May 21, 2018

Submitted via E-Mail

Linda Mawby
Land Use Services Department, San Bernardino County
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415
Linda.Mawby@LUS.sbcounty.gov

RE: Comments of Avangrid Renewables on the Draft Alternative Policy Language for Renewable Energy and Conservation Element Policy 4.10

Dear Ms. Mawby:

Avangrid Renewables submits the following comments on the draft alternative policy language for Policy 4.10 of the San Bernardino County Renewable Energy and Conservation Element (RECE), to be presented to the County Planning Commission on May 24, 2018.

On July 25, 2017, Avangrid Renewables provided written comments on the April 2017 Final Public Hearing Draft of the RECE. Avangrid Renewables has proposed a project that would produce up to 200 megawatts (MW) of solar energy using photovoltaic technology and may include a battery storage facility up to 200 MW in size. The project is sited wholly on lands owned by and under the jurisdiction of the California State Land Commission (CSLC) in the central portion of San Bernardino County, about 15 miles south of the City of Barstow and 12 miles northwest of the unincorporated community of Lucerne Valley.

As we explained previously, our project will promote many of the goals described in the RECE—including siting large-scale renewable projects outside of existing communities, minimizing the need for new transmission corridors, and reducing greenhouse gas (GHG) emissions in response to state mandates. Our project is not only consistent with many of the RECE goals, it is also important for helping California achieve its ambitious renewable energy, climate, and energy storage goals.

With regard to the revised staff recommendation for Policy 4.10, the draft alternate language is an improvement, and we appreciate the efforts behind it. We continue to seek clarification that the RECE applies to generation project siting only and not to transmission facilities. As we explained previously, although our project is entirely on CSLC lands, there may be a portion of the associated transmission line that crosses into Lucerne Valley to the point of interconnection, as designated by Southern California Edison and the California Independent System Operator.

The location of the interconnection point is outside of our control. Policy 4.10 should not be used to block the interconnection of well-sited renewable generation projects consistent with RECE goals with the transmission grid. Doing so would result in the need for new and longer transmission corridors, thus undermining one of the core goals of the RECE to minimize the need for transmission infrastructure. Therefore, the RECE should not be interpreted in a way that would hinder the development of facilities needed to interconnect our project—especially in light of our project's consistency with many of the RECE's goals.

In the event that transmission facilities are somehow deemed included in the RECE, the RECE should not be implemented in a way that interferes with renewable generation projects like ours that are located outside of County lands and jurisdiction, for which applications have already been filed before the implementation of the RECE.

We appreciate this opportunity to comment on the draft alternative language for Policy 4.10 of the RECE. If you have any questions, please feel free to contact me at harley.mcdonald@avangrid.com or 760.445.3081.

