THE REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
PROJECT NO. R2011-00833-(5)
ZONE CHANGE NO. 201100005

WHEREAS, the Regional Planning Commission ("Planning Commission") of the County of Los Angeles ("County") has conducted a public hearing in the matter of Zone Change No. 201100005 on June 11, 2014:

WHEREAS, the Planning Commission finds as follows:

1. The Project Site is located within the unincorporated area identified as Antelope Valley West on the County's Zoned District Map and near the City of Lancaster, and it is bounded by 110th Street West to the west, 102nd Street West to the east, West Avenue B to the south, and West Avenue A-8 to the north. Approximately 240 acres are located within the unincorporated County area.

2. The permittee, North Lancaster Ranch LLC ("Permittee"), requested approval to change zoning of the 240-acre property from A-1-2 (Light Agriculture-two acres minimum required area) to A-2-2 (Heavy Agriculture-two acres minimum required area) pursuant to Section 22.24.150 of the County Zoning Ordinance ("County Code"). Permittee proposes new development ("Project") within the 240-acre North Lancaster Ranch project site located within Los Angeles County ("Project Site"). The site plan for the Project depicts a required 20-foot setback from the solar arrays to the subject Project's property line, which setback may also include a vegetative buffer 10 feet in width for locations across from sensitive uses. An additional required 10-foot "slope easement" would be dedicated to the County as part of the public rights-of-way around the project. The Project Site would include a perimeter safety and security fence eight feet in height including three-strand barbed wire at the top to protect the public from high voltage electricity and to protect the facility from intrusion. Construction internal to the site would be comprised of solar panels set in arrays with associated inverters, transformers, and two internal substations, with access through the site by compacted interior dirt roads. All of the subject property, with the exception of above-mentioned buffers, would be used for construction of arrays and appurtenant facilities to generate approximately 20 megawatts of solar photovoltaic electricity. The electricity generated would be transmitted through underground transmission lines to tie in to the electrical grid using existing transmission lines or through additional lines limited in length, to the nearest point of connection as depicted on the site plan. Interior drainage basins are required to insure that stormwater flows match pre-existing conditions as it flows through the subject site. This

Project 1 is required to provide a 12-foot trail easement along the southern boundary to provide continuity for a County planned trail.

3. The proposed Zone Change is consistent with the Countywide General Plan and Antelope Valley Areawide General Plan ("Areawide Plan") for the property. The proposed Zone Change to A-2-2 is consistent with the land use designation of N-1 (Non-Urban 1), because the intent of the zoning (to Zone A-2-2) is to implement the land use (Category N-1).

4. The Project is consistent with the proposed A-2-2 zoning classification and complies with development standards of Title 22 of the County Code.

5. Modified conditions of the Project Site and of the surrounding community warrant the adoption of the Zone Change. The Project's location within an area encouraging growth of the solar electricity generation industry and in proximity to existing interconnection facilities, makes the Project Site ideal for further solar electricity generation development, intensifying its designation as a regional source for generating electricity while remaining sensitive to surrounding uses. The existing regulations applicable to the Project Site are primarily reflective of the earlier planned use of the subject property as largely limited to agricultural use. The addition of solar electricity generation facilities and other supporting equipment is a suitable alternative use to agriculture because of the shortage of available water in the Antelope Valley, the low-profile and pollution-free operational nature of a solar array field, and the need to meet California's renewable energy mandates. The existing A-1-2 zoning designation on the proposed Project Site would not allow for solar electricity generation, thereby eliminating the opportunity for the location of such a facility in an area highly suitable for such a use. Therefore, the regulations contained in and the development contemplated by the Zone Change would establish additional and appropriate land use controls to establish the use of the Project Site in a manner that would ensure compatibility with the surrounding community.

6. Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper and property posting.

7. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, CA 90012. The custodian of such documents and materials shall be the Section Head of the Special Projects Section, Los Angeles County Department of Regional Planning.

RESOLVED, That the Regional Planning Commission recommends to the Board of Supervisors of the County of Los Angeles as follows:

1. Change of zone from A-1-2 to A-2-2;

2. That the Board of Supervisors adopt the Environmental Impact Report ("EIR") (including Final EIR dated April, 2014, Draft EIR dated January, 2014, California Environmental Quality Act Findings of Fact, and Mitigation Monitoring and Reporting Program), certify its completion and determine that the project, with modifications, will not have a significant impact upon the environment;

3. That the Board of Supervisors find the recommended zoning is consistent with the Los Angeles Countywide General Plan and Antelope Valley Areawide General Plan; and

4. That the Board of Supervisors hold a public hearing to consider the above recommended change of zone.

I hereby certify that the foregoing resolution was adopted by a majority of the voting members of the Regional Planning Commission on the County of Los Angeles on June 11, 2014

Rosie Ruiz, Secretary
County of Los Angeles
Regional Planning Commission

ACTION DATE: June 11, 2014

VOTE: 4:0:0:1

Concurring: Shell, Louie, Pedersen, Modugno

Dissenting: 0

Abstaining: 0

Absent: Valadez

SZD:KKS
6/19/14

Attachments: Zone Change Ordinance and Zone Change Map
c: Each Commissioner, Zoning Enforcement, Building and Safety

ZONING CASE NUMBER

ORDINANCE NUMBER _____

An ordinance amending Section 22.16.230 of Title 22 of the County Code, changing regulations for the execution of the Antelope Valley Areawide General Plan of the Los Angles Countywide General Plan, relating to the Antelope Valley West Zoned District No. 115.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1. Section 22.16.230 of the County Code is amended by amending the map of the Antelope Valley West Zoned District No. 115 as shown on the map attached hereto.

SECTION 2. The Board of Supervisors finds that this ordinance is consistent with the Antelope Valley Areawide General Plan of the Countywide General Plan of the County of Los Angeles.

CHANGE OF PRECISE PLAN

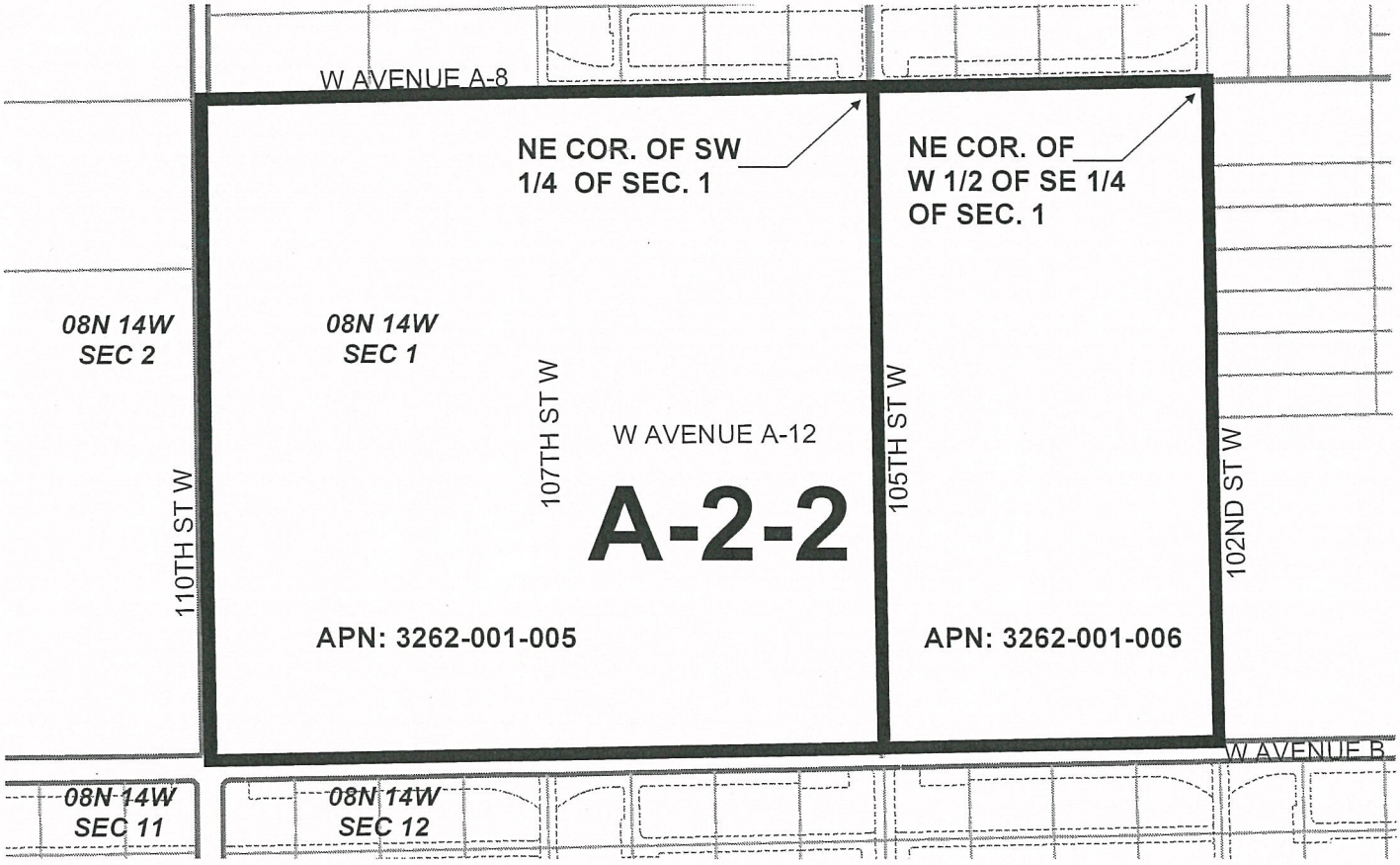
ANTELOPE VALLEY WEST ZONED DISTRICT

ADOPTED BY ORDINANCE: _____

ON: _____

ZONING CASE: ZC201100005

AMENDING SECTION: 22.16.230 OF THE COUNTY CODE



LEGAL DESCRIPTION:

APN: 3262-001-005

THE SW. 1/4 OF SEC.1, T.8N., R.14W. SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.

APN: 3262-001-006

THE W. 1/2 OF THE SE. 1/4 OF SEC. 1, T.8N., R.14W. SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.

LEGEND:

- PARCELS
- STREET / RIGHT OF WAY
- LOT LINE
- CUT/DEED LINE
- EASEMENT LINE
- ZONE CHANGE AREA

N

0 500 1,000 FEET

COUNTY ZONING MAP
405H189

DIGITAL DESCRIPTION: \ZCO\ZD_ANTELOPE_VALLEY_WEST\

THE REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
ESTHER L. VALADEZ, CHAIR
RICHARD J. BRUCKNER, PLANNING DIRECTOR

Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

PROJECT SUMMARY

PROJECT NUMBER
R2011-00833-(5)

HEARING DATES
May 7, 2014, June 11, 2014

REQUESTED ENTITLEMENTS **Project 1**
Zone Change No. 201100005
Conditional Use Permit No. 201100079
Environmental Assessment No. 201100109

OWNER / APPLICANT
North Lancaster Ranch, LLC

MAP/EXHIBIT DATE
March 24, 2014

PROJECT OVERVIEW

Project 1: North Lancaster Ranch

A zone change is requested to change zoning from light agriculture, which does not allow electricity generation facilities, to heavy agriculture, which does allow electricity generation facilities. The Project proposes to develop 20 megawatts of solar photovoltaic electricity generation on 240 acres of flat, previously farmed fallow land, perimeter security fencing, and one 10,000 gallon water tank. No operations building or other permanent buildings are proposed. The Project would employ a series of photovoltaic module arrays, using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facility would deliver the electrical output to the existing regional transmission system. To minimize fugitive dust, no grading, disking, tilling, or rolling is proposed for preparation of the solar array areas; some grading is required for internal roads and required flood control drainage features. Proposed water supply for construction and operations would include use of out-of-basin or recycled water. The Project proposes use of existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where feasible to minimize the need for new electrical support facilities. Construction of any new transmission lines necessary within unincorporated Los Angeles County jurisdiction would be located underground. The Project would be constructed and then operated for an estimated 35 years. A Little Buttes Trail easement and vegetative buffer would be located at the southern boundary at West Avenue B. One existing developed site is located across the road from the northwest corner of the property. Vacant, unfarmed, undeveloped land surrounds the remainder of the site.

LOCATION AND ACCESS
105th Street West & West Avenue B, Lancaster, CA

ASSESSORS PARCEL NUMBER(S)
3262-001-005, 3262-001-006

SITE AREA
240 Acres

GENERAL PLAN / LOCAL PLAN
Antelope Valley Areawide General Plan

ZONED DISTRICT
Antelope Valley West

LAND USE DESIGNATION
N-1 (Non-Urban 1)

ZONE
Existing: A-1-2 (Light Agriculture-two acres minimum required area)

Proposed: A-2-2 (Heavy Agriculture-two acres minimum required area)

POWER GENERATION	MAX DENSITY/UNITS	COMMUNITY STANDARDS DISTRICT
20 MW	NA	NA

ENVIRONMENTAL DETERMINATION (CEQA)
Environmental Impact Report

KEY ISSUES

- Consistency with the Los Angeles County Antelope Valley Areawide General Plan
- Compliance with the following Section(s) of Title 22 of the Los Angeles County Code:
  - 22.56.040 (Conditional Use Permit Burden of Proof Requirements)
  - 22.24.110 (A-2 Zone Development Standards)
  - 22.16.110 (Zone Change Burden of Proof Requirements)

CASE PLANNER:	PHONE NUMBER:	E-MAIL ADDRESS:
Mr. Kim Szalay	(213) 974 - 4876	kszalay@planning.lacounty.gov

Silverado Power RPC Agenda Text

Special Projects

Project No. R2011-00833-(5) (Mr. Szalay)
Applicant: Silverado Power, LLC
Antelope Valley West Zoned District
105th Street West & West Avenue B, Lancaster, CA

a. Conditional Use Permit No. 201100079 to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

b. Zone Change No. 201100005 to change the zoning from the A-1-2 (Light Agriculture-two acres minimum required area) zone to the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.16.070).

c. Environmental Review No. 201100109 State Clearing House No. 2012061068. An Environmental Impact Report has been prepared pursuant to CEQA reporting requirements.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

NOTICE OF PUBLIC HEARING

SILVERADO POWER WEST, LOS ANGELES COUNTY
PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 201100005
ENVIRONMENTAL REVIEW NO. 201100109
EIR STATE CLEARINGHOUSE NO. 2012061068

Notice is hereby given that the Regional Planning Commission of Los Angeles County ("Commission") will conduct a public hearing concerning these land use proposals on **May 7, 2014** at 9:00 a.m., in Room 150, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. Room 150 will be open to the public at 8:50 a.m. Interested persons will be given an opportunity to testify.

SITE LOCATION
Projects 1-6 are located in the Antelope Valley in unincorporated Los Angeles County west of the Antelope Valley Freeway (State Route 14). All six Project sites are located between 30th Street West and 120th Street West on the east-west axis. On the north-south axis, the sites are between West Avenue A to the north and West Avenue K to the south. The Projects range from 38.5 acres to 256 acres in size and from 5 MW to 52 MW in solar generation capacity.

PROJECT DESCRIPTION
Silverado Power is a utility scale solar photovoltaic ("PV") developer proposing the development of six solar PV Projects in the western portion of the Antelope Valley, located in the northern portion of unincorporated Los Angeles County. Each of the six solar PV Projects is planned for separate properties, is being developed separately, and are analyzed individually and cumulatively for all phases of each project including planning, construction, and operation. The Projects to be developed are given below by Project name, Project number, Conditional Use Permit ("CUP") No., assessor's parcel number ("APN"), acres, megawatts ("MW"), and adjacent street intersection:

Project 1 North Lancaster Ranch – Project No. R2011-00833; CUP No. 201100079; APNs 3262-001-006 and 3262-001-006; 240 acres; 20 MW; 105th Street West and West Avenue B

Project 2 Western Antelope Blue Sky Ranch – Project No. R2011-00798; CUP No. 201100070; APN 3267-015-001; 157 acres; 40 MW; 110th Street West and West Avenue K

Project 3 American Solar Greenworks – Project No. R2011-00799; CUP No. 201100071; APNs 3268-018-035, 3268-018-002, and 3268-018-036; 135.61 acres; 35 MW; 70th Street West and West Avenue G

Project 4 Antelope Solar Greenworks – Project No. R2011-00807; CUP No. 201100076; APNs 3218-002-018, 3218-002-023, 3203-002-015, 3203-002-017, 3218-001-002, 3218-001-003, 3218-001-004, 3203-002-011, 3203-002-012, 3203-002-013, 3203-002-014, and 3219-019-011; 256 acres; 52 MW; 97th Street West and West Avenue I

Project 5 Silver Sun Greenworks – Project No. R2011-00801; CUP No. 2011000072; APNs 3267-003-001, 3267-003-002, and 3267-003-003; 160 acres; 20 MW; 120th Street West and West Avenue I

Project 6 Lancaster WAD – Project No. R2011-00805; CUP No. 201100074; APN 3115-010-004; 38.49 acres; 5 MW; 35th Street West and West Avenue D

Projects 1-6 are not dependent upon each other for success. Each Project can succeed as a stand-alone project if other projects are not approved by Los Angeles County or if technical or financial problems delay or block the completion of a Project. Each project must receive consideration of its Conditional Use Permit application and other entitlements on the merits of the individual project and individual site.

Zone Change No. 201100005
To change the zoning on Project 1, the 240-acre North Lancaster Ranch site associated with Project No. R2011-00833 and CUP No. 201100079, from A-1-2 (Light Agriculture-two acres minimum required area) to A-2-2 (Heavy Agriculture-two acres minimum required area).

Conditional Use Permit
To authorize a separate Conditional Use Permit for each of Projects 1 through 6 for a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area), A-2-5 (Heavy Agriculture-five acres minimum required area), and D-2-2 (Desert-Mountain-two acres minimum required area) zones.

ENVIRONMENTAL DOCUMENTATION
An EIR, including Final EIR, Draft EIR, Mitigation Monitoring and Reporting Program, and CEQA Findings of Fact have been prepared for Projects 1-6 pursuant to the California Environmental Quality Act (Cal. Pub. Res. Code §§ 21000, et seq.). The Final EIR will be available for review at least 10 days prior to the public hearing date (Cal. Code of Reg. Title 14 Chap. 3 §15089(b)).

PUBLIC COMMENT PERIOD AND REVIEWING LOCATIONS
Materials for Projects 1-6 are available for review Monday through Thursday, 7:30 a.m. to 5:30 p.m. (closed on Fridays) at: County of Los Angeles Department of Regional Planning, Hall of Records, Room 1362, 320 West Temple Street, Los Angeles, California 90012. Selected materials are also available for review beginning **April 7, 2014** at the County libraries listed below and on the Projects' Department of Regional Planning website http://planning.lacounty.gov/case/view/silverado/ .

Lancaster Library
601 West Lancaster Blvd.
Lancaster, CA 93534

Quartz Hill Library
42018 North 50th St. West
Quartz Hill, CA 93536

Canyon Country Jo Anne Darcy Library
18601 Soledad Canyon Rd.
Santa Clarita, CA 91351

Lake Los Angeles Library
16921 East Avenue O, #A
Palmdale, CA 93591

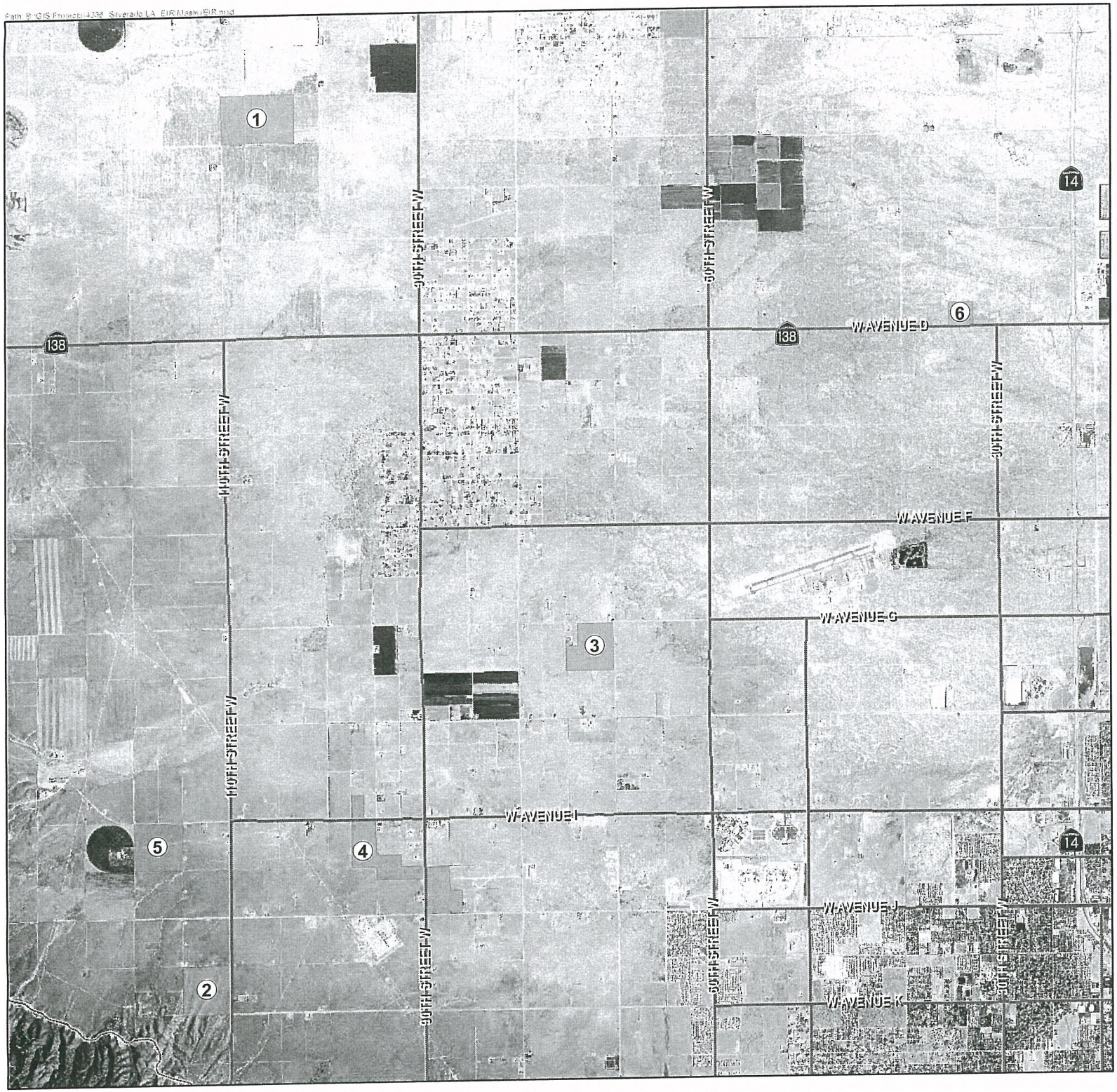
Antelope Valley Bookmobile
601 West Lancaster Blvd.
Lancaster, CA 93534

These cases do not affect the zoning of surrounding properties. If you are unable to attend the public hearing but wish to send written comments, please write to Attention: Mr. Kim Szalay, Department of Regional Planning, Room 1362, 320 West Temple Street, Los Angeles, California 90012, or, by email to specialprojects@planning.lacounty.gov. You may also obtain additional information concerning this case by telephoning Mr. Kim Szalay at (213) 974-4876 between 7:30 a.m. and 5:30 p.m., Monday through Thursday (our offices are closed on Fridays). Callers from North County areas may dial (661) 272-0964 (Antelope Valley) or (661) 253-0111 (Santa Clarita) toll free and then ask to be connected to (213) 974-4876.

If you challenge a County action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice or by written correspondence delivered to the Regional Planning Commission at, or prior to, the public hearing.

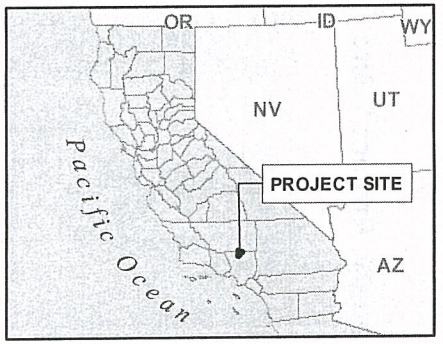
Un aviso de acuerdo con la Ley de Calidad Ambiental de California (CEQA). El Condado de Los Angeles considerará un proyecto para el desarrollo de 6 facilidades de energía fotovoltaica. El informe sobre los impactos ambientales está disponible desde el dia siete de Abril hasta siete de Mayo (30 días). Una audiencia pública para considerar el proyecto tendrá lugar el siete de Mayo 2014. Si necesita más información, o si quiere este aviso en Español, favor llamar al Departamento de Planificación al (213) 974-6466.

ADA ACCOMMODATIONS: If you require reasonable accommodations or auxiliary aids and services such as material in alternate format or a sign language interpreter, please contact the ADA (Americans with Disabilities Act) Coordinator at (213) 974-6488 (Voice) or (213) 617-2292 (TDD), with at least three business days notice.



SILVERADO POWER WEST
LOS ANGELES COUNTY

PROJECTS 1 - 6



Legend

Project Location

1 – Project 1 North Lancaster Ranch
2 – Project 2 Western Antelope Blue Sky Ranch
3 – Project 3 American Solar Greenworks
4 – Project 4 Antelope Solar Greenworks
5 – Project 5 Silver Sun Greenworks
6 – Project 6 Lancaster WAD

N

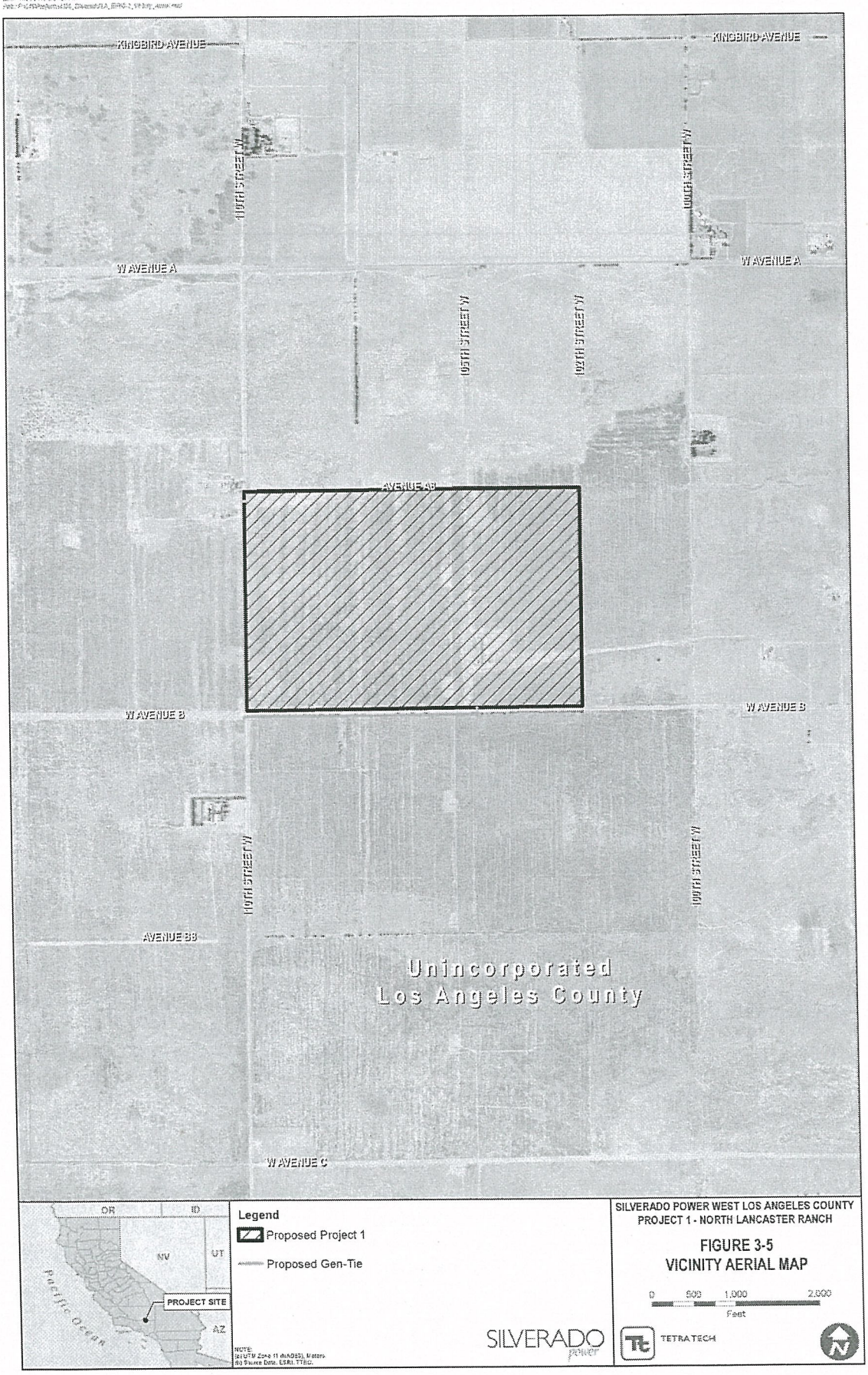
0 0.5 1 2
Miles

NOTE:
(a) State Plane, Zone V (NAD83), US Survey Feet.
(b) Source Data: ESRI, TT.

