**LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION**

To: County of San Bernardino, Land Use Services Department

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Date: 2/21/2019

RE: **COMMENTS:** **NOP/INITIAL STUDY: LENDLEASE ENERGY – CALCITE SOLAR – LUCERNE VALLEY**

Did all residents within the required project perimeter receive notices?

The IS narratives dismiss the intensity of “potentially significant” impacts marked in the boxes. All items marked “potentially significant” are valid issues that need to be fully assessed and mitigated in the EIR.

**AESTHETICS:**

All category impacts will be ‘environmentally significant’. The Lucerne Dry Lake bed/playa is a significant/important geologic feature – likely remnant of a Pleistocene lake. As stated in the IS - a citizen’s group (because the County can’t or won’t) is actively pursuing/working on a state-designated Hwy 247/Barstow Rd. ‘scenic route’ – and is far along in the process. Caltrans has designated it as “eligible” for said status which means this project application must be referred to: (Rose Bishop, LA #4868 Caltrans District 8 - District Landscape Architect  464 W 4th St. San Bernardino, CA 92401 – MS 1062 Ph: 909-383-6414  ~ Email: rose.bishop@dot.ca.gov) for analysis of impacts to scenic quality and the likely reality that this project alone/and cumulatively with all the others will scuttle said state-scenic designation – a significant impact in and by itself. The entire view shed will be disrupted/interrupted with this project in the foreground. Glare cannot and will not be avoided no matter the coatings utilized. The two existing solar projects on Camprock Road in Lucerne Valley commands the viewscape of the north slope of the S. B. Mountain range during most of the day due to strong glare. A cumulative impact analysis must include all the other proposed solar projects in the vicinity of Calcite Solar.

County Policy (Open Space 5.3) precedes the listing of county scenic highways by area. The 2016 Caltrans doc. is in line with the county definition.

“The County desires to retain the scenic character of visually important roadways throughout the County. A “scenic route” is a roadway that has scenic vistas and other scenic and aesthetic qualities that over time have been found to add beauty to the County. Therefore, the County designates the following routes as scenic highways and applies all applicable policies to development on these routes.”

**AIR QUALITY**

The County should require the developer to fund and install a minimum of 2 particulate monitors (ie: Purple Airs – 2.5 and 10 PPM) downwind - east and northeast of the site - ASAP to measure background levels prior to construction - and what will be fugitive dust impacts from grading, etc. during construction and operation. Also we need a sentinel monitor upwind to get a baseline of air quality entering the site. Vegetation root mass “left in place” will not likely last long enough to be effective for soil erosion control – at least what’s left under panels due to shading of native desert vegetation that requires full sunlight. Natural reestablishment is highly unlikely. Construction should be limited to the least windy months of the year (ie: May to October). Winter/spring months are normally the windiest with the highest level of potential dust storms affecting downwind residents, etc. The cumulative analysis must include potential soil erosion/fugitive dust from the proposed Calcite Substation, Sienna Solar, Ord Mt. Solar and Aurora Solar (on State School lands), etc.

**BIOLOGICAL RESOURCES**

An analysis of brine shrimp populations on the Lucerne Lake playa should be included. The solar panel “lake effect” on migratory birds– particularly in this Pacific Flyway – must be assessed based on known impacts at other industrial solar PV sites. Designated wildlife corridors exist within and adjacent to the site’s boundaries and must be considered. The eastern boundaries of Apple Valley Town’s pending HCP are close by to the west and northwest and should be mapped relative to this and other proposed project sites.

**GEOLOGY AND SOILS**

As stated under Air Quality - dependence on maintenance of the root base after mowing is speculative – plus it’s been our experience with solar and mining projects that BAPs in writing don’t get to the dozer operators – who for all intent and purposes are the de-facto, on-site ‘environmental managers’ – doing what they do best – grading. The Units 4 and 5 clay soils adjacent to Lucerne Dry Lake likely can’t be stabilized with water which would create a slippery muck that can’t be worked on – therefore better stabilized with fine gravel – which would be necessary for roads anyway.

**GREENHOUSE GAS EMISSIONS**

The EIR needs to include a quantifiable analysis of all the GHG emissions associated with/emitted by the manufacture of all the project’s facilities (not just panels) – construction equipment – worker and equipment transportation - the loss of carbon sequestering from disturbed desert soils – and how many years it will take to achieve a net GHG benefit from solar-generated electricity at this site.

**HYDROLOGY AND WATER QUALITY**

The IS doesn’t describe which parcel has the existing or proposed new well. Does the project already have water rights or yet to be determined? It needs a “will serve” letter from the source with sufficient ‘Free Production Allowance’ whether served from on or off site. Local groundwater quality is critical to its use for panel washing – especially with high levels of Total Dissolved Solids (TDS) which won’t work for panel washing unless distilled or otherwise treated.

Construction of the two solar projects on Camprock Road in Lucerne Valley (Agincourt and Marathon – 230 acres) used about 50 acre’ and according to the construction supervisor needed another 20 for 70 ac’ total – and even in this course/rocky alluvium the fine soils blew off for days with plumes over 500’ high – well documented with photos – resulting in notices of violations and fines from County Code Enforcement and MDAQMD. The Calcite project’s soils are much finer sands and clays which will require much more water for erosion control especially if construction occurs during the windy months. Doing the math – with 230 acres requiring 70 ac’ of water for construction (even with dirt blowing off anyway) – Calcite’s 664 acres/divided by 230 acres/= 2.88 X 70 ac’ = closer to 200+ac’ of construction water vs. the 125 ac’ stated in the IS. What’s really important are the local and regional effects of extracting/consuming that much water in this severely over-drafted portion of the ESTE Sub Area – along with is marginal water quality.