Sincerely,

K. Harley McDonald

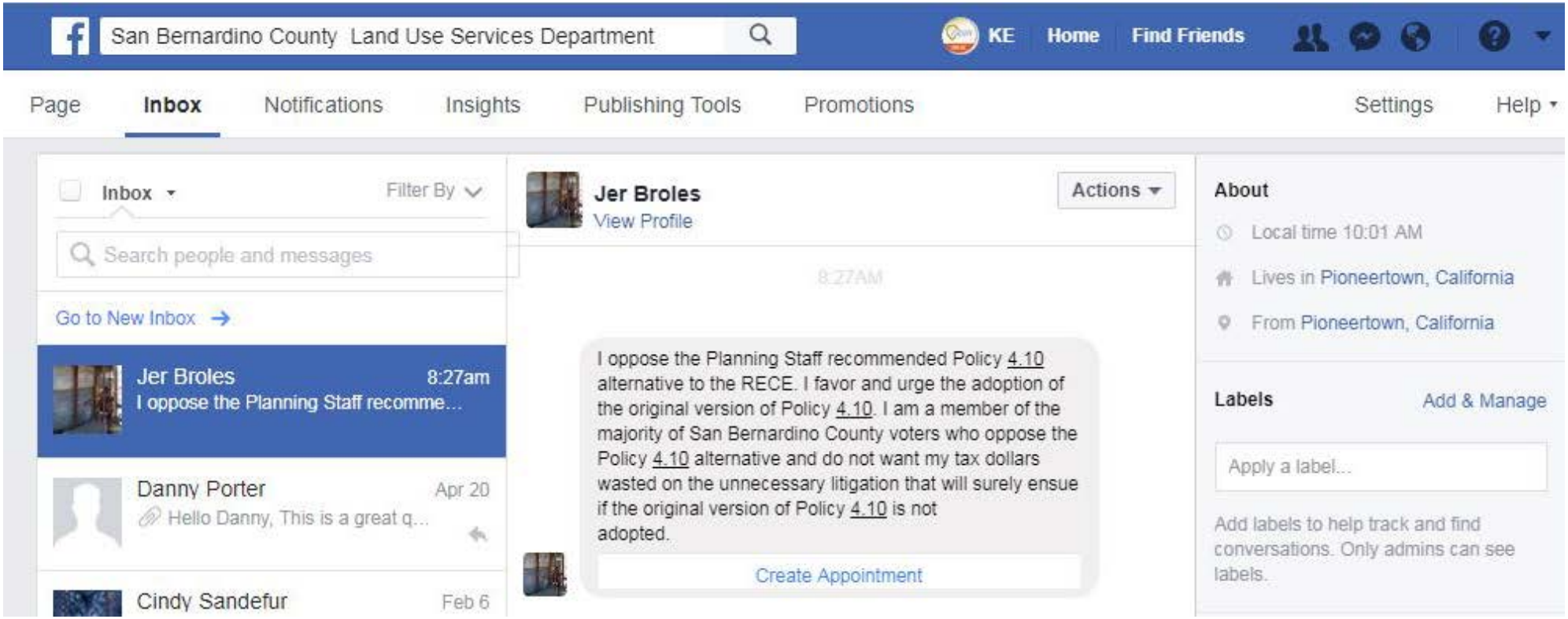
K. Harley McDonald
Senior Business Developer

Cc: Supervisor Robert A. Lovingood
Supervisor Janice Rutherford
Supervisor James Ramos
Supervisor Curt Hagman
Supervisor Josie Gonzales

From: Jack Dugan
To: Mawby, Linda
Subject: Opposition to 4.10 REOC
Date: Tuesday, May 22, 2018 1:49:26 PM

I oppose the planning staff recommended 4.10 REOC
Planning and the county need to find a viable locations for solar energy that does not affect residential areas. We are located on 1 and 1/4 ac that is zone RL in the beautiful town of Pioneertown and will do anything to keep are neighborhood from this type of destruction.

Thank you,
John and Sandra Dugan
Po box 387 Pioneertown Ca. 92268
760-228-0552


San Bernardino County Land Use Services Department
KE
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Settings
Help
Inbox
Filter By
Search people and messages
Go to New Inbox
Jer Broles
8:27am
I oppose the Planning Staff recomme...
Danny Porter
Apr 20
Hello Danny, This is a great q...
Cindy Sandefur
Feb 6
Jer Broles
View Profile
Actions
8:27AM
I oppose the Planning Staff recommended Policy 4.10 alternative to the RECE. I favor and urge the adoption of the original version of Policy 4.10. I am a member of the majority of San Bernardino County voters who oppose the Policy 4.10 alternative and do not want my tax dollars wasted on the unnecessary litigation that will surely ensue if the original version of Policy 4.10 is not adopted.
Create Appointment
About
Local time 10:01 AM
Lives in Pioneertown, California
From Pioneertown, California
Labels
Add & Manage
Apply a label...
Add labels to help track and find conversations. Only admins can see labels.

