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February 21, 2019

To: Mr. Chris Warrick - Senior Planner
San Bernardino County Land Use Services Dept.
385 North Arrowhead Ave., First Floor
San Bernardino, Calif. 92415
Email: Chris.Warrick@lus.sbcounty.gov

Dear Mr. Chris Warrick

Please accept these comments on behalf of the Homestead Valley Community Council and our Scenic Highway 247 Committee, to the San Bernardino County Initial Study on the proposed Lendlease Energy Development LLC - Calcite Solar Project.

The Homestead Valley Community Council (HVCC) was formed in 1996 to address all matters affecting the Morongo Basin unincorporated communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley. It is comprised of delegates appointed through the community associations of each of these member communities.

In 2011 HVCC formed the Scenic Highway 247 Committee to obtain CA State Scenic Highway designation for State Highway 247. The committee is currently working with representatives from Caltrans and SB County LUSD to complete the necessary steps for this designation.

We appreciate the opportunity to submit these comments for the project record.

Sincerely,

A handwritten signature in cursive script that reads 'Jim Harvey'.

Jim Harvey
President, Homestead Valley Community Council

The Homestead Valley Community Council (HVCC) formed the Scenic California Highway 247 Committee with the goal of preserving the scenic beauty and remarkable history of this unique route, originally established by wagon wheels.

Our Mission:

We will achieve State Scenic Highway designation for Highway 247 traversing the communities of the Town of Yucca Valley, Flamingo Heights, Yucca Mesa, Landers, Johnson Valley, Lucerne Valley and the City of Barstow.

We will identify the heightened visual experience in our Mojave Desert through official acknowledgment of our distinct natural, historical and recreational qualities.

An officially recognized scenic corridor will attract tourism, enhance business and generate community pride.

We have reviewed the Calcite Solar Draft Initial Study dated January 23, 2019. The studies describes the project in part as follows:

- construction and operation of a 100 megawatt (MW) alternating current (AC) photovoltaic (PV) solar energy facility on approximately 664 acres
- would include a 100 MWAC maximum capacity and energy storage (battery) system and a 220 kilovolt overhead generation tie line (gen-tie line) that would extend approximately 0.2 mile north to Southern California Edison's (SCE) proposed Calcite Substation.
- An on-site substation, inverters, fencing, roads, and supervisory control and data acquisition (SCADA) system would also be constructed as part of the proposed improvements.
- The Project would be constructed on 5 non-contiguous sites (or "Units"), which would be located along either side of State Route 247 (SR-247);
- Solar energy would be captured by an array of PV panels mounted to a single-axis tracking system. Each tracker would hold approximately 80 to 90 panels (depending on final configuration), and at its highest rotated edge would have a maximum height of approximately 12 feet above grade
- The inverter stations would be up to 12 feet in height
- The Project would include construction of a substation consisting of components up to 55 feet in height and overhead lines supported by 45- to 60-foot tall poles

Based on the size and scope of this project as described in the study, The Scenic California Highway 247 Committee concludes that this project will undoubtedly have a substantial adverse effect on the scenic vista, will substantially damage scenic resources, and will substantially degrade the existing visual character and quality of the site and its surroundings.

We are currently finishing the State Route 247 Visual Impact Study to be submitted soon to Caltrans and SB County LUSD for review and likely State Scenic Designation. The highway is already county designated scenic and is currently on the state's list of eligible highways for scenic designation. This is not a race to obtain scenic designation to impose management restrictions for projects like this in and around Highway 247. As a highway already established as eligible for scenic designation, State Highway 247

currently has scenic protection under Chapter 27 of the California Department of Transportation Standard Environmental Reference:

*“The intent of the State Scenic Highway Program is to protect and enhance California's natural scenic beauty. If a highway is listed as **eligible for official designation**, it is also part of the Scenic Highway System and care must be taken to preserve its eligible status.”*

(California Department of Transportation website:

<http://www.dot.ca.gov/ser/vol1/sec3/community/ch27via/chap27via.htm#scenic>)

We must also point out that Caltrans has submitted the following comment on the DRECP:

*“Ensure each energy project considers impact upon officially designated **and eligible** State Scenic Highways.”*

For more information see

the Landscape Architecture website:

http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

Furthermore, we must also bring your attention to several sections from the California Streets and Highways Code, specifically sections 260, 263, and 263.1:

Section 260. (Added by Stats. 1963, Ch. 1788.)

