



Endorsed by:

Homestead Valley Community Council
www.hvccsite.org

Morongo Basin Historical Society
www.mbhs.org

Flamingo Heights
Community Association
www.fhca.com

Johnson Valley
Improvement Association
see www.johnsonvalley.com

Hammerking Productions
dave@kingofthehammers.com

Landers Association

Yucca Mesa
Improvement Association
www.yuccamesa.org

Western American Railroad Museum
www.barstowrailmuseum.org

Lucerne Valley
Chamber of Commerce

Lucerne Valley
Economic Development Association

Lucerne Valley Market & Hardware

Lucerne Valley Museum

Route 66 Mother Road Museum
www.route66museum.org

Joshua Tree
Gateway Communities
Tourism Committee
www.joshuatreegatewaycommunities.com

Points of Interest Promotions
Lucerne Valley
billembright@thenewlight.net

Rockhound Field Trip Fanatics!
<http://rockhound-field-trips.ning.com>

Morongo Basin
Conservation Association
www.mbconservation.org

Lucerne Valley-Johnson Valley
Municipal Advisory Council

Barstow Chamber of Commerce
www.barstowchamber.com

Morongo Basin
Municipal Advisory Council

Julie Hackbarth-McIntyre
Mayor, City of Barstow

Chris Warrick, Senior Planner, County Land use Services
via e-mail at Chris.Warrick@lus.sbcounty.gov.

Re: Draft EIR Ord Mountain Solar Project & Calcite Substation State Clearinghouse Number 2017051082

We repeat comments made in June and January 2017, evidently overlooked during the drafting of the EIR. We focus on the economic value of increasing tourism to the region, threatened by the visual industrial intrusions into the Scenic 247 corridor.

We refute the claim on p. 33 of the DEIR: "Although the project would alter the existing character of the site, the introduction of project components would not substantially obstruct or interrupt views of surrounding mountainous terrain. The majority of the proposed solar and energy storage project equipment would maintain a relatively low vertical profile and would display a height of approximately 12 feet."

A 483-acre eyesore majority of 12-foot-high solar panels, yes, but the claim omits the on-site substation components up to 25 feet tall, lightning protection masts up to 70 feet high, a 60-foot deadend H-frame with masts up to 70 feet, overhead lines on 45- and 60-foot poles, 20-foot-high battery storage structures, the tie-line spanning Hwy 247 on 150-foot concrete or steel poles, to the Edison Calcite substation, initially sited in 13 acres on a 75-acre parcel, with its transmission lines and "ancillary facilities," and built-in allowances to accommodate cumulative effects.

See Figures 1, 2 and 3. Compare the map of the Terrain Visible to the Traveler as presented in the original Scenic 247 presentation to the County with the map, Cumulative Viewshed of Proposed Solar Projects. Very little of the Scenic 247 corridor would not be impacted by these projects and the cumulative effects they can generate.

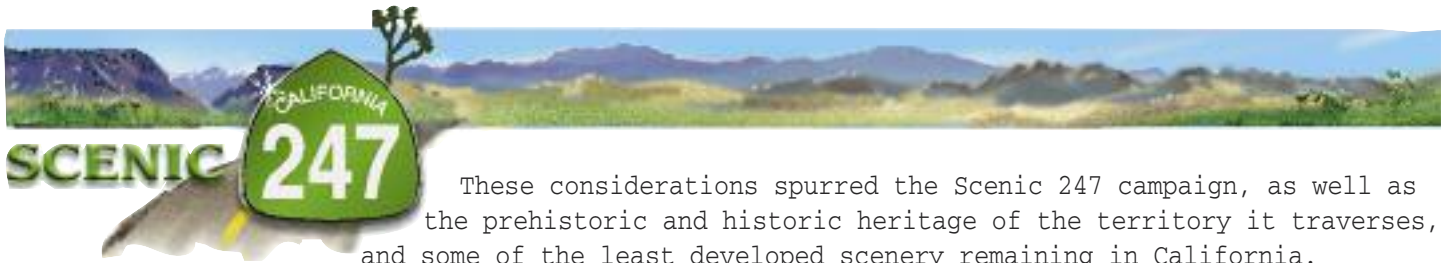
The Scenic 247 Committee's campaign for Scenic Highway status dovetails with the County tourism program. Scenic 247 links urban centers and a recreational gold mine. Scenic Highway designation itself makes a proven magnet for travelers,

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.

SCENIC 247 COMMITTEE •

51720 Hacienda Rd.#247, Johnson Valley, CA 92285 • www.scenichighway247.com
A committee of the Homestead Valley Community Council



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 give the desert over for the profit of private industry, what they will do cannot be undone.

We also urge you to heed Caltrans' 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

From this link to the California Department of Transportation website:

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

Under Chapter 27 - Visual & Aesthetics Review:

"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.**"

Also see Page 5 of this document: California Streets and Highways Code, Sections 260, 263,

Thank you for your attention,

A handwritten signature in black ink that reads 'Betty Munson'. The signature is written in a cursive, flowing style.

