

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

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From: Chuck Bell, Pres. _____
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Date: 2/23/15

Re: Draft DRECP

EVEN AFTER ALL OUR WRITTEN AND VERBAL SUBMISSIONS – AFTER WE SHOWED CALIFORNIA ENERGY COMMISSIONER KAREN DOUGLAS AND GOVERNOR’S REP. TERRY WATT THE LOCATION OF A MAJOR PV PROJECT THAT (THEY ALL AGREED) WAS IN THE WRONG PLACE – AFTER WE SHOWED THEM THE 6-7 SQUARE MILE AREA WE PROPOSE AS A DFA “INDUSTRIAL-SCALE SOLAR PV ZONE” – (WHICH THEY SAID WAS A “PERFECT” LOCATION) - LUCERNE VALLEY IS STILL TOTALLY ENGULFED WITHIN AND SURROUNDED BY DFAs IN **ALL** ALTERNATIVES. THAT’S NOT PLANNING – THAT’S JUST SHEER ARROGANCE.

Said DFAs trump and violate our community plans and the San Bernardino County General Plan, constituting a significant adverse impact on our communities’ current and future land uses—potentially eliminating real economic progress. Utility-scale renewables are so heavily subsidized that most cannot economically operate on their own yet will displace other land uses that can. The acreage requirement per solar/wind MW is a poor tradeoff of desert resources within the total mix of energy options.

The draft DRECP is an illegible, complicated, convoluted, internally inconsistent document so full of acronyms and cross reference that – if implemented in its current form – would create such a morass of disconnected programs and requirements that it would take years to amend – but more likely to be litigated for reasons other than just “property right takings”.

Fortunately for us – we don’t have to delve into all of the DRECP’s obvious imperfections. Thanks to the San Bernardino County Board of Supervisors – we strongly support and agree with the County’s exceptional DRECP Position Statement (incorporated herein by reference) which encompasses most of our major concerns. The County (certainly not the DRECP agencies) has been listening to its residents and community reps. over the past years.

BLM and State energy planning (without local involvement) is unraveling a multitude of conservation efforts that citizens and BLM have spent decades implementing. We’re dismantling the integrity of the California Desert and its communities, losing the whole of it by giving away its parts.

DRECP must abandon its current singularly focused approach and adopt the policy to fill up rooftops, backyards and parking lots with photovoltaic (PV) solar where necessary transmission and infrastructure exist. This alone may actually realize renewable goals **before** considering execution of the DRECP’s proposed DFAs. PV-covered parking lots in Palm

Springs and Las Vegas alone could generate MWs better and cheaper than in our communities, closer to the areas of demand optimizing existing infrastructure.

Point of Use-Distributed Generation MW's must be inventoried and counted toward the State's 33% RE goal (especially now that it's likely at 50%) – not just industrial scale projects that have and will create such opposition and impacts. Our Lucerne Valley Market and Shopping Center is installing parking lot solar – we are working on one for the Senior Center and our Community Park - along with many of us in our back yards.

The costs and impacts of transmission lines and substations to accommodate even a portion of build-out within the DFAs would be prohibitively expensive and significantly disruptive. DFAs (via good old fashioned zoning) should be designated by the County and communities—not by the state or federal government—with appropriate planning to reflect a community's existing land uses, objectives, and constraints, e.g., limited water supplies for solar thermal and even for construction of PV plants, specifying low profile panels, buffering from residential uses, absolutely no utility-scale wind turbines—factoring in transmission potential and access to existing SCE substations that can accommodate the power. This should be a LOCAL zoning effort—not usurped by state dictates. The County is doing just that with its SPARC (Renewable Energy Element to the General Plan).

The EPA Policy Act of 2005 ordered a target of 10,000 MW on public lands. This target was directed exclusively to federal public lands in the West. Meanwhile, 15 million acres of EPA-identified, contaminated land across the United States could be re-purposed for the same development. These almost 495,000 properties tracked by EPA would transform liabilities into assets without the environmental degradation to remote desert lands and their rural communities. The DRECP needs to incorporate an alternative which creates renewable energy generation on the inventory of disturbed and contaminated public lands in the State.

The DRECP should be “CRECP” (California Renewable Energy Conservation Plan) – where sufficient solar insolation – even in northern California – can produce efficient solar PV power. While we're at it, why not include San Diego and Orange Counties with their massive parking lots available for PV solar? Why not San Francisco – to help compensate for its water supply and energy impacts from what used to be a prime asset of Yosemite Valley (Hetch-Hetchy reservoir and dam)?

The consistent message in the vast majority of the responses to this disastrous plan should be a strong indication to all respective agencies that the DRECP should be revised accordingly – with a new draft within 6 months – with a corresponding 90 day comment period.