Cite as: Cal. Sts. & High. Code §260.

It is the intent of the Legislature in designating certain portions of the state highway system as state scenic highways to establish the State's responsibility **for the protection and enhancement of California's natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment.** It is further declared to be the intent of the Legislature in designating such scenic highways to assign responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate thereto and to indicate, in broad statement terms, the location and extent of routes and areas requiring continuing and careful co-ordination of planning, design, construction, and regulation of land use and development, by state and local agencies as appropriate, **to protect the social and economic values provided by the State's scenic resources.**

Section 263. (Amended by Stats. 1991, Ch. 775, Sec. 6.)

Cite as: Cal. Sts. & High. Code §263.

The state scenic highway system is hereby established and shall be composed of the highways specified in this article. **The highways listed in Sections 263.1 to 263.8, inclusive, are either eligible for designation as state scenic highways or have been so designated.**

Section 263.1. (Amended by Stats. 1994, Ch. 1220, Sec. 27.)

Cite as: Cal. Sts. & High. Code §263.1.

The state scenic highway system shall include:

Routes 28, 35, 38, 52, 53, 62, 74, 75, 76, 89, 96, 97, 127, 150, 151, 154, 156, 158, 161, 173, 197, 199, 203, 209, 221, 236, 239, 243, **247**, 254, and 330 in their entirety.

There is little doubt the Scenic Highway 247 Committee would be required to identify each of the 5 “units” described in the Initial Study as “significant intrusions” to the scenic value of State Highway 247 in the Visual Assessment report we are now finishing for Caltrans and SB County LUSD review, had the project completion preceded our assessment. When you add the additional visual obstruction the proposed Calcite Substation will impose it is clear to us that the project is in direct conflict with our mission to achieve State Scenic Designation for Highway 247 and has the potential to jeopardize our success.

The EIR for the Calcite Solar Project MUST address the negative impact this project would have on the scenic resources of State Highway 247 and the significant conflicts it would present with our mission **and** the numerous policies and codes previously referenced in this comments letter.

The Scenic 247 Committee’s campaign for Scenic Highway status dovetails with the County tourism program. Scenic 247 links urban centers and a recreational gold mine. Scenic Highway designation itself makes a proven magnet for travelers.

We have argued many times: San Bernardino County suffers from lack of revenues, lack of jobs. The County exports mineral resources, but little else brings outside money into the region – except exporting the story of our attractions, building tourism to support local enterprises and enhance County and State revenues.

Highway businesses cannot survive on local population alone. The stores, restaurants, medical offices in our communities serve residents who benefit from tourism and recreation revenues.

These considerations spurred the Scenic 247 campaign, as well as the prehistoric and historic heritage of the territory it traverses, and some of the least developed scenery remaining in California.

A major consideration for development in a scenic corridor is Visual Impact, how compatible is it with the character of the area? (Note: Many states and countries treat their rural and wild scenery as a natural resource, and it is).

The push for industrial renewable energy generation in the California desert ignores this value. Already, unpleasant visual impacts of wind turbines, massive solar fields and miles of transmission lines mar the legendary California experience for travelers.

Studies prove that people come to the desert from cities, other states and countries around the world, not for industrialization, but for wide open spaces. Industrial-scale renewable energy development means loss of tourism, and loss of present and future tax revenues.

The County and California need revitalizing, not government-imposed depression, not ghost towns. Promises of jobs from the energy developers have not materialized; instead we witness the destruction of desert habitat and private property values.*

We urge that the Scenic 247 corridor be judged as a valuable and irreplaceable resource for conservation, not exploitation.

We urge planners to remember that if we allow precious open desert spaces to be exploited for land intrusive industrial scale solar and wind projects, what they will do cannot be undone. We must utilize all of the already developed spaces first for solar and wind, and prioritize “point-of-use” solutions to increase renewable energy supplies. This is the better way.