* See Addendum: "Market Value and Solar Farms"

SCENIC 247 COMMITTEE • 51720 Hacienda Rd.#247, Johnson Valley, CA 92285 • www.scenichighway247.com
A committee of the Homestead Valley Community Council

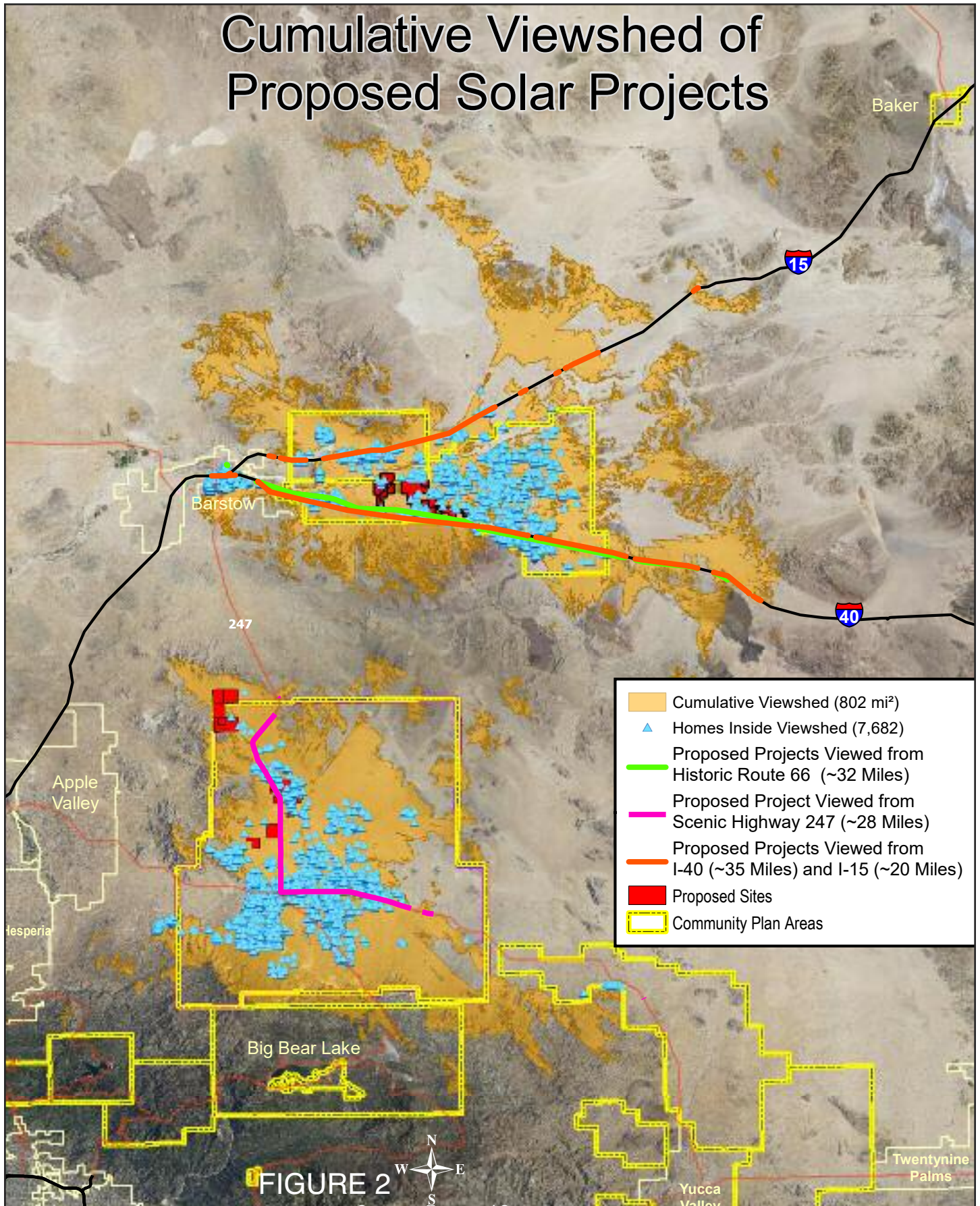
State Route 247 and Nearby Points of Interest



FIGURE 1

SCENIC 247 COMMITTEE • 51720 Hacienda Rd.#247, Johnson Valley, CA 92285 • www.scenichighway247.com
A committee of the Homestead Valley Community Council