PROJECT LOCATIONS

TETRA TECH

Silverado Power West, Los Angeles County, Project 1 Site



RPC MEETING DATE
May 7, 2014
AGENDA ITEM NOS.
6-11

REGIONAL PLANNING COMMISSION
TRANSMITTAL CHECKLIST

PROJECT NOS.: **R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011- 00807-(5), R2011-00801-(5), R2011-00805-(5) (Projects 1-6)**

CASE NOS.: **CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074 (Projects 1-6)**
ZONE CHANGE NO. 201100005 (Project 1)
EIR ENVIRONMENTAL ASSESSMENT NO. 201100109 (Projects 1-6)

CONTACT PERSON: Mr. Kim Szalay

Combined Items for All Six Projects (Projects 1-6)

☒ VICINITY, LAND USE, AND ZONING MAPS (Projects 1-6 context)

☒ STAFF ANALYSIS (Projects 1-6 incorporated in one report)

☒ SITE PLANS, ELEVATIONS, AND DIAGRAMS (Projects 1-6 on disk)

☒ ENVIRONMENTAL DOCUMENTATION – Final EIR (including Hearing Examiner transcripts and responses to comments), DEIR, CEQA FINDINGS AND MMRP (Projects 1-6 on disk)

☒ CORRESPONDENCE (Projects 1-6)

☒ HEARING EXAMINER STAFF SUMMARY (Projects 1-6)

☒ APPLICANT'S OUTREACH TABLE (Projects 1-6)

Project-Specific Materials by Project

☒ PROJECT SITE LOCATION AERIAL BY PROJECT

☒ FACTUAL - PROJECT SUMMARY BY PROJECT

☒ DRAFT CUP FINDINGS BY PROJECT

☒ DRAFT CUP CONDITIONS WITH DEPARTMENT CONDITIONS BY PROJECT

☒ DRAFT ZONE CHANGE DOCUMENTS (Project 1, R2011-00833, RCUP 201100179)

☒ BURDEN OF PROOF STATEMENTS BY PROJECT

Reviewed By: _____

RPC MEETING DATE
May 7, 2014
AGENDA ITEM NOS.
6-11

REGIONAL PLANNING COMMISSION
TRANSMITTAL CHECKLIST

PROJECT NOS.: **R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011- 00807-(5), R2011-00801-(5), R2011-00805-(5) (Projects 1-6)**

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☒ CORRESPONDENCE (Projects 1-6)

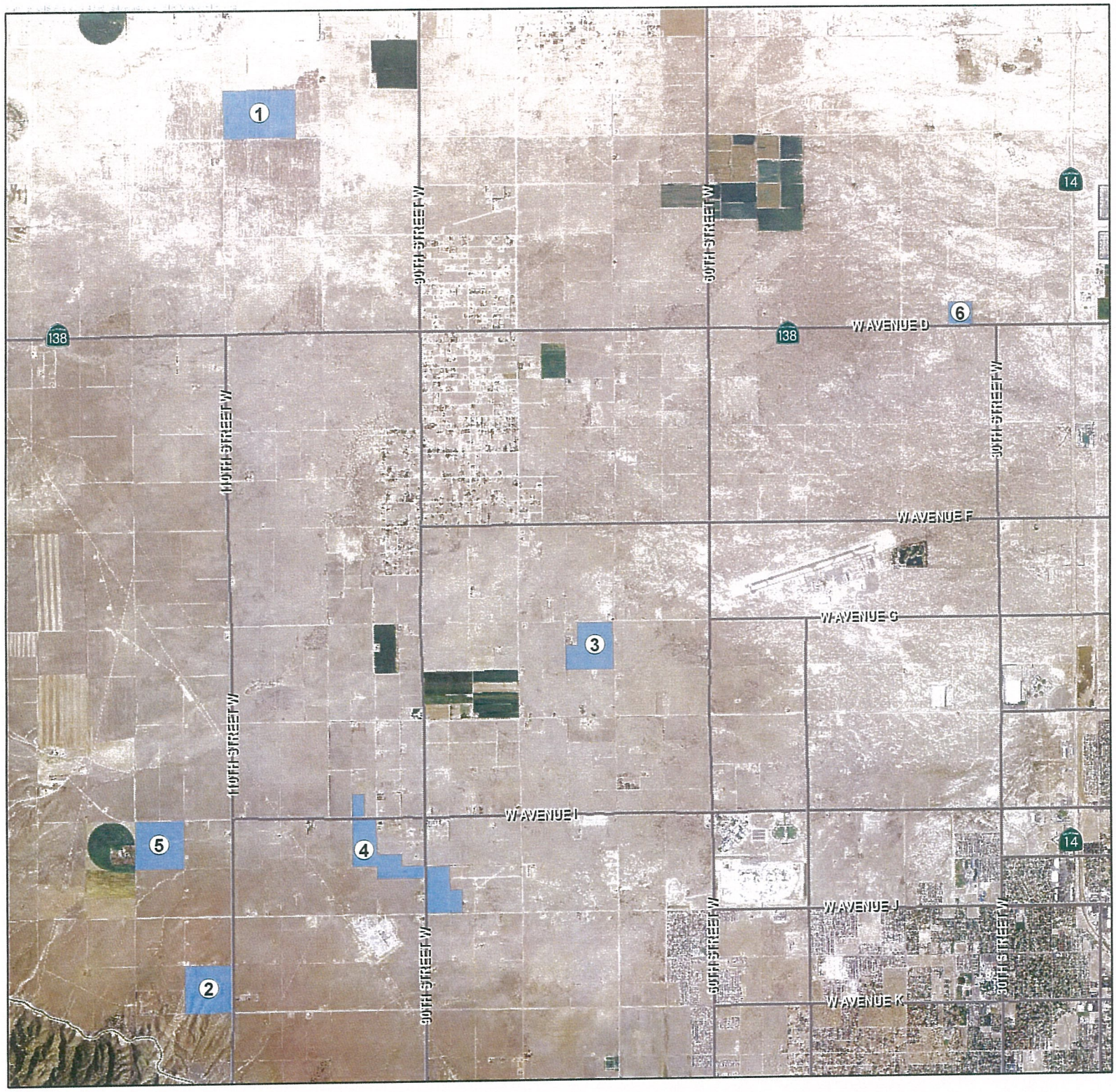
☒ HEARING EXAMINER STAFF SUMMARY (Projects 1-6)

☒ APPLICANT'S OUTREACH TABLE (Projects 1-6)

PROJECTS 1-6

ALL PROJECTS COMBINED ITEMS

VICINITY MAP
AND AERIALS
PROJECTS 1-6



SILVERADO POWER WEST
LOS ANGELES COUNTY

PROJECTS 1 - 6

Legend

Project Location

1 – Project 1 North Lancaster Ranch
2 – Project 2 Western Antelope Blue Sky Ranch
3 – Project 3 American Solar Greenworks
4 – Project 4 Antelope Solar Greenworks
5 – Project 5 Silver Sun Greenworks
6 – Project 6 Lancaster WAD

N

0 0.5 1 2
Miles

NOTE
(a) State Plane, Zone V (NAD83), US Survey Feet.
(b) Source Data: ESRI, TT.

PROJECT LOCATIONS

TETRA TECH

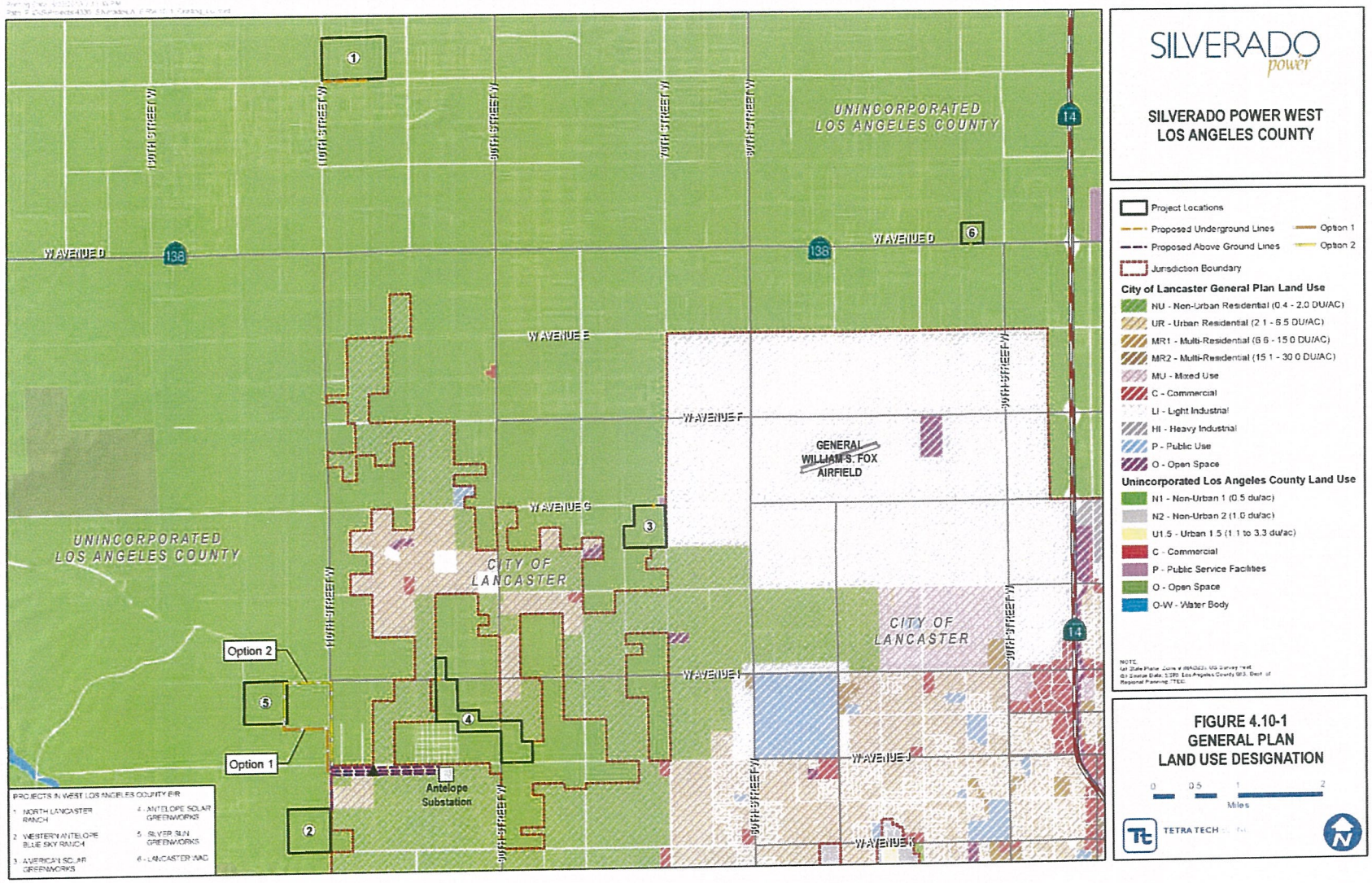
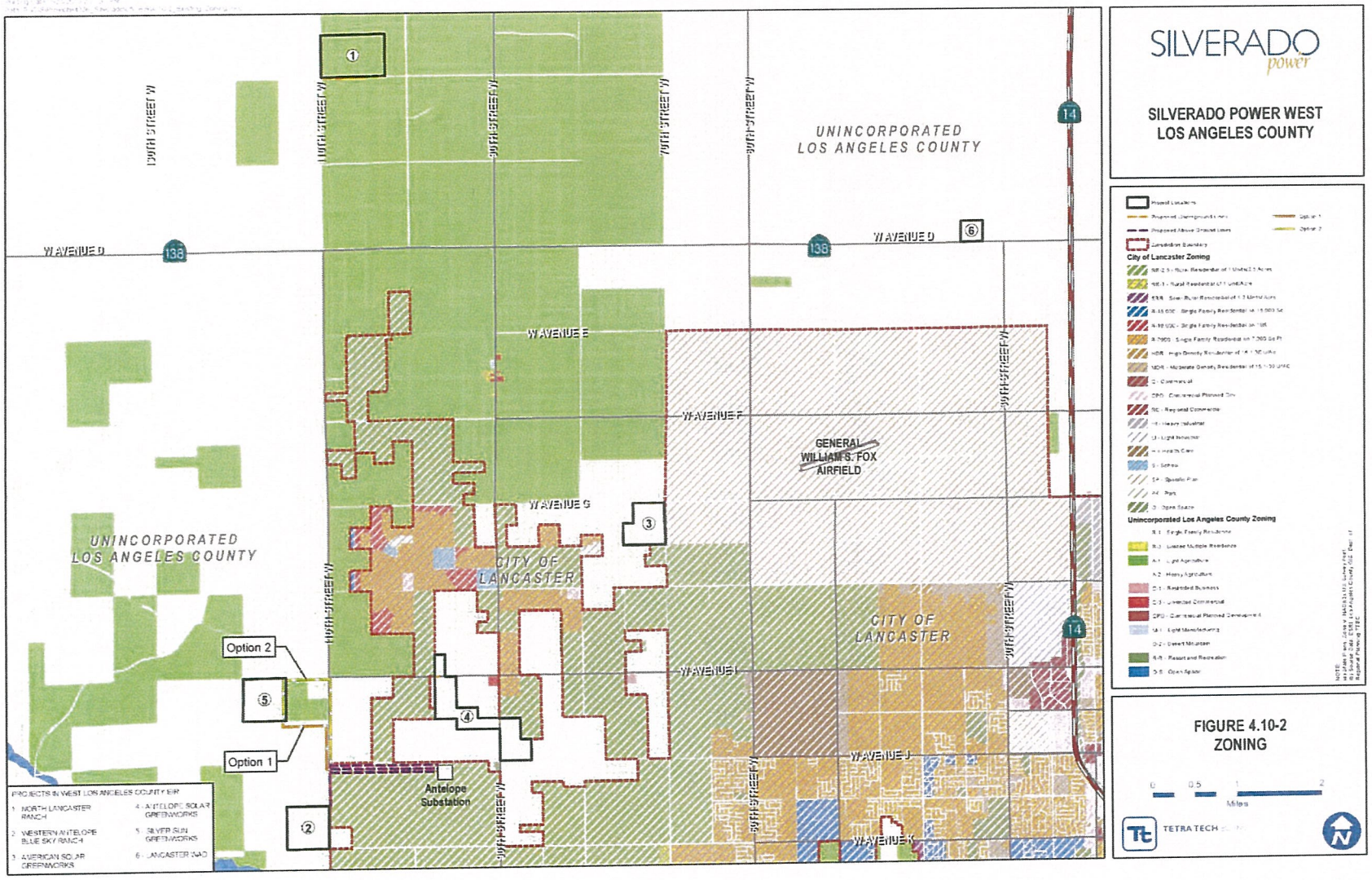


FIGURE 4.10-1
GENERAL PLAN
LAND USE DESIGNATION


SILVERADO power
SILVERADO POWER WEST
LOS ANGELES COUNTY
UNINCORPORATED
LOS ANGELES COUNTY
CITY OF
LANCASTER
GENERAL
WILLIAM J. FOX
AIRFIELD
W AVENUE D
W AVENUE E
W AVENUE F
W AVENUE G
W AVENUE I
W AVENUE J
W AVENUE K
10TH STREET W
30TH STREET W
Option 1
Option 2
Antelope
Substation
City of Lancaster Zoning
Unincorporated Los Angeles County Zoning
FIGURE 4.10-2
ZONING
Miles
TETRA TECH

STAFF ANALYSIS

(Projects 1-6 In One Report)

STAFF ANALYSIS

PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 201100005
ENVIRONMENTAL ASSESSMENT NO. 201100109
EIR STATE CLEARINGHOUSE NO. 2012061068

SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS 1-6

INTRODUCTION

The applicant, Silverado Power, LLC ("Applicant") is proposing the Silverado Power West, Los Angeles County projects 1-6 which are comprised of six photovoltaic solar energy generation facilities ("SGFs") and their associated generation-tie transmission lines ("Genties"), together called "Projects 1-6". The six Project sites together cover approximately 987 acres and would produce 172 megawatts ("MW") of electrical power in total. The Projects sites range in size from 38.49 acres to 256 acres, and would generate from 5 MW to 52 MW in electricity generation capacity per site. Each of Projects 1-6 are planned for separate properties, are being developed separately, and are analyzed individually and cumulatively in the Draft Environmental Impact Report ("Draft EIR") for all phases of each project including planning, construction, and operation according to the requirements of Section 15161 of the California Environmental Quality Act ("CEQA"). Each of Projects 1-6 is independent of each other in terms of the required regulatory approvals from the County. Each Project can succeed as a stand-alone project if other projects are not acted upon by Los Angeles County or if technical or financial problems delay or prevent the subsequent development of a Project. CEQA allows for a group of related projects to be analyzed within a single EIR. Each of Projects 1-6 must also receive approval of its own Conditional Use Permit ("CUP") application and for Project 1 approval of a Zone Change application on the merits of the individual project and individual site.

Renewable Energy Initiatives in the County

In response to ongoing concerns in the Antelope Valley regarding development of solar and other renewable energy projects, the County initiated the preparation of a Renewable Energy Ordinance, currently under environmental review, and the County currently requires strict requirements for nearly all utility scale renewable energy solar projects ("Utility Scale Projects") located throughout the County's unincorporated areas. Prior to adoption of the Renewable Energy Ordinance, the Department of Regional Planning imposes conditions of approval for Utility Scale Projects including specific measures to limit and control dust during construction and operations through mandated dust control plans and enforcement procedures including limiting grading to only that necessary for required internal roads and flood control facilities. These Utility Scale Projects are also required to use water supplies which do not draw down the Antelope Valley water basin currently in the adjudication process, to maintain low-height facilities,

and to underground transmission lines to reduce visual impacts across the valley. In consideration of the additional restrictions placed on development of Utility Scale Projects, of the approximately 38 Utility Scale Projects filed with the Department of Regional Planning, 22 have been withdrawn, two are indefinitely on hold, two have been denied, four have been approved, one is in the hearing process, and the Silverado Power West, Los Angeles County Projects 1-6 are in the current hearing process.

ENTITLEMENTS REQUESTED

The entitlements for Projects 1-6 required pursuant to the County of Los Angeles Zoning Ordinance, Title 22 ("County Code") are indicated below.

- Project 1:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

  Zone Change to change the zoning from A-1-2 (Light Agriculture-two acres minimum required area) to A-2-2 (Heavy Agriculture-two acres minimimum required area) zone (Section 22.16.070).

- Project 2:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-5 (Heavy Agriculture-five acres minimum required area) zone (Section 22.24.150).

- Project 3:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

- Project 4:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

- Project 5:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-5 (Heavy Agriculture-five acres minimum required area) zone (Section 22.24.150).

- Project 6:
  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the D-2-2 (Desert-Mountain-two acres minimum required area) zone (Section 22.32.090).

LOCATION AND ACCESS

Projects 1-6 are located in the West Antelope Valley in unincorporated Los Angeles County and are all located west of State Route 14 ("SR 14") as depicted in the attached exhibits. All six Project sites are located between 30th Street West to the east and 120th Street West to the west on the east-west axis. On the north-south axis, the sites are between Avenue K to the south and Avenue A to the north. The individual Projects are located adjacent to the following intersections:

Project 1: 105th Street West and West Avenue B, Lancaster, CA
Project 2: 110th Street West and West Avenue K, Lancaster, CA
Project 3: 70th Street West and West Avenue G, Lancaster, CA
Project 4: 97th Street West and West Avenue I, Lancaster, CA
Project 5: 120th Street West and West Avenue I, Lancaster, CA
Project 6: 35th Street West and West Avenue D, Lancaster, CA

DESCRIPTION OF PROJECTS 1-6

Projects 1-6 are generally located on flat unproductive farmland that is no longer used for farming or other agricultural purposes. Projects 1-6 are surrounded by properties comprised of various land uses, although a majority of the surrounding lands are unoccupied agricultural and grazing lands. The nearest residential communities are Antelope Acres, the Fairmont Community, the City of Lancaster, and the City of Palmdale. Land uses surrounding Projects 1-6 consist of open space areas, agricultural land, low density single family housing, and undeveloped grazing lands. Historically, agriculture has been a primary land use in the Antelope Valley. Some properties in the area continue to be utilized for agricultural production; however, because of the declining groundwater levels in the Antelope Valley region and due to the costs of imported water, the properties in the area have a limited supply of water to irrigate crops. Many of these properties ceased farming activity over the last two decades and remain as fallow land. Angeles National Forest in the San Gabriel Mountains is located south of Projects 1-6, and the Tehachapi Mountains are located to the north.

Each of Projects 1-6 would be designed and built in a very similar manner. Each of the six sites would employ a series of photovoltaic module arrays, using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facilities would deliver the electrical output to the existing regional transmission system. Construction would generally take place during normal daylight hours and would conform to County construction requirements. No grading, disking, tilling, or rolling is proposed for preparation of the solar array areas; however, some grading is required for internal roads and required flood control drainage features. Projects 1-6 would be constructed in individual project-specific phases and then be operated for an estimated 35 years. Projects 1-6 were sited to minimize impacts to the environment and to the local community by using previously disturbed land degraded from prior use, and by proposing to use existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where feasible to minimize the need for new electrical support facilities. Projects 1-6 proposed to be

developed are listed below by Project name, Project number, assessor's parcel number ("APN"), acres, megawatts of electrical energy that would be produced, and zoning and land use designations:

Silverado Power West, Los Angeles County Projects
Project Information Table

Project Name	County Project/CUP Nos.	Assessor's Parcel No. (APN)	Acres	MWs	Zone*	Land Use
Project 1 North Lancaster Ranch	R2011-00833 /201100079 Zone Change 201100005	3262-001-005, 3262-001-006	240	20	From A-1-2 to A-2-2	N-1**
Project 2 Western Antelope Blue Sky Ranch	R2011-00798 /201100070	3267-015-001	157	40	A-2-5	N-1
Project 3 American Solar Greenworks	R2011-00799 /201100071	3268-018-035, 3268-018-002, 3268-018-036	135.6	35	A-2-2	N-1
Project 4 Antelope Solar Greenworks	R2011-00807 /201100076	3218-002-018, 3218-002-023, 3203-002-015, 3203-002-017, 3218-001-002, 3218-001-003, 3218-001-004, 3203-002-011, 3203-002-012, 3203-002-013, 3203-002-014, 3219-019-011	256	52	A-2-2	N-1
Project 5 Silver Sun Greenworks	R2011-00801 /201100072	3267-003-001, 3267-003-002, 3267-003-003	160	20	A-2-5	N-1
Project 6 Lancaster WAD	R2011-00805 /201100074	3115-010-004	38.5	5	D-2-2	N-1
TOTAL			**987.1 Acres**	**172 MWs**		

* A-1 zone is Light Agriculture
A-2 zone is Heavy Agriculture
The D-2 zone is Desert and Mountain.
The number after the zoning designation identifies the minimum number of acres required

** N-1 land use is Non-Urban 1

EXISTING ZONING AND LAND USE: SURROUNDING PROPERTIES

Projects 1-6 zoning and land use designations are as indicated in the table above. Surrounding properties zoning and land use designations are as follows below:

Surrounding Zoning and Land Uses		
Project Name	**Surrounding Zone***	**Surrounding Land Uses****
Project 1 North Lancaster Ranch	North: A-1-2 South: A-1-2 East: A-1-2 West: A-2-2	North: N-1 South: N-1 East: N-1 West: N-1
Project 2 Western Antelope Blue Sky Ranch	North: A-2-5 South: A-2-5 East: A-2-5 & City of Lancaster West: A-2-5	North: N-1 South: N-1 East: N-1 & City of Lancaster West: N-1
Project 3 American Solar Greenworks	North: A-2-1 South: A-2-1 & City of Lancaster East: City of Lancaster West: A-2-1	North: N-1 South: N-1 & City of Lancaster East: City of Lancaster West: N-1
Project 4 Antelope Solar Greenworks	North: A-2-2 & A-2-1 South: A-2-2 & R-R-5, East: A-2-2, A-2-1 & City of Lancaster West: A-2-2 & City of Lancaster	North: N-1 & City of Lancaster South: N-1 East: N-1 & City of Lancaster West: N-1 & City of Lancaster
Project 5 Silver Sun Greenworks	North: A-2-2 South: A-2-5 East: A-1-2 West: A-2-5	North: N-1 South: N-1 East: N-1 West: N-1
Project 6 Lancaster WAD	North: D-2-2 South: D-2-2 East: D-2-2 West: D-2-2	North: N-1 South: N-1 East: N-1 West: N-1

* A-1 zone is Light Agriculture
A-2 zone is Heavy Agriculture
D-2 zone is Desert and Mountain.

The number after the zoning designation identifies the minimum number of acres required

** N-1 land use is Non-Urban 1

SITE PLAN DESCRIPTION

Each of Projects 1-6 sites would be characterized similarly by providing a required 20-foot set- back from the solar arrays to the subject Project's property line, which setback may also include a vegetative buffer 10 feet in width for locations across from sensitive uses (see attached project exhibits). An additional required 10-foot "slope easement" would be dedicated to the County as part of the public rights-of-way around each project. Each site would include a perimeter safety and security fence eight feet in height including three-strand barbed wire at the top to protect the public from high voltage electricity and to protect the facility from intrusion. Construction internal to the site would be comprised of solar panels set in arrays with associated inverters, transformers, and either no internal substation (Project 6), or one internal substation (Projects 2-3, and 5), or two internal substations (Projects 1 and 4), depending on the size of the individual Project, with access through the site by compacted interior dirt roads. With the exception of Project 2, not counting buffers mentioned above, all of the sites use the majority of the subject properties for construction of arrays and appurtenant facilities to generate solar photovoltaic electricity. Project 2 retains approximately one third of the site (southerly portion) as undeveloped open space to preserve habitat and avoid grading uneven areas. Interior drainage basins are required in each of the sites to insure that stormwater flows match pre-existing conditions as stormwater flows through the subject site. The electricity generated would be transmitted through underground transmission lines to tie in to the electrical grid using existing transmission lines or through additional lines limited in length, to the nearest point of connection as depicted on the site plans. Transmission lines for Projects 2 and 5 may have portions that run through the City of Lancaster ("City"). The transmission lines located within City jurisdiction could be either above ground or underground according to regulations and approvals by the City. Projects 1 and 2 are required to provide a 12-foot trail easement along one side of each site (south boundary of Project 1; east boundary of Project 2) to provide continuity for County planned trails. Each Project site would include the following elements (unless otherwise indicated):

- Temporary meteorological station (on two sites – Project 4 Antelope Solar Greenworks, and Project 6 Lancaster WAD)
- PV modules
- PV module mounting system
- Balance of system and electrical boxes (e.g., combiner boxes, electrical disconnects)
- Substation(s) (Projects 1 – 5)
- Electrical inverters and transformers including service parking areas
- Electrical AC collection system, including switchgear
- Data monitoring equipment
- Generation tie line
- Access roads and chain link perimeter security fencing
- No permanent operations or other buildings are proposed on any of the Projects' sites

- Mobile sanitation and drinking water facilities
- 10,000 gallon fire-flow water supply tank

The major components of proposed Projects 1-6 are described in greater detail in Section 3.4 of the Draft EIR.

PREVIOUS CASES / ZONING HISTORY

The sites for Projects 1-6 are each in an undeveloped state and little to no farming or other permitted activities have taken place at the sites in recent times. The Project 1 site has an abandoned former residence which will be demolished. A related solar photovoltaic project is adjacent to and north of Project 2 (R2012-01589). A Land Division case was filed on property adjacent and to the west side of Project 6 but has not been developed at present and remains as vacant open space (TR47003).

ENVIRONMENTAL DETERMINATION

The Department of Regional Planning ("Department") determined by way of an Initial Study and identified in the Notice of Preparation sent to agencies, that an Environmental Impact Report ("EIR") was necessary for the Project. The areas of potential environmental impact analyzed in the Draft EIR include the following:

- Aesthetics
- Agriculture and Forest
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases and Climate Change
- Hazards and Hazardous Materials
- Hydrology
- Land Use
- Noise
- Public Services
- Traffic and Transportation
- Utilities and Service Systems

The following areas were determined not to be significant and required no further environmental review as described in the Initial Study:

- Mineral Resources
- Employment
- Population
- Housing
- Recreation

As identified in the Draft EIR, after implementation of the required mitigation measures as would be enforced by the Project's Mitigation Monitoring and Reporting Program (approximately 62 mitigation measures), Projects 1-6 would not result in significant and unavoidable impacts to the environment. A summary of the areas analyzed that have less than significant impacts to the environment after implementation of mitigation measures is included below:

Aesthetics

Visual impacts to the aesthetic features of the Antelope Valley are a concern to the public. The visual effects of the Projects are shown in Section 4.1 of the Draft EIR. Inclusion of a screening vegetation buffer 10 feet in width is intended to partially screen certain boundaries of Projects 1-6 from sensitive adjacent uses or from regular passersby to minimize the visual impacts of Projects 1-6. A fugitive dust plan, and mitigation measures requiring mowing and no grading for array site preparation and minimal grading for roads and flood control basins, will limit visual pollution from dust. All Genties located within the unincorporated County would be placed underground to reduce the visual impact unless other applicable regulations require limited segments of above-ground installation. Off-site transmission Genties located within the City of Lancaster boundaries would be subject to the City's regulations regarding above ground or below ground installation. Assuring that dark skies at night in the Antelope Valley are protected from light pollution is also a concern to the public. Using only minimal security lighting on each site and using only shielded downward facing lighting on each site at night would minimize this impact to the dark skies presently found in the valley at night. Accordingly, impacts to aesthetics would be less than significant.

Agriculture and Forestry

Projects 1, 2, 3, 5 and 6 would not cause the conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance to non-agricultural use. Although Project 4 includes a property with Prime Farmland designation, it has not been farmed for more than 10 years and thus use for solar development would not impact any farming activity. The Department of Conservation has reviewed the Project 4 site and, in a letter dated December 31, 2012, determined that the properties "will be reclassified to Grazing Land on the 2012 edition of the Important Farmland Map for Los Angeles County" which will be published at a later date. Accordingly, impacts to Agriculture and Forestry would be less than significant.

Air Quality

Air quality would be maintained at present levels in the areas around Projects 1-6 by array site preparation including only mowing of vegetation with no grading, disking, tilling, or rolling of the array sites, and only limited required grading for internal roads and drainage features. Compliance with Air Quality Management District rules for fugitive dust control, such as establishing a dust control plan, is required; some of the required dust control measures include regular watering of construction areas, use of gravel, wood chips, and non-toxic soil binders, re-establishing vegetation where

feasible, and limiting the amount of internal road or drainage feature grading per day. Accordingly, impacts to Air Quality would be less than significant.

Biological Resources
Wildlife protections include requirements that prior to grading, additional site surveys would assure all wildlife on the sites would be removed and/or protected. A biological monitor would be onsite during all earthwork activities, mowing, and other construction activities. Mitigation lands would be acquired to mitigate impacts on any sensitive species such as Swainson's hawk, Burrowing Owl, special-status migratory and wintering birds, and the Alkali Mariposa Lily. Accordingly, impacts to Biological Resources would be less than significant after mitigation.

Cultural Resources
Mitigation Measures are provided which require protection of any cultural resources or human remains or paleontological resources which may be found during construction of Projects 1-6. Accordingly, impacts to Cultural Resources would be less than significant after mitigation.

Geology and Soils
Projects 1-6 would not expose people or structures to adverse effects related to geologic hazards including strong seismic shaking, seismic related ground failure, and landslides with the implementation of mitigation measures. Projects 1-6 impacts to soil erosion, on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse, and expansive soil would be less than significant with the implementation of mitigation measures and compliance with all applicable county building codes. Accordingly, impacts to Geology and Soils would be less than significant.

Greenhouse Gas ("GHG") Emissions and Climate Change
Maximum construction levels are not expected to result in annual GHG emissions which exceed the threshold proposed by the Antelope Valley Air Quality Management District ("AVAQMD"). As such, Projects 1-6 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Accordingly, impacts to GHG Emissions and Climate Change would be less than significant.

Hazards and Hazardous Materials
There is a potential concern for hazardous constituents, particularly cadmium, to leach from certain types of solar modules into the local soils or ground water. Solar panels which use cadmium telluride composition would be covered with glass. Prior to the start of construction activities, a Hazardous Materials Management and Hazardous Waste Management Plan and a Stormwater Pollution Prevention Plan shall be implemented for each of Projects 1-6. The public also raised concerns that local law enforcement and fire services are not adequate in the area and may be impacted by Projects 1-6. This issue is addressed further in the Draft EIR in Section 4.12, which concludes that impacts to Hazards and Hazardous Materials would be less than significant and that

impacts to law enforcement and fire services are addressed in the Public Services section of the Draft EIR.

