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December 17, 2021

To:

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

Subject: Stagecoach Solar Project Draft EIR Comments

Dear Ms. Mongano:

Please accept this correspondence as comments to the October 22, 2021 release of a Draft Environmental Impact Report (DEIR) for the proposed Stagecoach Solar Project

The Homestead Valley Community Council (HVCC) was formed in 1996 to address all matters of mutual interest affecting the four Homestead Valley sub-communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley. We are comprised of delegates appointed through the community associations of each of the four Homestead Valley member communities.

Several years ago HVCC formed the Scenic Highway 247 Committee comprised of HVCC delegates and community members residing along the State Highway 247 corridor. The Scenic Highway 247 Committee submitted comments to the California State Lands Commission during the Public Scoping period in November 2020. In those comments the Scenic Highway 247 Committee stated its intent to seek and achieve official State Scenic Highway designation for Highway 247 and

provided details as to the progress of that mission, including the completion of the 115-page Visual Assessment and the start of producing the Corridor Protection Program.

HVCC would like to thank the California State Lands Commission for accepting and recording the 247 committee's 2020 Public Scoping comments, and for accurately identifying State Hwy 247 throughout the DEIR as "a State-Eligible and County-Designated Scenic Highway".

While the DEIR recognizes Hwy 247 as State Scenic Eligible, it erroneously implies only a potential for additional scenic protections (through official State Scenic designation) by failing to disclose that the current State Scenic Eligible status already provides additional protections for the highway's extensive scenic attributes. From the Scenic Hwy 247 Committee's comments:

"The County has designated S.R. 247 as scenic. The State has established it as eligible for scenic designation, therefore it 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.'*"

—Department of Transportation website:

<https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-27-visual-aesthetics-review#scenic>

Furthermore, the DEIR also directly contradicts Chapter 27 of the California Department of Transportation Standard Environmental Reference by incorrectly stating:

Although SR-247 is a State-Eligible and County-Designated Scenic Highway, there are no State-Designated Scenic Highways in the study area. Therefore, the Proposed Project would not result in an aesthetic/visual impact under this criterion.

Again, under Caltrans guidelines, "as a highway listed as eligible for official

scenic designation”, State Hwy 247 *“is part of the Scenic Highway System and care must be taken to preserve its eligible status”* and therefore does qualify for scenic protections under the State Scenic Highway System criterion.

As an update to the 2020 Scenic Highway 247 Committee comments, the committee received approval of the submitted Visual Assessment by officials at Caltrans and San Bernardino County Land Use Services in February 2021. The Corridor Protection Plan was introduced to the San Bernardino County Planning Commission at their Dec 9th 2021 meeting, and the commission unanimously expressed support for scenic designation. We anticipate approval of the CPP by the Board of Supervisors in February 2022 and final official scenic designation by Caltrans shortly afterwards.

If the final EIR completion precedes official scenic designation, HVCC formally requests that it contains acknowledgement of Chapter 27 of the California Department of Transportation Standard Environmental Reference and the protections granted to Hwy 247 as a “listed as eligible for scenic designation” highway. Conversely, if scenic designation precedes completion of the final EIR as expected, the EIR must reflect the new official scenic designation status.

We thank you for this opportunity to comment.