NOTE: Lucerne Valley's “Industrial-Scale PV Suitable DFA” – previously submitted - is our only location that meets the following criteria.

Following is a summary list of what our communities *NEED* from the DRECP:

Maintain our own County's land-use authority and our rural, land-use integrity.

Incur no loss of access to or availability of mineral resources.

Maintain access for low-impact recreation.

Receive financial benefits to our communities bearing the brunt of RE generation. Purchase of construction materials locally to at least get sales tax (and County Measure I revenue to partially compensate from road damage from said activity).

Be provided detailed analysis and mitigation in the form of compensation for the loss of property values in vicinity of the projects (proven impact).

Be provided detailed fiscal analysis of government subsidies for solar/wind – our tax dollars being used to adversely impact our own communities.

DFA's must avoid locations where current economically beneficial (job-producing) land uses or periodic events would be adversely affected.

No industrial-scale in residential areas, no solar thermal due to size and water demand.

Point of Use DG generation must be counted towards RPS Goals.

San Bernardino County generate MWs equal only to our own demand – not subsidize the whole of California.

Analysis of water consumption for construction, maintenance and operation. We are in an adjudicated, over drafted groundwater basin. Recent construction of a 250 acre utility scale solar project consumed approximately 50+ acre feet of water – mostly potable groundwater. The project truly needed an additional 20 acre feet to avoid the flying dirt that prompted complaints and County Code Enforcement's three Violation Notices to the contractor. Construction water must come from non-potable sources.

Confine projects within 2 miles of *existing transmission corridors*. 'Transmission Plan' that does not require new alignments/corridors, only short connections to existing grid.

Minimum 1000 foot set-back from a "scenic" state highway.

Inventory and detailed analysis of soils most susceptible to erosion and blow sand. Implement a ground disturbance plan to control soil erosion/sand blow/weeds in and around solar structures – allow no adverse effects on surrounding properties. Mowing is significantly preferable to grading/de-brushing – and beneficial to developer to avoid future wind erosion and complaints triggering code enforcement. Install parallel sand fencing on sites with (wind) erodible soils.

No soil disturbance during typical windy desert months – January to June.

Perform an analysis of the net air quality and CO2 benefits/detriments/tradeoffs of development within all of its RE planned acreage - compared to more conventional generators – factoring in the loss of carbon sequestering desert vegetation and soils (significant per recent studies) – the global effects of importing panels, etc. from China produced by coal-burning electrical generation (exporting of our pollution abroad) – all the other energy/pollution inputs into the manufacture of panels and associated infrastructure – and construction/decommissioning related emissions.

Produce an "economic impact report" to include property value impact, number of temporary and permanent jobs for local residents, tax and other new revenues that will directly benefit us - disclosing every expected economic impact – positive and negative – performed by a third party, reputable entity with experience in energy project-related economic analysis.

Require bonding sufficient to demolish the project at the end of its productive life and to reclaim the landscape and terrain to a specified condition. (Require detailed photos and survey info re: a

site's condition prior to development). If a RE project ceases to produce an agreed upon minimum output over an agreed upon time, it shall be decommissioned, demolished, and not be allowed to remain indefinitely as an eyesore that produces just a token output, delaying its demise.

Following is a summary list of what is wrong with the DRECP:

Loss of agricultural lands for production, uncertain options for future agricultural uses, dilution of Mojave Desert cattle allotments' full value for ultimate compensation – a property right taking.

Conflicts with existing as well as future more economically viable development and locations of regular temporary events.

Obscures our view sheds.

Requires additional infrastructure on and off site for industrial scale - (transmission lines, etc)

Strong opposition to utility-scale **wind** projects – too heavily subsidized – view shed obtrusive – inefficient generation of power during peak demand periods relative to other sources - harm to raptors/eagles/etc. – a multitude of access roads that encourage OHV trespass, trash dumping, ambient particulate matter - long transmission lines/new corridors over and around hills – intermittent power from wind that is difficult for the grid to accept without shutting down other generation sources.

Renewable energy “zones” should be located in areas of poor habitat, and on flat terrain so as not to interfere with critical watersheds, floodwater runoff, percolation to the aquifer - and to reduce/eliminate grading requirements.

California residents already pay some of the highest electricity rates in the nation. DRECP should determine the ultimate potential cost of electricity and rates resulting from the County's potential maximum generation on its DFA acreage.

Finally, in closing, the DRECP must factor in the continued improvements of solar technologies and the eventual “Net Zero” energy requirement to be placed on residential as well as commercial/industrial development. This and other future realities stand to significantly negate the need for industrial-scale projects. With all the incentives provided to developers and in our haste to encourage industrial scale renewable energy, we could likely build monster energy generation projects that are not and will not be needed, which will become a blight on our California desert landscape. What kind of legacy do we want to leave for our future generations?