Hydrology (Flood Control)
Control of surface water regarding water flow onto and out of Projects 1-6 is a potential concern. Technical hydrology studies are provided detailing the designs for storm water control on Projects 1-6 sites which would meet County design standards. Accordingly, impacts to Hydrology would be less than significant.

Land Use and Planning
Projects 1-6 are allowed within the land use and zoning designations with discretionary review and approval, with the exception of Project 1 which would require a zone change. There are no established communities that would be separated as a result of Projects 1-6. The sites are primarily surrounded by vacant properties with the exception of 14 total residences or similar developments located across from the boundaries of Projects 1-6. Projects 1-6 would be consistent with applicable land use plans and policies and in compliance with applicable regulations. Accordingly, impacts to Land Use and Planning would be less than significant.

Noise
Construction noise and vibration impacts would be temporary and localized to sensitive receptors such as residences located in close proximity to Projects 1-6 sites. Noise and vibration from construction of Projects 1-6 are expected to occur for only four to eight weeks per Project site. Mitigation measures are provided for construction noise and vibration for each of Projects 1-6, including limiting noise-generating construction to daytime hours, to reduce impacts to less than significant after mitigation.

Public Services
Projects 1-6 impacts to capacity or service level, or that result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities to maintain acceptable service ratios, response times or other performance objectives for fire protection and sheriff protection would be less than significant. Projects 1-6 would have no impact on park, school, library, or public building capacities, service levels or performance objectives. Impacts to Public Services would be less than significant.

Transportation and Traffic
Based on the transportation analysis in the Draft EIR, the impacts of Projects 1-6 on the existing transportation and traffic system in the areas surrounding Projects 1-6 would be limited in construction duration and traffic volume, and roads would continue to operate well under the maximum traffic capacity. As such, traffic impacts with mitigation would be less than significant.

Utilities and Service Systems (Water)

The amount of water use and the extraction of water pumped from wells on Projects 1-6 is a concern for residents living in the area. Calculations and analyses were performed to determine the amount of water required for construction and operation of Projects 1-6. Water estimates are provided in Section 4.14 of the Draft EIR. Because Projects 1-6 are proposing to use out-of-basin water (water not affected by the current Antelope Valley water adjudication process) and use of recycled water for construction and operations, with no use of on-site wells, the impacts from water usage would be less than significant.

STAFF EVALUATION

Projects 1-6 consistency with the County of Los Angeles General Plan ("General Plan"), Antelope Valley Areawide General Plan ("Areawide Plan"), compliance with the County Code, compatibility regarding land use and neighborhood impact, and evaluation of the Applicant's ability to meet all requirements for a Conditional Use Permit for Projects 1-6, a Zone Change for Project 1, and corresponding burdens of proof for each of Projects 1-6, will be evaluated at the public hearing before the Regional Planning Commission ("Planning Commission"). The Planning Commission will receive additional public testimony on the merits of Projects 1-6 and make a determination to approve or deny the individual Projects based on full consideration of the whole record as presented in the Draft EIR, Final EIR, public testimony, and consistency, compliance, and compatibility determinations discussed below.

General Plan/Areadwide Plan Consistency

The proposed Projects 1-6 are consistent with the General Plan and the Areawide Plan N1 (Non-Urban 1) land use designation applicable to each of Projects 1-6. Projects 1-6 meet the definition of a "utility installation" referenced in the listing of non-urban non-residential land uses allowed in remote areas designated Non-Urban 1 (Areawide Plan, Pg. VI-5).

Summary of Projects 1-6 Consistency with Applicable General Plan Policies

Projects 1-6 are consistent with each of the elements of the General Plan. A more detailed analysis of General Plan policies applicable to the proposed Project is included in Table 4.10.1 starting on page 4.10-18 of the Draft EIR. Below is a brief summary of the Project's consistency analysis in relationship to the key elements of the General Plan.

Conservation and Open Space Element

Projects 1-6 are consistent with policies encouraging support for renewable energy such as solar energy generation, encouraging support for cost-saving incentives for such alternative energy sources, avoiding development in Significant Ecological Areas, and protecting panoramic views through low-profile development.

Land Use Element
Projects 1-6 are consistent with policies requiring planned developments to avoid land use conflicts with neighboring activities. Though development of the Projects may have a temporary negative effect on some adjacent residential properties during construction, long term operations of Projects 1-6 are passive in relationship to neighboring land uses.

Economic Development Element
Projects 1-6 are consistent with the County's policies encouraging the location of renewable energy generation projects within the unincorporated areas of the County.

Circulation, Housing, Noise, Safety, and Public Facilities Elements
Projects 1-6 are consistent with these elements since their development and operation do not generate significant traffic, propose no housing, require no additional public facilities, and have no significant impacts regarding noise and safety considerations during construction and operation of Projects 1-6.

Summary of Projects 1-6 Consistency with Applicable Policies of the Areawide Plan
Projects 1-6 are consistent with the Areawide Plan. A more detailed analysis of Areawide Plan policies applicable to the proposed Project are included in Table 4.10.1 starting on page 4.10-19 of the Draft EIR. Below is a brief summary of Projects 1-6 consistency analysis in relationship to the Areawide Plan.

Land Use Element
Projects 1-6 are consistent with the Land Use Element as follows:

Balance of Development. Projects 1-6 were analyzed in relationship to existing development surrounding Projects 1-6 sites and in relationship to cumulative related projects proposed in the surrounding area within a five-mile radius. Twenty-two solar projects previously proposed in the unincorporated County have withdrawn applications for conditional use permits. Only a few applications for solar projects remain in process in the County. Projects 1-6 do not create an over-balance of solar development in the Antelope Valley.

Hillside Management. Projects 1 and 3-6 have no hillside slopes in excess of 25 percent. Project 2 proposes development of sloping areas of up to a maximum of 20 percent slope, avoiding hillside management areas in excess of 25 percent slope.

Floodplain Management. Project 4 has portions of the site in a designated flood plain and all of Project 6 is within a mapped flood plain. These sites shall comply with Floodplain regulations.

Sensitive Land Uses. Projects 1-6 avoid disrupting highly environmentally sensitive lands by using previously disturbed properties and by maintaining natural flow of stormwaters through Projects 1-6 sites. Groundwater from the adjudicated basin is left

untouched as out-of-basin and recycled water supply is proposed for use during construction and operations.

Agricultural Lands. Projects 1-3 and 5 are not currently farmed but are located in Agricultural Opportunity Areas and would not interfere with any adjacent or nearby farm operations. Project 4 is being downgraded from Prime Farmland to Grazing land. Project 6 is not located in an Agricultural Opportunity Area and is not currently farmed.

Resource Conservation. Projects 1-6 do not impact groundwater, would not produce green-house gases, and would generate electrical energy rather than use it.

Cummunity Revitalization, Community Design, and Human Resources Elements
Projects 1-6 are consistent with policies encouraging community revitalization as follows:

Community Identity/Aesthetics. Projects 1, 3, 4, and 6 would locate all electrical transmission lines underground. Projects 2 and 5 would locate underground all electrical transmission lines located within unincorporated County jurisdiction, and transmission lines for Projects 2 and 5 located within the City of Lancaster's jurisdiction may be located underground or above ground. Projects facing residences and located adjacent to more heavily used streets will provide additional landscaping along the Project boundaries as depicted in Projects 1-6 site plans.

Employment. Projects 1-6 will provide substantial construction employment opportunities for residences of the Antelope Valley.

Environmental Resource Management Element
Projects 1-6 are consistent with policies regarding resource management as follows:

Natural Resources. Cultural, Archaeological, and Paleontological resources are protected by Projects 1-6 resource protection requirements. An historic cemetery was located on the Project 4 site and shall be protected in perpetuity. Air quality protections are required for construction of Projects 1-6 to protect adjacent uses from fugitive dust and other construction emissions.

Trails. Projects 1 and 2 are required to provide public trail easements along certain boundaries of those Projects as depicted on the Projects' site plans.

Noise Abatement Element
Projects 1-6 are consistent with noise abatement policies as follows:

Aviation-related Noise. None of the Projects are located within a sensitive aviation-related noise contour. Projects 3 and 4 are the closest Projects to an air field and are located below the noise contour regulations.

Construction and Operational Noise. All construction noise impacts are mitigated to be below County noise standards. Operations of Projects 1-6 are anticipated to generate no significant noises to surrounding uses.

Seismic and Public Safety Elements
Projects 1-6 are consistent with policies for seismic and public safety. All arrays, inverters, transformers, substations, transmission lines, and other equipment must meet building and safety standards for earthquake and fire protections. Perimeter security fencing is required for public safety and property protection purposes.

Housing, Circulation, Public Services and Facilities, Governmental Services, and Energy Conservation Elements
Projects 1-6 are consistent with these elements because the Projects propose no housing, make no significant impacts to traffic, public services, governmental services and energy conservation. As renewable energy generation projects, Projects 1-6 would provide a large scale reduction in energy used to produce electricity compared to a traditional fossil fuel energy generation facility of similar output.

Consistency with Areawide Plan Guidelines for Non-Residential Uses in Non-Urban Areas (Pages VI-24, 25)
Projects 1-6 are consistent with the Areawide Plan location, access, and design Guidelines as follows:

Location.
Projects 1-6 are consistent with location guidelines of the Plan. Proposed Projects 1-6 are located on previously disturbed lands surrounded by mostly vacant properties with a few residential uses located across from certain perimeter locations of the Project sites. Some agricultural uses are in the general vicinity. Proposed daily operations are considered relatively passive similar to existing surrounding uses. Existing primary roadways would be retained for maintaining existing circulation patterns in the area. Existing utilities, other public services, and infrastructure are available to Projects 1-6. Projects 1-6 provide native landscaping and open space buffering across from residential uses and along significant adjacent roadways as visual mitigation for public passersby. The relatively flat topography, distance from known active faults, and previously farmed and disturbed property, make the locations suitable for the proposed photovoltaic solar electricity generation development.

Access.
Projects 1-6 have primary access points consistent with access guidelines of the Plan. Projects 1-6 propose primary access from existing adjacent streets with low traffic volumes. These locations prevent the hazards associated with higher speeds on those sites near higher volume roadways. Transport of materials during construction of Projects 1-6 largely avoids existing residential communities.

Design.
The proposed designs of Projects 1-6 are consistent with applicable design guidelines of the Plan. Solar panel arrays are to be of the low-profile fixed tilt or tracking variety which will not block views to the Tehachapi Mountains to the north and other vistas to the south, east or west from the nearby roadways. Additionally, native drought-tolerant shrubs, drought tolerant trees, and other drought-tolerant plantings are proposed to screen the frontages of solar panel development along sensitive frontages on each of Projects 1-6. Using as natural a placement of plantings as possible and temporary drip systems to establish the plantings are proposed. Perimeter chain link fencing is proposed for security and safety purposes and would be screened in certain sensitive locations as discussed above. No outdoor advertising is proposed nor permitted. Minimal security lighting shielded downward is proposed which will minimize visual impacts to neighboring properties and wildlife.

County Code and Development Standards Compliance
Projects 1-6 comply with applicable County Code for each of Projects 1-6 corresponding zones (see Project Information Table on page 4 above for each Project's zone). Project 1 requires a zone change from the A-1-2 (Light Agriculture-two acres minimum required area), which does not permit electricity generation facilities, to the A-2-2 (Heavy Agriculture-two acres minimum required area) zone, which permits electricity generation facilities when a Conditional Use Permit is obtained. Project 1 meets the burden of proof for a zone change to A-2-2 zoning and complies with A-2-2 zone regulations.

Section 22.24.150 of the County Code, Uses Subject to Permits, lists the following use as permitted provided a Conditional Use Permit is obtained, "Electric distribution substations, electric transmission substations and generating plants, including microwave facilities used in conjunction with any one thereof." The proposed Projects 1-6 are each a photovoltaic solar power electricity generation plant with distribution substation(s) (except Project 6 does not have an on-site substation) and transmission lines and comply with the following regulations of the County Code as follows:

1. Section 22.24.170.A Front, Side and Rear Yard Requirements. A minimum set back of 20 feet for front yard, five feet for side yard and corner side yard, 10 feet for reversed corner side yard, and 15 feet for rear yard is required.

   Projects 1-6 provide a minimum set back of 20 feet from the property line throughout all boundaries of the subject properties. Specific designated areas provide additional set back, buffering, or other dedicated spaces as indicated on the site plans. As such, Projects 1-6 comply with yard setback requirements.

2. Section 22.48.160 Fences and Walls. Depending on the location within the property, three and one half to six feet in height is the maximum fence height permitted per County Code.

Projects 1-6 propose perimeter fencing eight feet in height, including three-strand barbed wire at the top, for project security and safety purposes. The Applicant is seeking a modification to allow the fence to be a uniform eight feet in height around the entire perimeter of each of the Projects 1-6 sites as depicted on the site plans, and would include openings for small animals at regular intervals. Planning staff supports this request and believes it to be appropriate for the use and the location. The project complies with fencing requirements as proposed to be modified pursuant to the conditional use permit modification process.

3. Chapter 22.52 Part 7 Outside Storage. This Part 7 requires that all outside storage open to view from the exterior boundary of a lot or parcel of land upon which it is conducted shall be enclosed by a solid wall or fence. This requirement would not apply to temporary material staging areas and temporary outdoor worker facilities used during construction.

   For the purposes of Projects 1-6 temporary staging areas and temporary outdoor worker facilities are defined as areas used for construction and the use of which are not to exceed build out of Projects 1-6 according to each of Projects 1-6 approved phasing schedules. Projects 1-6 do not propose permanent outside storage for ongoing operations. Projects 1-6 comply with operational outside storage requirements.

4. Chapter 22.52 Part 11 Industrial Use and Handicapped Parking. Either one space per two employees or one space per 500 square feet is required to meet industrial use standard parking requirements. One handicapped space per 40 standard spaces is required.

   Projects 1-6 do not propose permanent buildings such as operations and maintenance buildings, therefore Projects 1-6 only require parking spaces for operational service vehicles upon completion. Each Project site will require on-site parking spaces for service vehicles during operations. Construction parking is required to be located at least 1,000 feet from sensitive receptors such as private residences. Projects 1-6 complie with parking requirements.

5. Chapter 22.52 Part 20 Green Building Requirements. County Green Building Standards for outdoor water conservation, demolition recycling, and wash water operations apply.

   Projects 1-6, as proposed, meet Green Building standards. The Applicant proposes to plant native and County Biologist approved native-compatible drought-tolerant shrubs and trees, and numerous native grasses in as natural a pattern as possible within 10-feet of property frontage along designated property boundaries as depicted on Projects 1-6 site plans. A drip system would initially be used to establish the drought-tolerant plantings at each site. These plantings would also

serve as screening of the project components located closest to the subject roadways and sensitive residential uses.

6. Chapter 22.52 Part 21 Drought-Tolerant Landscaping. Requirements for drought-tolerant landscaping include use of County-authorized drought-tolerant plant lists, minimum required percentages of drought-tolerant plantings, limitations on the amount of turf, and efficient watering management.

   County approval of landscaping plans is required for Projects 1-6. Projects 1-6 shall comply with Drought-Tolerant Landscaping requirements.

7. Chapter 22.52 Part 22 Low-Impact Development. This part of the County Zoning Ordinance references Title 12 Chapter 12.84 for Low Impact Development Standards ("LID"). LID standards are designed to limit hydro-modification impacts to natural drainage systems and to manage excess volume from each lot upon which development is occurring so as to be infiltrated at the lot level or alternatively to sub-regional facilities.

   Projects 1-6 propose to sustain the primary natural drainage courses running through each of Projects 1-6 sites, which will include numerous on-site drainage basins in certain development areas to infiltrate a portion of Project runoff on-site, to the satisfaction of the Department of Public Works. Projects 1-6 comply with LID requirements.

Site Visit and Neighborhood Compatibility

County planning and environmental staff have visited Projects 1-6 sites at various times during the environmental and entitlement review process. Projects 1-6 site locations were strategically evaluated by the Applicant using extensive criteria to minimize environmental and other project related impacts of Projects 1-6. Some of the most critical criteria used for site selection are as follows:

- locate sites with previously disturbed or previously degraded land from prior farming or other prior uses to minimize disturbance of untouched pristine lands;
- locate sites near existing transmission lines or existing substation facilities, public rights-of-way and infrastructure to minimize off-site disturbances and minimize costs from excessively long transmission lines and new roadways;
- locate sites away from highly populated areas to minimize impacts to residences and other sensitive uses; and
- minimize impacts to threatened or endangered species or their habitats, or to other sensitive cultural or natural resources.

Staff concurs that these are suitable and appropriate criteria for locating development of solar photovoltaic energy generation projects in the Antelope Valley. Projects 1-6 have largely met these criteria, though some criteria are met at some expense of other criteria. For example, though none of the Projects are located near highly populated areas, to use previously disturbed land and be located near existing infrastructure, all but one Project has at least one resident or other development located across a roadway from the subject Project's site. A total of 14 residences and/or other developments are cumulatively located across from Projects 1-6. Project 1 has one residence located across from the corner of its northwest boundary. Project 2 has one residence located across from its eastern boundary. Project 3 has one residence located across from each of its eastern, southern, and western boundaries and two residences across from its northern boundary. Project 4 has two residences located across from its northeast boundary, one residence across from its southeast boundary, and three residences across from its southwest boundary. Project 5 has one residence located across from its western boundary, and Project 6 has no developments across from its boundaries. Considering all factors, staff concludes that Projects 1-6 are suitably sited when the approximately 62 required environmental mitigation measures and other conditions of approval are met to minimize impacts. The 14 residences or other developments located adjacent to the subject sites would be protected from Project impacts during construction, and the operations of Projects 1-6 would be substantially passive.

Applicant Outreach

The Applicant has provided a summary listing of public outreach meetings the Applicant independently facilitated (attachment).

BURDEN OF PROOF

Conditional Use Permit Burdens of Proof

According to Section 22.56.040 of the County Code, in addition to the information required in the permit application, the Applicant shall substantiate to the satisfaction of the Commission, the following facts:

A. That the requested use at the location proposed will not:

1. "Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area;"

   Projects 1-6 are surrounded predominantly by vacant land and several residences or similar developments. Projects 1-6 propose operationally passive projects that generate minor impacts which can be mitigated with no remaining significant environmental impacts on the surrounding area.

2. "Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site; or"

Based on the Draft EIR conclusion that Projects 1-6 mitigation measures would reduce any environmental impacts to a less than significant level, staff has determined that the construction and operation of Projects 1-6 would not limit, hinder or denigrate the use of properties in the vicinity of Projects 1-6.

3. "Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare."

   Areas of concern regarding Projects 1-6 are mitigated to a level of no significant impact on the environment. Additionally, Projects 1-6 propose various measures such as a fire-flow water tank for each site, perimeter fencing, buffer areas, and limited night security lighting to minimize the potential of hazardous situations arising from Projects 1-6. Additional dust control measures are required in the conditions of approval to further reduce health and visual effects of fugitive dust.

B. "That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area."

   Projects 1-6 encompass a total of 987 acres allocated by Project as shown in the Project Information Table above on page 4, providing sufficient space for each Project proposed including proposals to maximize buffering and safety in relationship to surrounding properties.

C. "That the proposed site is adequately served:"

   1. "By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate; and"

      Projects 1-6 require minimal long-term use of roads for ongoing operations, therefore the current access and road conditions require minimal improvements to operate the proposed use. Any damage to existing or improved local roadways caused by project construction and/or operations is required to be repaired at the Applicant's expense as required by mitigation measures and conditions of approval.

   2. "By other public or private service facilities as are required."

      All required and needed public and private service facilities are proposed to be met for Projects 1-6.

Staff concludes and is of the opinion that the burdens of proof for a conditional use permit for Projects 1-6 have been met by the Applicant, subject to compliance with the

conditions of approval including all associated mitigation measures in the Mitigation Monitoring and Reporting Program. The Applicant's responses are also attached.

Zone Change Burden of Proof

In addition to the information required by Section 22.16.100 of the Zoning Code, the Zone Change burden of proof required by Section 22.16.110 must be met by Project 1. The Applicant shall substantiate to the satisfaction of the commission the following facts:

A. "That modified conditions warrant a revision in the zoning plan as it pertains to the area or district under consideration;"

The Project 1 site is currently zoned A-1-2 (Light Agriculture-two acres minimum required area) similar to adjacent undeveloped properties to the north, south and east of the Project 1 site. Properties to the west, including an existing developed site across from the northwest corner of the subject property, are zoned A-2-2 (Heavy Agriculture-two acres minimum required area) similar to the proposed change of zoning proposed for Project 1 to A-2-2. A-1 zoning does not permit electricity generation facilities. A-2-2 zoning does permit electricity generation facilities with approval of a Conditional Use Permit. There are no sensitive uses or other existing developments or farming activities currently located adjacent to the subject site to the north, south and east where current A-1-2 zoning applies. The Project 1 site is determined to be a suitable site for extending the A-2-2 zoning to allow the electricity generation facility proposed.

B. "That a need for the proposed zone classification exists within such area or district;"

The State of California requires 33 percent of electrical energy to be produced by renewable energy sources by the year 2020. The proposed Project 1 is a solar photovoltaic electricity generation project which would assist California in producing needed and required renewable energy production. The A-2-2 zoning is necessary to permit Project 1 to proceed with a request for a Conditional Use Permit.

C. "That the particular property under consideration is a proper location for said zone classification within such area or district; and"

The proposed Project 1 use of previously disturbed lands located adjacent to existing transmission lines and other infrastructure, lands that are located away from highly populated areas, and lands with minimal impacts to sensitive plants, animals and their habitats, are the types of sites the County encourages for use by solar photovoltaic electricity generation facilities.

D. "That placement of the proposed zone at such location will be in the interest of public health, safety and general welfare, and in conformity with good zoning practice."

Placement of the proposed zone at such location will be in the interest of public health, safety and general welfare, and in conformity with good zoning practice, in that the proposed zoning classification will allow implementation of development that protects the safety of current and future residents due to the presence of geologic, seismic, fire, flood, erosion, or potential crime hazards through appropriate design and location standards. The Project 1 site has access to all of the available services and facilities that are needed for the proposed development. The design and scale of Project 1 is limited to the proposed Project 1 site which will protect the surrounding land uses from incompatible developments.

COUNTY DEPARTMENT COMMENTS AND RECOMMENDATIONS

County of Los Angeles Department of Public Works

In its letters dated April 16 for Project 1 and April 17, 2014 for each of Projects 2-6, the Department of Public Works indicated requirements which must be met for water supply, drainage and grading, building and safety, and road improvements.

County of Los Angeles Fire Department

In its letters dated March 4, 2014 for Project 1 and October 18, 2013 for Projects 2-6, the Fire Department indicated requirements which must be met for water storage facilities, access, and special requirements for vegetation management and fire control, electrical equipment, and other specialized fire protection measures.

County of Los Angeles Department of Public Health

In its letter e-mail dated February 20, 2014 and letter dated October 11, 2013 for Projects 1-6, the Department of Public Health stated requirements for potable water supply, wastewater disposal, and noise. The e-mail dated February 20, 2014 provided Department of Public Health clearance for Projects 1-6 based on revised site plans meeting the requirements of the letter dated October 11, 2013.

County of Los Angeles Department of Parks and Recreation

In its letter dated March 12, 2014, the Department of Parks and Recreation provided specific trail requirements which must be met for Project 1 and Project 2. No further requirements were provided regarding Projects 3 through 6.

LEGAL NOTIFICATION AND PUBLIC OUTREACH

Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the Zoning Ordinance, the community was appropriately notified of the Regional Planning Commission Hearing by mail, newspaper, property posting, library posting and on the Department's website. Newspaper notices were published in The Antelope Valley Press and La Opinion on April 7, 2014. Notices to property owners located within a 1,000-foot radius of Projects 1-6 property boundaries, to a courtesy list of interested parties, and to five local libraries, were mailed on April 3, 2014. Notices were verified to be posted on the subject properties for Projects 1-6 on April 7, 2014 and were made available on the Department's website on April 3, 2014. On April 24, 2014 the Final EIR

with Mitigation Monitoring and Reporting Program ("MMRP") was sent by mail to required agencies including the State Clearing House and other interested parties, to five local libraries, and posted on the Department's website.

PUBLIC COMMENTS

Project Issues

Several development issues regarding the proposed Projects 1-6 were raised by public agencies and interested parties in response to the Initial Study/Notice of Preparation of a Draft EIR and Scoping Meeting, through the County interdepartmental review, and the Draft EIR public review processes including a Hearing Examiner public hearing. Comments included issues related to visual impacts, dust control and public health, decommissioning at the end of the life of the Projects, impacts to wildlife and habitat, water supply concerns, hydrology and run off controls, hazardous materials, and public services regarding Sheriff and Fire Department response times. All of these issues are addressed in the Draft EIR, associated Mitigation Monitoring and Reporting Program, and the Conditions of Approval for Projects 1-6. Responses to all agency and public comments on the Draft EIR are addressed in the Project's Final EIR. The Final EIR and other case materials are accessible on the Department's website: http://planning.lacounty.gov/case/view/silverado/.

Hearing Examiner Public Hearing

A Hearing Examiner public hearing was held on February 1, 2014 to receive public testimony regarding Projects 1-6 as analyzed in the Draft EIR. A transcript of the Hearing Examiner hearing is included in the Final EIR disk accompanying this report, and the Staff Summary submitted to the Hearing Examiner is attached. A total of approximately 80 members of the public attended, and 26 people testified at the hearing on Projects 1-6 as analyzed in the Draft EIR. Members of the public raised concerns regarding potential fugitive dust, additional traffic and safety concerns during construction, construction noise, potential visual impacts, use of limited available water, and protection of a rural lifestyle. Other members of the public testified in favor of additional construction employment, meeting California's renewable energy goals, and advantages of low-profile, quiet, and passive development during operations. In addition to necessary corrections and clarifications, responses by the County to all of the comments received on the Draft EIR have been provided in the Final EIR including responses to comments from a complete transcript of public testimony from the Hearing Examiner public hearing. A total of 50 commenters received responses in the Final EIR including the 26 oral testifiers from the Hearing Examiner public hearing, five written comments from various agencies or organizations, and 19 additional written comments from the general public.

Public Comments Received After Hearing Examiner Public Hearing and Prior to Planning Commission Hearing

Twenty members of the public provided additional written comments regarding Projects 1-6 during the 30-day comment period and two weeks prior to the Planning Commission public hearing received up to the time of preparation of this report. All other comments received will be forwarded to the Planning Commission up to the day of the hearing.

Comments in Favor

No comments specifically in favor of the Projects were received at the time of preparation of this report.

Comments Opposed or With Concerns

Eighteen comments opposed to the Projects were received at the time of preparation of this report including comments requesting more time to review Project documents, air quality and noise impacts to adjacent residences during construction, health concerns regarding fugitive dust, construction safety, traffic safety related to Project 6 located adjacent to SR 138, amount of mitigation lands, impacts to views, plants, and animals, and requests for the Planning Commission to hold its hearing near the Projects in the Antelope Valley.

Comments Neither in Favor Nor Opposed

Two comments neither in favor nor opposed to the Projects were received at the time of preparation of this report including comments about Projects 1-6 public review processes and suggesting alternatives to Project 2 site regarding impacts to flowers.

REMAINING PROCEDURES

Once the public hearing before the Planning Commission is completed, the Planning Commission may certify or reject the EIR and approve or deny the entitlements requested for Projects 2-5 and make a recommendation to the Board of Supervisors ("Board") regarding the Zone Change for Project 1, as well as approve or deny the Conditional Use Permit for Project 1. If approval of the Zone Change is recommended by the Planning Commission, a public hearing will be held before the Board to consider the Zone Change as well as to consider the associated EIR and Conditional Use Permit for Project 1, which are deemed called up for review with the requested Zone Change. At the conclusion of this hearing, the Board would decide whether to consider the EIR pertaining to Project 1 and approve or deny the associated Zone Change and Conditional Use Permit.

FEES/DEPOSITS

If approved, fees identified in the Conditions of Approval will apply unless modified by the Planning Commission.

STAFF RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing: Staff recommends the Planning Commission adopt Environmental Assessment No. 201100109 Environmental Impact Report State Clearinghouse Number 2012061068, approve the CEQA Findings of Fact, adopt the Mitigation Monitoring and Reporting Program, and approve Project Numbers R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), and R2011-00805-(5), Conditional Use Permit Numbers 201100079, 201100070, 201100071, 201100076, 201100072, and 201100074, adopt a resolution recommending approval to the Board of Supervisors of Zone Change Number 201100005 associated with Project Number R2011-00833, subject to all requirements and provisions of the Mitigation Monitoring and Reporting Program and Conditions of Approval.

SUGGESTED MOTION:

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING, AND ADOPT THE ENVIRONMENTAL IMPACT REPORT (STATE CLEARING HOUSE NO. 2012061068 AND COUNTY ENVIRONMENTAL ASSESSMENT NO. 201100109) PREPARED FOR PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), AND R2011-00805-(5) PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPT THE CEQA FINDINGS OF FACT, AND ADOPT THE MITIGATION MONITORING AND REPORTING PROGRAM.

I MOVE THAT THE REGIONAL PLANNING COMMISSION ADOPT THE RESOLUTION RECOMMENDING APPROVAL TO THE BOARD OF SUPERVISORS OF ZONE CHANGE NO. 201100005, AND APPROVE CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, AND 201100074, SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS OF APPROVAL.

Prepared by: Mr. Kim K. Szalay, MPL, AICP, Principal Regional Planner
Reviewed by: Samuel Z. Dea, Supervising Regional Planner

Attachments:
Projects 1-6 Vicinity, Zoning, and Land Use Maps and Factual Summaries
Draft Findings
Draft Conditions of Approval with Mitigation Monitoring and Reporting Program
Draft Zone Change Resolution and Ordinance
Site Plans and Exhibits (Disk)
Final Environmental Impact Report (Disk: includes Hearing Examiner Transcript, DEIR, CEQA Findings of Fact, and MMRP)
Applicant's Burden of Proof statements
Correspondence

Hearing Examiner staff report
Applicant's outreach table

SZD:KKS:kks
4/22/14

CORRESPONDENCE

(Projects 1-6: Agency, Group, Individual)

Kim Szalay

From: DRP Special Projects
Sent: Tuesday, April 22, 2014 8:11 AM
To: S Z; DRP Special Projects; Mitch Glaser; Thuy Hua; Rosie Ruiz; Mark Child; Richard Bruckner; Carl Nadela
Cc: Hickling, Norm
Subject: RE: Silverado Comment Letter Pt. I

Good Morning Susan,

I have received your letter every time. This is the 5th copy of the same letter I have received.

