

Tracy: Same comments as the following on the “revised” CUP - OPPOSITION

Chuck Bell 5/1/15

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

To: Tracy Creason
Senior Planner, LUS
(e-mail) – signed hard copy to follow

From: Chuck Bell, Pres.
P. O. Box 193
Lucerne Valley, Ca 92356
760 964 3118 chuckb@sisp.net

Date: 2/3/15

RE: **LUCERNE VALLEY SOLAR ONE – INFIGEN - ATWELL, LLC - PROJECT NO. 14001141**

Tracy:

We appreciate the project notice and filings. This is our preliminary position statement based on information received to date.

Richard Selby and I met with the applicant’s representative on site a few months ago. While we appreciate his reaching out to us – we informed him that we would oppose this project based on its location and what transpired across the road at Lone Valley Solar during construction – the same issues affecting this site.

This project is east of Camprock Rd. – adjacent to the existing 250 acre Lone Valley Solar (formerly Agincourt and Marathon) which already commands that view shed from every site angle. This proposed 200 acre site will totally consume and alter that view shed – in an area that is not suitable for industrial-scale PV for reasons we have expressed many times for both the DRECP and SPARC (County’s Renewable Element) processes.

This is a good example of one solar project begetting another one – especially with a likely SCE PPA due to upgrades on the adjacent power line done for Lone Valley – all BEFORE we know where these projects should be placed – exactly what SPARC and the DRECP are supposed to determine – trumping said plans and the time and funding that went into them. This and other pending applications should be placed ‘on hold’ until said plans are finalized.

OR – with our likely support - Infigen could pursue the 6-7 square mile area in Lucerne Valley that we have mapped and submitted to just about everyone and entity involved with RE – the only suitable location in our area for industrial-scale PV – out of site – poor quality groundwater – flat and requiring no grading – with site conditions precluding residential or agricultural use - within an existing SCE transmission corridor – and not much good for anything else.

Lone Valley's construction water use was approximately 50 acre feet – about 20 less than what project reps. have hinted it needed due to not enough water being applied during initial grading stages which resulted in significant sand blow – with a plume extending almost a mile off site – prompting notices of violation from Code Enforcement. This project has the same terrain, soil types, grading requirements – therefore water use projection should be closer to 70 acre feet. And what is the source – and when determined? Lone Valley only could obtain 10 acre feet of (non-potable) state water from Mojave Water Agency's Morongo pipeline traversing the local area – with the rest from a farm requiring long distance hauling - almost 40 acre feet of potable water from an overdrafted, adjudicated groundwater basin.

The EIR will have to cover more than tortoise/habitat impacts. If one was done for Lone Valley – there would have been 'significant adverse environmental impacts' that would have to be dealt with better than they were – likely requiring 'overriding considerations' for those that could not be (and weren't) mitigated.

Starting construction in the month of April is certainly not advisable due to springtime being our high wind period. Dirt blowing off the site will invite visits from County Code Enforcement – and likely fines.

As did Lone Valley – the site will require tremendous amounts of grading – not just a dust issue – but it is within the watershed/washes that percolate mountain runoff into our over drafted groundwater basin – the primary area of recharge critical for the 'Lucerne Basin' north of the Helendale Fault. The panels' impervious surfaces, wash diversions, accelerated volumes of flows, etc. that impede percolation will cause downstream flooding and evaporation – not percolation – in the lower elevations.

Lone Valley 'advertised' its Joshua trees for adoption in the S. B. Sun newspaper – which hardly anyone in this region reads – thus had few if any takers – with most destroyed. (I would have taken 10 of them). This is just another example of applicants, developers, contractors AND the County not understanding rural communities and how best to interact with its residents.

Bottom line: there should be no industrial-scale RE projects in native desert habitats – especially on the higher slopes with the most variety of diminishing native desert plant species.

Please keep us informed of every action/document/etc. associated with this project. We know the County is obligated to process these applications – but for reasons expressed above – the County should adopt a program that places these applications 'on hold' - or better yet - denied until we have the Renewable Energy Element and "Industrial Scale PV Zoning" in place.