From: Mary Effron
To: Mawby, Linda
Subject: Renewable Energy Projects
Date: Monday, May 21, 2018 6:13:08 PM

Dear Ms. Mawby,
I am very concerned with the haphazard placement of solar farms in our community of Joshua Tree, Yucca Valley and 29 Palms.
Most people do not equate the destruction of the desert with solar farms. The land is scraped, animals are nonexistent and the
eyesore of the solar panels have replaced the beauty of the desert which is why we are living there in the first place.
There are other ways to achieve renewable energy — destroying virgin land in the desert seems so shortsighted.
I would be so honored if you would listen to all of us who wish to protect the desert for us and future generations.
Thank you.
Mary Effron
7187 Mt. Shasta Ave.
Joshua Tree, CA

From: Melanie Crider
To: Mawby, Linda
Subject: Policy 4.10
Date: Tuesday, May 22, 2018 9:42:01 AM

Dear Ms. Mawby,

I am sending this email in regards to Policy 4.10. I would like the records to show that I am in opposition to the Planning Staff recommended Policy 4.10 alternative to the RECE.

However, I am in favor and support the adoption of the original version of Policy 4.10.

I am a local resident, living in an area off of Pipes Canyon Road for about 30 years. I am a registered voter and am included in the large number of San Bernardino County voters who strongly oppose the Policy 4.10 alternative.

Thank you for your time,

Melanie Crider
3138 Bush Avenue
Pioneertown, CA 92268-0026
760-401-7068

From: Paula Deel
To: Mawby, Linda
Subject: Planning Commission - RECE - 4.10
Date: Monday, May 21, 2018 10:56:52 PM

Vote for the original 4.10

Simply put, the original version protects us – the new revised version does not.

Additional utility solar power is not needed. Solar power should be produced where needed not 100 miles away.

Our desert is fragile and has already been abused; don't continue the cycle.

Paula Deel

Ted Stimpfel
newberrysprings@mail.com

May 22, 2018

Linda Mawby, Senior Planner
San Bernardino County Land Use Services Department
385 North Arrowhead, First Floor
San Bernardino, CA 92415-0187
Via email: Linda.Mawby@lus.sbcounty.gov

Re: Planning Commission RECE Policy 4.10 Hearing May 24, 2018

Dear Ms. Mawby,

I earlier approached Land Use Services staff with the desire of presenting video evidence before the Planning Commission's public hearing regarding Policy 4.10 on May 24, 2018.

I was informed by LUS staff that it would be OK to show the video provided that permission was granted by the Planning Commission's chairman and that the video is provided to LUS preferably two days before the hearing to allow time for setup.

In communicating with Chairman Jonathon Weldy, he was most gracious in wanting to help facilitate my request. His only concern was that since the video runs 3-minutes, he did want me to spend time introducing it as that would run over my three-minute allotment. Chairman Weldy was justifiably concerned about time fairness to the other speakers and I agreed with him.

Chairman Weldy informed me that he would contact LUS with his decision to permit the video and that he would get back with me regarding the mechanics of transferring the video to LUS.

On Friday afternoon, May 18, 2018, without having yet heard from Chairman Weldy, I traveled to the county's main administrative offices in San Bernardino to drop off my 154MB video file on a thumb drive. My plan was to leave it in the care of a receptionist. Upon entering the building, I found that I had received an e-mail from the chairman during my drive informing me of the denial of my request.

As the e-mail I received had a cc: to Terri Rahhal, I presume that she was the roadblock trying to prevent evidence against her recommended Alternative Policy 4.10. The main foundation of the denial is a claim that LUS does not yet have a procedure in place to handle the submission of video evidence.

What?!!! How lame of an excuse is that to deny me my right to present relevant evidence before a public hearing when the county has no physical obstacle. I had earlier spoken with "Troy" with Multi-Media Services that handles the video projection

equipment for the county and he stated that my format would not present any technical problem for him. My video can be easily accommodated. Just like all the hundreds of PowerPoint and videos that LUS has presented in the Covington Chamber, my video can be presented.