Sincerely,

Kim

Mr. Kim K. Szalay, MPL, AICP
Principal Planner
Special Projects Section
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
(213) 974-4876 Direct
(213) 626-0434 Fax
kszalay@planning.lacounty.gov

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From: S Z [mailto:ontishima1775@gmail.com]
Sent: Monday, April 21, 2014 12:01 PM
To: Kim Szalay; DRP Special Projects; Mitch Glaser; Thuy Hua; Rosie Ruiz; Mark Child; Richard Bruckner; Carl Nadela
Cc: Hickling, Norm
Subject: Fwd: Silverado Comment Letter Pt. I

Please forgive me for sending again, if you have already received this email from "Susan@avopenspace.org." I keep getting "undeliverable" returns, and want to be sure you all have received our letter.

Thank you,
Susan Zahnter

---------- Forwarded message ----------
From: <susan@avopenspace.org>
Date: Mon, Apr 21, 2014 at 11:24 AM

Subject: Silverado Comment Letter Pt. I
To: kszalay@planning.lacounty.gov, specialprojects@planning.lacounty.gov, mglaser@planning.lacounty.gov, thua@planning.lacounty.gov, rruiz@planning.lacounty.gov, mchild@planning.lacounty.gov, rbruckner@planning.lacounty.gov, cnadela@planning.lacounty.gov
Cc: nhickling@lacbos.org

Dear Mr. Szalay, Commissioners, and Planners,

Since my comment letter was not accepted previously, I would like re-submit our groups' letter of opposition to the Silverado Power West Projects, and ask that it be added to the public record, and that its contents be addressed as part of the final review. I would like to request, again, that the hearing be reassigned to a later date that would give concerned citizens, and perhaps those who need more time to review the over 5,500 pages of the finished EIR, and final planning documents. Thirty days seems reasonable enough. It has taken nearly two years for the document to be presented, and the public has only ten days to submit final comments--according to the most recent notice. Residents and citizens of Antelope Valley deserve more time; they are ones most affected by this collection of utility-scale solar projects. I recognize that the previous review period lasted 45 days, but those of us who are not professionals, have other jobs, etc., need more time to compare the finished document with the draft.

Please let me know you are in receipt of this email, and have successfully downloaded both parts of our letter (large file size). The second part will follow immediately, in another email. Please distribute this email and letter to the Planning Commissioners as soon as possible.

Thank you, and best regards,
Susan Zahnter
Member, FAVOS, CCWAV

Kim Szalay

From: S Z [ontishima1775@gmail.com]
Sent: Monday, April 21, 2014 1:17 PM
To: Kim Szalay
Subject: Re: Silverado Comment Letter Pt. I

Mr. Szalay,

Thank you for letting me know you have received our letter. I was never sure you received it the first time, as I had a great deal of difficulty sending the file in February and today--repeated mailer daemon messages each time. I was distressed at those repeated returns. As I mentioned before, I am not terribly proficient at handling large files or compressing so they are accepted by emails with limiting amounts of data. Sorry to have bombarded you.

Thanks again,
Susan

On Mon, Apr 21, 2014 at 12:55 PM, Kim Szalay <kszalay@planning.lacounty.gov> wrote:

Good Morning Susan,

I have received three copies of the same letter from you. I also received the two files of poppy photos. These will be entered in the public record and forwarded to the Planning Commission.

Thank you for the input.

Kim

Mr. Kim K. Szalay, MPL, AICP

Principal Planner

Concerned Citizens of the Western Antelope Valley
Susan Zahnter, Member
P O Box 786
Lake Hughes, CA 93532
Susan@avopenspace.org

21 February 2014

SENT VIA EMAIL

Mr. Kim Szalay, Principal Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
kszalay@planning.lacounty.gov

RE: Silverado Projects:
Project 1: R2011-00833 (CUP201100079, RZC201100005), North Lancaster Ranch
Project 2: R2011-00798 (CUP201100070), Western Antelope Blue Sky Ranch
Project 3: R2011-00799 (CUP201100071), American Solar Greenworks
Project 4: R2011-00807 (CUP201100076), Antelope Solar Greenworks
Project 5: R2011-00801 (CUP201100072), Silver Sun Greenworks
Project 6: R2011-00805 (CUP201100074), Lancaster WAD

Dear Mr. Szalay,

As an Antelope Valley resident and member of Concerned Citizens of the Western Antelope Valley, I would like to respond to the Environmental Impact Review (EIR) for the above referenced Silverado Projects. I have ongoing concerns regarding the adverse effects of utility-scale renewable energy projects on rural communities and residents' health; adverse effects on wildlife; and adverse effects on viewshed, that have, so far, evaded adequate solutions, are easily ascertained by poor results evidenced by current projects, in spite of adhering to minimum requirements and Best Management Practices required by Conditional Use Permits. We have found this document's mitigations to satisfy significant impacts to those areas mentioned above are inadequate. I would also assert the impacts are consistently downplayed. According to California Environmental Quality Act Guidelines, potentially significant impacts must be mitigated to a less than significant level. It seems clear after experience with other solar projects that impacts may not easily be mitigated to a level that poses no threat to the health and safety of residents, or the natural environment, including viewshed.

As previously mentioned, rural communities interspersed within large tracts of agriculturally zoned land have borne the brunt of utility-scale renewable energy projects, and concomitant undesirable effects. The Antelope Valley Areawide Plan 1986 (AVAP), discusses the preservation of rural communities, stating: "Scattered throughout the Antelope Valley are a wide variety of very low density, rural villages which are worthy of protection. Each is uniquely identifiable from its surroundings. Their residents express a sense of community pride and local identity. . . it is important to sustain these areas as unique, low-density "living environments" " (AVAP 1986, Community Recognition, Section III-1). No longer are rural communities unique "living environments" protected by the General Plan (GP) and the AVAP. Communities are made of people, not industrial-scale solar installations faking as

farms growing "green energy." Instead, thousands of acres of chain link and barbed wire fencing intrude on the open spaces of recovering agricultural lands, as industrial commercial projects are incongruously thrust into rural communities.

Our "unique" communities are at risk from the proliferation of solar projects covering thousands of acres which contribute to the uncontrolled (despite landscape, grading, and soil treatment plans approved by Regional Planning (RP), and AVAQMD) deposition of fugitive dust into the air during wind events that occur almost daily. This puts residents at risk for respiratory disease, such as dreaded valley fever—for which there is no cure, increased asthma, and difficulties for those with chronic obstructive pulmonary disease. Policy statements in the AVAP seek to "Promote air quality that is compatible with health, well-being, and enjoyment of life. The public nuisance, property and vegetative damage, and deterioration of aesthetic qualities that result from air pollution contaminants should be prevented to the greatest degree possible"(Policy Statements, Natural Resources, V-17, Number 140). So, how compatible are industrial-scale solar projects, and their inability to prevent fugitive dust, according to this RP policy? The EIR states that the projects will be completed in phases, so ground disturbance is minimized, and that vegetation will not be removed—but mowed to six inches, and water and chemical stabilization will control the fugitive dust. The condition of native and even non-native grasslands and wildflower fields as a result of serious drought have rendered vegetation to such a fragile state, that commonly considered actions, such as the movement of vehicles across the landscape causes total destruction of vegetation essentially into dust. There have been no examples of successful avoidance of vegetative harm or re-vegetation at any solar site in the Antelope Valley.

As of yet, no dust control measures required by RP or the AVAQMD have adequately addressed this huge problem, and sounds like a potential significant impact that cannot be mitigated to less than significant. A response letter, dated June 27th, from City of Palmdale's Planning Director Richard Kite regarding the (immediately adjacent neighbor to Silverado's Projects 2,4,5) West Antelope Solar Project's Initial Study, says, "With regards to air quality, the City does not believe that stating the project will comply with the Antelope Valley (AV) Air Quality Management District (AQMD) District Rule 403 (Fugitive Dust) is sufficient to abate potential impacts of PM_{10}." Not only that, but Bret Banks, Director of the AVAQMD has says in his letter to RP, July 1st, regarding the same project, that "successful fugitive dust control and site stabilization would result in maintaining vegetation to the highest extent possible. Re-vegetation in desert environments is extremely difficult with 80 percent failure rates seen as typical, even with supplemental irrigation. Project areas which retain vegetative ground cover may (as in might, not "will") achieve stabilization without implementing reseeding efforts."

Dust storms caused by both construction and operation of industrial scale solar development are also harmful to desert plants and animals. According to the article "Wildlife Conservation and Solar Energy Development in the Desert Southwest, United States" by Jeffrey E. Lovich and Joshua R. Ennen, published in the journal "BioScience", December 2011, by the University of California Press on behalf of the American Institute of Biological Sciences, dust from solar operations has far reaching effects on remaining vegetation:

> These construction activities produce dust emissions, especially in arid environments (Munson et al. 2011), which already have the potential for natural dust emission. Dust

> can have dramatic effects on ecological processes at all scales (reviewed by Field et al. 2010). At the smallest scale, wind erosion, which powers dust emission, can alter the fertility and water-retention capabilities of the soil. Physiologically, dust can adversely influence the gas exchange, photosynthesis, and water usage of Mojave Desert shrubs (Sharifi et al. 1997). Depending on particle size, wind speed, and other factors, dust emission can physically damage plant species through root exposure, burial, and abrasions to their leaves and stems. The physiological and physical damage to plant species inflicted by dust emissions could ultimately reduce the plants' primary production and could indirectly affect wildlife food plants and habitat quality.

Thus, the dust produced by Silverado's facilities will threaten not only the health of humans and safety of transportation corridors but also will have the potential to damage native plants throughout the Western Antelope Valley, whose presence attracts thousands of visitors each year for wildflower viewing and who spend tourism dollars at local businesses. It is our contention that it will be impossible to preserve on-site vegetation during the construction phase of all portions of this project and it will not be possible to to rely upon AVAQMD's Rule 403 to adequately prevent fugitive dust. Phased earthwork will not matter if vegetation is destroyed during the construction process, and soil stabilization fails, which has been seen to happen.

Considerable discussion occurs in the EIR concerning valley fever and concludes that unattainable levels of particulate matter exist now, prior to the implementation of Silverado Projects. Agricultural operations persist in the area, as well as off-road vehicle use, contributing to the problem. The EIR states:

> " Adjacent to the proposed Projects area, much of the land is zoned for agricultural use. The Project sites are not currently active agricultural land, but agricultural activities are ongoing in nearby areas. Dust from tilled agricultural land and off-road vehicles contribute to the current level of background dust near the site. The majority of dust in the region is generated from agricultural and off-road activities and wind storms. High wind episodes, defined as when wind speed is greater than 25 miles per hour (mph), occur approximately 5 percent of the time at the Poppy Park Remote Automated Weather Station (RAWS) located just east (should be west) of the Project sites. The region is non-attainment for particulate matter, with the majority of these emissions occurring in the form of dust. At present, the local population is exposed to significant levels of dust, and the dust in the region is believed to potentially carry the *C. immitis* fungi (i.e., Valley Fever) (4.3-10).

A majority of the fugitive dust events have not resulted from agricultural operations, off road vehicle use, and wind storms. Existing solar projects have been a major source of dust, driven by windstorms, contributing to dangerous driving conditions, destruction of existing vegetation, and unhealthful air. The statement above seeks to circumvent responsibility for additional dust and valley fever by saying dust exists already, and more will not matter. Sensitive receptors list does not mention the Del Sur Elementary School (4.3.2.1.5). Every solar project that is built costs the rural communities nearby in the form of valley fever infections and other pulmonary illnesses.

The EIR states "The Solar Generating Facility would not impact any designated scenic routes." This is rubbish. I would defy anyone who tells me it is the same to look at a fully developed chain-link barbed

wire enclosed industrial-scale solar installation and tell me that it is not noticeably different than looking at open space, and frequently, dense wildflower-forb field vistas present in the western Antelope Valley. It is observed that Projects 2 and 5 will destroy wildflower fields and views of the Poppy Reserve that help qualify this road as a scenic route in the Scenic Highways Element (SHE) (1974) of the GP, identified as Route #20, along "Johnson Road-110th Street West-Avenue K from Elizabeth Lake Road to 60th St. West." Additionally, views from Lancaster Road looking south and east will be impaired from Route #16 described as "Gorman Post Road-Lancaster Road-110th St. West from Golden State Freeway (I-5) to Avenue K" (SHE, Scenic Highway Map System Index, SHA-2, #16, #19,#20). As many as 100,000 people visit the State of California Poppy Reserve and surrounding lands each year, especially during times of exceptional bloom. They also visit other wildflower locations that coincide with scenic highways previously mentioned. At the very least hundreds, if not thousands, of cars pass the location during daily commutes on 110th Street West between Highway 138 and main east/west Avenues D, E, F, G, H, I, J, K, and also from Johnson Hill Road to and from the Lakes Communities, and Santa Clarita.

Even though the SHE was not codified, the GP expects proper evaluation of development in designated scenic areas, and includes even "proposed" scenic highways (GP, Scenic Highways, III-54).The Land Use Element details design review for Scenic Highways, in part, stating, "The proposed development should be designed to create a consistent visual relationship with surrounding development with the natural terrain and vegetation," and "structures and landscaping should complement and enhance scenic views" (GP, III-54). Through these statements, one may question the scenic viability of this project, since it will not enhance views due to its large footprint, buildings, solar arrays, drainage basins, transformer buildings, industrial chain-link/barbed wire perimeter fencing, where there is now only open space grasslands and wildflower fields. Furthermore, the GP says, "The project should protect the visual quality of highly scenic areas and views from scenic highways, roads, trails and key vantage points" (GP, Resource Protection, III-72). This would include views from Johnson Road/110th St. West, West Avenue K, and West Avenue I/Lancaster Road near the Antelope Valley Poppy Reserve. Please also note that the Antelope Valley Press, in its promotion of the City of Lancaster's Poppy Festival, published an article October 27th, 2013, in its Welcome to the Antelope Valley Magazine, that includes a map of wildflower viewing areas identifying 110th St West as such (see attached). Finally, and perhaps most importantly, the GP in its Land Use Section/Scenic Highways, III-55 states, "Commercial or industrial uses should be conducted entirely within closed buildings, except for restaurants, recreational uses and gasoline service stations." It is apparent that the Projects are inconsistent with the scenic highway design standards outlined in the GP, AVAP, and the SHE.

Worldwide, a coalition of organizations including the America Audubon Society has identified over 8,000 IBAs or Important Bird Areas. The purpose of the IBA Program is to set "science-based" priorities for habitat conservation to "promote positive action to safeguard vital bird habitats." According to the Audubon's IBA website, "IBA inventories provide a scientifically defensible method for prioritizing conservation activities and allocating limited conservation dollars to ensure the maximum benefit to birds." A subset of these 8,000 sites has been given the higher status of "Globally Important Bird Areas." These 424 worldwide sites have special status due to "global conservation concern." (http://web4.audubon.org/bird/iba/)

One of these 424 areas is in Los Angeles County, in the Western Antelope Valley. This site, the Antelope Valley Important Bird Area provides breeding, foraging and nesting habitat for Swainson's Hawk, Golden and Bald Eagles, Northern Harriers, Burrowing Owls, Le Conte's Thrasher, Tricolored

Blackbirds and other sensitive species, including the California Condor. Describing this IBA, the Audubon Society states that, "The grassland bird community is most impressive in winter, when large numbers of raptors concentrate in the area. Large flocks of Vesper Sparrows, Horned Lark and Mountain Bluebirds also occur here, widely extirpated elsewhere in the Los Angeles area. The agricultural fields, especially alfalfa, are productive year round. Winter brings Mountain Plover, whose flocks are among the last in southern California. After wet winters, nesting grassland species like Northern Harrier linger well into spring, and occasionally even breed. Swainson's Hawk maintains its southernmost breeding outpost in the state here. As this IBA lies in the path of a major spring migrant route for songbirds, these windbreaks can host hundreds of vireos, thrushes and warblers during April and May."

This leads to the EIR's interpretation of the biological value of the project area pertaining to Swainson's hawk. The assertion that the projects contain "some limited value as foraging habitat for Swainson's hawk" appears to be false. Excerpts from the "Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California," submitted to the Desert Renewable Energy Program by the California Energy Commission and Department of Fish and Game, June 2, 2010 indicate:

> Renewable energy project development could cause direct, indirect, individual, and cumulative adverse impacts to Swainson's hawks when facility construction and operation areas (such as wind turbines, power plants, solar panels and tower sites, access roads, staging areas, and pulling/splicing locations) occur in areas where hawks are present. Potential impacts include loss of foraging habitat and disruption of breeding activities due to increased dust, noise, and human presence. Direct mortality from vehicle strikes and collisions with wind turbines is also known to occur. Construction disturbance during the breeding season and habitat loss could cause incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment (2).
>
> Additionally, "A substantial reduction in numbers or habitat of a rare, threatened, or endangered species would be considered a significant impact under CEQA. Potentially significant impacts may result from activities that cause nest abandonment, loss of nest trees, loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), or direct mortality. Due to the Swainson's hawk's known preference for areas of low vegetation that support abundant prey, such as grasslands or alfalfa fields (Bechard 1982, Babcock 1995), the Department considers conversion of foraging areas to renewable energy power plant facility sites to be habitat loss. For example, solar panel arrays are expected to eliminate most or all foraging potential. Significant habitat loss may result from individual projects and cumulatively, from multiple projects" (2).

These two paragraphs indicate the project sites are hawk foraging habitat, and they appear to be within approximately five miles of a nest occupied in 2010 near Avenue D and 110th Street West described by Element Power Wildflower Green Energy Farm Biological Constraints Analysis and attached map (Appendices, Biota Report, Initial Study, 18, 30) and a known active nest site directly adjacent to Project 5 along 120th Street West. According to the California Department of Fish and Wildlife (CDFW) any nest is considered to be active if occupied once within the last five years, and specifically,

"Impacts to suitable habitat or individual birds within a five-mile radius of an active nest will be considered significant and to have the potential to "take" Swainson's hawks as that term is defined in §86 of the Fish and Game Code" (Swainson's Hawk Survey Protocol, 3). The CDFW Protocol further states "Construction disturbance during the breeding season and habitat loss could cause incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment." Not only that, the protocol identifies the Antelope Valley's ten breeding pairs as especially sensitive to renewable energy development, stating:

The current land uses in the Antelope Valley area support approximately 10 breeding pairs. This area comprises the southernmost edge of the known breeding range for this species in California. The small number of breeding Swainson's hawks in the Antelope alley and the potential isolation from other Swainson's hawk populations makes the Antelope Valley population particularly susceptible to extirpation. Swainson's hawks have high nest site fidelity, meaning they return to the same site year after year (Estep 1989, Woodbridge et al. 1995) This may limit exchange of individual birds between distant breeding groups (Hull et al. 2007). Hull et al. (2007) found evidence suggesting that the Central Valley population has had little recent genetic exchange with other populations east of the Sierra Nevada. Due to the geographical isolation of the Antelope Valley Swainson's hawk population from other breeding populations, together with the species' high site fidelity, it is reasonable to infer that rapid re-colonization of the Antelope Valley would be unlikely if nesting pairs were lost. Given these facts, the California Department of Fish and Game (Department) would consider impacts to breeding pairs to be potentially significant because they may cause the population to become less than self-sustaining (2).

The assertion that "some limited value as foraging habitat for Swainson's hawk" exists on all proposed Silverado Projects is refuted by the existence of the nesting sites previously mentioned. The CDFW's Swainson's hawk Survey Protocol, June 20, 2010 says, "Due to the Swainson's hawk's known preference for areas of low vegetation that support abundant prey, such as grasslands or alfalfa fields (Bechard 1982, Babcock 1995), the Department considers conversion of foraging areas to renewable energy power plant facility sites to be habitat loss." Furthermore, a minimum of 2:1 ratio of mitigation land is required for infringement on their habitat; more should be considered for destruction of nesting and nesting foraging areas.

Loss of Burrowing owl habitat is certain with the implementation of the these projects. Successful owl burrows have been observed immediately adjacent to project 2's north boundary on West Avenue J, east of 110th Street West, along a proposed gen-tie line, as indicated in West Antelope Solar's Mitigated Negative Declaration. Why biologists for this project failed to identify those owls is curious. Even though no detection of owls on project 2 is claimed by the EIR, occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl, or its sign at or near a burrow entrance, is observed within the last three years (Staff Report on Burrowing Owl Mitigation, CDFW, 2012).

Comments by biologist and raptor expert, Dr. K. Shawn Smallwood, in his letter dated 16 November 2013 (from the West Antelope Solar MND) state, "Burrowing owl habitat will be entirely destroyed by the West Antelope Solar Energy Project within the project boundary and out to about 150 m from the

boundary." There is then, considerable reason to believe the same to be true of the Silverado Projects. The identification of artificial burrows on site, unoccupied, show the difficulty and unpredictable nature of relocating owls. According to Dr. Smallwood, burrowing owls dislike nesting areas "amidst tall plants or tall structures." They will not repopulate areas within solar arrays, or within approximately 500 feet of such areas. See attached listing of wildlife likely to be seen on or near project properties-- it is more expansive than those provided in the EIR and is in line with what EIR biological evaluations should have revealed.

Moreover, Dr. Peter Bloom, in his 2 December 2003 letter to CDFW for listing Burrowing Owls as threatened, has this to say:

1. Passive relocation usually succeeds only in displacing the owls. Even if as prescribed in the Guidelines 6.5 acres are preserved for each pair, once the project development is completed and is later surrounded by other developments, whatever acreage has been set aside becomes useless for owl conservation.
2. Given the recently published (Gervais et al. 2003) results of radio telemetry studies of BUOWs in the Central Valley, it would appear that the 150-m survey buffer area around a project site is inadequate and will need to be expanded to at least a 600-m survey buffer area in order to adequately address the needs of both on and off-site breeding pairs. Since male burrowing owls often move greater than 1,000 m (Gervais et al. 2003) when foraging in the breeding season, consideration for off-site foraging habitat affected by development, particularly in agricultural areas should be included in assessments. According to Gervais et al. (2003) habitat improvements should be planned within 600m of the nest site for breeding burrowing owls to maximize foraging efficiency.
3. Passive relocation should only be used as a mitigation technique when the BUOW nesting territories in question are directly adjacent to permanently protected lands.
4. A more appropriate term for the passive relocation of BUOW pairs is eviction (Trulio 1995), meaning the pairs have no "home", no protective burrows to escape to. While artificial burrows are required as part of the process, there is no guarantee that the owls will find the new burrows once evicted, and adequate monitoring and maintenance of the artificial burrows almost never occurs.

Even if on site mitigation were possible, the construction process and the buffer requirements to active nests or burrows would most likely be ineffective in the pile-driving process during construction described in the EIR. Additional effects would include loss of ground squirrels, whose burrows provide homes for owls. The project may use herbicides, rodenticides and pesticides that would, without doubt, eliminate any habitat remaining on or nearby the projects. Additionally, the figures (such as Figure 4, Appendix B-3, page 1050/4833) provided for location identified species do not show *all* projects in the region; it would be beneficial to the reader to understand the whole picture as pertains to renewable energy development in the western Antelope Valley area and more properly evaluate the effects of these projects.

Eradication of ground squirrels on site will reduce availability of habitat; and the use of rodenticides, pesticides, and herbicides may eradicate the owls and other raptors near the project site. There is no discussion in the MND regarding the use of such chemicals, thence, no review of potentially deadly poisons to wildlife. Pile-driving equipment may also affect burrows considered potential habitat, and could cause burrow collapse, eliminating possibility of habitation by owls on the project's proposed on

site mitigation land. Even though no detection of owls on the north site burrows was found, occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl, or its sign at or near a burrow entrance, is observed within the last three years (Staff Report on Burrowing Owl Mitigation, CDFW, 2012,). There is no record of surveys that occurred within the last three years, except for the previously mentioned West Antelope Solar, as a project in close proximity to two of the Silverado projects. Should relocation and mitigation of loss of nesting habitat and foraging areas prove unsuccessful, subsequent mitigation should be discussed as part of ongoing monitoring and additional alternative habitat should be provided. There is no clear evidence presented that mitigation is successful in replacing lost habitat and that it will be used by displaced species.

The EIR does not consider loss of foraging area pertaining to tri-colored blackbirds, a California Species of Special Concern, well known to the area because of several nesting locations within a few miles of these projects. During spring seasons with average rainfall when the grasslands support large numbers of insects, especially grasshoppers, tri-colors can be seen carrying them back to their nestlings. These grasshoppers undoubtedly support nesting raptors and their broods as well It would be a mistake to allow the EIR to miss reporting the active and abundant wildlife normally present during non-drought years. The document needs to reconsider the value of all affected lands within the proposed projects' purview, so residents, concerned citizens and the planning office may understand the overall cumulative effects of these and other large utility-scale renewable energy projects. All of the special-status species discussed in the EIR and touched upon in this letter serve as "flagship species" of our Antelope Valley. Their protection really does signify quality of life for not only all other species—from soil fungi and bacteria; wildflowers, herbaceous plants, and trees, to birds, small and large mammals, reptiles; but for human inhabitants as well.

All in all, the actual mitigation of impacts to rural communities and their unique character goes unanswered. At what point do the thousands of acres of utility-scale solar projects change the "living environments" of our Western Antelope Valley and render communities virtually devoid of the special and common species we enjoy as we are surrounded by industrial development? Planning documents talk much about project compatibility in order to protect areas from disturbing effects of improperly placed commercial and industrial developments, but Regional Planning seems to do little in supporting those existing planning goals and objectives that would slow, or even eliminate, the onslaught of so-called "green energy" projects causing serious impact to our communities. Consider, too, the inability of accepted best practices and modern soil stabilizers to contain the fugitive dust that blows from their projects. Threats to human health, like valley fever, can neither be ignored nor mitigated easily. Finally, the CDFW protocols recommended mitigation measures and preservation of mitigation land extend beyond what is not clearly discussed in the EIR for significant impacts to wildlife and residents.

Sincerely,

Susan Zahnter

Susan Zahnter
Member, CCWAV

CC: Supervisor Michael Antonovich, Field Deputy Norm Hickling, Planning Director Richard Bruckner, Planning Supervisor Mitch Glaser, Renewable Energy Policy Planner Thuy Hua

This list is easily applied to the Silverado Projects and many here do not appear or are they mentioned in the EIR.

Table 1. Special-status species of wildlife that could potentially occur at, or travel through, the proposed West Antelope Solar Project site.

Common name	Scientific name	Status[1]	Occurrence likelihood	
			Neg Dec	Smallwood
Pallid bat	*Antrozous pallidus*	CSC	Not expected	Possible
Townsend's western big-eared bat	*Plecotus t. townsendii*	CSC	Not expected	Possible
Western mastiff bat	*Eumops perotis*	CSC	No mention	Probable
Long-eared myotis	*Myotis evotis*	WBWG	No mention	Probable
Fringed myotis	*Myotis thysanodes*	WBWG	No mention	Probable
Long-legged myotis	*Myotis volans*	WBWG	No mention	Probable
Yuma myotis	*Myotis yumanensis*	CSC	No mention	Probable
American badger	*Taxidea taxus*	CFP	Maybe	Probable
Tehachapi pocket mouse	*Perognathus alticolus*	CSC	No mention	Possible
Mountain plover	*Charadrius montanus*	BCC, BSSC2	Not expected	Possible
Turkey vulture	*Cathartes aura*	CDFG 3503.5	Observed	Probable
California condor	*Gymnogyps californicus*	FE, CE	No mention	Possible
Golden eagle	*Aquila chrysaetos*	CFP, BGEPA	No mention	Probable
Northern harrier	*Circus cyaneus*	SSC3	Maybe	Certain
White-tailed kite	*Elanus leucurus*	CFP	No mention	Probable
Cooper's hawk	*Accipiter cooperi*	CDFG 3503.5	No mention	Probable
Sharp-shinned hawk	*Accipiter striatus*	CDFG 3503.5	No mention	Probable
Ferruginous hawk	*Buteo regalis*	SSC	Observed	Certain
Red-tailed hawk	*Buteo jamaicensis*	CDFG 3503.5	No mention	Certain
Red-shouldered hawk	*Buteo lineatus*	CDFG 3503.5	No mention	Probable
Swainson's hawk	*Buteo swainsoni*	CT	Maybe	Certain
American kestrel	*Falco sparverius*	CDFG 3503.5	No mention	Probable
Merlin	*Falco columbarius*	CDFG 3503.5	No mention	Possible
Prairie falcon	*Falco mexicanus*	CDFG 3503.5	Observed	Probable
Peregrine falcon	*Falco peregrinus*	CE, CFP	No mention	Possible
Barn owl	*Tyto alba*	CDFG 3503.5	No mention	Probable
Great-horned owl	*Bubo virginianus*	CDFG 3503.5	No mention	Probable
Short-eared owl	*Asio flammeus*	SSC3	Not expected	Possible
Western burrowing owl	*Athene cunicularia*	SSC2, FCC	Observed	Certain

California horned lark	*Eremophila alpestris actia*	CBRL	No mention	Certain
Loggerhead shrike	*Lanius ludovicianus*	SSC2 (breeding)	Maybe	Certain
LeConte's thrasher	*Taxostoma lecontei*	SSC1	Not expected	Unlikely
Tricolored blackbird	*Agelarius tricolor*	SSC1	Maybe	Possible
Western pond turtle	*Emys marmorata*	CSC	No mention	Unlikely
Desert tortoise	*Gopherus agazzassii*	FT, CT	Not expected	Possible
Silvery legless lizard	*Anniella pulchra pulchra*	SSC	Not expected	Possible
Coast horned lizard	*Phrynosoma blainvillii*	SSC	Not expected	Possible

[1] *Listed as FE = federal endangered, FT = threatened, FCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, BGEPA = Bald and Golden Eagle Protection Act, CE = California endangered, CT = California threatened, CSC = California species of special concern (not threatened with extinction, but rare, very restricted in range, declining throughout range, peripheral portion of species' range, associated with habitat that is declining in extent), CFP = California Fully Protected (CDFG Code 4700), CDFG 3503.5 = California Department of Fish and Game Code 3503.5 (Birds of prey), and SSC2 and SSC3 = California Bird Species of Special Concern priorities 2 and 3, respectively (Shuford and Gardali 2008), CBRL = California Bird Responsibility List, WBWG = Western Bat Working Group listing as moderate or high priority.*

Kim Szalay

From: Mark Shoemaker [shoesfive@msn.com]
Sent: Friday, April 18, 2014 8:53 PM
To: DRP Special Projects
Cc: Mark Shoemaker
Subject: SILVERADO POWER WEST, LA COUNTY PROJECT NOS. R2011-00798-(5)

Attention: Mr. Kim Szalay, Department of Regional
Planning, Room 1362, 320 West Temple Street, Los Angeles, California 90012
email: specialprojects@planning.lacounty.gov

Project 2 Western Antelope Blue Sky Ranch – Project No. R2011-00798; CUP No. 201100070; APN 3267-015-001; 157 acres; 40 MW; 110th Street West and West Avenue K

In regards to the above project it will destroy the annual flora of the area. This area is near the foothills so a greater amount of rainfall occurs providing scenic wildflowers that will be decimated by this project. So many other areas exist to the North of this site that it must be moved. Putting solar panels on the flat lands that have much more alkaline soil, due to the lack of drainage, makes more sense. Placing the solar panels on the sloping hillside that provides lush flowers and grass will wipe out the plants in this area and the wildlife (mammals, birds, insects, etc.) that depend on the life cycle of the flora. Just look at the aerial map, http://planning.lacounty.gov/assets/upl/case/silverado_aerial-maps.pdf, where Projects 1, 3, and 6 show no color. However, Projects 2, 4, and 5 all have some greenery in and surrounding the area. It makes no sense to wipe out the areas that have abundant life when other areas are available.

