

MBCA

morongo basin conservation association

PO Box 24, Joshua Tree CA 92252
<http://www.mbconservation.org>

April 26, 2018

County of San Bernardino
Land Use Services Department
Tom Nieves, Contract Planner
385 N. Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Tom.Nieves@lus.sbcounty.gov

Re: Daggett Solar Energy Project

Dear Mr. Nieves;

The MBCA appreciates this opportunity to comment on the Daggett Solar Energy Project.

1. Initial Study required for informed scoping comments from stakeholders

We open our comments with the regret that Land Use Services chose not to provide an Initial Study as background for scoping comments. We understand from Ms. Rahhal that the choice to provide only the 2-page sketch of the 3,5000-acre project was based on the early (and correct) decision that an EIR will be required. The 484-acre Ord Mountain Solar Project scoping was supported by a 102-page Initial Study. We request, in the future, that scoping for ALL solar projects, utility scale and smaller, be accompanied by an Initial Study. The purpose of CEQA is to inform the stakeholders, which was not accomplished with the brief description of this project.

2. Aesthetics: a-d – Significant impacts both individually and cumulatively that cannot be mitigated

The unincorporated community of Daggett is confined between the I-15 and the I-40 within the narrow end of a triangle that extends east to the Cady Mountains. See Figure 1

Cumulatively, the proposed 3,500-acre Daggett Solar Project is adjacent to the existing 300-acre Sunray Solar project and the proposed 1,200-acre Sunpower Solar 1 Project for a total of 5,000-acres.

The size of Daggett Solar (5.5 square miles) will significantly impact the scenic vista looking from all directions: north from National Trails Highway (Route 66) and the I-40 to the Calico Mountains; south from the I-15 to the Newberry Mountains Wilderness Area; west or east across the basin connecting the Cady Mountains and the Mojave Trails National Monument with Barstow. Historic Route 66, which travels through the town of Daggett (founded 1883) will closely parallel the projects for over 7 miles. The EIR should be thorough in evaluating the loss of the scenic vista and resources including the

historical and rural character of the community. The hundreds of thousands of industrial 20-foot high panels will be impossible to hide behind a perimeter chain link fence (of unspecified height) with 1 foot of barbed wire. Because of the Project size and the significant cumulative impact, visual analyses must be performed for Daggett Solar alone and then for the three together.



Figure 1: Daggett-Newberry Springs area showing mountain viewpoints, Wilderness, the Mojave River, and the location of the Newberry Elementary School.

3. Air-Quality: a-d – Significant impacts that are possibly unmitigable

4. Geology and Soils: b – Substantial soils erosion will be significant and mitigation difficult

The Mojave Desert Plan Area is in federal and state nonattainment for the criteria pollutant PM10. The area is under the jurisdiction of the MDAQMD. The closest monitoring station for the project area is in the City of Barstow and there may or may not be data that qualifies as PM10 baseline for this project. The Soda Mountain Solar Project (BLM) further to the east and also on a sand transport path used the Victorville monitoring station for the 2- year baseline data. Victorville data from within the city is not applicable when accounting for incidents of PM10 release during high wind conditions in the Daggett area. However, the Daggett Airport, which will be surrounded on three sides by the project, is a regional weather information center. Should it be approved the developer, NRG, should be required to install a PM10 Base Air Monitor at the airport to record baseline data and data throughout the life of the project, for construction and operation.

Based on National Resource Conservation Service (NRCS) soil type data for the Mojave River area in San Bernardino County the whole of the Daggett Triangle is a sand transport path and subject to eolian dust during high wind events. See Figure 2. The County LUS and Code Enforcement should review their recent records for complaints related to the 22-acre Soitec Solar Project on Mountain View Rd. in Newberry Springs for the damage done to the downwind neighbor from blowing sand.

We are aware that for the electronics in the tracker units to operate correctly they must be installed on very level ground. The Daggett Solar application (provided following a Public Records Request) stated that 2,400,000 cubic yards of soil would be graded. What does that mean? Since there are 1,760-yards in a mile, the graded cubic yards of dirt, laid end to end, would stretch 1,363 miles, half way across the United States. It is important to know where this vast amount of dirt would be placed and what would insure that it does not release sand and dust during wind events.