My video has since been upload to YouTube at: https://youtu.be/NuOqSgLtKI8
A higher quality full file (154MB) version can be downloaded at:
http://newberryspringsinfo.com/SandTransportPaths.mov

The video illustrates the massive particulate matter that blows off of the desert disturbed soils in Sand Transport Paths during high winds and the physical damage that the dust causes to human lungs. The video is a short dramatic wake-up to the dangers and the massive liability that LUS is placing the county into. The PM10 sized dust particles do the same damage as asbestos.

The blading of many square miles of the desert in Sand Transport Paths for utility-scale solar will greatly exacerbate the blowing dust problem. Lives matter!

The video is relevant and on target to the matter of the hearing and I strongly object to my evidence being discriminately and unconstitutionally denied.

Cordially,

TS

Ted Stimpfel
Newberry Springs

Victoria Paulsen
43843 Valley Center Newberry Springs, CA 92365 760-447-2118 words4fun@gmail.com

May 16, 2018

TO THE SAN BERNARDINO COUNTY PLANNING COMMISSIONERS REGARDING THE WORDING OF

RENEWABLE ENERGY AND CONSERVATION ELEMENT 4.10

I strongly urge the Commissioners to keep the original text of element 4.10 as it was presented at the August 8, 2017 meeting. Following are my reasons why this should be done.

The suggested compatibility report in the "recommended" version relies solely on the solar applicant to decide how to "protect the quality of life and economic opportunities in existing unincorporated communities." This is contrary to the County Development Code, as I shall show below.

The law of the County, per County Development Code 84.29.035(a), requires *you*, the Planning Commission, and not the solar company to "determine that the location of the proposed commercial solar energy facility is appropriate in relation to the desirability and future development of communities, neighborhoods, and rural residential uses, and will not lead to loss of the scenic desert qualities that are key to maintaining a vibrant desert tourist economy by making each of the findings of fact in subdivision (c)."

Subdivision (c) delineates 31 items that are to be studied by the Planning Commission before determining whether or not the solar energy project should be considered. Not one of those items limits this process to only communities with approved Community Plans, as does the "recommended" version of RE 4.10. [1]

A number of those 31 items deal with the visual and environmental impacts of the project. The "recommended" RE 4.10 leaves it to the solar facility to decide how it plans to "minimize *potential visual impacts* of the project." The fox guards the chicken coop.

[1] The original version of 4.10 does prohibit utility-oriented RE projects within the boundaries of existing community plans, but it also prohibits development in RL land use districts. Newberry Springs worked for years with the County on a community plan that was shelved without adequate explanation.

It is important to realize that by giving responsibility to the solar energy project applicant for deciding what is best for the community, the Planning Commission does not get a full nor accurate, nor lawful, picture of the community. For instance, the NRG application for a massive installation in Daggett and Newberry Springs used false data in describing their project. Among these are photos that show low-profile photovoltaic panels less than half the height of the ones actually being proposed (20-ft high).

The County should go slowly in approving industrial-size solar installations, and never in RL zones. Instead, San Bernardino's RE Element component should be *forward-thinking* toward distributive power. While cities like Los Angeles and San Diego are moving toward 100% distributive energy, industrial solar companies are championing wasteful large installations that send electricity far away from the source. In not many years, these large-scale installations will be superfluous.

Meanwhile, please go back to the original wording of RE 4.10 that has some benefit to unincorporated communities. Reject the "recommended" version that has all the earmarks of having been written by the solar industry itself.

Thank you –

orig signed

Victoria Paulsen
Private Person but also
Director, Newberry Springs Community Services District
Director, Newberry Springs Economic Development Association

cc: Terri Rahhal, LUS
cc: Supervisor Robert Lovingood, 1st District
cc: Christian Guntert, District Representative