I have attached photos, see below, of the location to emphasize the above points!

I propose two solutions:
1) Moving this project to the North and East which has flatter land, less precipitation, and a more alkaline that does not support these type of wildflowers.
2) Increasing Projects 1, 3, or 6 by just fifty+ acres each to offset the 157 acres of Project 2.

As a long time valley resident who enjoys driving to see the wonderful wildflowers and related wildlife thank you for reviewing this comment.

Please reply to confirm receipt or call if you have any questions.

Mark Shoemaker
40420 Gemelos Court
Palmdale, CA 93551
661-722-4561

The view to the West and South which shows the rising slope into the foothills.

The view to the North and West which shows the distant areas that are flat and brown similar to the graded interior of any solar panel farm.

The Notice of Public Hearing:
http://planning.lacounty.gov/assets/upl/case/silverado_hearing-notice.pdf

Kim Szalay

From:	Dave and/or Sandy [trubereans@gmail.com]
Sent:	Thursday, April 17, 2014 2:40 PM
To:	DRP Special Projects; Kim Szalay; Mitch Glaser; Richard Bruckner; Thuy Hua; Mark Child; HICKLING, Norm, Iac; ANTONOVICH, Michael, Iac; Rosie Ruiz
Subject:	Silverado Power West R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
Importance:	High

April 17, 2014

Mr. Kim K. Szalay, MPL, AICP
Principal Planner, Special Projects Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Dear Mr. Szalay,

Re: Silverado Power West, Los Angeles County
-Project #R2011-00833-(5), #R2011-00798-(5), #R2011-00799-(5), #R2011-00807-(5), #R2011-00801-(5), #R2011-00805-(5)
-Conditional Use Permit #201100079, #201100070, #201100071, #201100076, #201100072, #201100074
-Zone Change #201100005
-Environmental Review #201100109
-EIR State Clearinghouse #2012061068

Please consider re-scheduling the hearing date for Silverado Power West from May 7, 2014 to a date that would allow at least 45 days for the public to review the Final Environmental Impact document. The public needs far more time for comment preparation than 10 days, as this May 7th date only allows that for the public to review the EIR. This is not a reasonable time frame to review thousands of document pages, as well as reviewing the Regional Planning documents with associated changes.

The residents in the Antelope Valley typically commute long distances to work, and find it an extra heavy burden to also have to travel to Los Angeles during the work week to attend hearings held there while missing work. Therefore, please consider holding this and all future related hearings in Lancaster. This is only fair and the right thing to do, especially in this struggling economy where residents are trying to be responsible in their employment. By having to miss a day's work (possibly many) to attend this and related hearings causes the residents further hindrances from having ample opportunity to be a part of their community.

Thank you for your consideration in these matters,

Sincerely,

David and Sandra McCrae
47211 212th St. W.
Lancaster, CA 93536

Kim Szalay

From: Bernie Walp [bernie@well.com]
Sent: Wednesday, April 16, 2014 6:20 PM
To: Kim Szalay
Subject: Re: Silverado project: Findings of Fact

Dear Mr. Szalay,

Thank you very much. We'll wait for the 24th, then.

May I assume we're on your mailing list now, for all notices related to this project? I did receive an email from your office regarding the 7 May hearing, and our next-door neighbors got a snailmail. (email is sufficient.)

Regards,
Bernie Walp
9348 West Avenue I, Lancaster 93536-8002

On 16 Apr 14, at 4:43 PM, Kim Szalay wrote:

> Good Afternoon Mr. Walp,
>
> The California Environmental Quality Act (CEQA) Findings of Fact and Projects 1-6 Conditional Use Permit (CUP) Findings of Fact will be posted on the County website next Thursday, April 24, 2014. You will see a place holder for case materials on the Silverado Power Projects 1-6 link per below. The additional case materials are in process currently. The first six bulleted items do not yet have these documents. Starting at the "Hearing Notice" bullet you can see currently available case materials.
>
> http://planning.lacounty.gov/case/view/silverado/

Kim Szalay

From: Kim Szalay
Sent: Wednesday, April 16, 2014 4:44 PM
To: Bernie Walp
Cc: DRP Special Projects
Subject: RE: Silverado project: Findings of Fact

Good Afternoon Mr. Walp,

The California Environmental Quality Act (CEQA) Findings of Fact and Projects 1-6 Conditional Use Permit (CUP) Findings of Fact will be posted on the County website next Thursday, April 24, 2014. You will see a place holder for case materials on the Silverado Power Projects 1-6 link per below. The additional case materials are in process currently. The first six bulleted items do not yet have these documents. Starting at the "Hearing Notice" bullet you can see currently available case materials.

http://planning.lacounty.gov/case/view/silverado/

Sincerely,

Kim

Mr. Kim K. Szalay, MPL, AICP
Principal Planner
Special Projects Section
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
(213) 974-4876 Direct
(213) 626-0434 Fax
specialprojects@planning.lacounty.gov

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-----Original Message-----
From: Bernie Walp [mailto:bernie@well.com]
Sent: Wednesday, April 16, 2014 3:38 PM
To: Kim Szalay
Subject: Silverado project: Findings of Fact

Dear Mr. Szalay,

Duplicating a voice-mail I just left you: can you point me to a document called "Findings of Fact" that will be voted on at the 7 May hearing? I just learned of its existence from Mr. Ryan Galeria of Silverado.

Many thanks,
Bernie Walp
9348 West Avenue I, Lancaster (adjacent to a Silverado project)
661-945-2606
bernie@well.com

Regarding:

SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECT STATE CLEARINGHOUSE NO. 2012061068 COUNTY PROJECT NOs. R2011-00833, 00798, 00799, 00807, 00801, 00805 CONDITIONAL USE PERMIT NOs. 201100079, 70, 71, 76, 72, 74 ZONE CHANGE NO. 201100005 ENVIRONMENTAL REVIEW NO. 201100109

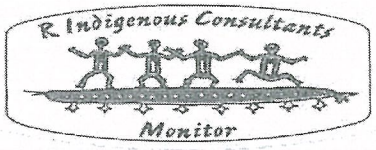
Kim Szalay

From: Randy Folkes [ndnrandy@gmail.com]
Sent: Wednesday, April 16, 2014 4:10 PM
To: DRP Special Projects
Subject: Cultural Resources Monitoring
Attachments: R Indig Intro letter.doc

Hello Carolina,

Thanks, for making us part of the consultation process.

In good Spirit,
Randy



R. Indigenous Consultants
Tribal Monitoring LLC
4676 Walnut Avenue
Simi Valley, CA 93063
Cell (805) 905-1675
ndnrandy@gmail.com
R-indigenousconsultantstribalmonitoring.com

April 16, 2014

Hello, my name is Randy Guzman-Folkes and I am from the Tataviam Band of Mission Indians, Venturano Chumash, and Shone-Paiute. My company is R. Indigenous Consultants· Tribal Monitoring LLC. I take pride in providing Native American Monitoring services that protect our sacred sites, cultural resources and ancestors during grading, excavation, and site development.

R. Indigenous Consultants Tribal Monitoring LLC/Randy Guzman-Folkes is listed on the Native American Heritage Commission's Native Monitoring list. The NAHC understands the important relationship between California Indian Communities and the land, which is an Asset for cultural resources. The State and Federal Government has enacted laws that set out to preserve and safeguard theses sites and resources.

As a Native Monitor, I work in consultation with archeologists, geologists, paleontologist, and city planners. We work together to review documents such as Environmental Impact Reports, grading plans, California Environmental Quality Reports, site surveys and National Forestry Reports. However, these documents are not enough to identify sacred sites or areas of concern to tribes. Often these documents do not contain tribal input, cultural knowledge, or accurate historic background. This is why the

Federal, State, and local governments have laws in place that call for consultation and monitoring of development projects.

My family has been recognized by both the State of California and the NAHC as a, Most Likely Descendant (MLD). This means that should any development impact a cultural site or sensitive area, R. Indigenous Consultants Tribal Monitoring can provide an MLD to facilitate the correct handling of the site, artifact or culturally sensitive materials. R. Indigenous Consultants has been in the field of Native American Monitoring for over 30 years. We are eager to work with your company and to educate you about the laws that pertain to the protection and preservation of sacred sites and cultural resources.

We would be honored to work with you on your current or upcoming projects.

In Good Spirit,

Randy Guzman-Folkes

Kim Szalay

From: Bernie Walp [bernie@well.com]
Sent: Wednesday, April 16, 2014 3:38 PM
To: Kim Szalay
Subject: Silverado project: Findings of Fact

Dear Mr. Szalay,

Duplicating a voice-mail I just left you: can you point me to a document called "Findings of Fact" that will be voted on at the 7 May hearing? I just learned of its existence from Mr. Ryan Galeria of Silverado.

Many thanks,
Bernie Walp
9348 West Avenue I, Lancaster (adjacent to a Silverado project)
661-945-2606
bernie@well.com

Regarding:

SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECT STATE CLEARINGHOUSE NO. 2012061068 COUNTY PROJECT NOs. R2011-00833, 00798, 00799, 00807, 00801, 00805 CONDITIONAL USE PERMIT NOs. 201100079, 70, 71, 76, 72, 74 ZONE CHANGE NO. 201100005 ENVIRONMENTAL REVIEW NO. 201100109

Kim Szalay

From: Margaret Rhyne [m.rhyne@verizon.net]
Sent: Tuesday, April 15, 2014 5:09 PM
To: Kim Szalay; m.rhyne@verizon.net; DRP Special Projects
Cc: Anthony Curzi; Samuel Dea; Mitch Glaser; Thuy Hua; NHickling@lacbos.org
Subject: Re: RE: Silverado Renewable Energy project in the West AV

Mr. Szalay,
There is often an enormous difference between what regulations require and what is fair and reasonable service to the citizens of Los Angeles County. I am saddened to see that you are not being responsive to the needs of the citizens of the Antelope Valley. This has not been my experience with county planners previous to this project. The Regional Planning Commission has come to the Antelope Valley before for hearings on important projects. This nearly 1,000 acre project certainly should be one of those considered important enough for a local hearing. Traveling to Los Angeles is a daunting challenge for many people as is the task of attempting to understand a 5,000 + page document and responses to that document in a very limited amount of time. The DRP and project proponents had over 1 year to put together what will be proposed as the Final EIR but the public has just 2 weeks to respond to that Final EIR? No reasonable person can consider this to be adequate. I also continue to object to the lack of disclosure concerning all of the comments made both in writing and in testimony on Feb 1. Why were all of the public comments concerning the DEIR not made public immediately at the close of the comment period?

On 04/15/14, Kim Szalay<kszalay@planning.lacounty.gov> wrote:

Good Morning Margaret,

You will find the Project Summary pages and individual location maps for each of the six projects and the overall context map of all six projects, on the website.http://planning.lacounty.gov/case/view/silverado/

The responses you are referring to will be in the Final EIR response to comments which will be posted two weeks prior to the public hearing on May 7. The Final EIR with responses to all comments should be posted on Thursday April 24.

The California Environmental Quality Act (CEQA) requires the Final EIR with responses to comments and any corrections to the Draft EIR to be posted at least 10 days prior to a public hearing on the project. Responses to your letters are included in the Final EIR, including responses regarding mitigation land.

Regarding these time frames, please note that the DEIR has been available since January, and a Hearing Examiner public hearing to receive testimony from the public was held locally in Lancaster on February 1, 2014. The Final EIR is primarily responses to public and agency comments and corrections to the Draft EIR. Please look forward to Final EIR posting on the County's website in compliance with CEQA requirements.

Regarding the location of the public hearing before the Regional Planning Commission downtown, please note that the purpose of the Hearing Examiner hearing was to be in the community to take public input on the Project as analyzed in the Draft EIR. We look forward to seeing you at the public hearing before the Planning Commission on May 7.

Sincerely,

Kim Szalay

Mr. Kim K. Szalay, MPL, AICP

Principal Planner

Special Projects Section

Department of Regional Planning

320 W. Temple Street, Room 1362

Los Angeles, CA 90012

(213) 974-4876 Direct

(213) 626-0434 Fax

kszalay@planning.lacounty.gov

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From: Margaret Rhyne [mailto:m.rhyne@verizon.net]
Sent: Tuesday, April 15, 2014 9:38 AM
To: Kim Szalay; DRP Special Projects
Cc: Anthony Curzi; Samuel Dea; Mitch Glaser; Thuy Hua; NHickling@lacbos.org
Subject: Silverado Renewable Energy project in the West AV

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With time fast approaching for the hearing, these documents need to be made available to the public ASAP. This is a huge project of almost 1,000 acres with an DEIR of over 5,000 pages; it is simply not reasonable for the public to have

only 10 days to review the response documents.

I also have not received an answer to my repeated questions about the amount of total land that the project proponents estimate will be impacted by the project thus necessitating mitigation land.

I also believe that the number of people who attended the Feb 1 hearing in Lancaster is strong evidence of the level of concern that local residents have about this project. That concern needs to be honored by a reasonable response from the Department of Regional Planning by:

- Postponement of May 7 Hearing
- Providing no less than a 30 day review period of the DRP response to testimony and letters concerning the DEIR
- Rescheduling the Hearing before the Planning Commission in Lancaster

Kim Szalay

From:	S Z [ontishima1775@gmail.com]
Sent:	Monday, April 21, 2014 1:09 PM
To:	Kim Szalay; DRP Special Projects; Mitch Glaser; Thuy Hua; Rosie Ruiz; Mark Child; Richard Bruckner; Carl Nadela
Cc:	Hickling, Norm
Subject:	Fwd: : Part II Silverado Comment Letter--email failed
Attachments:	CCWAV Silverado EIR Comments Pt. I.pdf

I am unable to forward Part II of our Silverado Comments. The file may be too large, or corrupted. The pages consist of a Swainson's Hawk Nest Area Map, to be found in the Element Power Project BCA; as well as a graphic map of Wildflower Viewing Areas that will be affected by this project, as published in the Antelope Valley Press.

Please let me know you are in receipt of Part I--attached here again.

Thank you,
Susan Zahnter

-----Original Message-----
From: susan@avopenspace.org [mailto:susan@avopenspace.org]
Sent: Monday, April 21, 2014 02:44 PM
To: kszalay@planning.lacounty.gov, specialprojects@planning.lacounty.gov, mglaser@planning.lacounty.gov, thua@planning.lacounty.gov, rruiz@planning.lacounty.gov, mchild@planning.lacounty.gov, rbruckner@planning.lacounty.gov, cnadela@planning.lacounty.gov
Cc: nhickling@lacbos.org
Subject: Part II Silverado Comment Letter

Here is Part II, with previous email below. I would like to add that the hearing for this project be held in Lancaster, so local residents may have a better opportunity to appear before the Planning Commission.

Sincerely,
Susan Zahnter

Dear Mr. Szalay, Commissioners, and Planners,

Since my comment letter was not accepted previously, I would like re-submit our groups' letter of opposition to the Silverado Power West Projects, and ask that it be added to the public record, and that its contents be addressed as part of the final review. I would like to request, again, that the hearing be reassigned to a later date that would give concerned citizens, and perhaps those who need more time to review the over 5,500 pages of the finished EIR, and final planning documents. Thirty days seems reasonable enough. It has taken nearly two years for the document to be presented, and the public has only ten days to submit final comments--according to the most recent notice. Residents and citizens of Antelope Valley deserve more time; they are ones most affected by this collection of utility-scale solar projects. I recognize that the previous review period lasted 45 days, but those of us who are not professionals, have other jobs, etc., need more time to compare the finished document with the draft.

Please let me know you are in receipt of this email, and have successfully downloaded both parts of our letter (large file size). The second part will follow immediately, in another email. Please distribute this email and letter to the Planning Commissioners as soon as possible.

Thank you, and best regards,
Susan Zahnter
Member, FAVOS, CCWAV

--

Kim Szalay

From: susan@avopenspace.org
Sent: Monday, April 21, 2014 11:03 AM
To: Kim Szalay; Anthony Curzi; Thuy Hua; Carl Nadela; Richard Bruckner; Mark Child; Paul Mc Carthy; Joseph Decruyenaere; Rosie Ruiz; Emma Howard
Subject: Spectacular Wildflower Bloom in AV
Attachments: Silverado Solar B - Copy.JPG; West Antelope SolarB - Copy.JPG

Hello Regional Planners,

This year has been exceptional for wildflowers in the Antelope Valley. The brief, but heavy rain after extended drought has produced incredible bloom throughout. In the Western A.V., scenic areas for viewing extend from West Highway 138, Three Points Road south, (my neighborhood), east to 110th Street West--essentially for miles along the West Highway 138, and all around the Poppy Reserve.

If you have not planned a trip, you should. I suggest this because it would give you a sense of what we rural residents want to protect and pass on as a legacy for future residents and visitors from around the world. These areas are traversed by the same roads mentioned the Scenic Highways Element of the General Plan 1974, whose intended protections should be extended to proposed 2035 planning documents; the same areas worthy of protection from utility-scale solar sprawl.

I have attached a couple of photos of the areas in which the West Antelope Solar Project (recently approved), and the Silverado Project areas 2 and 5. What a terrible loss to viewshed and wildlife this will be, and quite different from MNDs and EIRs professing low quality habitat--desert wasteland, and easily mitigated with landscaping. See it before it is gone.

Most Sincerely,
Susan Zahnter
Member, FAVOS & CCWAV
Vice President, Three Points Town Council

NOTICE OF
PUBLIC HEARING ON PROPOSED
PROJECT NO. R2011-00798
PROPOSED ON THIS SITE:
Construction of a 40 MW photovoltaic
solar facility on 157 acres
PUBLIC HEARING
DATE: May 7, 2014
TIME: 9:00 a.m.
LOCATION: Hall of Records Room 150
320 West Temple Street
LOS ANGELES, CA 90012
FOR INFORMATION CALL:
DEPARTMENT OF
REGIONAL PLANNING AT
(213) 974-6476

Kim Szalay

From: Kim Szalay
Sent: Tuesday, April 15, 2014 11:01 AM
To: Margaret Rhyne; DRP Special Projects
Cc: Anthony Curzi; Samuel Dea; Mitch Glaser; Thuy Hua; NHickling@lacbos.org
Subject: RE: Silverado Renewable Energy project in the West AV

Good Morning Margaret,

You will find the Project Summary pages and individual location maps for each of the six projects and the overall context map of all six projects, on the website. http://planning.lacounty.gov/case/view/silverado/

The responses you are referring to will be in the Final EIR response to comments which will be posted two weeks prior to the public hearing on May 7. The Final EIR with responses to all comments should be posted on Thursday April 24.

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Regarding the location of the public hearing before the Regional Planning Commission downtown, please note that the purpose of the Hearing Examiner hearing was to be in the community to take public input on the Project as analyzed in the Draft EIR. We look forward to seeing you at the public hearing before the Planning Commission on May 7.

Sincerely,

Kim Szalay

Mr. Kim K. Szalay, MPL, AICP
Principal Planner
Special Projects Section
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
(213) 974-4876 Direct
(213) 626-0434 Fax
kszalay@planning.lacounty.gov

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From: Margaret Rhyne [mailto:m.rhyne@verizon.net]
Sent: Tuesday, April 15, 2014 9:38 AM
To: Kim Szalay; DRP Special Projects
Cc: Anthony Curzi; Samuel Dea; Mitch Glaser; Thuy Hua; NHickling@lacbos.org
Subject: Silverado Renewable Energy project in the West AV

I still do not see any new documents on the website concerning the proposed Silverado Renewable Energy Project. There were numerous people who testified at the Feb. 1 hearing in Lancaster. I do not see their testimony on the website. Further, I do not see a response from county to their testimony nor a response to the letters received from FAVOS and CCWAV.

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- Providing no less than a 30 day review period of the DRP response to testimony and letters concerning the DEIR
- Rescheduling the Hearing before the Planning Commission in Lancaster

Kim Szalay

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- Postponement of May 7 Hearing
- Providing no less than a 30 day review period of the DRP response to testimony and letters concerning the DEIR
- Rescheduling the Hearing before the Planning Commission in Lancaster

Kim Szalay

From: S Z [ontishima1775@gmail.com]
Sent: Tuesday, April 15, 2014 9:36 AM
To: DRP Special Projects
Cc: fifthdistrict@lacbos.org; Hickling, Norm; Richard Bruckner; Mark Child; Mitch Glaser; Thuy Hua; Carl Nadela; Rosie Ruiz; evizcarra@lacbos.org
Subject: Re: Silverado Power West R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)

Mr. Szalay,

Since the Final EIR can be circulated "10 days or more" indicated by your email below, it seems quite possible to extend the period for final review. This is our local communities' last chance to offer comments prior to the hearing--as indicated in the Meeting Public notice, May 7th. Also, why is this considered a "Special Project?"

Best Regards,
Susan

On Tue, Apr 15, 2014 at 9:16 AM, DRP Special Projects <specialprojects@planning.lacounty.gov> wrote:

Please note that the Draft EIR was circulated for 45 days and a Hearing Examiner public hearing was held in Lancaster on February 1, 2014 to receive public input on the Draft EIR. The California Environmental Quality Act (CEQA) requires that the Final EIR be published

10 days

or more in advance of the public hearing on the Project. The Final EIR is primarily responses to comments from the public and agencies regarding the public inputs received during the Draft EIR circulation and any corrections that were made to the Draft EIR. Please feel free to comment further on the project(s) for the Public Hearing before the Regional Planning Commission on May 7, 2014.

Sincerely,

Kim Szalay

Mr. Kim K. Szalay, MPL, AICP

Principal Planner

Special Projects Section

Department of Regional Planning

320 W. Temple Street, Room 1362

Los Angeles, CA 90012

(213) 974-4876 Direct

(213) 626-0434 Fax

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From: S Z [mailto:ontishima1775@gmail.com]
Sent: Tuesday, April 15, 2014 8:59 AM
To: DRP Special Projects; Kim Szalay
Cc: fifthdistrict@lacbos.org; Hickling, Norm; Richard Bruckner; Mark Child; Mitch Glaser; Thuy Hua; Carl Nadela; Rosie Ruiz; evizcarra@lacbos.org
Subject: Silverado Power West R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)

Dear Mr. Szalay,

Re: Silverado Power West, Los Angeles County, Project Nos. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5),
R2011-00807-(5), R2011-00801-(5), R2011-00805-(5); Conditional Use Permit Nos. 201100079, 201100070, 201100071,
201100076, 201100072, 201100074; Zone Change No. 201100005; Environmental Review No. 201100109; EIR State Clearinghouse No. 2012061068

I respectfully request that the scheduled hearing date for Silverado Power, May 7th, be rescheduled to a date that would allow a full 45 days for public review of the Final Environmental Impact document. The public notice indicated the EIR would not be available until 10 days prior to the hearing, and only "selected" documents would be available in libraries. I believe ten days is a far from adequate amount of time to look over

5,589 pages, plus associated changes, plus Regional Planning's own documents, and still make reasonable comments. (For hearing notice see attached document.)

Additionally, I would like to request that the public hearing for this project be held in Lancaster. For projects of this size and nature, and considering potential impacts to local communities, residents should have more opportunity to respond. Many cannot take an entire day off work, or find it very difficult to travel to Los Angeles.

Sincerely,

Susan Zahnter

Friends of Antelope Valley Open Space

Concerned Citzens of the West Antelope Valley
661.724.2043

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Kim Szalay

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Kim Szalay

Mr. Kim K. Szalay, MPL, AICP
Principal Planner
Special Projects Section
Department of Regional Planning
320 W. Temple Street, Room 1362
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Sincerely,
Susan Zahnter
Friends of Antelope Valley Open Space
Concerned Citzens of the West Antelope Valley
661.724.2043

--

Kim Szalay

From: L Lee [lee101219@gmail.com]
Sent: Wednesday, April 09, 2014 1:21 PM
To: DRP Special Projects
Subject: Project 6

Project 6 is right next to Highway 138 West, it should not be permitted a solar plan. It will limit the future highway development for too many years and may make it hard for Metro plans.

Lisa Lee
3115010007

Kim Szalay

From: Reuter, Krisy [k.reuter@westside.k12.ca.us]
Sent: Monday, April 07, 2014 11:28 AM
To: Kim Szalay
Subject: Project 3

Hello,

I am the homeowner and one of the persons living in the home in the development to the south as described as "A single existing development is located across from each of the east, west, and south boundaries and two existing developments are located across from the north boundary of the
Project site. No other developments are adjacent to or in close proximity to the subject property"

This is worded as if people do not live here. We are desperately and adamantly against this project. I've attended meetings at Lanc. Library, written letters and am highly concerned for my home. This is our quiet place of peace and safety. The fundamentals of why we live here will be 100% compromised and jeopardized if this project continues.

Please, please, please abandon this project. Find places uninhabited for these projects. I'm the tiny speck to the South of this project, when looking at a map, which can barely be seen, unless a person is looking hard to visually find a home on the map. However, it's 5 acres with my house, my workshop, my garage, my pumphouse, my animals, my kids, as well as myself. All will be extremely negatively impacted by this project being TOO CLOSE.

Thank you,
Krisy Reuter

Re:

PROJECT NUMBER HEARING DATE
R2011-00799-(5) May 7, 2014
REQUESTED ENTITLEMENTS
Conditional Use Permit No. 201100071
Environmental Assessment No. 201100109
OWNER / APPLICANT MAP/EXHIBIT DATE
American Solar Greenworks March 24, 2014
PROJECT OVERVIEW
Project 3: American Solar Greenworks
The Project proposes to develop 35 megawatts of solar photovoltaic electricity generation on 135.6 acres of flat, previously farmed fallow land with some re-established vegetation, perimeter security fencing, and one 10,000 gallon water tank. No operations building or other permanent buildings are proposed. The Project would employ a series of photovoltaic module arrays, using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facility would deliver the electrical output to the existing regional transmission system. To minimize fugitive dust, no grading, disking, tilling, or rolling is proposed for preparation of the solar array areas; some grading is required for internal roads and required flood control drainage features. Proposed water supply for construction and operations would include use of out-of-basin or recycled water. The Project proposes use of existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where feasible to minimize the need for new electrical support facilities. Construction of any new transmission lines necessary within unincorporated Los Angeles County jurisdiction would be located underground. The Project would be constructed and then operated for an estimated 35 years. A vegetative buffer would be located on the northerly half of the western boundary and at the northerly and easterly Project boundaries. A single existing development is located across from each of the east, west, and south boundaries and two existing developments are located across from the north boundary of the Project site. No other developments are adjacent to or in close proximity to the subject property.
LOCATION AND ACCESS
70th Street West & West Avenue G, Lancaster, CA
ASSESSORS PARCEL NUMBER(S) SITE AREA
3268-018-035, 3268-018-002, 3268-018-036 135.6 Acres
GENERAL PLAN / LOCAL PLAN ZONED DISTRICT

Antelope Valley Areawide General Plan Antelope Valley West
LAND USE DESIGNATION ZONE
N-1 (Non-Urban 1) A-2-2 (Heavy Agriculture-two acres minimum required area)
POWER GENERATION MAX DENSITY/UNITS COMMUNITY STANDARDS DISTRICT
35 MW NA NA
ENVIRONMENTAL DETERMINATION (CEQA)
Environmental Impact Report
KEY

Westside Union School District

Kim Szalay

From: Margaret Rhyne [m.rhyne@verizon.net]
Sent: Monday, February 24, 2014 10:28 AM
To: Kim Szalay
Cc: nhickling@lacbos.org; Samuel Dea; cglass@ix.netcom.com; JillRMoran@gmail.com; jim.dodson@verizon.net; kj.allen96@gmail.com; kportwest@roadrunner.com; rrhomestead@qnet.com; debbie@dshsolutions.com; ontishima1775@gmail.com; DesertMama1@gmail.com
Subject: Re: RE: Silverado Power West F & W NOP comment letter
Attachments: Ivanpah installation a zone of death for tortoises.pdf

Thank you Kim - and thank you for taking the time to talk to me last week. Despite your help however, still working to understand the mitigation strategies suggested in the Silverado DEIR.

Also - one of the large concerns we have with this project regards what we suggested would be the under reporting of the biological value of land caused by conducting surveys during a drought. I recently was sent an article which discusses the consequences of just that issue. Surveys done during drought conditions for the giant Ivanpah solar tower plant under reported desert tortoises.because the survey was done during a drought - I have highlighted the paragraph with that info in the attachment. This is a fact now admitted by the project proponents but unfortunately too late for the many tortoises that have died as a consequence. Plant proponents were repeatedly warned about this by knowledgeable biologists but ignored these comments. The attached article shows that unfortunately the comments were correct . We fear a similar scenario for Swainson's hawk, burrowing owls, tricolored blackbirds and California badgers on the Silverado project lands. These are all CA state listed endangered species that nest in the West AV - an area where they currently maintain their last remaining viable habitat in S. Calif. We must err on the side of caution concerning habitat destruction in this area and the project must provide adequate off-site mitigation that is deeded and endowed according to CDFW regulations.

On 02/20/14, DRP Special Projects<DSpecialProjects@planning.lacounty.gov> wrote:

Good Morning Margaret,

Per our phone conversation attached are California Department of Fish and Wildlife (formerly Fish and Game) comments pertaining to the Notice of Participation regarding the six Silverado Power West projects located within unincorporated Los Angeles County. These comments were referred to as part of the preparation of the Biota section of the Draft EIR and for design of the projects proposed. We do not yet have a date for public hearing before the Planning Commission. There is work to complete on the Final EIR with regard to public comments received and to be responded to. The letters received and transcripts of the testimony at the hearing examiner hearing, along with responses to all of those comments, will be in the Final EIR at least 10 days prior to the public hearing before the Regional Planning Commission.

Sincerely,

Kim Szalay

Mr. Kim K. Szalay, MPL, AICP

Principal Planner

Special Projects Section

Department of Regional Planning

320 W. Temple Street, Room 1362

Los Angeles, CA 90012

(213) 974-4876 Direct

(213) 626-0434 Fax

kszalay@planning.lacounty.gov

From: Margaret Rhyne [mailto:m.rhyne@verizon.net]
Sent: Wednesday, February 19, 2014 12:32 AM
To: Samuel Dea; Kim Szalay
Cc: nhickling@lacbos.org; cglass@ix.netcom.com; JillRMoran@gmail.com; jim.dodson@verizon.net; kj.allen96@gmail.com; kportwest@roadrunner.com; rrhomestead@qnet.com; debbie@dshsolutions.com; ontishima1775@gmail.com; DesertMama1@gmail.com
Subject: Silverado Power West DEIR

Attached are comments concerning the DEIR for the Silverado Power West Project* from Friends of Antelope Valley Open Space.

