

July 25, 2017

Via e-mail and First-Class Mail

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San Bernardino County Board of Supervisors
San Bernardino Government Center
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Dear Chairperson Lovingood and Supervisors Ramos, Rutherford, Hagman and Gonzales:

Re: Renewable Energy and Conservation Element

We are a coalition made up of the following community associations, businesses and individuals: Lucerne Valley Economic Development Association (LVEDA), Johnson Valley Improvement Association, Oak Hills Property Association, Homestead Valley Community Council, Newberry Springs Economic Development Association, Morongo Basin Conservation Association, Flamingo Heights Community Association, Church of Our Lord and Savior (Lucerne Valley), Lucerne Valley Market/Hardware, Alliance for Desert Preservation (“ADP”), Mojave Communities Conservation Collaborative, Brian Hammer, Sue Hammer, Marina D. West, Pat Flanagan, Neville Slade, Dave Blevins, Jenny Wilder, Cheryl Hemmendinger, Sarah Kennington, Steve Bardwell, Kenneth D. Lair, Jackie R. Lindgren, Wilma Jean Magee, Dennis Schwander, Roger S. Peterson, Gary Williams, Richard Selby, Jerrold G. Byars, Edward Gala, Debra Gala, David Ecker, Kathy Spindler, Martha Lynn, Brad Hicks, Sarah McKee, Dale Staton, Renee Lynn, Bob Lien and Ann Connor. Together, we represent a broad spectrum of residents, businesses, organizations, recreationists and conservationists in the High Desert of San Bernardino County.

We have previously sent the Supervisors a letter, dated October 17, 2016, with our comments on the draft Renewable Energy and Conservation Element (the “RECE”). ADP also sent you a letter, dated September 20, 2016, supplementing comments made by its members at the August 4, 2016 workshop regarding the RECE.

In this letter, we will summarize our most current thoughts on how the RECE can be configured in such a manner that its stated goals and objectives – which we whole-heartedly endorse -- can become concrete realities.

We have kept this letter relatively brief, and given it an informal bullet-point format, with the hope it will be of assistance to you in your deliberations at the August 8, 2017 proceeding.

1. The RECE Should Adopt Geographic Overlay Zones for Utility-Scale Renewable Energy Utilizing Some Variation on the Five Geographic Areas Identified in San Bernardino County Supervisors’ Resolution No. 2016-20 (the “Resolution”).¹

Funneling utility-scale projects to those five specified overlay areas -- North of Kramer Junction, Trona, Hinkley, El Mirage and Amboy (which comprise some 153,200 acres and potentially could allow for between 17,000 to 20,000 MWs of new solar projects) -- or some variation of them,² would confer the following benefits on the County:

- it would provide clarity, simplicity and eliminate room for intractable qualitative arguments of the sort that must be parsed through under a criteria-based approach; relying solely on statements of goals and objectives would invite just such arguments

¹ The proposed RECE mentions the Resolution as a guiding principle when it comes to locating utility-scale projects. Likewise, sub-policy RE 4.10.1 prohibits utility-scale projects in Rural Living land use districts, but does not address the other zoning designations.

While all this is good, we believe that, for the reasons set out below, the RECE should go farther.

² The Board of Supervisors carefully chose the five areas based on a landscape-level analysis as to where environmental, community and transmission issues, among others, would be minimized. Then, through a simple process of elimination, it became apparent that there are highly degraded, transmission-adjacent, former and current industrial, mine and brownfield sites further north that are away from population centers, i.e., the five sites. That selection process is described in our attached October 17, 2016 letter.