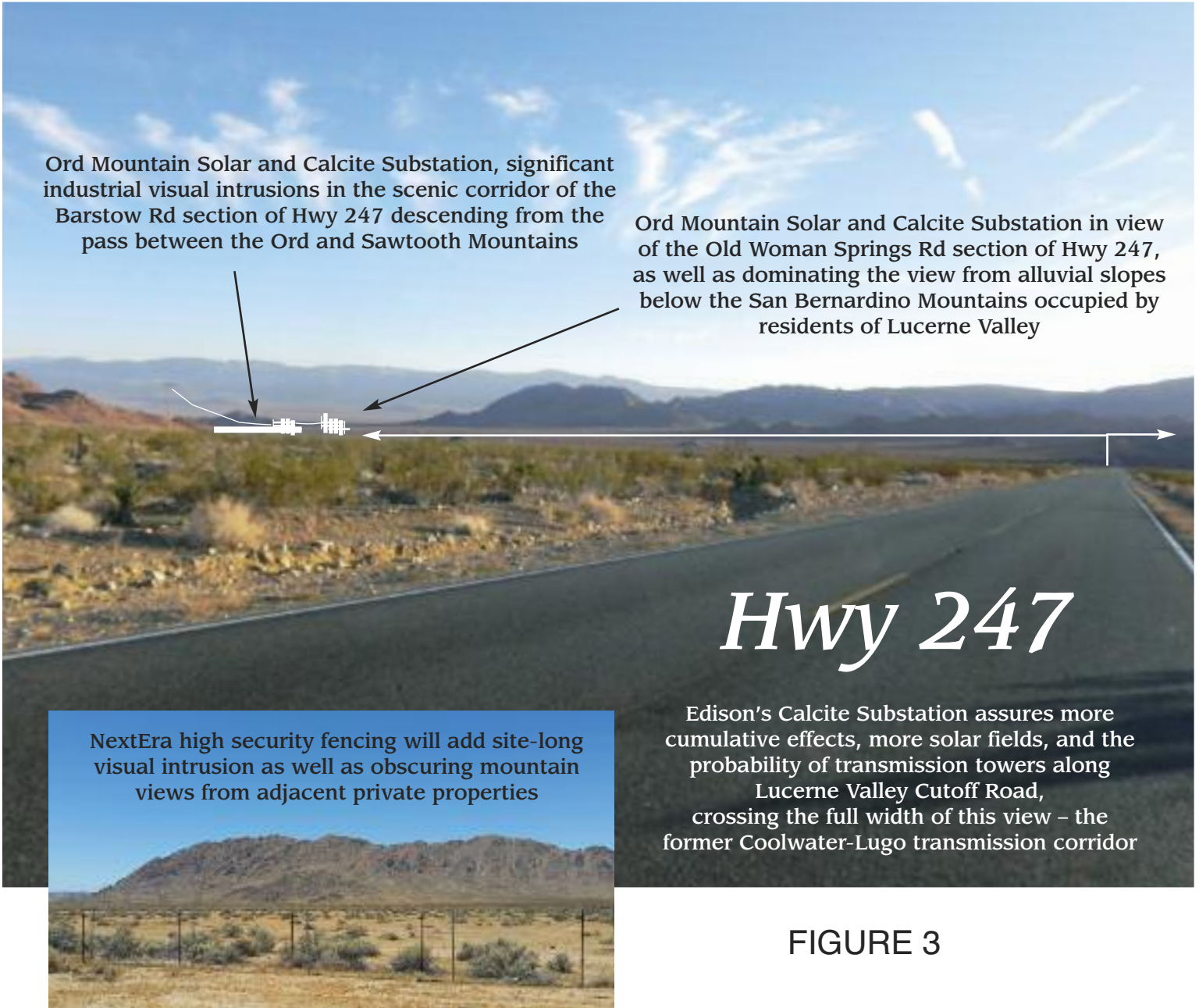
Cumulative Viewshed of Proposed Solar Projects



SCENIC 247 COMMITTEE • 51720 Hacienda Rd.#247, Johnson Valley, CA 92285 • www.scenichighway247.com
 A committee of the Homestead Valley Community Council



Approximation of the Siting of the Proposed Ord Mountain Solar and Calcite Substation Projects An Industrial Visual Intrusion for Miles Around



Ord Mountain Solar and Calcite Substation, significant industrial visual intrusions in the scenic corridor of the Barstow Rd section of Hwy 247 descending from the pass between the Ord and Sawtooth Mountains

Ord Mountain Solar and Calcite Substation in view of the Old Woman Springs Rd section of Hwy 247, as well as dominating the view from alluvial slopes below the San Bernardino Mountains occupied by residents of Lucerne Valley

Hwy 247

NextEra high security fencing will add site-long visual intrusion as well as obscuring mountain views from adjacent private properties

Edison's Calcite Substation assures more cumulative effects, more solar fields, and the probability of transmission towers along Lucerne Valley Cutoff Road, crossing the full width of this view - the former Coolwater-Lugo transmission corridor

FIGURE 3



CALIFORNIA STREETS AND HIGHWAYS CODE SHC

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.