

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

To: **By Email: John.Oquendo@lus.sbcounty.gov**

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P. O. Box 193  
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Date; 1/27/17

**Re: Project Number: P2016005610/CUP – NextEra/Ord Mt. Solar  
Application for a Conditional Use Permit to construct and operate a 60  
MW PV solar energy facility on 484 acres in Lucerne Valley**

John:

LVEDA's full comments and positions on the project are included in the "Coalition's" letter submitted separately. (Note the range of the parties signing on. All of us affected by these industrial solar projects are in this fight together).

The Coalition's letter articulates the inability to make 'findings of approval' for this project pursuant to both the current County Solar Ordinance and the draft Renewable Energy Element.

This response focuses on cumulative impacts from this and other projects that have to be assessed in the EIR.

NextEra's Ord Mt. Solar's 60 MWs. Sorrell's current application for 200 MWs on State School Lands in NW Lucerne Valley. SCE's Calcite Substation for NextEra – and possibly for Sorrell – and with 4 additional LOCAL projects for connection to it that have yet to be divulged - per recent statements by SCE staff. (Note that SCE is actively pursuing Calcite before said solar projects have been approved – betting on the come - cart before the horse). Lone Valley Solar's (formerly

Agincourt and Marathon) existing 20 MW plants on the west side of Camprock Rd. (over 250 acres of native desert habitat totally wiped out). Pending 20 MW 'Solar One' under County jurisdiction on the east side of Camprock Rd. with EIR in progress. All the potential BLM 'Development Focus Areas' approved in the DRECP targeting Lucerne Valley - even on the N. Slope of the SB Mts. where solar insolation is marginal due to topography. Plus the DRECP decision to consolidate more State School Lands around Old Woman Springs Ranch in east Lucerne Valley specifically designated for many square miles of solar projects. And who knows what else?

We are getting besieged project by project – a “death by a thousand cuts”. The County can't claim that said projects not approved or not on line should not be included in a cumulative impact analysis – or that they might not conform to the County's (draft) RE Element - because all of them are actively being proposed with plans made accordingly. In addition – the County and its residents have minimal influence affecting projects within BLM and State Lands Commission jurisdictions.

Commenting on each one as it comes down the assembly line is necessary – we have to do it. But it is the County's obligation and legal requirement to fully comprehend and divulge the totality of individual and cumulative impacts from all these current and proposed projects:

Acres consumed. Habitats lost. Water requirements in an overdrafted, adjudicated groundwater basin. Wind erosion and air quality (as evidenced by what occurred at the Lone Valley Solar sites). Effects on surrounding residences. Lack of economic benefit to Lucerne Valley and the County (non-local construction crews – minimal long-term jobs for operation, and usually not local – with minimal increase in assessed value due to property tax exemptions for solar facilities). Loss of property values and difficulty of selling parcels and residences on the periphery of these sites. Glare from solar panels visible from all locations within the community. Disruption of desert soils that are known to be significant carbon sequesters. Transmission lines, substations, associated infrastructure. Etc.

CEQA's requirement for a Cumulative Impact Analysis is based on the premise that the **WHOLE IS GREATER THAN THE SUM OF ITS PARTS.**

Please keep us informed of the project and its EIR status throughout the process.