- it would spare the people in rural communities from having to monitor and oppose an endless stream of projects
- it would provide the County with flexibility -- overlay zones would neither commit the County to wide-open utility-scale development nor irrevocably ban it from County lands – and projects in the five areas would still be subject to environmental review and have to meet the RECE’s articulated standards in order to obtain approval
- it would implement the position taken by the Supervisors in their Position Paper, dated February 3, 2015, submitted with reference to the draft DRECP, which stated that the communities of Newberry Springs, Stoddard Valley, Johnson Valley, Lucerne Valley and Apple Valley are not appropriate for DFAs
- it would be a clear and unequivocal assertion by the County of its land use authority, in keeping with Phase II of the DRECP, which is to address utility-scale renewable energy and conservation values on private lands
- it would also provide maximum legitimacy and authority to the County’s position regarding the many harmful effects of wide-spread, serial industrialization in the face of the Phase I BLM LUPA, which makes, according to our calculations, approximately 550,000 acres of DFAs “General Public Lands” and “Variance Process Lands” throughout the County available for utility-scale renewable energy development, not to mention the thousands of acres of transmission that would have to be installed to accommodate approximately 8,000 MWs of utility-scale development on federal lands
- it would stop the proliferation of utility-scale projects in (and north of) Lucerne Valley; the residents of this area have not been treated well by the projects that were approved and built, and now residents are under siege by the Ord Mountain solar and Calcite substation projects (approximately 500 acres/60 MWs), as well as the Aurora Sorrel solar project (approximately 3,000 acres/200 MWs – just north of the Ord Mountain/Calcite projects)
- it would also be a constraint on new transmission. The Ord Mountain/Calcite projects appear to be part of a step-by-step revival of the Coolwater-Lugo Transmission Project, which had stated as one of its chief justifications that new transmission was needed to interconnect renewable energy projects north and east of the Granite Mountains. The RETI 2.0 Plenary Group Report refers to a hypothetical “Desert Area Constraint,” and speculates that one remedy might be a new Coolwater-Lugo line. That report also posits an enormous and unrealistic 5,000 MWs of new utility-scale projects in what it calls the “Victorville/Barstow Transmission Focus Area.” We know you are aware of

the apparent biases infecting the RETI 2.0 process, and the apparent deafness of some state and federal planners to the land use concerns of the County and its residents

- it would, in short, mold the RECE in a way that protects and prioritizes the welfare and sustainability of the County's very interdependent human and natural communities, and provide assurance to the people of this County that our desert would not become a national dumping ground for big, grid-oriented energy projects, where the profits and power are sent out of the County, while all the downsides remain here
- it would, as discussed below in Section 8 of this letter, be consistent with the approach taken by other Southern California counties, such as Inyo and Imperial Counties, which have restricted certain types of utility-scale projects to specified overlay districts.

Adoption of the overlay zones would require revision of the RECE's RE Policy 3.3, which calls for the County to “[l]imit utility-oriented renewable energy generation facilities in unincorporated areas of the County to sites consistent with standards set forth in the Development Code,” and of RE Policy 5.2, which states that “[l]arge utility-scale RE generation projects – 10 megawatts or more – on private land will be limited to the site-types below in the unincorporated County: [various types of lands are specified].” These policies should be revised to state explicitly that they apply only to the siting of utility-scale facilities on the five sites.³

2. The RECE Should Require that, in Determining Whether or Not to Grant Requests for Any Approvals Needed for Utility-Scale Projects on BLM and State Lands, the County Must Apply All Identified Criteria to Achieve and Preserve the County's Priorities and Objectives, including Protection of its Human and Natural Communities.

The RECE should make it clear that:

- (a) the RECE's goals and standards apply whenever the County is called upon to grant discretionary approvals (such as well permits and rights of way, for example) needed to

³ The draft RECE states (on p. 36) that “. . . this Element encourages utility-oriented RE development on federal land in DRECP Development Focus Areas (DFAs), specifically those endorsed for this purpose by the Board of Supervisors resolution.” The first portion of that sentence runs counter to our recommendation that, in weighing approvals needed for RE development on federal land, the County should prioritize achieving the RECE's goals, as well as protection of our human and natural communities, to the greatest extent possible, i.e., the County should *discourage* utility-scale development on BLM land. The second portion of the quoted sentence must also be revised, because the Resolution endorsed the DRECP DFAs only to the limited extent that they overlapped with the five sites identified in the Resolution.

establish utility-scale projects on lands that are within the County's boundaries, yet outside of its direct jurisdiction, like properties under the sway of the BLM and the State Lands Commission;

(b) in exercising its discretionary authority in that regard, the County must carefully weigh the benefits that would accrue from the proposed project to the County and its residents against the harmful effects – short-term and long-term – that would be imposed on affected individuals, communities and ecological processes/habitat linkages; and

(c) unless the benefits decidedly and demonstrably outweigh the burdens, the County must deny the requested discretionary approval.