Since the installation of solar facilities began around 2013 dust events during high winds have become a serious and immediate health and quality-of-life problem for communities like Lucerne Valley, Newberry Springs, Hinkley, and the Morongo Basin. Experience has shown that the mitigation measures required under the MDAQMD Fugitive Dust Rule 403.2 do not work in the Mojave Desert when constructing solar projects on slopes 1% or less.¹ What does work is the Great Basin Rule 433, adopted in 2016 following years of research and monitoring.² We suggest that the County LUS work closely with CA. Air Resources Board (CARB) and MDAQMD on implementing GB Rule 433 to insure that the communities of Daggett/Newberry Springs do not become a dust bowl and unlivable.

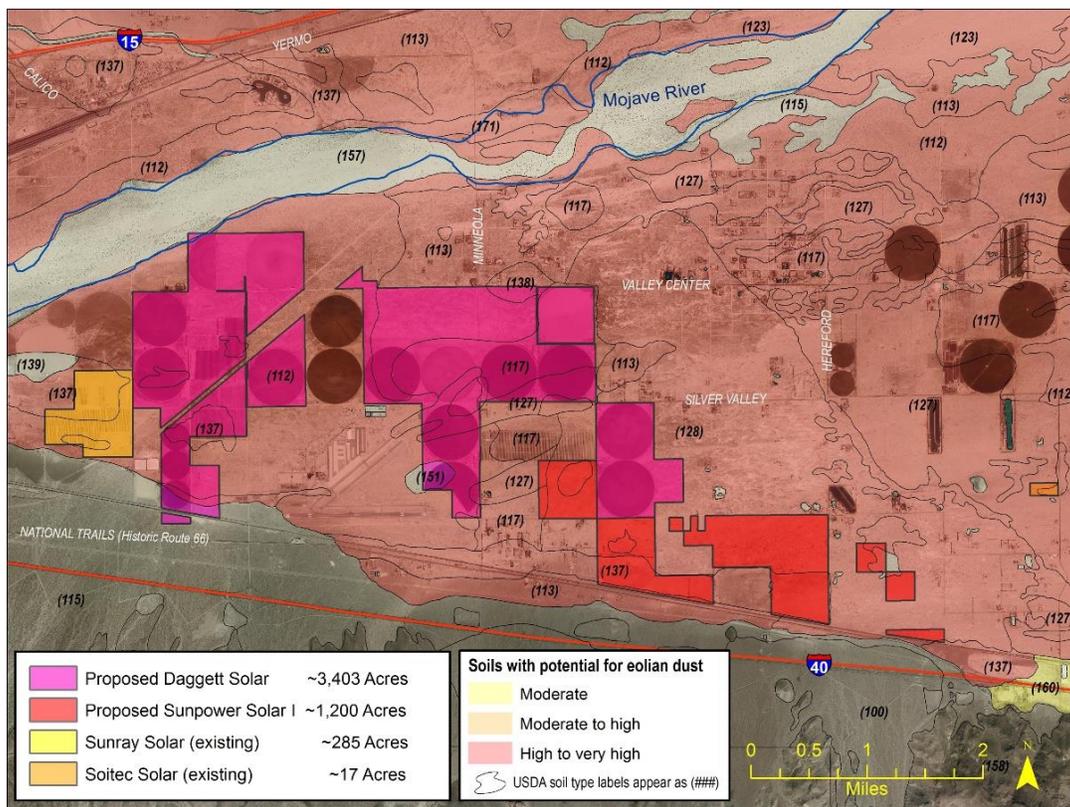


Figure 2: Map showing soils with the potential for eolian dust in the Daggett/Newberry Springs area. Soils analysis based on USDA REC Soil Classification. Map: Brian Hammer Professor Victor Valley College Agricultural and Natural Resources Department

1

https://d3n8a8pro7vhmx.cloudfront.net/mbca/pages/907/attachments/original/1501211030/LV_MAC_Presentation.pdf?1501211030 (accessed 4/26/2018)

² <https://www.arb.ca.gov/drdb/gbu/curhtml/r433.pdf> (accessed 4/26/2018)

5. Biological Resources: d - Significant impacts difficult to mitigate because of the project size

The whole 3,500 acres of the Daggett Solar Energy Facility, as proposed, is within the California Desert Linkage Network. See Figures 3 and 4. The Daggett Solar Facility would be a major impediment for

resident wildlife and movement over any time period.

