

December 8, 2011

Supervisor Brad Mitzelfelt
First District
County of San Bernardino
385 N. Arrowhead Ave, 5th Floor
San Bernardino, CA 92415

RE: P201100310/CUP – Victor Dry Farm Ranch, LLC

Supervisor Mitzelfelt,

Silverado Power is pursuing a 10 megawatt solar photovoltaic generation facility, Victor Dry Farm Ranch, within the County of San Bernardino that would help the region take a positive step forward in pursuing renewable energy development locally and meeting the requirements of your recently adopted "County of San Bernardino Greenhouse Gas Emissions Reduction Plan."

Silverado's proposed project is situated in a carefully selected location that has low biological and environmental impacts, no cultural resource impacts, provides direct access to existing transmission infrastructure, and enables the development of a cost-effective project to deliver clean, renewable, domestically-produced power to the region. The property is located one mile west of the city of Victorville; there are no structures on the site, and it is surrounded by vacant lands. There are only a few residences within five miles, and the property is currently zoned Rural Living (RL), under which energy production is an approved use by the County.

Although the proposed Victor Dry Farm Ranch project is located on land designated as RL in the County General Plan, the City of Victorville has stated that *"the City's position on solar generation plants has been that they are only permitted within the SCLA Specific Plan, in the Industrial zone district."* This stance creates several challenges that undermine the feasibility for solar development in Victorville. In particular, the industrial zoned land within SCLA remains on the higher end of property values in the region, which results in development costs that are prohibitively high. Furthermore, this stance makes it impossible to utilize land that has the best access to existing transmission infrastructure and grid demand – using existing infrastructure is an important siting strategy that greatly minimizes environmental impacts and also results in more cost-effective projects that benefit ratepayers. Locating all projects in the SCLA region would require significant facility upgrades that are time-intensive, costly and speculative. In contrast, our Victor Dry Farm Ranch project location allows for construction and delivery of clean power utilizing the existing infrastructure on a rapid timeline. This project is not "speculative"; Silverado has an approved power purchase agreement that will bring the project on-line and allow us to supply power by the end of 2013. The Conditional Use Permit for this site is the last major milestone needed to bring jobs to this area and begin construction on a clean renewable energy project that will provide power to over 2,500 homes in the region.

Although Victorville envisions future annexation of the project land for residential development, the current reality is that the project is located over a mile outside of the current city boundaries, and there is a vast amount of land that remains available for future housing development within the current city limits. We believe that Silverado's project is a responsible use of the land as it will serve as a valuable asset for the region and help provide clean power as the City and County continue to grow and increase electricity demand in the coming years.

As an additional consideration, the County's settlement with the California Attorney General's office over the 2007 lawsuit has resulted in ambitious steps forward by the County to reduce greenhouse gas emissions. In particular, the County has been considering how to promote and support the siting of renewable energy generation facilities as a key component of your GHG reduction strategies. The "County of San Bernardino Greenhouse Gas Emissions Reduction Plan" presents a comprehensive set of actions to reduce internal and external GHG emissions to 15% below current levels by 2020, consistent with the AB 32 Scoping Plan. The Plan, adopted by the County on December 6, 2012, includes the following goals and objectives:

- Reduce GHG emissions from the generation of electricity by promoting and supporting the siting of new renewable energy generation facilities;
- Establish and promote policies and strategies that facilitate the siting of new renewable energy generation;
- Establish and promote policies and strategies that facilitate renewable energy generation and co-generation projects where feasible and appropriate;
- Establish and implement measures that support the purchase and use of renewable and alternative energy.

Recommended strategies outlined in the Plan for achieving these goals include:

- **Support Utility-Scale Renewable Energy Siting and Transmission Lines.** The County will work with state and federal agencies and the renewable energy industry to identify suitable sites for production of renewable energy using local renewable resources such as solar, wind, small hydro, and biogas.
- **Identify and Resolve Potential Barriers to Renewable Energy Deployment.** The County will continue to identify and remove regulatory or procedural barriers to producing renewable energy in building and development codes, design guidelines, and zoning ordinances.
- **Mitigation of GHG Emissions Impacts Through Development Review Process.** Measurable reductions of GHG emissions will be achieved through the County's review and discretionary approval of new renewable energy facilities.

Silverado's proposed Victor Dry Farm Ranch project would be a valuable asset to the region and help demonstrate the County's fulfillment of the Plan. Furthermore, the project will contribute to the state's Renewable Portfolio Standard mandate that requires 33 percent of power come from renewable resources by 2020 and requires state agencies to take all appropriate actions to ensure the target is met.

The City questioned the maintenance and economic impact aspects of the project. The project has a rigorous operations and maintenance plan and will keep the facility running in peak form. The positive economic impact on the local economy is significant. This project would create approximately 65 construction jobs and help to establish full time jobs for regular maintenance and security needed at all solar sites in the southwest. Overall, this project has the potential to introduce tens of millions of dollars into the local economy through construction materials purchases, job creation, and tax revenue (sales and income taxes).

The Victor Dry Farm Ranch solar project is a positive development that is responsibly and carefully sited. It will help San Bernardino County meet the requirements to reduce GHG emissions from the generation of electricity and will bring jobs to the region. Silverado looks forward to becoming a positive community partner with both Victorville and San Bernardino. We encourage you to recognize the viability of this project and its value for your region. We are continuing dialogue with the City of Victorville about the project and look forward to further discussions with your office and County staff on this matter.

Sincerely,



Jim Howell
Executive Vice President of Development
Silverado Power

Cc: Randy Coleman – 1st District Planning Commissioner
Tracy Creason – Project Planner