The County applied just such a weighing process in considering – and in rejecting – the Soda Mountain solar project. Quite appropriately, the County put protection of its populace and conservation of its natural resources first, recognizing that all downsides of the project would have been endured by them and that all profits and power would have flowed out of the County.

The approach outlined above would have the following beneficial effects for the County:

- it would maximize the County's legitimacy when it asserts land use authority in such situations, and create a legitimate basis for dialogue with the BLM and the State Lands Commission over long-term planning for the lands within the County borders; this is quite important given that, according to the draft RECE (p. 8): “[t]he county's lands constitute 53% of the DRECP planning area”
- it would, by stating unequivocally that any project requiring ancillary County approvals must meet the County's standards and criteria, allow the furthest permissible reach of the County's land use principles
- it would protect the County's human and natural communities from a planned onslaught of new utility-scale projects, among which is the proposed 4,000-acre Aurora Sorrel solar project slated for State Lands Commission properties in north Lucerne Valley.

3. The RECE Needs to Refine the Definition of “Community-Oriented Solar” So That It Can Be Readily Differentiated from Utility-Scale Solar.

The proposed RECE quite rightly places a strong emphasis on community-oriented solar renewable energy, or CORE. We recommend that the RECE establish a more refined set of criteria, so that even if a project is under the maximums, it will be disallowed if its functional purpose and environmental effect is more like utility-scale. This is vital to prevent the proliferation of projects that paste on a “community-oriented” label but are, in fact, geared toward selling power to the grid.

Examples of relevant criteria – of the sort that should be incorporated into the RECE -- include the following:

- (a) The project should serve only the reasonably foreseeable short-term requirements of the local community, with net metering, and with sales of excess wattage as lowest priority (no more than 5% of the project's maximum output);
- (b) The nameplate capacity of a proposed community solar project must be proportionate to the current and reasonably anticipated needs of the community;
- (c) The project should require no new transmission infrastructure;
- (d) The cumulative megawatt capacity of community solar projects that can be put in a given area should be limited so that they do not become over-concentrated in any particular region; and
- (e) The project must be sponsored by and approved by the local community.

Adoption of criteria of the sort outlined above would have the following benefits for the County:

- it would set the bar high enough to prevent a developer from gaining approval for a utility-scale project that is clothed as a CORE facility, and ensure that only those projects that promote the policies and goals underlying the CORE concept will be approved
- it would discard the definition of CORE facilities found in the proposed RECE (at p. 25), which sets the bar too low by characterizing CORE facilities as ones that “are *primarily* intended to serve the people near them [emphasis added];” under that definition, up to 49.99% of a so-called community-oriented facility’s output could be sold to the grid without sacrificing its favored CORE status
- it would clearly differentiate CORE projects from utility-scale facilities, which is particularly important given that the draft RECE, by defining the latter type as “10 MW or greater” (p. 5), would allow projects of almost 80 acres to qualify as community solar (under current technology, it takes about eight acres to generate a solar MW).⁴ A CORE facility of, say, 79 acres – that sells

⁴ The need for clear differentiation in this regard is illustrated by the conflict in the draft RECE between the “10 MW or greater” definition for utility-scale and its “less than 20” MW definition (at p. 48) for “distributed generation.” Distributed generation should not be defined through megawatts given that it provides “point-of-use” electricity that does not register on that scale.

just short of half its output to the grid -- would be of a magnitude that could substantially alter the local natural environs, thereby encouraging even further efforts to promote industrial development; CORE projects in the neighborhood of 79 acres would not be fostered if only 5% of output could be sold to the grid

- it would prevent a developer from breaking up a large-scale project into several smaller ones labelled community solar and from concentrating so many CORE projects in one area that -- together -- their purpose and effect equates with utility-scale (in either of those cases, most of the power generated could be sold to the grid for the developer's profit, and our communities would mostly reap the detriments, which would include the overbuilding of projects labelled community solar).