Figure 3: Proposed and existing solar projects in Daggett/Newberry Springs shown in relation to the Desert Linkage Network.

Map: Brian Hammer
Professor Victor
Valley College
Agricultural and
Natural Resources
Department

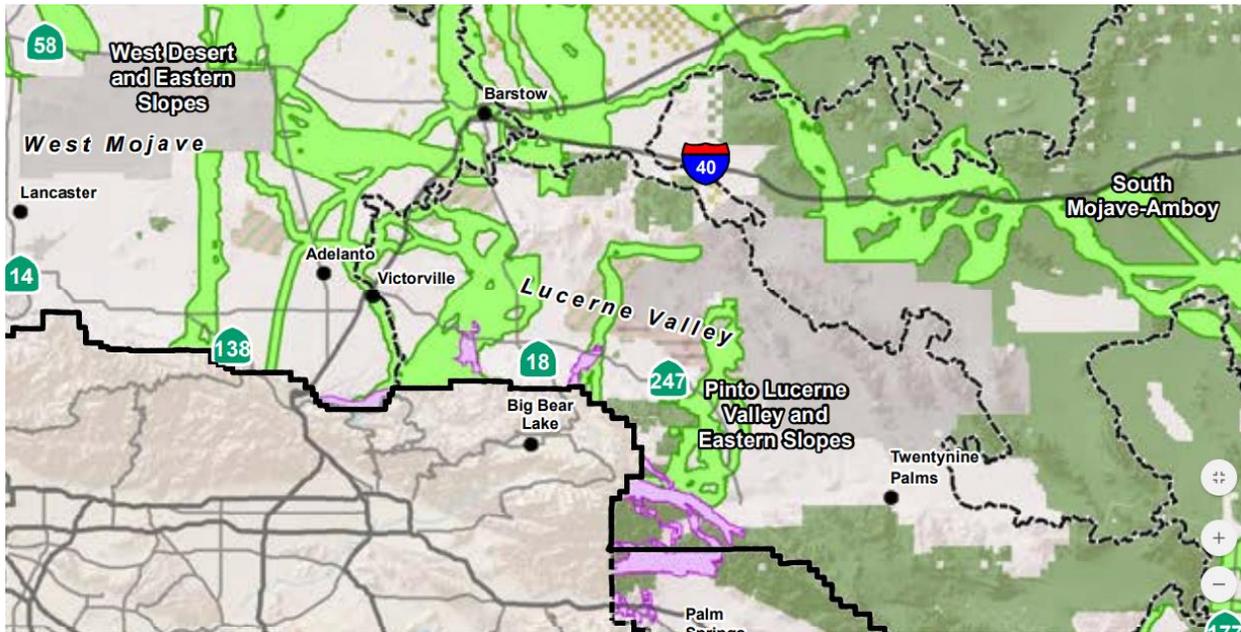
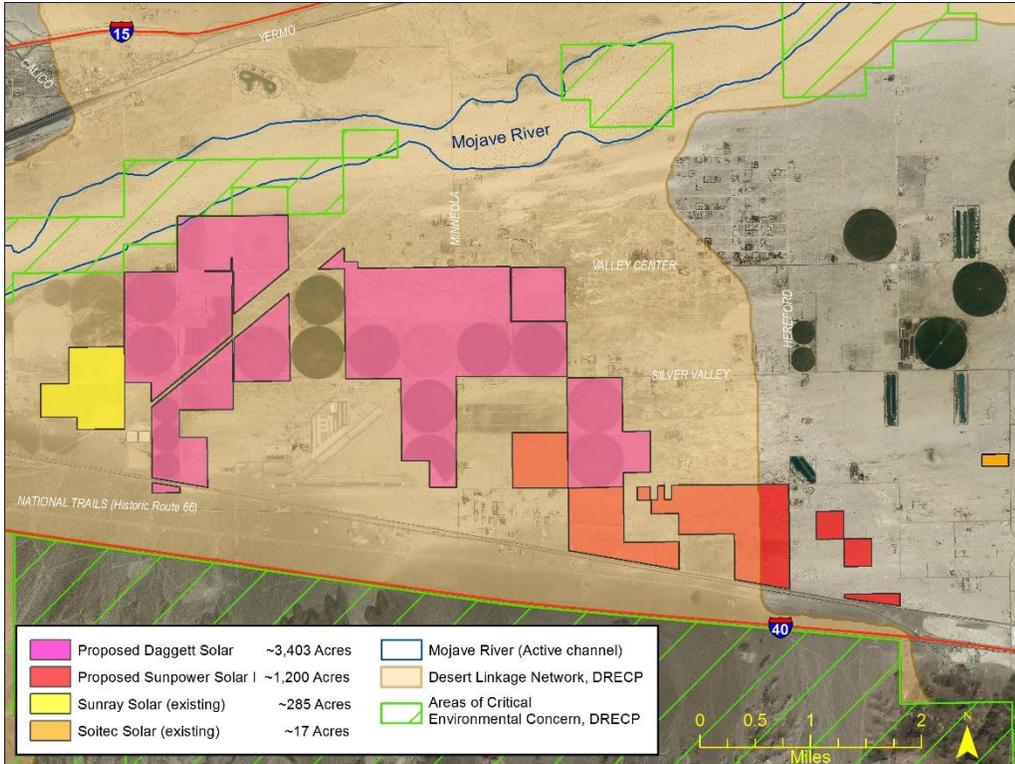


