the 60 MW NextEra (Ord Mt. Solar) recently filed for the north valley area.  Plus 8 Minute Energy’s potential 200 MW PV project recently filed – with more application work required – north of Lucerne Dry Lake and west of Barstow Rd. (Applicants of which we recently met with – and thanks for advising them to meet with us).  Plus the Aurora/Sorrel 200 acre project off Lucerne Cutoff currently filed with and being processed by State Lands Commission staff as lead agency (which doesn’t much care about local concerns).  Plus it looks like the old Chevron Solar on BLM east of town might be revived as Celtic Solar.  Plus we are 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.  Plus SCE is actively working on its proposed Calcite Substation in our Community Plan area (directly tied to the Ord. Mt. Solar project) - apparently signing up prospects – some of which we are aware of and a few that SCE cannot yet divulge – likely to be more local projects to be filed whether on private, BLM or State Lands.  Plus SCE is upgrading its northern Pisgah/Lugo transmission line through Lucerne Valley to accommodate more MWs – thus more potential options for local PPAs.  (Note:  Recently we and others asked for a moratorium on new projects and putting current pending ones on hold until the Element is approved.  Planning staff responded – much appreciated – but the Bd. did not act on it).