4. The RECE Needs to Provide More Definite Siting Criteria for CORE Projects.

The RECE should provide definitive parameters for where community solar projects are to be sited. Otherwise, the main virtue of community solar – that is, the way it benefits the communities it serves – will be lost.

Suggestions about siting criteria that should be added to the RECE are described below:

- Community solar projects should not impinge on wildlife corridors (our October 17, 2016 letter noted that biologist Kristeen Penrod – whose research is widely viewed as the gold standard by state and federal agencies -- has extensively mapped these corridors in the County)⁵

Adding to the definitional confusion is that the draft RECE makes no mention of the “10 MW or greater” standard in its definition of utility-scale at the end of the document (p. 57); instead, it defines it as a system providing “more than 50% of its output” for use outside the “local area.” This can be remedied by adding the “10 MW or greater” principle from p. 5 to the definition on p. 57.

⁵ The draft RECE speaks (at p. 6) in terms of prohibiting renewable energy production in areas identified as “critical habitat, or as a wildlife corridor for species of special concern as defined in the Conservation Element, *without comprehensive and feasible mitigation or avoidance of potential impacts.*” The second, italicized clause of that sentence should be removed because impinging on vital wildlife linkages can cause serious environmental degradation that cannot be mitigated away.

The first, non-italicized clause of the quoted sentence should make a direct reference to Ms. Penrod’s studies, which include well-delineated maps (and, better yet, they should be incorporated in the RECE). The Conservation Element (Section V of the General Plan) makes

- terms like “disturbed” and “degraded” should be very carefully defined, because, historically, they have been frequently used to include almost any part of the desert that has experienced any degree of human development; currently, most of the desert has a dispersed rural population which successfully coexists with an intact natural environment
- given that the unique, and delicate, balance between human and natural communities described in the previous bullet point could be destroyed by too much energy development, including CORE projects, the RECE should emphasize that, to the greatest extent possible, community solar development take place on truly “disturbed” lands that have been severely degraded by human activity, like former brownfield, mining and industrial sites
- the draft RECE defines community CORE projects (at p. 26) as those that provide electricity primarily for “local off-site use,” as opposed to a “neighborhood” system that supplies power for “adjacent use.” All CORE projects should be defined as ones that are sponsored by the local communities to which they are adjacent because, otherwise, a community would be incentivized to locate its project in the backyard of the community next door, and vice versa
- “fallow agricultural lands” should not automatically be offered up as good places to site new projects, which is, unfortunately, what the draft RECE does; large portions of certain desert regions, such as Lucerne Valley, have at one time been used for farming, but are now recovered or recovering desert lands; siting criteria should be developed which are sensitive to these distinctions
- the issue addressed in the previous bullet point has gained increasing prominence and urgency with the advent of the proposed Ord Mountain/Calcite projects – in the Initial Study for the projects, the proponents incorrectly asserted that the region’s past agriculture usage deprives it of any real conservation value
- siting criteria should be established that will prevent community scale renewables from needlessly impinging on the communities they are intended to serve, with particular attention given to quality of life and visual values issues

general references, in regard to the “Desert Region Habitat,” to: (i) ACECs (Areas of Critical Environmental Concern) recognized by the BLM; (ii) ASBIs (Areas of Special Biological Importance) declared by the Cal. Dept. of Fish & Game; and (iii) a “Conservation Background Report,” but it does not plot where these zones are to be found, and it leaves out a lot of non-ACEC/ASBI habitat that is in urgent need of protection from development.

- the proposed RECE calls for new subdivisions to set aside land for development of neighborhood solar; this is fine, so long as the siting criteria emphasizes and incentivizes community solar systems which to the greatest extent possible use the built environment – that is, parking lots, rooftops and the like -- as opposed to ground-mounted solar
- siting criteria should be adopted for community solar which minimize the need for new transmission infrastructure, because the addition of such infrastructure leads to sharply higher costs for the power consumer and environmental degradation.