Also attached is the comment letter of July, 2012 sent in response to the Notice of Preparation to the original planner for this project, Carolina Blengini

We would like to know when comment letters for the project DEIR will be posted on the website. Please inform us concerning the timeline and process for viewing all comment letters.

Thank you for holding the hearing on the DEIR this month in Lancaster - we hope that upcoming hearings concerning this project also will be held in the Antelope Valley.

*Silverado Power West Los Angeles County

Project1: R2011-00833 (CUP201100079, RZC201100005), North Lancaster Ranch
Project2: R2011-00798 (CUP201100070), Western Antelope Blue Sky Ranch
Project3: R2011-00799 (CUP201100071), American Solar Greenworks
Project4: R2011-00807 (CUP201100076), Antelope Solar Greenworks

Project5: R2011-00801 (CUP201100072), Silver Sun Greenworks
Project6: R2011-00805 (CUP201100074), Lancaster WAD

Ivanpah installation a zone of death for tortoises, raptors

The world's largest solar thermal power plant officially went online one week ago today, on February 13. At a ceremony in the Mojave Desert south of Las Vegas, with US Energy Secretary Ernest Moniz presiding, the Ivanpah Solar Electric Generating System formally joined California's power grid.

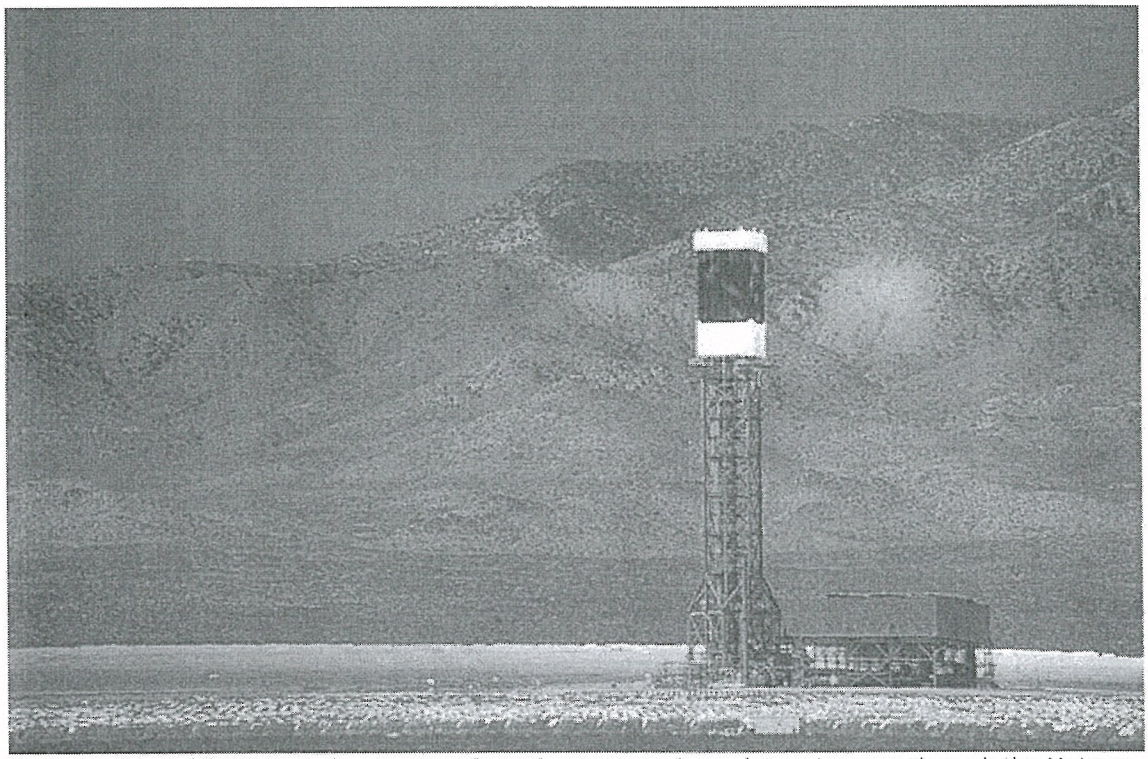


Photo by Howard IgnatiusBirds migrating from the Arctic to Central America pass through the Mojave: Ivanpah could conceivably depress bird populations across half a continent.

The cleantech trade press trumpeted the milestone in glowing terms only rewritten corporate press releases can offer. One article went so far as to call it the "Hoover Dam of Solar," though whether that is a good or bad thing depends on your view of river impoundment. Reaction to the opening from other quarters was decidedly nuanced. When it was proposed in 2007, Ivanpah was first lauded as the future of clean energy. Now, the project is rarely covered in the press without the epithet "controversial" attached, aside from those glowing reports in the tech press.

Ivanpah's three units each consist of a 459-foot power tower surrounded by more than 100,000 independently targetable mirrors, called "heliostats." The heliostats focus the harsh Mojave sunlight on boilers atop the towers, where the concentrated solar radiation (a.k.a. "solar flux") generates steam. The steam turns turbines, which generate electricity. The three units combined will generate up to 377 megawatts of power for Pacific Gas & Electric and Southern California Edison.

In a nation struggling to come to a sane climate policy, Ivanpah might seem like an unambiguously good project. If the nearly 4,000-acre solar plant had been sited somewhere else, that might have

been closer to the truth. But located where it is, this week's coverage of the opening ceremony wasn't complete with the word "controversial."

From the start, wildlife advocates opposed the Ivanpah plan. Its nearly 4,000 acres, perched on an alluvial fan a few miles from the Mojave National Preserve, was some of the best remaining habitat for the desert tortoise, which the federal government lists as a threatened species. Tortoise biologists hired by project backer BrightSource Energy surveyed the site and came back with an estimate of about three dozen tortoises on the site.

Many other biologists felt that estimate was off. The survey was done during a very dry year, and during droughts tortoises tend to stay in their deep burrows. They're easy to undercount. The site was also the home to 80 percent of the known California occurrences of *Asclepias nyctaginifolia*, a rare milkweed, and to dozens of yuccas more than 500 years old. Most national environmental groups supported the project anyway, citing its benefit to the nation's greenhouse gas footprint.

Early opposition centered around the Sierra Club's California-Nevada Desert Committee, which formed a nucleus of organizing to which other small groups flocked. Desert Committee activists attempted to persuade the Sierra Club's national office to oppose the project, in court if necessary, due to its threats to the tortoise and other species.

But in 2010, mainstream green groups were talking openly about how Ivanpah would be the destructive project they purposefully *didn't* oppose, to prove they were serious about combating climate change and give them leverage to oppose worse projects. The Sierra Club's board of directors voted not to oppose the project. Michael Brune, the Club's then newly installed executive director, sent out a memo announcing the decision to desert activists that began, "No one said that clean energy would be easy."

Ivanpah quickly proved more destructive than the Club and other groups had expected. When construction started in 2011, the limit of 37 tortoise "takes" the US Fish and Wildlife Service (USFWS) had allowed over the life of the project was reached in a matter of weeks. (A "take" is a legal term meaning any kind of potentially negative interaction with a protected species, ranging from handling and harassment to injury and death.) After halting construction on the project in April of that year, FWS quickly revised its assessment of the project's risk to tortoises. The agency determined that construction would actually affect as many as 3,000 tortoises, with the possibility that as many as 700 baby tortoises might be killed during construction without being detected.

After making that determination, USFWS rewrote its authorization for the Ivanpah plant and construction started again.

To their credit, BrightSource and its partners in Ivanpah — NRG Energy and Google — spent millions of dollars during the next few years caring for the tortoises they found on site, with some of the nation's best wildlife biologists and veterinarians involved. But another wildlife issue came up in 2013: the effect of concentrated solar flux on birds and other wildlife.

In 2011, BrightSource had several other proposed projects on the table in the California desert. All of them would be much larger than Ivanpah, with more intense solar flux. Environmental activists started asking tough questions during hearings on these projects. For example, what would happen to birds, bats and insects that fly into that flux?

An answer came in late 2013 at Ivanpah. Mortalities from solar flux had been noted since testing began in March of last year. In October, a startling number of dead migrating birds on the site led federal wildlife biologists to a sad conclusion. The bright solar flux likely attracts insects, which attract small birds, which attract raptors: an entire food chain drawn into a zone of lethal solar flux. This

ecological trap's effect on migrating birds was especially troubling. Birds migrating from the Arctic to Central America pass through the Mojave: Ivanpah could conceivably depress bird populations across half a continent.

The solar flux issue has contributed to at least three BrightSource projects being suspended. The most recent one, Palen in Riverside County, was nearly declined by the California Energy Commission based almost entirely on the solar flux threat to birds. Instead, BrightSource and its partner, Abengoa Solar, suggested that mortality data be collected at Ivanpah so that the energy commission could have a better sense of Palen's danger. The commission agreed, meaning that Ivanpah has now become a kind of prototype wildlife death lab for solar power tower projects.

This might all be a regrettable necessity — a consequence of our need to get off fossil fuel electricity — were it not for the astonishing drop in costs of photovoltaic technology that may doom large desert solar projects like Ivanpah anyway. Startling drops in costs of PV panels (the kind of solar technology that is usually used on a small to medium scale on homes and businesses, and different from the technology that BrightSource uses) sent prominent solar thermal companies into bankruptcy between 2010 and 2012. BrightSource itself canceled a planned initial public offering of its stock in April 2012 as more and more analysts suggested the future belonged to PV.

That momentum hasn't changed. In its coverage of Ivanpah's ribbon cutting, *The New York Times* suggested that the era of large desert solar might well be over. It's just too much easier, cheaper and quicker to cover rooftops and landfills and other already disturbed landscapes with solar panels, which have no moving parts and are thus far cheaper to operate than turbines operating at high temperatures.

Which means Moniz's ribbon cutting may have signaled more of an end than a beginning.

Chris Clarke
Chris Clarke is a former editor of the Earth Island Journal. He's a natural history writer and environmental journalist currently at work on a book about the Joshua tree, living in Joshua Tree, California.

http://www.earthisland.org/journal/index.php/elist/eListRead/large_scale_solar_energy_generation_may_be_over_as_soon_as_it_has_begun/

Lancaster, Calif.
Feb 11 - 14

Mr. Michael Antonovich, Supervisor;

This letter is being sent to you to request you do not allow Silverado to put in Project 3 at 70 St. West & Ave G Antelope acres, California, 93536. My husband Jim & I live directly west of the proposed project, daughter and 14 & 13 year old grandchildren live directly south of the proposed project. There is absolutely nothing between our 10 acres and our daughter's 5 acres and this unwanted project. We all moved out here 13 years ago for the view, room, quiet, peace, slower pace and now this intrusion,

NO!

The pictures in the EIR are totally bogus. It only mentions homes north & east of the proposed project. Well, there are 3 homes right here to the south and west that include 9 people; 4 of them kids 14 & younger. Directly across G is another home with 2 people. Two of the kids are our

only grandchildren who live south of the proposed project with their mother, our daughter. We all ask that you deny this project, for their and our preserved life style, safety, peace of mind, unobstructed view and quality of life.

We ask that a study be done on the long term effects of cadmium on humans, especially youngsters, air and ground water since we are all on private ground water wells.

also Mr. Antonovich, would you want this as your families sunrise view? We love watching the sun rises & sun sets here in the acres. One main reason we live here.

We are also very concerned about Valley Fever which has become more and more common when the desert floor is ground up & disturbed. We ask that a study be done on Valley Fever and it's symptoms and long term effects. I personally know a teacher of 6 who had been a Physical Education Instructor

who died from Valley Fever and many acquaintances know others who have died & or are ill from it. My grandson and I already suffer greatly from dust allergies.

Our 2 grandchildren and daughter & us use a road between our homes that would be totally obliterated by this project. Project 3 should not be put in. Please stop it!

Property values would be drastically lowered if these solar panels surrounded us. We are already on a fixed income & in our late 60's, so we need financial security from our home.

In 2 1/2 weeks on my walks I have personally seen 3 coyotes, 6 ravens, rabbits, coveys of quail, a gopher and a hawk; and a half dozen owls come & go. You and I know these would be greatly impacted by this project. I want an EIR done on the native wildlife. We also have wildlife trails in the projected area.

Our concern is also that Fox airport pilots would be blinded by the glare from the panels. On Feb. 10, 2014 I personally went to Fox airport along with another concerned neighbor & we talked to Mr. Irving, the manager He was not aware of this proposed project & no one from Silverado has talked to him regarding it. At the Feb. 1 - 2014 meeting at Lancaster library a Silverado salar employee stated that "pilots had no concerns about glare from the panels". We assumed he was giving us facts from our local pilots, now we don't believe that. At the Feb. 1 meeting the same employee stated, "the project would be watered twice a day!" what a joke. with Calif. in a drought yet to water twice a day is like spitting into the wind. they have no idea what it's like up here, we get winds that obscure my neighbors who live 500 yds. North of me.

So Silverado's pictures are bogus, they say they've talked to people who they really haven't. What else isn't true?

Ask for a new unbiased EIR and a temporary injunction on Silverado's

projected project 5 3 in L.A. County.

Mr. Antonovich please don't let us down! Stop project 3! I've always had superb results from your office & personnel. Please stop project 3 at 70 St. West & Ave G Antelope Acres, Lancaster, California 93536.

Thank You,
Coralee Reuter
7362 west ave G.
Lancaster, calif.
93536
Coralee Reuter

B = build
A = absolutely
N = nothing
A = anywhere
N = near
A = anyone

@P
BR 14-~~PP~~
(11)

Board of Supervisors
County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

March 14, 2014

Mr. Bernie Walp
Ms. Elizabeth Bryan
9348 West Avenue I
Lancaster, CA 93536-8002

Dear Mr. Walp and Ms. Bryan:

Thank you for your recent correspondence.

By copy of this letter, I am asking that Mr. Richard Bruckner, Director of the Department of Regional Planning, look into your concerns and respond directly to you, with a copy of his response to my Antelope Valley office.

Again, thank you for writing.

Sincerely,

Mike Antonovich

MICHAEL D. ANTONOVICH
Supervisor

MDA:nhd

c: Mr. Richard Bruckner ✓

RECEIVED
MAR 27 2014
BY:_____

ROOM 869 KENNETH HAHN HALL OF ADMINISTRATION, 500 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012
TELEPHONE (213) 974-5555 • FAX (213) 974-1010 • WEBSITE: www.antonovich.com • E-MAIL: fifthdistrict@lacbos.org

9348 West Avenue I
Lancaster, Calif. 93536-8002

1 March 2014

Hon. Michael D. Antonovich
Fifth Supervisorial District
1113 W. Avenue M-4, Suite A
Palmdale, Calif. 93551

Subj.: County's policy of notifying residents about enormous industrial solar power plants

Dear Supervisor Antonovich:

A San Francisco investment firm has plans—evidently under way in collusion with County officials for a long time—to cover hundreds of acres of land with solar panels and barbed-wire chain-link prison fences, imposing a radical transformation upon western Antelope Valley's peaceful rural environment.

Shouldn't we have been told? We and several immediate neighbors have received *no notices or warnings* of the scheme. Someone scheduled a poorly publicized "hearing" for Saturday afternoon of Super Bowl week-end. Had we received any of the information that has been leaking out afterward, we would have been present and vocal at that hearing. If the Planning Department and other authorities do the developers' bidding, land that has been covered with alfalfa, carrots, tumbleweeds and onions now will be reszoned and permits will be issued to *permanently* degrade the land into an ugly blight.

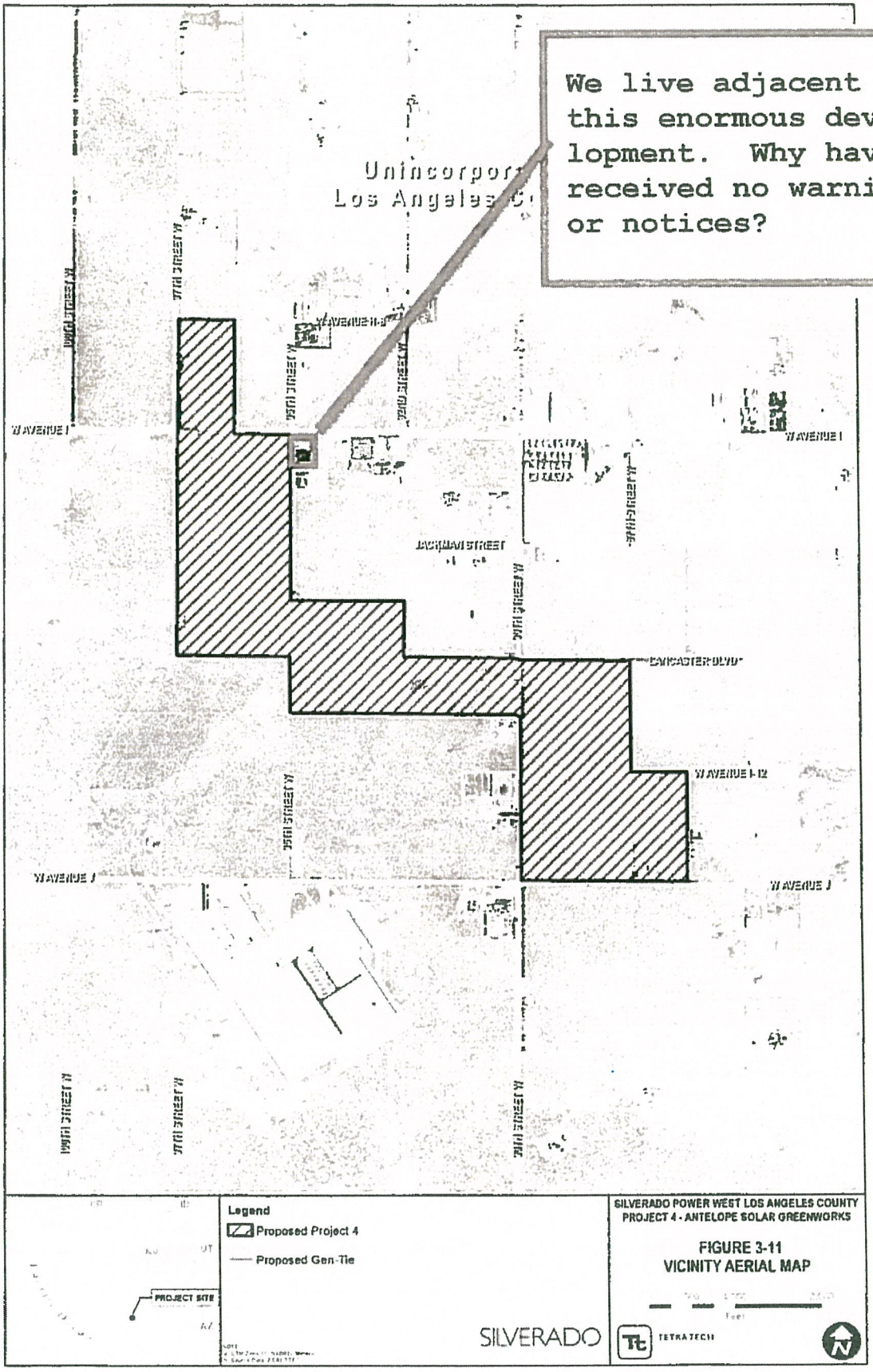
Do you favor or oppose this "Silverado" solar project? Are you confident that developers and regulators are following the rules to notify residents of their plans? We feel sorely abused. Do you have any advice for us? Is this a done deal?

Many thanks,

Bernie Walp

Elizabeth Bryan

encl: map



SILVERADO POWER WEST LOS ANGELES COUNTY
PROJECT 4 - ANTELOPE SOLAR GREENWORKS

FIGURE 3-11
VICINITY AERIAL MAP

EV

2/13/14

Re: Silverado Solar Plants - Project 3 on 70th W. and Ave. G-8

To: Supervisor Michael Antonovich Dist. 5
320 West Temple St.
Los Angeles, CA 90012

I'd like to have the following questions answered, which myself and others asked at the meeting on 2/1/14 at the Lancaster City Library:

1. How specifically will the extreme noise disruptions be addressed?

2. How specifically will the extreme obstruction-of-view and eye-soar issues be addressed?

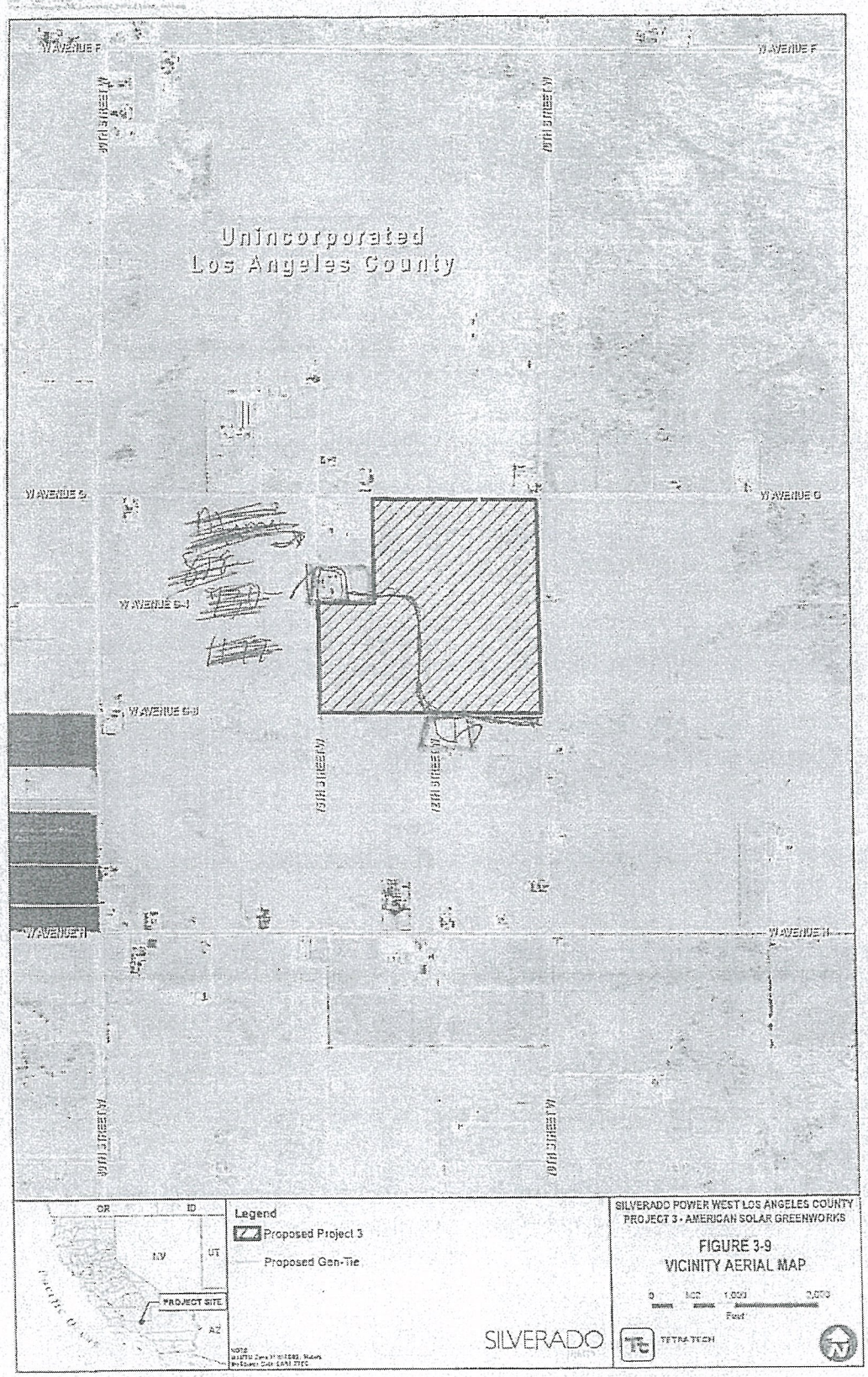
3. How specifically will the current road that is 72nd St. W. and it's current access to G-4 be addressed when demolished and removed?

*4. How specifically will physical safety, as it related to my 2 children and I, be addressed when our solitude and anonymity will be altered and compromised?

*5. How specifically will health safety, as it relates to the extreme dust and air pollution be addressed?

*6. How specifically will health safety, as it relates to the electro-magnetic-currents similar to electric power plants be addressed?

Sincerely,
Krisy Reuter
46330 72nd St. W.
Lanc., Ca 93536-8115
(I'm the home this project 3 sits on top of, to the South and my parents are the home this project 3 sits on top of, to the West. – See attached map)
* - Most important


W AVENUE F
W AVENUE G
W AVENUE G-1
W AVENUE G-2
W AVENUE H
60TH STREET W
70TH STREET W
Unincorporated
Los Angeles County
OR
ID
NV
UT
AZ
PROJECT SITE
Legend
Proposed Project 3
Proposed Gen-Tie
SILVERADO
SILVERADO POWER WEST LOS ANGELES COUNTY
PROJECT 3 - AMERICAN SOLAR GREENWORKS
FIGURE 3-9
VICINITY AERIAL MAP
0
500
1,000
2,000
Feet
TETRA TECH

HEARING EXAMINER
STAFF SUMMARY
(Projects 1-6 In One Summary)

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

HEARING EXAMINER STAFF SUMMARY

COUNTY PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 201100005
ENVIRONMENTAL REVIEW NO. 201100109
STATE CLEARINGHOUSE EIR NO. 2012061068

DESCRIPTION OF PROJECTS

The applicant, Silverado Power, LLC is proposing the Silverado Power West, Los Angeles County projects which are comprised of six photovoltaic solar energy generation facilities ("SGFs") and their associated generation-tie transmission lines ("Genties"), together called "Projects". The six Project sites together cover approximately 987 acres and would produce 172 megawatts ("MW") of electrical power in total. The Project sites range in size from 38.49 acres to 256 acres, and would generate from 5 MW to 52 MW in electricity generation capacity per site. Each of the six Projects are planned for separate properties, are being developed separately, and are analyzed individually and cumulatively in the subject Draft Environmental Impact Report ("DEIR") for all phases of each project including planning, construction, and operation according to the requirements of Section 15161 of the California Environmental Quality Act ("CEQA"). The Projects are independent of each other in terms of the required approvals from the County. Each Project can succeed as a stand-alone project if other projects are not acted upon by Los Angeles County or if technical or financial problems delay or prevent the subsequent development of a Project. CEQA allows for a group of projects to be analyzed within a single EIR. Each of the six Projects must also receive approval of its own Conditional Use Permit ("CUP") application and for Project 1 approval of a Zone Change application on the merits of the individual project and individual site.

The Projects are located on primarily unproductive farmland that is no longer used for farming or other agricultural purposes. Each of the six Projects would be designed and built in a very similar manner. Each of the six sites would employ a series of photovoltaic module arrays, using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facilities would deliver the electrical output to the existing regional transmission system. Construction would generally take place during normal daylight hours and would conform to County construction requirements. No grading, disking, tilling, or rolling is proposed for preparation of the solar array areas; some grading is required for internal roads and required flood control drainage features. The Projects would be constructed in phases and then operated for an estimated 35 years. The Projects have been sited

to minimize impacts to the environment and to the local community by using previously disturbed land that has been degraded from prior use, and proposes use of existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where feasible to minimize the need for new electrical support facilities. The Projects to be developed are listed below by Project name, Project number, assessor's parcel number ("APN"), acres, megawatts of electrical energy that would be produced, and zoning and land use designations:

Silverado Power West, Los Angeles County						
Project Name	**County Project/CUP Nos.**	**Assessor's Parcel No. (APN)**	**Acres**	**MWs**	**Zone***	**Land Use**
Project 1 North Lancaster Ranch	R2011-00833 /201100079 Zone Change 201100005	3262-001-005, 3262-001-006	240	20	From A-1-2 to A-2	N-1**
Project 2 Western Antelope Blue Sky Ranch	R2011-00798 /201100070	3267-015-001	157	40	A-2-5	N-1
Project 3 American Solar Greenworks	R2011-00799 /201100071	3268-018-035, 3268-018-002, 3268-018-036	135.6	35	A-2-2	N-1
Project 4 Antelope Solar Greenworks	R2011-00807 /201100076	3218-002-018, 3218-002-023, 3203-002-015, 3203-002-017, 3218-001-002, 3218-001-003, 3218-001-004, 3203-002-011, 3203-002-012, 3203-002-013, 3203-002-014, 3219-019-011	256	52	A-2-2	N-1
Project 5 Silver Sun Greenworks	R2011-00801 /201100072	3267-003-001, 3267-003-002, 3267-003-003	160	20	A-2-5	N-1
Project 6 Lancaster WAD	R2011-00805 /201100074	3115-010-004	38.5	5	D-2-2	N-1
TOTAL			**987.1 Acres**	**172 MWs**		

* The A-1 zone is Light Agriculture and the A-2 zone is Heavy Agriculture. D-2 is Desert and Mountain zone. The number after the zoning designation is acres of minimum required area.

** N-1 land use is Non-Urban 1

Detailed descriptions of each Project site are provided in Chapter 3, Description of Projects, of the DEIR. The required entitlements are pursuant to the Los Angeles County Zoning Ordinance, Title 22 as indicated below.

REQUIRED ENTITLEMENTS

- Project 1:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2 (Heavy Agriculture) zone (Section 22.24.150).

  Zone Change to change the zoning from A-1-2 (Light Agriculture-two acres minimum required area) to A-2 (Heavy Agriculture) (Section 22.16.070).

- Project 2:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-5 (Heavy Agriculture-five acres minimum required area) zone (Section 22.24.150).

- Project 3:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

- Project 4:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-2 (Heavy Agriculture-two acres minimum required area) zone (Section 22.24.150).

- Project 5:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the A-2-5 (Heavy Agriculture-five acres minimum required area) zone (Section 22.24.150).

- Project 6:

  Conditional Use Permit to authorize a solar photovoltaic electricity generation facility and construction of a water tank in the D-2-2 (Desert-Mountain-two acres minimum required area) zone (Section 22.32.090).

