

**From:** Chuck Bell [mailto:chuckb@sisp.net]

**Sent:** Friday, June 23, 2017 12:40 PM

**To:** 'SupervisorRamos@sbcounty.gov'; 'Wiltshire, Molly'; 'SupervisorLovingood@sbcounty.gov'; 'Holland, Don'; 'SupervisorGonzales@sbcounty.gov'; 'SupervisorRutherford@sbcounty.gov';

'SupervisorHagman@sbcounty.gov'; 'Rahhal, Terri'; 'Watkins, Karen'; 'Mawby, Linda'; 'Hudson, Tom'

**Cc:** 'Oquendo, John'; 'Duron, Heidi - LUS'; 'Baca, Sandra'

**Subject:** FW: Lucerne Valley Situation

By not heeding our request for a 'moratorium' on new applications and a 'hold' on the solar projects currently being processed - the County has put Lucerne Valley into a very serious and damaging situation – potentially ruining the very essence and land-use integrity of our community. It needs to be fixed and quickly.

We don't expect any direct response from BOS members due to the sensitive nature of this subject – potential need for future recusals, etc. But we do from staff as directed by the Bd.

We in Lucerne Valley (and all the north slope rural communities) have worked very hard over the past several years with County staff in drafting the Renewable Energy Element (now called RECE). The final draft is basically a good document – incorporating most of what we have been hammering on ever since the first (SPARC) meetings – not so well run by the consultants.

The Element was touted as the County's 'solution' to what renewable energy project goes where – important for us and those communities that had to deal with poorly placed projects approved with ineffective conditions of approval – as well as no or marginal monitoring during and after construction. Our experience with Lone Valley Solar on Camprock Rd.: We're the ones that had to call Code enforcement and the MDAQMD to report blowing dirt and other violations. We're the ones that had to help them find water for construction when the developer exceeded its allotted water from Mojave Water Agency. The Sheriff Dept. had to call us to get the phone # of the owner of the one that had a fire in a structure. And we're the ones that had to inform a project rep. that the panels were not rotating correctly. All this, and nearby residences got inundated with rodents displaced from the native desert that was totally wiped out. And surrounding property values tanked.

We will make our final comments on RECE – **but it won't do us much good in light of the utility-scale solar projects currently in place or pending – therefore not subject to RECE - the barn door wide open!**

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.

**All these currently filed projects on private lands under County jurisdiction will technically be exempt from the Element's stipulations and siting requirements. Time will tell if the current Solar Ordinance's rather weak criteria will have any effect on ultimate decisions.**

Planning staff knows what we are up against. Too bad BOS reps. didn't attend the recent "Ord Mt. Solar" (NextEra) environmental scoping session. They would have had a lot to talk about with their bosses. The Community Center was filled

to capacity with over 20 public members speaking – Planning staff (John and Heidi) did a good, professional job explaining the environmental process – but this and other pending projects are so contentious that it was **hard for the community members to focus on the project’s specific impacts because the bottom-line issue for us is that we “don’t want it” – we got plenty of them already - and shouldn’t be dealing with this or the others until the RECE is adopted.**

We will do our usual due diligence on Ord Mt. Solar, etc. – sending comments – playing by the rules – but here is likely what we, the County and developers are dealing with:

Community-wide opposition to utility scale/oriented projects that feed the regional grid – which is consistent with RECE’s proposed prohibition of such projects within community plan boundaries – **yet such applications and still being accepted and processed.**

**County is processing and still accepting applications for major utility scale solar projects in areas/regions that the BOS rejected per its 2/17/16 Resolution ‘2016-20’ - a direct indication of its unanimous position opposing said utility scale developments even outside DFA’s on private lands.**

Residents, the County and developers going down the yellow brick road with contentious projects – lot of time, expense and labor – definite negative responses – difficult PC hearings – potential appeals to the BOS – more hearings – and (as clearly stated at the Ord Mt. Solar scoping meeting – not an idle threat) - ‘litigation’.

BOS members dealing with pressure from developers and unions vs. their constituents – we the voters.

Add all this up and what we potentially get is what none of us want – eroding relationships with our BOS members, most of whom have listened to us, all of which have visited Lucerne Valley (Thank You) and have seen our preferred location for a community solar project – and have supported our positions in the past (North Peak Wind/etc. ).

And: Will staff recommendations and PC/BOS decisions be based on just the current Solar Ordinance's criteria – or be directly consistent with RECE's stipulations (even though applications were accepted prior to its adoption)? Note: RECE will likely be approved and in place when these projects go to hearings.

And: Will the County (forcefully) help us in dealing with BLM and the State Lands Commission re: these issues?

We and many others recently asked for a moratorium on new project applications, and that current/pending application processing be put on hold until the RECE is approved. All we got out of it was the BOS asking staff what the status of the Element was – and then the April 2017 draft showed up on the website.

**This is our second request for a “moratorium/hold” – which would be entirely consistent with the BOS/County documents (ATTACHED) – all of which we greatly appreciate – but they must be adhered to even before RECE is approved in order for the County to maintain credibility.**

**Again, we don't expect a direct reply from the BOS – but would at least appreciate discussion between Admin. and staff on how to deal with this situation – and a response.**

Thank You,

Chuck Bell - Pres., Lucerne Valley Economic Development Assoc. (LVEDA) 760 964 3118