5. The RECE Should State Clearly That Utility-Scale Wind Projects Are Prohibited Altogether.⁶

This approach would benefit the County in the following respects;

- it would protect the quality of life of its populace and the intactness of its environment by excluding a form of utility-scale generation that has particularly destructive physical impacts
- utility-scale wind has become increasingly identified as a “dinosaur technology” – why should the County be saddled with these monstrosities when they are inevitably abandoned?
- it would bring the County into accord with the approach taken by Inyo County, a county that has a lot in common with our own.

To take it a step further, we would also request that the RECE state affirmatively that solar thermal and parabolic trough and concentrated thermal facilities – including such facilities in combination with fossil fuel generation (like gas turbine power) -- cannot be established in the County. Those technologies have all the downsides, and more, that utility-scale wind has.

6. The RECE Should Require Renewable Energy Developers to Provide Comprehensive Analyses of the Effects Their Projects Would Have on Groundwater Supplies.

The proposed RECE does not include any clearly-defined criteria by which County decision-makers can assess the degree to which proposed renewable energy projects, including CORE projects, will negatively impact the County’s already stressed and over-drafted

⁶ To that end, the phrase, “wind energy,” should be removed from RE Policy 2.1, which states “[s]upport solar energy generation, solar water heating, **wind energy** and bioenergy systems that are consistent with the orientation, siting and environmental compatibility policies of the General Plan.” (Emphasis added.)

groundwater basins. The RECE should require that developers of renewable energy projects – other than rooftop or parking lot solar – provide, as part of the application process, a scientific and comprehensive analysis of the effects their projects would have on the County’s groundwater supplies (the need for such a requirement becomes clear when such data as we have on the subject – which comes chiefly from the DRECP – is considered; that data is laid out in our October 17, 2016 letter, which we urge the Supervisors to re-read).

In that regard, the RECE should put the onus on those seeking to develop renewable energy facilities on the County’s public and private lands to:

(1) conduct and incorporate a comprehensive assessment as to how the siting of their proposed renewable energy generation would – in combination with other factors, including the plethora of utility-scale projects that will be developed on public land under the BLM LUPA and on State lands -- affect relevant groundwater basins, i.e., to what degree would their sustainability be threatened;

(2) conduct a baseline study as to the current status of those aquifers – how much potable and non-potable water is each such groundwater basin currently holding? How much water is being pumped out of each basin by the residents and businesses currently relying upon them? How much water can be expected to recharge the basins, either from natural sources or from the State Water Project? Are the groundwater basins sustainable in view of the demands currently being made on them, and in view of their recharge rates, or are they approaching collapse, i.e., what are their tipping points? What is the likely effect of the ongoing, historic drought on our groundwater basins?; and

(3) demonstrate that use of water for a project will not exceed the annual rate of replacement of that water so that “groundwater mining” is avoided and so that adverse impacts to biological resources (including wildlife) due to hydrological impacts caused by water use can be avoided.⁷

The RECE should require that the County decline to approve any projects on private land – or decline to provide discretionary approvals needed for projects on public land (see the discussion above in Section 2) – unless the County is satisfied that the project would not compromise the viability of affected groundwater basins.

The approach outlined above would have the following benefits for the County:

-- it would allow the RECE to provide the far-sighted vision it aspires to

⁷ This is a requirement of the Renewable Energy General Plan Amendment that was adopted in 2015 by Inyo County, a county which, because it is geographically large, mostly rural and arid, has much in common with this County.

- water is an irreplaceable resource that is this County's lifeblood, and must be protected from usages that would permanently deplete aquifers in order to send power and profits out of the County
- this resource is already threatened by a prolonged drought, and jeopardized by 20,000 MWs of new utility-scale renewable energy that the DRECP plans for the California desert – thousands of acres of new water-hungry utility-scale projects are being proposed, such as Ord Mountain solar and Aurora Sorrel solar.

7. Some of the Goals in the RECE Should Be Refined, and in Some Cases Be Revised, in Order to Realize its Stated Aspirations.

