

County of San Bernardino

November 12, 2020

Sarah Mongano
Senior Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Dear Ms. Mongano,

As members of the San Bernardino County Board of Supervisors, we write to express our concern and opposition to the proposed Stagecoach Solar Project (Project) in the unincorporated community of Lucerne Valley. It is our understanding that this project will be sited on undeveloped state property, and the California State Lands Commission (CSLC) will serve as the lead agency under the California Environmental Quality Act (CEQA). This letter is submitted in response to the CSLC solicitation for public and agency comments as to the scope and content of the environmental analysis.

Renewable energy development has been a major issue in San Bernardino County for over a decade. After a three-year public process which relied heavily on stakeholder input from our communities, the Board of Supervisors on August 8, 2017, adopted a Renewable Energy and Conservation Element (RECE) into our General Plan, incorporating our citizens' vision for renewable energy development in San Bernardino County policies.

In 2019, the Board of Supervisors adopted Policy 4.10 into the RECE. Under the provisions of this policy, development of utility-scale renewable energy projects within Community Planning areas is prohibited. The proposed location of the Project is in direct conflict with this established land use policy in San Bernardino County, as it would be developed in the Lucerne Valley Community Planning Area. We request that CSLC take into account this significant conflict when conducting the CEQA environmental analysis for the Project.

We were dismayed to learn that the Project will interfere with critical wildlife linkages identified in a Multi-Species Habitat Conservation Plan (MSHCP) for the Town of Apple Valley. The MSHCP Plan Area is strategically located at the intersection of three important wildlife linkages that are not only important to the immediate region, but also to the Mojave Desert as a whole. The identification and protection of these linkages will facilitate wildlife movement and gene flow across a wider regional landscape, making the entire region more resilient to the effects of climate change by ensuring the long-term viability of six Areas of Critical Environmental Concern.

The proposed project site is also problematic for the designation of State Route 247 (SR-247) as a State Scenic Highway by the California Department of Transportation. The close proximity of the Project to SR-247 disturbs the iconic viewshed of Lucerne Valley and jeopardizes efforts to obtain this highly coveted designation. This undertaking is a critical priority for Lucerne Valley and residents in nearby desert communities, thus the proposed location of this project will receive considerable backlash from our constituents if it moves forward as intended.

We also cannot overlook our citizens' concerns about visual impacts of renewable energy development on rural communities. The scenic quality of desert open space attracts highly valued tourism and contributes greatly to the quality of life in our desert communities. It is essential that this quality is considered by CSLC during the project review and decision process.

It is important to note that the County does support the development of utility-oriented renewable energy projects in defined areas. The Board of Supervisors adopted in RECE Policy 5.4.2 the following: "Encourage utility-oriented RE generation to occur in the five Desert Renewable Energy Conservation Plan (DRECP) Development Focus Areas (DFAs) that were supported by the Board of Supervisors on February 17, 2016, Resolution No. 2016-20 and on adjacent private lands (North of Kramer Junction, Trona, Hinkley, El Mirage, and Amboy)." These defined areas were determined through a meticulous process undertaken by the County of San Bernardino, taking into consideration our stakeholder input and citizens' vision for renewable energy development.

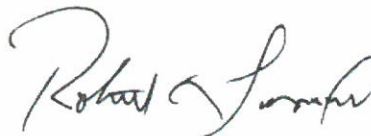
The proposed Project conflicts with our County's current land use policies, would interfere with critical wildlife linkages, and significantly impacts the viewshed of the unincorporated community of Lucerne Valley. For these reasons, we cannot support the application submitted by Aurora Solar, LLC and respectfully request that it be withdrawn. If the CSLC and/or project applicant are interested in exploring alternative options within San Bernardino County that meet our policy requirements, our county staff will gladly assist with identifying locations that are suitable for this type of development.

Thank you for the opportunity to express our views on this project. We look forward to receiving a response to our comments.

Sincerely,



Dawn Rowe
3rd District Supervisor
County of San Bernardino



Robert A. Lovingood
1st District Supervisor
County of San Bernardino

CC: Paul Cook, Congressman, 8th District of California
Jay Obernolte, State Assemblyman, 33rd State Assembly District
Shannon Grove, State Senator, 16th State Senate District