Project retention/detention basins need to be described in the EIR – with locations/depth/for percolation or evaporation/etc/.

**LAND USE AND PLANNING**

A claim can be made that the project “will physically divide an established community” – or at least critical elements of it. We can call industrial solar all sorts of wonderful, fuzzy things – but bottom-line – they are “industrial land uses” that don’t fit in Rural Living/Agriculture/Resource Conservation, etc. zoning districts. The various locations of Calcite/Ord Mt/Sienna/Agincourt/Marathon/Aurora projects – some congregated – some dispersed - will divide/interrupt existing land-uses, community values – diluting our community and its land-use integrity. This must be assessed in the EIR and dealt with cumulatively.

The IS states that “the project would not conflict with any applicable land-use plan, policy or regulation of an agency with jurisdiction over the project….” It cites the County’s Renewable and Conservation Element – even without the original Policy 4.10 in place. It should also cite the goals and policies in the 2007 Lucerne Valley Community Plan, the County’s Vision Statement, and the County Solar Ordinance – all of which separately and collectively include stipulations and policies that will make “findings of approval” for this and the other projects extremely difficult.

Impacts on wildlife corridors, the adjacent Ord Mt. and the Granite Mt. ACECs (on both sides of the projects) - and the Apple Valley Town HMP need to be included in this analysis.

**NOISE**

Said noise impacts need to be assessed. Noise travels long distances through typical High Desert ambient air conditions and has to be factored in for residents even ½ to a mile away during operation – and even much further during construction. People who live in urban or mountain areas have no idea how far noise travels in desert environments – especially at this project’s elevation.

**POPULATION AND HOUSING**

“Displacement” impacts of housing and people need to be considered potentially “significant” due to empirical evidence of properties around the existing Camprock Rd. solar projects – with devalued home/parcel values that can’t even be sold. (Talk to our realtors)! This is a major issue for the community and its residents – not just those living next to existing or potential industrial solar developments.

**PUBLIC SERVICES**

To avoid the confusion that occurred at a fire a couple years ago at Agincourt/Marathon Solar on Camprock Rd. - where we were called during the fire by the Sheriff’s Dept. to provide a developer contact to inform and gain access – the County/developer needs to register the site and contact phone numbers with both County Fire and Sheriff’s Dept. at our local stations.

**RECREATION**

This and Sienna Solar need to determine these project’s (cumulative) affects on potential disruptions to large-scale use of the Lucerne Dry Lake bed for recreational rocket and commercial fireworks testing – likely more affected by Sienna Solar than Calcite Solar – but nevertheless a major cumulative impact issue for our community.

**TRANSPORTATION/TRAFFIC**

The EIR must assess: Where will the union workers come from – south from Barstow motels – or east from Victorville motels, etc.? Same for the trucked materials – from I-40 or I-15 south on Barstow Rd. – or east on Bear Valley Rd. or Hwy 18 from I -15? What are the impacts/changes in levels of service/etc. on Hwy 18 from the west through town – particularly the 4 way stop at the Hwy 247/247 intersection? How much traffic would come from the east on Hwy 247 from Yucca Valley, etc. Same for Rabbit Springs Rd. to and from Hwy 18 as a bypass from town? What routes will the over-size trucks take and during what times of day/night? Increasing traffic – especially trucks on Hwy 247 (Barstow Rd.) combined with project-related truck and worker traffic will create the need for left/right turn pockets (even if just temporary during construction) for access to the many project sites to partially mitigate safety hazards. The sharp curve at Haynes Rd. adds to the potential traffic/safety hazards. Between Haynes and Northside Rds. there is a curve and terrain change that also creates a significant traffic hazard (2 fatalities have occurred).

The cumulative effects of a project like Ord Mt. Solar/etc., etc. being constructed at the same time as Calcite Solar need to be quantified and mitigated.

**UTILITIES AND SERVICE SYSTEMS**

The IS doesn’t say which parcel has the existing or proposed new well. Does the project already have water rights or yet to be determined? It needs a “will serve” letter from the source with sufficient Free Production Allowance whether served from on or off site. Local groundwater quality is critical to its use for panel washing – especially with high levels of Total Dissolved Solids (TDS) which won’t work for panel washing unless distilled or otherwise treated.

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Project retention/detention basins need to be described in the EIR – locations/depth/for percolation or evaporation/etc/.

**MANDATORY FINDINGS OF SIGNIFICANCE**

The EIR must quantify individual and cumulative impacts – and be forthright and honest in describing those that cannot be mitigated on site or compensated off-site.

The “no project” alternative must be given serious consideration – with no typical, circular logic of “it doesn’t meet the project goal of having the site built so therefore we don’t consider it as a serious alternative”. \*SCE and other investor-owned utilities just told the CPUC they don’t need –don’t want – the grid can’t handle - any additional renewable energy procurement for years to come. Evidenced by the fact other states are getting paid to accept our excess solar-generated power during daylight hours.

*\*JOINT REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON PROPOSED DECISION ACCEPTING DRAFT 2018 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLANS, which was e-filed with the Commission’s San Francisco docket office today, February 19, 2019, and is hereby served.*

*……THE IOUS SHOULD NOT BE ORDERED TO PROCURE NEW RPS-ELIGIBLE RESOURCES AT THIS TIME…….. The Joint Utilities have no need for procurement of new RPS eligible resources at this time to meet RPS goals.*

**MPs H**