We suggested – in Appendix 1 to our October 17, 2016 letter -- some specific goals and related provisions of the proposed RECE that should be refined and revised in ways that, if adopted, will allow for implementation of the goals it espouses.

For instance, the RECE states, as its RE Goal 1, that “[t]he County will pursue energy efficiency tools and conservation practices that optimize the benefits of renewable energy.” This is a laudable and well-stated goal, which prompts us to suggest the addition of the following sub-goals:

- (1) “The County recognizes that renewable energy created for on-site use, such as rooftop or parking lot solar distributed generation, best optimizes the benefits of renewable energy by greatly reducing land disturbance and avoiding the need for the installation of new transmission infrastructure;” and
- (2) “Encourage the use of ‘combined heat and power’ at facilities located in the County that are powered by coal, such as cement plants.”

We urge that the Supervisors re-consider the proposals made in Appendix 1.

8. The County Should Follow the Lead of Other DRECP Counties That Have Restricted Large-Scale Renewable Energy Development to Specified Overlay Zones.

The REAT agencies have clearly stated that the non-federal phase of the DRECP will be guided by land use principles formulated by affected counties. This creates an important opportunity for the County – which has borne more than its share of the burden of utility-scale renewable energy development – to articulate at the General Plan level its decision that utility-scale renewable energy can and should be restricted to areas already substantially damaged and degraded.

Certain other DRECP counties have done just that.

Inyo County's Renewable Energy General Plan Amendment (its "REGPA") restricts utility-scale development to seven Solar Energy Development Areas ("SEDAs") subject to compliance with further planning criteria and caps on total megawatts and acreage. The combined total megawatt cap for the seven SEDAs is 850 MWs, and the combined total acreage cap is 5,100. Wind energy projects are excluded. Additionally, the REGPA states that Inyo County does not support new transmission in or through that county above what is necessary for the megawatt cap placed on each SEDA.

Imperial County's Land Use Ordinance, Division 17, includes a Renewable Energy ("RE") Overlay Zone, which authorizes the development and operation of renewable energy projects, with an approved Conditional Use Permit ("CUP"). The RE Overlay Zone is an area determined to be the most suitable for the development of renewable energy facilities while minimizing the impact to other established uses. CUP applications proposed for specific renewable energy projects not located in the RE Overlay Zone would not be allowed without a determination by the county Board of Supervisors that a proposed renewable energy project is located adjacent to the existing RE Overlay Zone, that the project is not located in a sensitive area and that the project would not result in any significant environmental impacts. An "island" overlay would be allowed for a future renewable energy project, by amendment, that is not located adjacent to the existing RE Overlay Zone, but only if the project is located adjacent (sharing a common boundary) to an existing transmission source, is consistent with the expansion of an existing renewable energy operation and would not result in any significant environmental impacts.

Inyo and Imperial Counties share much in common with this County, and we urge that their enlightened approach in guiding large-scale development to overlay zones be adopted as a guide by this County.

9. Conclusion

We commend the progress made in the proposed RECE toward fostering renewable energy development that does not come at the cost of the County's human and natural communities. Incorporation of our comments will allow the RECE to achieve that goal.

Configuring the RECE in that manner would also acknowledge an emerging reality on the California energy scene: this State has such a glut of renewable energy that it is increasingly paying other states to take the surplus and the State has to curtail solar and wind power production. See a *Los Angeles Times* article, June 22, 2017, entitled "California has invested heavily in solar power. Now there's so much that other states are sometimes paid to take it." Because of this surplus, existing power plants run, on average, at slightly less than one-third of capacity. And some plants are being closed decades earlier than planned. But the overbuilding continues apace because – according to industry insiders cited in the article – such construction receives a "lopsided incentive": "utilities can build in the construction costs into the amount that the utility can charge electricity users – no matter how much or how little is used." In other

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words, such charges include a guaranteed rate of return, i.e., profit, for the utilities. The RECE ought not abet that process.

We look forward to participating in the hearing scheduled for August 8, 2017.

Very truly yours,

Community Associations, Businesses and Organizations:

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San Bernardino County Board of Supervisors

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