LOCATION AND ACCESS

The Projects are located in the Antelope Valley in unincorporated Los Angeles County and are west of the SR 14. All six Project sites are located between 30th Street West and 120th Street West on the east-west axis. On the north-south axis, the sites are between Avenue K to the south and Avenue A to the north. The individual Projects are located adjacent to the following intersections:

Project 1: 105th Street West & West Avenue B, Lancaster, CA
Project 2: 110th Street West & West Avenue K, Lancaster, CA
Project 3: 70th Street West & West Avenue G, Lancaster, CA
Project 4: 97th Street West & West Avenue I, Lancaster, CA
Project 5: 120th Street West & West Avenue I, Lancaster, CA
Project 6: 35th Street West & West Avenue D, Lancaster, CA

SITE DESCRIPTION

The Projects are generally located on flat unproductive farmland that is no longer used for farming. The location of the Projects include a variety of land uses, although a majority of the surrounding lands are unoccupied agricultural and grazing lands. The nearest residential communities are Antelope Acres, the Fairmont Community, the City of Lancaster, and the City of Palmdale. Land uses surrounding the Projects consist of open space areas, agricultural land, low density single family housing, and undeveloped grazing lands. Historically, agriculture has been a primary land use in the Antelope Valley. Some properties in the area continue to be utilized for agricultural production; however, because of the declining groundwater levels in the Antelope Valley region and due to the costs of imported water, the properties in the area have a limited supply of water to irrigate crops. Many of these properties have ceased farming activity over the last two decades and remain as unproductive fallow land. Angeles National Forest in the San Gabriel Mountains is located south of the Projects, and the Tehachapi Mountains are located to the north. Each Project site would include the following elements:

- Temporary meteorological station (on two sites – Project 4 Antelope Solar Greenworks, and Project 6 Lancaster WAD)
- PV modules
- PV module mounting system
- Balance of system and electrical boxes (e.g., combiner boxes, electrical disconnects)
- Substation (Projects 1 – 5)
- Electrical inverters and transformers
- Electrical AC collection system, including switchgear
- Data monitoring equipment
- Generation tie line
- Access roads and chain link perimeter security fencing
- No permanent operations or other buildings are proposed on any of the Projects' sites

The major components of the proposed Projects are described in greater detail in Section 3.4 of the DEIR.

ENVIRONMENTAL DETERMINATION

The Department of Regional Planning ("Department") determined by way of an Initial Study and identified in the Notice of Preparation sent to agencies, that an EIR was necessary for the Project. The areas of potential environmental impact analyzed in the DEIR include the following:

- Aesthetics
- Agriculture and Forest
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases and Climate Change
- Hazards and Hazardous Materials
- Hydrology
- Land Use
- Noise
- Public Services
- Traffic and Transportation
- Utilities and Service Systems

The following areas were determined not to be significant and required no further environmental review as described in the Initial Study:

- Mineral Resources
- Employment
- Population
- Housing
- Recreation

As identified in the DEIR, after implementation of the required mitigation measures as would be enforced by the Project's Mitigation Monitoring and Reporting Program (approximately 62 mitigation measures), the Projects would not result in significant and unavoidable impacts to the environment. A summary of the areas analyzed that have less than significant impacts to the environment after implementation of mitigation measures is included below:

Aesthetics

Visual impacts to the aesthetics in Antelope Valley are a concern to the public. The visual effects of the Projects are shown in Section 4.1 of the Draft EIR. Inclusion of a 10-foot wide screening vegetation buffer intended to screen or partially screen certain Projects has been proposed as a mitigation measure and would minimize the visual

impacts of the applicable Projects. All gen-tie lines located within the County of Los Angeles would be placed underground to reduce the visual impact unless other applicable regulations require limited segments of above-ground installation. Off-site transmission gent-tie lines located within the City of Lancaster boundaries would be subject to the City's regulations regarding above ground or below ground installation. Assuring that dark skies at night in the Antelope Valley are protected from light pollution is also a concern to the public. Using only minimal lighting on each site and using only shielded downward facing lighting on each site at night would minimize this impact and maintain the dark skies presently found in the valley at night. Impacts to aesthetics would be less than significant.

Agriculture and Forestry

Projects 1, 2, 3, 5 and 6 would not cause the conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance to non-agricultural use. Although Project 4 has a property with Prime Farmland designation, it has not been farmed for more than 10 years and thus use for solar development would not actually impact any farming activity. The Department of Conservation has reviewed the Project 4 site and, in a letter dated December 31, 2012, determined that the properties "will be reclassified to Grazing Land on the 2012 edition of the Important Farmland Map for Los Angeles County." Impacts to Agriculture and Forestry would be less than significant.

Air Quality

Air quality would be maintained in the areas around the Projects by array site preparation including only mowing of vegetation with no grading, disking, tilling, or rolling of the array sites, and only limited required grading for internal roads and drainage features. Compliance with Air Quality Management District rules for fugitive dust control such as establishing a dust control plan including regular watering of construction areas, use of gravel, wood chips, and non-toxic soil binders, re-establishing vegetation where feasible, and limiting the amount of internal road or drainage feature grading per day are some of the required dust control measures. Impacts to Air Quality would be less than significant.

Biological Resources

Wildlife protections include requirements that prior to grading, additional site surveys would assure all wildlife on the sites would be removed and/or protected. A biological monitor would be onsite during all earthwork activities, mowing, and other construction activities. Mitigation lands would be acquired to mitigate impacts on sensitive species such as Swainson's hawk, Burrowing Owl, special-status migratory and wintering birds, and the Alkali Mariposa Lily. Impacts to Biological Resources would be less than significant.

Cultural Resources

Mitigation Measures are provided which require protection of any cultural resources or human remains or paleontological resources which may be found during construction. Impacts to Cultural Resources would be less than significant.

Geology and Soils

The Projects would not expose people or structures to adverse effects related to geologic hazards including strong seismic shaking, seismic related ground failure, and landslides with the implementation of mitigation measures. The Projects impacts to soil erosion, on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse, and expansive soil would be less than significant with the implementation of mitigation measures. Impacts to Geology and Soils would be less than significant.

Greenhouse Gas Emissions and Climate Change

Maximum construction levels are not expected to result in annual GHG emissions which exceed the threshold proposed by the AVAQMD. As such, the Projects would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts to Green House Gas Emissions and Climate Change would be less than significant.

Hazards and Hazardous Materials

There is a potential concern for hazardous constituents, particularly cadmium, to leach from certain types of solar modules into the local soils or ground water. Solar panels which use cadmium telluride composition would be covered with glass. Prior to the start of construction activities, a Hazardous Materials Management and Hazardous Waste Management Plan and a Stormwater Pollution Prevention Plan shall be implemented for each project. The public also stated their concern that local law enforcement and fire services are not adequate in the area and may be impacted by the Project. This issue is addressed further in the Draft EIR in Section 4.12. Impacts to Hazards and Hazardous Materials would be less than significant.

Hydrology (Flood Control)

Control of surface water regarding water flow onto and out of the Projects is a potential concern. Technical hydrology studies are provided giving the designs for storm water control on the Projects' sites which would meet Los Angeles County design standards. Impacts to Hydrology would be less than significant.

Land Use and Planning

The Projects are allowed within the land use and zoning designations with discretionary review and approval, with the exception of Project 1 which would require a zone change. There are no established communities that would be separated as a result of the Projects. The Projects would be consistent with applicable land use plans and policies, and in compliance with applicable regulations. Impacts to Land Use and Planning would be less than significant.

Noise

Construction noise and vibration impacts would be temporary and localized to sensitive receptors such as residences located in close proximity to the Projects sites. Noise and vibration from construction of the Projects are expected to happen for only 4 to 8 weeks per Project site. Mitigation measures are provided for construction noise and vibration for each Project to reduce impacts to less than significant.

Public Services

The Projects' impacts to capacity or service level, or that result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and sheriff protection would be less than significant. The Projects would have no impact on park, school, library, or public building capacities, service levels or performance objectives. Impacts to Public Services would be less than significant.

Transportation and Traffic

Based on the transportation analysis, the impacts of the Projects on the existing transportation and traffic system in the areas surrounding the Projects would be limited in construction duration and traffic volume, roads would continue to operate well under the maximum traffic capacity, and as such traffic impacts with mitigation would be less than significant.

Utilities and Service Systems (Water)

The amount of water and the extraction of water pumped from wells on the Projects is a concern for residents living in the area. Calculations and analyses were performed to determine the amount of water required for construction and operation of the Projects. Water estimates are provided in Section 4.14 of the DEIR. Since the Projects are proposing to use out-of-basin water and recycled water for construction and operations, with no use of on-site wells, the impacts from water usage would be less than significant.

LEGAL NOTIFICATION AND PUBLIC OUTREACH

Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the Hearing Examiner Hearing by mail, newspaper, property posting, library posting and on the Department's website. Newspaper notices were published in The Signal and La Opinion on January 6, 2014. Notices to property owners located within a 1,000-foot radius of the property boundaries, to a courtesy list of interested parties, and to five local libraries, were mailed on January 3, 2014. Notices were verified to be posted on the subject property and were made available on the Department's website on January 6, 2014. On January 6, 2014 a Notice of Completion and Notice of Availability ("NOC-NOA") of a DEIR was posted at the County Recorder's office. On January 3, 2014 the NOC-NOA was sent by mail to required agencies including the State Clearing House and other interested parties. The NOC-NOA is also posted on the Project site and on the Department's website.

PREVIOUS CASES/ZONING HISTORY

There are no previous zoning cases pertaining to the Projects' sites.

STAFF EVALUATION

Project consistency with the County of Los Angeles General Plan, Antelope Valley Areawide General Plan, compliance with the County Zoning Ordinance and development standards, compatibility regarding land use and neighborhood impact, and evaluation of the applicant's ability to meet all requirements for a Conditional Use Permit for Projects 1-6, a Zone Change for Project 1, and corresponding burdens of proof as applicable, will be determined subsequent to the Hearing Examiner public hearing. The Hearing Examiner Public hearing is established primarily to receive public testimony on the merits of the Project as analyzed in the Draft EIR prior to Project consideration by the Regional Planning Commission ("Planning Commission") at a later date.

Project Issues

Several development issues regarding the proposed project were raised by public agencies in response to the Initial Study/Notice of Preparation of an EIR and Scoping Meeting, through the County interdepartmental Screencheck DEIR review process, and the current DEIR public review. Previous comments included issues related to visual impacts, dust control, decommissioning at the end of the life of the Projects, impacts to wildlife and habitat, water supply concerns, hydrology and run off controls, hazardous materials, and public services regarding Sheriff and Fire Department response times. These issues have been addressed in the DEIR, and responses to all agency and public comments will be addressed in the Project's Final EIR.

COUNTY DEPARTMENT AND AGENCY COMMENTS AND RECOMMENDATIONS

County Department and applicable agency comments and conditions will be finalized subsequent to the Hearing Examiner public hearing and prior to consideration by the Planning Commission and Board of Supervisors ("Board"). At the time of this report the Native American Heritage Commission ("NAHC") provided an updated list of NAHC contacts for ongoing consultation with the NAHC.

PUBLIC COMMENTS

Members of the Public

Two (2) members of the public provided written comments regarding the project at the time of this report.

Comments in Favor

No comments in favor were received at the time of this report.

Comments Opposed

Two (2) comments opposed to the Project were received at the time of this report. The comments expressed concerns about the effect of the Projects on property values and views in the area.

Comments Neither in Favor Nor Opposed

Two (2) comments were received indicating appreciation for the communication received with no comment on the Projects.

REMAINING PROCEDURES

Since the DEIR public comment period does not close until February 19, 2014, mitigation measures and draft conditions pertaining to the Project will be completed following the Hearing Examiner public hearing. Once the DEIR comment period closes, the Department will review public comments received, will draft responses to those comments, and draft the Final EIR and Mitigation Monitoring and Reporting Program. Staff will also prepare CEQA Findings, draft Findings and Conditions pertaining to the Project related entitlements, and submit documentation to the Planning Commission for consideration prior to the Planning Commission hearing to be set at a future date.

Once the public hearing before the Planning Commission is scheduled and completed, the Planning Commission will certify or reject the EIR and approve or deny the entitlements requested for Projects 2-5 and make a recommendation to the Board regarding the Zone Change for Project 1. A public hearing would be held before the Board for the Zone Change and a call for review of the associated EIR and Conditional Use Permit for Project 1. During this hearing, the Board would decide whether or not to adopt the EIR and approve or deny the Project 1 Zone Change and CUP entitlement requests.

Prepared by: Mr. Kim K. Szalay, MPL, AICP, Principal Regional Planner
Reviewed by: Samuel Z. Dea, Supervising Regional Planner

SZD:KKS
2/12/14

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: January 9, 2014

TO: David W. Louie, Chair
Esther L. Valadez, Vice Chair
Harold V. Helsley
Curt Pedersen
Pat Modugno

FROM: Samuel Z. Dea
Section Head, Special Projects

SUBJECT: SILVERADO POWER WEST DEIR
COUNTY PROJECT NOs. R2011-00833, 00798, 00799, 00807, 00801 and 00805
CONDITIONAL USE PERMIT NOs. 201100070, 71, 72, 74, 76 and 79
ZONE CHANGE NO. 201100005
ENVIRONMENTAL REVIEW NO. 201100109

The Department of Regional Planning has completed the review of the Draft Environmental Impact Report ("DEIR") for the Silverado Power West Project. The DEIR was released and distributed for Public Review on January 6, 2014 and the 45-day comment period will end on February 19, 2014.

County Zoning Code authorizes a Hearing Examiner public hearing for taking public testimony on the Project DEIR and Project-related entitlements prior to a hearing before the Regional Planning Commission (Section 22.60.040). A Hearing Examiner hearing is scheduled for February 1, 2014, to be held at the Lancaster Library starting at 1:00 p.m. and ending after the last testifier or 4:00 p.m., whichever comes first. Once the Hearing Examiner hearing is completed, a hearing before the Regional Planning Commission ("Commission") will be scheduled for the Commission to take further testimony on the Project and to consider possible action on the associate EIR which includes the DEIR, Final EIR, Mitigation Monitoring and Reporting Program, and CEQA Findings of Fact.

Attached is one disc copy of the DEIR for your advance review. The disc includes the DEIR and corresponding appendices. Additional case materials such as the Staff Report, Findings and Conditions and Exhibit Map will be forwarded prior to the Commission hearing date. A hard copy of the DEIR is also available at the Commission room.

If you have any further questions, please contact Samuel Dea at (213) 974-4808 or by email at sdea@planning.lacounty.gov or Kim Szalay at (213) 974-4876 or by email at kszalay@planning.lacounty.gov.

SZD:CSB

Attachment: Notice of Completion and Availability of the DEIR and Notice of Hearing Examiner Public Hearing; One DEIR CD dated December, 2013

APPLICANT'S OUTREACH (Projects 1-6)

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Public Outreach in Los Angeles County

Organization	Meeting Dates	Notes
Town Councils		
Antelope Acres Town Council	**August 14, 2011** Mailed introductory company letter **August 24, 2011** Silverado Power spoke with Town Council President, Vicki Nelson **September 18, 2011** Silverado met with Vicki Nelson and Vanessa **October 19, 2011** Silverado presented to the Town Council regarding Los Angeles County sites. **March 21, 2012** Silverado presented to the Town Council again to discuss in more details the priority sites moving forward including ... **April 18, 2012** Silverado attended Town Council meeting as guest. Introductions to new Council Officers. **June 29, 2012** Silverado provided an update to Council President. **July 17, 2012** Silverado met with Council Leadership to talk about solar development and upcoming presentation. **July 18, 2012** Silverado presented the six Los Angeles County sites to the Council. **January 15, 2014** Silverado presented to the Town Council regarding the upcoming Hearing Examiner meeting and the status of the EIR.	Silverado has been in regular attendance and has given multiple presentations at the Antelope Acres Town Council meetings from 2011 through present, including multiple question and answer sessions. Regular updates on the local area projects and the Los Angeles County EIR process have been delivered during this time.
Fairmont Town Council	**August 14, 2011** Mailed introductory company letter **August 24, 2011** Silverado Power spoke with Town Council representatives. **September 19, 2011** Silverado spoke with town council representatives **October 20, 2011** Silverado presented to the Town Council regarding Los Angeles County sites. **April 19, 2012** Silverado presented to the Town Council again to discuss in more details the priority sites moving forward. **June 21, 2012** Silverado presented the six Los Angeles County sites to the Council.	Silverado has attended multiple meetings and delivered three presentations at the Fairmont Town Council meetings in 2011 and 2012. Regular updates on the local area projects and the Los Angeles County EIR process have been delivered during this time.
Oso Town Council	**February 22, 2012** Silverado presented to the Town Council again to discuss in	Silverado has attended meetings,

	more details the priority sites moving forward. **June 29, 2012** Silverado met with Town Council Board to provide updated information for distribution, answered Board members' questions.	provided information on project status, and met with residents throughout 2011 and 2012.
Quartz Hill Town Council	**March 21, 2012** Silverado presentation at the Quartz Hill Town Council. **May 15, 2012** Silverado presented the six Los Angeles County sites to the Council.	Silverado has attended meetings, delivered multiple presentations, provided information on project status, and met with residents throughout 2011 through 2013.
Association of Rural Town Councils	**May 31, 2012** Silverado presentation at the Association of Rural Town Councils.	Silverado has presented at the Association of Rural Town Councils, held a question and answer session, and provided additional information on our projects.
Lake Los Angeles Town Council	**August 16, 2012** Silverado provided hard copy information on potential projects. **August 23, 2012** Silverado attended meeting and answered questions regarding project plans. **November 22, 2012** Silverado presentation to Lake Los Angeles Town Council.	Silverado has presented at the Lake Los Angeles Town Council, held a question and answer session, and provided additional information on our projects.
	Environmental Organizations	
Antelope Valley Dustbusters	**July 17, 2012** Silverado met with Dustbusters to discuss dust mitigation strategy. **September 11, 2012** Silverado attended Dustbusters meeting. **November 29, 2012** Silverado met with Dustbusters. **Silverado and members of the Dustbusters also collaborated via phone and email on a regular basis.**	Silverado has met and collaborated with the Dustbusters regularly over the past 2 years. The recommendations of the Dustbusters were integral in the formation of Silverado's dust mitigation strategy.
Antelope Valley Resource Conservation District	**September 11, 2012** Silverado met with AVRCD to discuss proposed projects. **November 29, 2012** Silverado met with AVRCD to discuss dust mitigation and native plant selection.	Silverado has met with members of the Resource Conservation District numerous times to discuss dust mitigation and vegetation strategy.
Audubon Society	**July 19, 2012** Silverado met with Audubon Society to discuss projects.	Silverado has met on multiple

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	September 17, 2012	Silverado supplied additional project information and discussed projects.	occasions to discuss mitigation strategy in the western Antelope Valley, and provide updates on these projects.
		Education	
Westside School District	**August 25, 2011** **September 13, 2011** **May 16, 2012** **August 20, 2012**	Silverado provided letter with information on area projects. Silverado met with Superintendent and District representatives. Silverado met with Del Sur School Principal. Silverado met with representatives of the District.	Silverado has met with the District on multiple occasions to discuss educational opportunities as well as strategies to mitigate impacts to local area schools.
		Historic Preservation	
Lancaster Cemetery District	**April 23, 2012** **August 6, 2012** **January 9, 2014** **January 15, 2014** **February 18, 2014**	Silverado met with District members to discuss projects. Silverado provided update, answered additional questions. Silverado met with District members to provide update. Silverado met with the Lancaster Cemetery District Board to discuss preservation memorandum. Silverado met with District Board Chairman to finalize preservation memorandum.	Silverado has worked closely with the Lancaster Cemetery District to identify and preserve the historic Del Sur Cemetery, located on one of the project sites.
		Business Organizations	
Greater Antelope Valley Economic Alliance (GAVEA)	**February 23, 2012** **August 13, 2012** **April 19, 2012** **July 19, 2012**	Met with GAVEA board to describe projects. Silverado presented to GAVEA. Silverado gave update presentation to board. Silverado met with board members and provided project updates.	Silverado has met with GAVEA on a regular basis and delivered multiple presentations on our ongoing work in the Antelope Valley.
Antelope Valley Board Of Trade (AVBOT)	**September 13, 2011**	Silverado presented to AVBOT executive committee.	Silverado has met with AVBOT and delivered updates on our ongoing work in the Antelope Valley.
Lancaster Chamber of Commerce	**November 9, 2011** **November 28, 2012**	Silverado met with Chamber to introduce projects. Silverado provided update information to Chamber, responded to questions.	Silverado has met with the Lancaster Chamber of Commerce and delivered updates on our ongoing work in the Antelope Valley. Silverado is a member of the Lancaster Chamber of Commerce.

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Political			
Norm Hickling, Field Deputy for Los Angeles County Supervisor Mike Antonovich	**Mr. Hickling attends most Town Council meetings, and discussed proposed projects with Silverado.** **February 22, 2012** **April 23, 2012** **January 9, 2014** **April 10, 2014**	 Silverado met with Mr. Hickling to provide project updates. Silverado met with Mr. Hickling to provide project updates. Silverado met with Mr. Hickling to provide project updates. Silverado met with Mr. Hickling to provide project updates.	Silverado has met with Norm Hickling on multiple occasions and delivered updates on our ongoing work in the Antelope Valley.
Senator Steve Knight	**February 2, 2012** **February 15, 2012**	Silverado briefed Senator Knight's staff. Silverado met with Senator Knight.	Silverado has met with Steve Knight and delivered updates on our ongoing work in the Antelope Valley.
Former Senator Sharon Runner	**February 15, 2012**	Silverado met with Senator Runner.	Silverado has met with Sharon Runner and delivered updates on our ongoing work in the Antelope Valley.

RPC MEETING DATE May 7, 2014
AGENDA ITEM NOS. 6

REGIONAL PLANNING COMMISSION
TRANSMITTAL CHECKLIST

PROJECT NOS.: **R2011-00833-(5) (Project 1)**

CASE NOS.: **CONDITIONAL USE PERMIT NOS. 201100079**
ZONE CHANGE NO. 201100005
EIR ENVIRONMENTAL ASSESSMENT NO. 201100109

CONTACT PERSON: Mr. Kim Szalay

Project-Specific Materials Project 1

☒ PROJECT SITE LOCATION AERIAL BY PROJECT

☒ FACTUAL - PROJECT SUMMARY BY PROJECT

☒ DRAFT CUP FINDINGS BY PROJECT

☒ DRAFT CUP CONDITIONS WITH DEPARTMENT CONDITIONS BY PROJECT

☒ DRAFT ZONE CHANGE DOCUMENTS (Project 1, R2011-00833, RCUP 201100179)

☒ BURDEN OF PROOF STATEMENTS BY PROJECT

Reviewed By: _____

PROJECT-SPECIFIC MATERIALS

PROJECT 1

VICINITY MAP
AND AERIALS
PROJECT 1

Silverado Power West, Los Angeles County, Project 1 Site

FACTUAL
PROJECT 1

Department *of* Regional Planning
320 West Temple Street
Los Angeles, California 90012

PROJECT SUMMARY

PROJECT NUMBER
R2011-00833-(5)

HEARING DATE
May 7, 2014

REQUESTED ENTITLEMENTS
Zone Change No. 201100005
Conditional Use Permit No. 201100079
Environmental Assessment No. 201100109

OWNER / APPLICANT
North Lancaster Ranch, LLC

MAP/EXHIBIT DATE
March 24, 2014

PROJECT OVERVIEW

Project 1: North Lancaster Ranch

A zone change is requested to change zoning from light agriculture, which does not allow electricity generation facilities, to heavy agriculture, which does allow electricity generation facilities. The Project proposes to develop 20 megawatts of solar photovoltaic electricity generation on 240 acres of flat, previously farmed fallow land, perimeter security fencing, and one 10,000 gallon water tank. No operations building or other permanent buildings are proposed. The Project would employ a series of photovoltaic module arrays, using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facility would deliver the electrical output to the existing regional transmission system. To minimize fugitive dust, no grading, disking, tilling, or rolling is proposed for preparation of the solar array areas; some grading is required for internal roads and required flood control drainage features. Proposed water supply for construction and operations would include use of out-of-basin or recycled water. The Project proposes use of existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where feasible to minimize the need for new electrical support facilities. Construction of any new transmission lines necessary within unincorporated Los Angeles County jurisdiction would be located underground. The Project would be constructed and then operated for an estimated 35 years. A Little Buttes Trail easement and vegetative buffer would be located at the southern boundary at West Avenue B. One existing developed site is located across the road from the northwest corner of the property. Vacant, unfarmed, undeveloped land surrounds the remainder of the site.

LOCATION AND ACCESS
105th Street West & West Avenue B, Lancaster, CA

ASSESSORS PARCEL NUMBER(S)
3262-001-005, 3262-001-006

SITE AREA
240 Acres

GENERAL PLAN / LOCAL PLAN
Antelope Valley Areawide General Plan

ZONED DISTRICT
Antelope Valley West

LAND USE DESIGNATION
N-1 (Non-Urban 1)

ZONE
Existing: A-1-2 (Light Agriculture-two acres minimum required area)

Proposed: A-2-2 (Heavy Agriculture-two acres minimum required area)

POWER GENERATION
20 MW

MAX DENSITY/UNITS
NA

COMMUNITY STANDARDS DISTRICT
NA

ENVIRONMENTAL DETERMINATION (CEQA)
Environmental Impact Report

KEY ISSUES

- Consistency with the Los Angeles County Antelope Valley Areawide General Plan
- Compliance with the following Section(s) of Title 22 of the Los Angeles County Code:
  - 22.56.040 (Conditional Use Permit Burden of Proof Requirements)
  - 22.24.110 (A-2 Zone Development Standards)
  - 22.16.110 (Zone Change Burden of Proof Requirements)

CASE PLANNER: Mr. Kim Szalay

PHONE NUMBER: (213) 974 - 4876

E-MAIL ADDRESS: kszalay@planning.lacounty.gov

DRAFT FINDINGS
PROJECT 1

DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION
AND ORDER
COUNTY OF LOS ANGELES
PROJECT NO. R2011-00833-(5)
CONDITIONAL USE PERMIT NO. 201100079

PROJECT 1 NORTH LANCASTER RANCH

1. Project 1 North Lancaster Ranch is one of six projects cumulatively called Silverado Power West, Los Angeles County Projects 1-6 ("Projects 1-6").

2. The Los Angeles County ("County") Regional Planning Commission ("Commission") conducted a duly-noticed public hearing on May 7, 2014, in the matter of Project No. R2011-00833-(5), consisting of Conditional Use Permit No. 201100079 ("Project Permit"). The Project Permit was heard concurrently with Zone Change No. 201100005.

3. The County Hearing Examiner conducted a duly-noticed public hearing on February 1, 2014 to take testimony on the Draft Environmental Impact Report ("Draft EIR") for Projects 1-6.

4. The permittee, North Lancaster Ranch, LLC ("permittee"), requests the Project Permit to authorize a 20 Megawatt ("MW") solar photovoltaic electricity generation facility and construction of a water tank in the proposed A-2-2 (Heavy Agriculture-two acres minimum required area) zone ("Project") on a property located on 240 acres near the intersection of 105th Street West and West Avenue B in the West Antelope Valley within unincorporated Los Angeles County ("Project Site") pursuant to the Los Angeles County Zoning Ordinance ("County Code") Section 22.24.150.

5. The Zone Change is a related request to re-designate the Project Site's zoning from Zone A-1-2 (Light Agriculture-two acres minimum required area) to A-2-2.

6. The approval of the Project Permit will not become effective unless and until the Board has approved the Zone Change and it has become effective.

7. The Project Site is 240 gross acres in size and consists of two legal lots. The Project Site is vacant and rectangular in shape with flat, previously tilled topography.

8. The Project Site is located in the Antelope Valley West Zoned District and is currently zoned A-1-2.

9. The Project Site is located within the N-1 (Non-Urban 1) land use category of the Antelope Valley Areawide General Plan Land Use Policy Map.

10. Surrounding Zoning within a 500-foot radius includes:

    North: A-1-2
    South: A-1-2

East: A-1-2
West: A-2-2

11. Surrounding land uses within a 500-foot radius include:

North: N-1
South: N-1
East: N-1
West: N-1

12. The Project Site is in an undeveloped state and little to no farming or other permitted activities have taken place at the site in recent times.

13. The site plan for the Project depicts a required 20-foot setback from the solar arrays to the subject Project's property line, which setback may also include a vegetative buffer 10 feet in width for locations across from sensitive uses. An additional required 10-foot "slope easement" would be dedicated to the County as part of the public rights-of-way around the project. The Project Site would include a perimeter safety and security fence eight feet in height including three-strand barbed wire at the top to protect the public from high voltage electricity and to protect the facility from intrusion. Construction internal to the site would be comprised of solar panels set in arrays with associated inverters, transformers, and two internal substations, with access through the site by compacted interior dirt roads. All of the subject property, with the exception of above-mentioned buffers, would be used for construction of arrays and appurtenant facilities to generate solar photovoltaic electricity. Interior drainage basins are required to insure that stormwater flows match pre-existing conditions as it flows through the subject site. The electricity generated would be transmitted through underground transmission lines to tie in to the electrical grid using existing transmission lines or through additional lines limited in length, to the nearest point of connection as depicted on the site plan. This Project 1 is required to provide a 12-foot trail easement along the southern boundary to provide continuity for County-planned trails. The Project Site would include the following elements:

- PV modules
- PV module mounting system
- Balance of system and electrical boxes (e.g., combiner boxes, electrical disconnects)
- Two Substations
- Electrical inverters and transformers including service parking areas
- Electrical AC collection system, including switchgear
- Data monitoring equipment
- Generation tie line
- Access roads and chain link perimeter security fencing
- Mobile sanitation and drinking water facilities
- 10,000 gallon fire-flow water supply tank
- No permanent operations or other buildings are proposed.

14. The Project Site is accessible via West Avenue B and 110th Street West. Primary access to the Project Site will be via both an entrance/exit on West Avenue B and on 110th Street West.

15. The Project does not propose permanent buildings such as operations and maintenance buildings, therefore the Project only requires parking spaces for operational service vehicles. Construction parking is required to be located at least 1,000 feet from sensitive receptors such as private residences.

16. From 2011 to 2013, prior to the Commission's public hearing on the Project, the permittee performed public outreach and provided documentation to substantiate efforts of working with the community. Meetings included development of dust mitigation strategies with local organizations to mitigate Project-related fugitive dust, and meetings with Town Councils and residents to receive comments and concerns and provide information regarding Project proposals related to their comments.

17. The Department of Public Works provided Project conditions for water supply, drainage and grading, road improvements. The Fire Department provided Project conditions for water storage facilities, access, and special requirements for vegetation management and fire control, electrical equipment, and other specialized fire protection measures. The Department of Public Health provided Project conditions for potable water supply, wastewater disposal, and noise. The Department of Parks and Recreation provided specific trail requirements for this Project 1. All of these conditions from various departments have been included in conditions of approval.