Figure 4: Section from Figure D-1 Landscape Linkages. DRECP LUPA 2016. Appendix D Conservation and Management Action Implementation Support Information and Maps.

6 Land Use Planning: a - The Project will have significant community impact

The Daggett Solar Project will physically divide the community of Daggett and it will also divide it from neighboring Newberry Springs. See Figures 1 and 2. There is no mitigation to overcome this impact.

7 Population and Housing: b and/or c – potentially significant and probably more accurate to file the population outcomes under environmental justice

There is no denying that the soils are subject to eolian dust. The size of the project could create unimaginable living conditions for anyone with existing health problems involving lungs and heart. People have moved to the desert because of the clean air and many residents in Daggett have owned their homes for decades. It is important to research this possibility by querying health clinics, attending local meetings and questioning residents. This is an economically disadvantaged community so people may need to move for their health. With Daggett Solar obliterating the natural vistas and skyline and creating poor air-quality, their homes may have little value, so they will be stuck.

8 Public Services: Schools

The Daggett Solar Project is upwind (east) of the Daggett Middle School and west of the Newberry Elementary School. The distance in both cases is only about 4 miles, this is nothing when the wind is blowing and sand and dust are on the move. The Students are sensitive receptors that should be protected. The only reasonable mitigation should this project be approved, would be to relocate the schools, but to where?

9. Environmental Justice

In closing we note that the County has stated in official documents that solar energy should benefit the community where it is built. None of the solar energy produced in Daggett or Newberry Springs will be used by those living there, it will be transported to other locations, including out of state. What the residents will get is the loss of their quality of life, possibly their health, their investment in their homes and businesses, and a higher utility bill.

Thank you for this opportunity to comment.

Sincerely,



Pat Flanagan
Board member, Morongo Basin Conservation Association

Board

President – Sarah Kennington, Pioneertown

Vice President – David Fick, Joshua Tree

Secretary – Marina West, Landers

Treasurer – Steve Bardwell, Pioneertown

Member – Claudia Sall, Pioneertown

Member – Meg Foley, Morongo Valley

Member – Mike Lipsitz, Landers
Member – Ruth Rieman, Flamingo Heights
Member – Seth Shteir, Joshua Tree
Member – Laraine Turk, Joshua Tree

cc: Brad Poiriez, Mojave Desert AQMD, bradp@mdaqmd.ca.gov
Alan De Salvio, Mojave Desert AQMD, adesalvio@mdaqmd.ca.gov
Earl Withycombe, CARB, ewithyco@arb.ca.gov
Ted Stimpfel, Newberry Springs Community Alliance, newberrysprings@mail.com
Bob Berkman, CEQA Now, ctcdagget@mindspring.com
Paul Smith, SBCo. Planning Commissioner, pflaw29@gmail.com