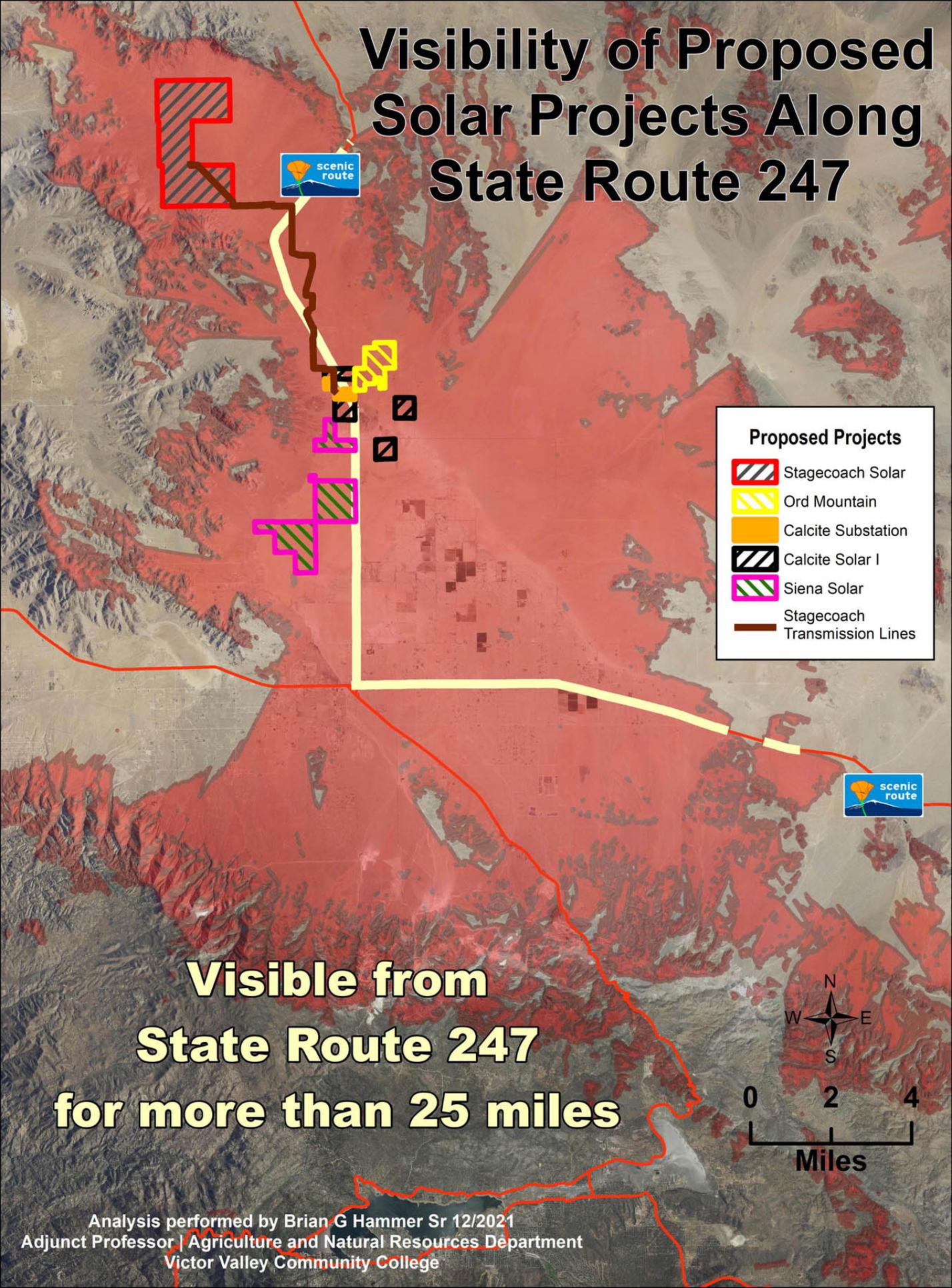
Sincerely,

James Harvey

A handwritten signature in cursive script that reads "James Harvey". The signature is written in black ink and is positioned below the typed name.

President, Homestead Valley Community Council
(On behalf of HVCC)

Visibility of Proposed Solar Projects Along State Route 247



Proposed Projects

- Stagecoach Solar
- Ord Mountain
- Calcite Substation
- Calcite Solar I
- Siena Solar
- Stagecoach Transmission Lines

**Visible from
State Route 247
for more than 25 miles**





City of Barstow Sphere of Influence

Sidewinder Mountain

Stordard Ridge

Stagecoach Solar

Ord Mountains

Granite Mountains

scenic route
State Hwy 247

Ord Mountain

Calcite Substation

Calcite Solar 1

Siena Solar

Lucerne Dry Lake

Lucerne Valley

scenic route
State Hwy 247

Image Landsat / Copernicus

Proposed Projects	
	Stagecoach Solar
	Ord Mountain
	Calcite Substation
	Calcite Solar I
	Siena Solar

Google Earth