18. The Department of Regional Planning, on behalf of the County as lead agency pursuant to the California Environmental Quality Act (California Public Resources Code section 21000 et seq.) ("CEQA"), conducted an Initial Study for the proposed Project and determined that an environmental impact report ("EIR") was necessary. The Department sent to agencies a Notice of Preparation for the EIR. The Department conducted a Scoping Meeting on February 1, 2014 and received comments from the Antelope Valley West community regarding concerns over air quality, noise, traffic safety, water supply, and visual aesthetics. A Draft EIR was prepared which evaluated the potential project-specific and cumulative environmental impacts of the Project and related projects. The Draft EIR was published for public comment on January 6, 2014 and the comment period closed on February 19, 2014. The mitigation measures necessary to ensure the Project will not have a significant effect on the environment are contained in the Mitigation Monitoring and Reporting Program ("MMRP") and the CEQA Findings of Fact, have been prepared for this project. After the close of the comment period for the Draft EIR, a Final EIR was prepared in accordance with section 15089 and 15132 of the CEQA Guidelines. The Final EIR includes the Draft EIR, corrections to the Draft EIR, an introduction to the applicable CEQA process, responses to all timely public comments on the Draft EIR, the MMRP, CEQA Findings of Fact, and referenced appendices.

19. Pursuant to the provisions of sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the Project's public hearings by mail, newspaper, and property posting. Additional notification was made available on County's website.

20. Twenty members of the public provided additional written comments regarding Projects 1-6 during the 30-day comment period two weeks prior to the Planning Commission public hearing, and received up to the time of preparation of this report. All other comments received are forwarded to the Planning Commission up to the day of the hearing.

21. No comments specifically in favor of the Projects were received at the time of preparation of this report.

22. Eighteen comments opposed to the Projects were received at the time of preparation of this report including comments requesting more time to review Project documents, air quality and noise impacts to adjacent residences during construction, health concerns regarding fugitive dust, construction safety, traffic safety related to Project 6 located adjacent to SR 138, amount of mitigation lands, impacts to views, plants, and animals, and requests for the Planning Commission to hold its hearing near the Projects in the Antelope Valley.

23. Two comments neither in favor nor opposed to the Projects were received at the time of preparation of this report including comments about Projects 1-6 public review processes and suggesting alternatives to Project 2 site regarding impacts to flowers.

24. [Hearing Proceedings] *To be inserted after the public hearing to reflect hearing proceedings.*

25. The Commission finds that the Project is consistent with the County of Los Angeles General Plan ("General Plan") and the Antelope Valley Areawide General Plan ("Areawide Plan") N1 (Non-Urban 1) land use designation applicable to the Project. The Project meets the definition of "utility and communication installations" referenced in the listing of public and semi-public uses in the General Plan (Page LU-15) and non-urban non-residential land uses allowed in remote areas designated Non-Urban 1 in the Areawide Plan (page VI-5).

26. The Commission finds that the Project is consistent with the applicable Policies of each of the Elements of the General Plan as set forth below.

27. The Commission finds that the Project is consistent with the policies of the Conservation and Open Space Element which includes encouraging support for renewable energy such as solar energy generation, encouraging support for cost-saving incentives for such alternative energy sources, avoiding development in Significant Ecological Areas, and protecting panoramic views through low-profile development. Project 1 is not within an SEA and is a low-profile development.

28. The Commission finds that the Project is consistent with the policies of the Land Use Element requiring planned developments to avoid land use conflicts with neighboring activities. Though development of the Project may have a temporary negative effect on some adjacent residential properties during construction, long term operations of the Project is passive in relationship to neighboring land uses.

29. The Commission finds that the Project is consistent with the policies of Economic Development Element encouraging the location of renewable energy generation projects within the unincorporated areas of the County and helping meet State mandates for renewable energy production.

30. The Commission finds that the Project is consistent with the policies of Circulation, Housing, Noise, Safety, and Public Facilities Elements. The Project makes no significant impacts to traffic, proposes no housing, requires no additional public facilities, and has no significant impacts regarding noise and safety considerations during construction and operation of the Project.

31. The Commission finds that the Project is consistent with the applicable policies of each of the Elements of the Areawide Plan as set forth below.

32. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Balance of Development in relationship to existing development surrounding the Project and in relationship to cumulative related projects proposed in the surrounding area within a five-mile radius, as follows. Twenty-two solar projects previously proposed in the unincorporated County have withdrawn applications for conditional use permits. Only a few applications for solar projects remain in process in the County. The Project does not create a situation causing an over-balance of solar development in the Antelope Valley.

33. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Hillside Management, as follows. The Project has no hillside slopes in excess of 25 percent.

34. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Floodplain Management, as follows. The Project is not located in a Floodplain or Flood Zone.

35. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Sensitive Land Uses, as follows. The Project avoids disrupting highly environmentally sensitive lands by using previously disturbed properties and by maintaining natural flow of stormwaters through the Project Site. Groundwater from the adjudicated basin is left untouched as out-of-basin or recycled water supply is proposed for use during construction and operations.

36. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Agricultural Lands, as follows. The Project is not currently farmed but is located in an Agricultural Opportunity Area and would not interfere with any adjacent or nearby farm operations.

37. The Commission finds that the Project is consistent with the applicable policies of the Land Use Element, Resource Conservation, as follows. The Project does not impact groundwater, would not produce green house gases during operations, and would generate electrical energy rather than use it.

38. The Commission finds that the Project is consistent with the applicable policies of the Community Revitalization, Community Design, and Human Resources Elements, as follows. The Project is consistent with Community Identity/Aesthetics provisions of the Areawide Plan. The Project would locate all electrical transmission lines underground and connect to existing above ground or undergound facilities adjacent to the Project Site. The Project will provide additional screening landscaping along certain of the Project's boundaries as depicted in the Project's site plans.

39. The Commission finds that the Project is consistent with the applicable policies of the Community Revitalization, Community Design, and Human Resources Elements, as follows. The Project is consistent with Employment provisions of the Areawide Plan. The Project will provide employment opportunities for residences of the Antelope Valley during both construction and operation of the Project.

40. The Commission finds that the Project is consistent with the applicable policies of the Environmental Resource Management Element, Natural Resources, as follows. The Project is consistent with policies regarding resource management as cultural, archaeological, and paleontological resources are protected by Project resource protection requirements. Air quality protections are required for construction of the Project to protect adjacent uses from fugitive dust and other construction emissions.

41. The Commission finds that the Project is consistent with the applicable policies of the Environmental Resource Management Element, Trails, as follows. The Project is required to provide a public trail easement along the southern boundary of the Project as depicted on the Project's site plans.

42. The Commission finds that the Project is consistent with the applicable policies of the Noise Abatement Element, Aviation-related Noise and Construction and Operational Noise, as follows. The Project is not located within a sensitive aviation-related noise contour and all construction noise impacts are mitigated to be below County noise standards.

43. The Commission finds that the Project is consistent with the applicable policies of the Seismic and Public Safety Elements, as follows. All arrays, inverters, transformers, substations, transmission lines, and other equipment must meet building and safety standards for earthquake and fire protections. Perimeter security fencing is required for public safety and property protection purposes.

44. The Commission finds that the Project is consistent with the applicable policies of the Housing, Circulation, Public Services and Facilities, Governmental Services, and Energy Conservation Elements, as follows. The Project proposes no housing, makes no significant impacts to traffic, public services, governmental services and energy conservation. As renewable a energy generation Project, the Project would

provide a large scale reduction in energy used to produce electricity compared to a traditional fossil fuel energy generation facility of similar output.

45. The Commission finds that the Project is consistent with the Areawide Plan Non-Residential Uses in Non-Urban Areas Location, Access, and Design Guidelines as set forth below.

46. The Commission finds that the Project is consistent with the Location Guidelines of the Areawide Plan as follows. The Project is located on previously disturbed land surrounded by mostly vacant properties with one development located across from the Project Site. Some agricultural uses are in the general vicinity. Proposed daily operations are considered relatively passive similar to existing surrounding uses. Existing primary roadways would be retained for maintaining existing circulation patterns in the area. Existing utilities, other public services, and infrastructure are available to the Project. The Project provides native landscaping and open space buffering along significant adjacent roadways as visual mitigation for public passersby. The relatively flat topography, distance from known active faults, and previously farmed and disturbed property, make the location suitable for the proposed photovoltaic solar electricity generation development.

47. The Commission finds that primary access is consistent with access guidelines of the Areawide Plan as follows. The Project provides primary access from existing adjacent streets having low traffic volumes. Transport of materials during construction of the Project largely avoids existing residential communities.

48. The Commission finds that the design of the Project is consistent with the Design Guidelines of the Areawide Plan as follows. Solar panel arrays are to be of the low-profile fixed tilt or tracking variety which will not block views to the Tehachapi Mountains to the north and other vistas to the south, east or west from the nearby roadways. Additionally, native drought-tolerant shrubs, drought tolerant trees, and other drought-tolerant plantings are proposed to screen the frontages of solar panel development along sensitive frontages on this Project. Using as natural a placement of plantings as possible and temporary drip systems to establish the plantings are proposed. Perimeter chain link fencing is proposed for security and safety purposes. No outdoor advertising is proposed nor permitted. Minimal security lighting shielded downward is proposed which will minimize visual impacts to neighboring properties and wildlife.

49. The Commission finds that, with the Zone Change, the Project is consistent with the applicable zoning designation for the Project Site. This Project 1 requires a zone change from the A-1-2, which does not permit electricity generation facilities, to the A-2-2 zone, which permits electricity generation facilities when a Conditional Use Permit is obtained. Project 1 meets the burden of proof for a zone change to A-2-2 zoning and complies with A-2-2 zone regulations. The Project complies with Section 22.24.150 of the County Code, Uses Subject to Permits, which lists the following use as permitted provided a Conditional Use Permit is obtained, "Electric distribution substations, electric transmission substations and generating plants, including microwave facilities used in conjunction with any one thereof." The Project is a

photovoltaic solar power electricity generation plant with distribution substations and transmission lines and complies with the applicable regulations of the County Code. The Project meets zoning regulations for yard requirements, fences and walls as modified by the conditional use permit, outside storage, low-impact development, green building, drought-tolerant landscaping, and parking requirements of one parking space per two employees during operations.

50. The Commission finds that the Project is compatible with the surrounding area in which the Project is located, as follows. The Project location uses previously disturbed land, is located near existing infrastructure such as existing transmission lines and/or substation facilities and public rights-of-way, is located away from highly populated areas and is in areas where impacts to threatened or endangered species and/or their habitats is minimized.

51. The Commission finds that in addition to the information required in the permit application, the applicant substantiates the burden of proof for a conditional use permit found in Section 22.56.040 of the Los Angeles County Code subject to compliance with the conditions of approval including all associated mitigation measures in the MMRP.

52. The Commission finds that the requested use at the location proposed will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, as follows. The Project is surrounded predominantly by vacant land and several residences or similar developments. The Project is an operationally passive Project that generates minor impacts which can be mitigated with no remaining significant environmental impacts on the surrounding area.

53. The Commission finds that the requested use at the location proposed will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, as follows. The Draft EIR concludes that the Project's mitigation measures would reduce any environmental impacts to a less than significant level, and therefore that the construction and operation of the Project would not limit, hinder or denigrate the use of properties in the vicinity of the Project.

54. The Commission finds that the requested use at the subject location will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare, as follows. Since areas of concern regarding the Project are mitigated to a level of no significant impact on the environment. Additionally, the Project requires various measures such as a fire-flow water tank for each site, perimeter fencing, buffer areas, and limited night security lighting to minimize the potential of hazardous situations arising from the Project. Additional dust control measures are required in the conditions of approval to further reduce health and visual effects of fugitive dust.

55. The Commission finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area, as

follows. The Project provides sufficient space including proposals to maximize buffering and safety in relationship to surrounding properties.

56. The Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, as follows. The Project requires minimal long-term use of roads for ongoing operations, therefore the current access and road conditions require minimal improvements to carry on the proposed use. Any damage to existing or improved local roadways caused by project construction and/or operations is required to be repaired at the applicant's expense as required by mitigation measures and conditions of approval.

57. The Commission finds that the proposed site is adequately served by other public or private service facilities as are required, as follows. All required and needed public and private service facilities would be met for the Project.

58. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the conditional use permit to 35 years.

59. The Commission finds that pursuant to sections 22.60.174 and 22.60.175 of the County Code, the community was properly notified of the public hearing by mail, newspaper, and property posting. Additionally, the Project was noticed and case materials were available on Regional Planning's website and at libraries located in the vicinity of the Antelope Valley West community. On April 3, 2014, a total of 611 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as 70 notices to those on the courtesy mailing list for the Antelope Valley West Zoned District and to any additional interested parties.

60. The Commission finds that the permittee is subject to payment of the California Department of Fish and Wildlife fees related to the Project's effect on wildlife resources pursuant to section 711.4 of the California Fish and Game Code.

61. The Commission finds that the Final EIR for the Project was prepared in accordance with CEQA, the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines. The Commission reviewed and considered the Final EIR, along with its associated MMRP, and Findings of Fact, and finds that they reflect the independent judgment of the Commission. The Findings of Fact are incorporated herein by this reference, as set forth in full.

62. The Commission finds that the MMRP for the Project is consistent with the conclusions and recommendations of the Final EIR and that the MMRP's requirements are incorporated into the conditions of approval for the Project.

63. The Commission finds that the MMRP, prepared in conjunction with the Final EIR, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts to the environment from the Project.

64. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Special Projects Section, Department of Regional Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING CONCLUDES THAT:

Regarding the Conditional Use Permit:

A. the proposed use with the attached conditions will be consistent with the adopted General Plan;

B. the proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare;

C. the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area; and

D. the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

THEREFORE, THE REGIONAL PLANNING COMMISSION:

1. Certifies that the Final EIR for the project was completed in compliance with CEQA and the State and County CEQA Guidelines related thereto; certifies that it independently reviewed and considered the information contained in the Final EIR, and that the Final EIR reflects the independent judgment and analysis of the Commission as to the environmental consequences of the Project; adopts the Findings of Fact and the MMRP; and finds that the MMRP is adequately designed to ensure compliance with the mitigation measures during the Project implementation.

2. Approves Conditional Use Permit No. 201100079, subject to the attached conditions.

3. Recommends to the Board of Supervisors a change of zone from A-1-2 to A-2-2.

Attachments

SZD:KKS
4/22/14

c: Each Commissioner, Zoning Enforcement, Building and Safety

DRAFT CUP CONDITIONS
PROJECT 1

DRAFT CONDITIONS OF APPROVAL
COUNTY OF LOS ANGELES
PROJECT NO. R2011-00833-(5)
CONDITIONAL USE PERMIT NO. 201100079

PROJECT 1 NORTH LANCASTER RANCH

PROJECT DESCRIPTION

Project 1 is located on a 240-acre site near the intersection of 105th Street West and West Avenue B within unincorporated Antelope Valley in Los Angeles County and would produce 20 Megawatts of electricity. The Project is comprised of an unmanned utility scale photovoltaic electricity generation facility which would employ a series of photovoltaic module arrays to convert sunlight into electrical energy using fixed-tilt or tracker mounting supports, to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facilities would deliver the electrical output to the existing regional transmission system from one on-site substation through an underground generation-tie transmission line. A 10,000 gallon fire-flow water supply tank would be located on-site. No permanent operations building or other buildings are proposed on the Project site. Construction would generally take place during normal daylight hours. The Project would be operated for an estimated 35 years. The Project is subject to the following conditions of approval:

GENERAL CONDITIONS

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.

2. This grant shall not be effective for any purpose until Permittee, and the owner of the subject property if other than Permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning ("Regional Planning") their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by **Condition No. 7** and until all required monies have been paid pursuant to **Condition Nos. 10 11**, and **14**. Notwithstanding the foregoing, this **Condition No. 2** and **Condition Nos. 4, 5, 9**, and **11** shall be effective immediately upon the date of final approval of this grant by the County.

3. Unless otherwise apparent from the context, the term "date of final approval" shall mean the date the County's action becomes effective pursuant to Section 22.60.260 of the County Code.

4. Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code Section 65009 or any other applicable limitations period. The County shall promptly notify Permittee of any claim, action, or proceeding and the County shall

reasonably cooperate in the defense. If the County fails to promptly notify Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.

5. In the event that any claim, action, or proceeding as described above is filed against the County, Permittee shall within ten days of the filing make an initial deposit with Regional Planning in the amount of up to $5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to permittee or permittee's counsel.

   If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, Permittee shall deposit additional funds sufficient to bring the balance up to the amount of $5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

   At the sole discretion of Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by Permittee according to County Code Section 2.170.010.

6. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.

7. Prior to the use of this grant, Permittee, or the owner of the subject property if other than Permittee, shall record the terms and conditions of the grant in the office of the County Registrar-Recorder/County Clerk ("Recorder"). In addition, upon any transfer or lease of the property during the term of this grant, Permittee, or the owner of the subject property if other than Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.

8. This grant shall terminate on May 7, 2049, 35 years from the date of approval. Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If Permittee intends to continue operations after such date, whether or not Permittee proposes any modifications to the use at that time, Permittee shall file a new Conditional Use Permit application with Regional Planning, or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least six (6) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that Permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.

9. This grant shall expire unless used within two (2) years from the date of final approval of the grant. A single one-year time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date.

10. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of Permittee to cease any development or activity not in full compliance shall be a violation of these conditions. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. Within 60 days after final approval of this grant Permittee shall deposit with the County the sum of $3,600.00. The deposit shall be placed in a performance fund, which shall be used exclusively to compensate Regional Planning for all expenses incurred while inspecting the premises to determine Permittee's compliance with the conditions of approval. The fund provides for 18 (first two years plus 16 biennial - every other year) inspections. Inspections shall be unannounced.

    If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, Permittee shall be financially responsible and shall reimburse Regional Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be $200.00 per inspection, or the current recovery cost at the time any additional inspections are required, whichever is greater.

11. Within three (3) days of the date of final approval of this grant, permittee shall remit processing fees payable to the County in connection with the filing and posting of a Notice of Determination ("NOD") for this project and its entitlements in compliance with Section 21152 of the Public Resources Code. Unless a Certificate of Exemption is issued by the California Department of Fish and Wildlife pursuant to Section 711.4 of the California Fish and Game Code, Permittee shall pay the fees in effect at the time of the filing of the NOD, as provided for in Section 711.4 of the Fish and Game Code, currently $3,104.75 ($3,029.75 for an Environmental Impact Report plus $75.00 processing fee.) No land use project subject to this requirement is final, vested or operative until the fee is paid.

12. Permittee shall comply with all mitigation measures identified in the Mitigation Monitoring and Reporting Program ("MMRP"), which are incorporated by this reference as if set forth fully herein.

13. Within thirty (30) days of the date of final approval of the grant by the County, Permittee shall record a covenant and agreement, which attaches the MMRP and agrees to comply with the mitigation measures imposed by the Environmental Impact Report for this project, in the office of the Recorder. Prior to recordation of the covenant, Permittee shall submit a draft copy of the covenant and agreement

to Regional Planning for review and approval. As a means of ensuring the effectiveness of the mitigation measures, Permittee shall submit annual mitigation monitoring reports to Regional Planning for approval or as required. The reports shall describe the status of Permittee's compliance with the required mitigation measures.

14. Permittee shall deposit an initial sum of $6,000.00 with Regional Planning within thirty (30) days of the date of final approval of this grant to defray the cost of reviewing and verifying the information contained in the reports required by the MMRP. Permittee shall replenish the mitigation monitoring account if necessary until all mitigation measures have been implemented and completed.

15. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to Chapter 22.56, Part 13 of the County Code.

16. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of said department.

17. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.

18. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").

19. Permittee shall maintain the subject property in a neat and orderly fashion. Permittee shall maintain free of litter all areas of the premises over which Permittee has control.

20. All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by Regional Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

    In the event of graffiti or other extraneous markings occurring, Permittee shall remove or cover said markings, drawings, or signage within 24 hours of notification of such occurrence, weather permitting. Paint utilized in covering such markings

shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

21. The subject property shall be developed and maintained in substantial compliance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, three (3) copies of a modified Exhibit "A" shall be submitted to Regional Planning within 60 days of the approval date.

22. In the event that subsequent revisions to the approved Exhibit "A" are submitted, Permittee shall submit three (3) copies of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A". All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

23. The approval of the permit is contingent upon approval of Zone Change Case No. 201100005 by the County of Los Angeles Board of Supervisors.

PERMIT SPECIFIC CONDITIONS - CONDITIONAL USE PERMIT

24. Prior to obtaining any grading or building permit, Permittee shall provide to the County a decommissioning plan ("Decommissioning Plan") in connection with any and/or all of the terminating events described in **Condition No. 26**, which Plan shall include, at a minimum, a detailed plan for decommissioning and deconstructing the facility, and for restoration of the site (collectively referred to as "decommissioning"). The Decommissioning Plan shall be developed to the satisfaction of the Director and the Director of Public Works and subject to their review and approval.

    The Decommissioning Plan shall provide for, including, but not be limited to, the following:

    a. Removal of solar panel structures and all appurtenant above-ground equipment;

    b. Removal of on-site overhead poles and above-ground electricity lines;

    c. Removal of permanent above-ground transmission lines and poles located in the public right-of-way if determined not usable by Public Works and/or any other applicable public or private utility. Otherwise such transmission lines and poles shall be allowed to remain;

    d. Removal of the on-site substation, if owned by Permittee. If in the future a public or private utility assumes ownership of the substation, such substation may remain on site to be used as part of the utility service;

e. Restoration of any disturbed soil and revegetation of the site to its pre-construction condition, with native vegetation similar to the vegetation in the surrounding vicinity;

f. Restoration or reclamation of project roads to their pre-construction condition unless the then-existing owner of the site elects to retain the improved roads for access throughout the site;

g. Documentation of the pre-construction condition of the project site, including, but not be limited to, a photographic record; and

h. Details of the performance and financial assurance guarantees described in **Condition No. 25**, explaining the amounts and schedule for the provision of such guarantees.

25. Prior to obtaining any building permits, Permittee shall provide to the County, to the satisfaction of the Director and the Director of Public Works, performance and financial assurance guarantees in an amount sufficient to ensure the performance of the approved Decommissioning Plan, as described in **Condition No. 24**. In this connection, Permittee shall be solely responsible for the costs and expenses associated with decommissioning the site after any of the terminating events described in **Condition No. 26**. In the event that the performance and financial assurance guarantees are not sufficient to fully compensate the County for the cost and expense of decommissioning the site, Permittee shall be responsible for compensating the County for any shortfall. In determining the sufficiency of the performance and financial assurance guarantees, the residual value of the solar panels, support structures, and other salvageable equipment (collectively "Salvageable Property") shall be considered.

With respect to the performance and financial assurance guarantees, the following requirements shall apply:

a. Permittee shall ensure that such guarantees are detailed in the approved Decommissioning Plan to the satisfaction of the Director and the Director of Public Works, and that such Decommissioning Plan shall explain the amounts and schedule for the provision of such guarantees;

b. Permittee shall provide a report to the Director every five years after the date of final approval of this grant to confirm that the performance and financial assurance guarantees are sufficient to ensure performance and implementation of the Decommissioning Plan. The report shall be subject to review and approval by the Director and the Director of Public Works particularly as to whether the performance and financial assurance guarantees are adequate to meet existing conditions at the time of the report;

A decommissioning pro forma summarizing the residual value of the Salvageable Property shall be included in the report. The pro forma shall include, at a minimum, the expected revenue from all Salvageable Property, as

defined in this **Condition No. 25**, the then-current cost of decommissioning the site, as required by the approved Decommissioning Plan, and the then-current value of any performance and financial assurance guarantees that have been provided as of the date of such report. In the event it is determined that the performance and financial assurance guarantees are insufficient to perform the decommissioning of the site as required by the approved Decommissioning Plan, Permittee shall be required to provide additional performance and financial assurance guarantees to the satisfaction of the Director and the Director of Public Works;

c. Any funds not used by the County in connection with decommissioning the site shall be returned to Permittee; and

d. The performance and financial assurance guarantees may consist of, including, but not limited to, one or more of the following, to the satisfaction of the Director and the Director of Public Works:

   i. An irrevocable letter of credit;

   ii. A surety bond;

   iii. An appropriate insurance policy;

   iv. A trust fund or escrow account established and maintained in accordance with approved financial assurances and practices to guarantee that decommissioning the site will be completed in accordance with the approved Decommissioning Plan; or

   v. A corporate guarantee.

26. Upon discontinuance of Permittee's operation as set forth in **Condition No. 27**, abandonment of the project in whole or in part, or termination of this grant as described in **Condition No. 8**, and in the event that a new permit application is not timely filed for a continued similar use or reuse of the site, Permittee shall perform decommissioning in accordance with the approved Decommissioning Plan, or compensate the County for use of a County-contracted consultant to perform such decommissioning. In the alternative, and at the County's sole election, the County shall be entitled to use any performance and/or financial assurance guarantees, as described in **Condition No. 25.d**, to perform the decommissioning itself or to contract for such decommissioning.

27. In the event that any portion of the solar field is not in operational condition for a consecutive period of six months, operations for that portion of the site shall be deemed to have been discontinued and that portion of the facility shall be removed from the site within 90 days from the date that written notice is sent to Permittee from the County. Within this 90-day period, Permittee may provide the Director a written request and justification for an extension of up to 90 additional days to resume operations of that portion of the site, which request shall be subject to the

satisfaction and approval of the Director. In no event shall the operations of the solar field or portion of the solar field be discontinued for more than 12 months from the date such operations were first deemed discontinued without being decommissioned pursuant to the approved Decommissioning Plan. Further, in no event shall any extension of the period to resume operations of any portion of the site pursuant to this **Condition No. 27** be deemed to extend the term or expiration date of this grant.

28. Permittee shall construct all transmission lines located within unincorporated Los Angeles County underground to the satisfaction of Public Works, except where above-ground crossings are required by applicable regulations.

29. Temporary structures, outside storage, and staging areas allowed for construction shall be removed from the project site within 120 days of project completion. Any other outside storage needed for the project shall comply with the requirements of Part 7 of section 22.52 of the County Code.

30. **Prior to obtaining any grading or building permit**, Permittee shall submit to the Director for review and approval three copies of a landscape plan, showing at least 10 feet of proposed landscaped area as depicted on the approved Exhibit "A," or as otherwise approved by Caltrans and/or Public Works as applicable, and showing re-vegetation of the array areas. The landscape plan shall depict the size, type, and location of all plants, trees, seeding, and watering facilities on-site to the satisfaction of the Director of Planning, and specifically for the watering facilities to the satisfaction of the Director of the Department of Public Works.

31. Permittee shall maintain all landscaping in a neat, clean, and healthful condition and shall properly prune, weed, remove litter, fertilize, and replace plants when necessary for the life of the Project. Watering facilities shall consist of a temporary water-efficient irrigation system, such as drip irrigation, which shall only be used to establish, or re-establish, and maintain the plantings in all landscaped areas as needed for the life of the Project.

32. Permittee shall establish and comply with a landscape maintenance program that controls the spread of invasive species on the subject property during the life of the grant term. The landscape maintenance program shall be submitted to the Director for review and approval prior to the first energization authorization of the facility.

33. All exterior fencing shall be visually non-intrusive to the satisfaction of the Director not to exceed eight feet in height including use of 3-strand barbed wire at the top, and shall include animal openings the lesser of one foot in height or maximum allowable by the Public Utilities Commission, 50 feet in length, every 200 feet on-center as depicted on the approved Exhibit "A".

34. Night-lighting, limited to only that required by applicable lighting regulations for safety and security, shall be shielded and directed downward to avoid lighting spillover and shall consist of: (a) motion sensor or manual switch lighting for entry-

lighting to the on-site equipment structures and electricity substation as applicable; and (b) light-sensor or motion-sensor lighting for the main access gate or gates.

35. Permittee shall, to the satisfaction of the Director, utilize the subject property only for the project as proposed and approved herein. In this regard, Permittee shall agree to and shall retire any development rights, including any rights to undertake irrigated farming on the subject property that require the use of groundwater for the life of this Conditional Use Permit.

36. Nothing in this grant shall prevent Permittee from installing more efficient solar panels in the future or increasing output, provided the footprint and overall disturbance area of the project does not increase. At such time Permittee wishes to install more efficient solar panels or increase output, a Revised Exhibit "A" shall be submitted to the Director for such installation.

37. The project shall be limited to use of trucked recycled water and/or water from sources not subject to the adjudication process currently in effect for the Antelope Valley groundwater basin for construction and operations of the Project.

38. The water tank on the subject property shall be painted an earth-tone color (such as beige, sand, taupe, or similar colors) to blend in with the surroundings, subject to review and approval by the Director.

39. Mobile sanitation facilities and potable drinking water supply shall be made available to workers during construction of the project to the satisfaction of the Department of Public Health.

40. In the event that piped recycled water suitable for use in construction and/or operation of the project becomes available from the public right-of-way adjacent to the project site at fair market value, Permittee shall obtain the necessary permits to connect to the recycled water, construct access, and connect to and purchase the piped recycled water.

41. In the event that piped potable water suitable for use in construction and/or operation of the project becomes available from the public right-of-way adjacent to the project site at fair market value, Permittee shall obtain the necessary permits to connect to the potable water, construct access, and connect to and purchase the piped potable water.

42. Permittee shall provide parking as required by the County Code, calculated at a parking ratio of one parking space for each two persons employed. The unmanned solar photovoltaic electricity generation facility ("solar facility") does not include operations buildings or other buildings and does require occasional servicing which requires one space per two persons servicing the facility.

43. Additional Dust Control Measures:

a. During site preparation and during operations vegetation shall be retained or mowed in and around array sites to prevent vegetative root loss. Disking, tilling or grading of array sites is prohibited except where specifically authorized by the Department of Public Works. Roads, drainage basins, equipment pads, and any other required earthwork authorized by the Department of Public Works shall be done in compliance with grading regulations;

b. Maintain dust control using phased earthwork, watering, clean gravel, composted wood chips not to exceed six inches in depth, application of nontoxic soil stabilizers, revegetation, limited public access on unpaved areas, impose vehicle speed limits on construction sites, and other dust control measures used during construction, operations, and removal and restoration activities;

c. Submit the required fugitive dust control plan including a dust plume response plan for review and approval by the Antelope Valley Air Quality Management District (AVAQMD) prior to any earthwork activities;

d. Permittee shall provide on the Project site weather stations, monitors with wind speed, wind direction, temperature and humidity sensors, and a mechanical dust-monitoring device, placed to the satisfaction of the Antelope Valley Air Quality Management District, to ensure the effectiveness of the Project's dust control treatment on the Project site;

e. Establish required vegetation along certain portions of Project perimeter as depicted on Exhibit "A" as early as feasible following Project approval for both visual screening and limiting the off-site movement of dust. To limit temporary visual impacts during construction, permittee shall install temporary green-screen fencing cover in the areas requiring the above portions of perimeter landscaping;

f. Maintain vegetative ground cover to the greatest extent feasible throughout the array areas for the life of the subject permit;

g. Decommissioning plans shall include restoration of Project site disturbed areas with drought-tolerant vegetation from the County's drought-tolerant plant lists then in effect to the satisfaction of the Regional Planning Biologist at the end of the life of the project;

h. Mitigation monitoring and Conditional Use Permit inspections shall be done during the first two years to ensure compliance with dust and other mitigation measures and other conditions of project approval during construction and initial operations;

i. If determined necessary by the Director of Regional Planning, permittee shall pay the cost of an on-site mitigation and conditions compliance monitor during construction, satisfactory to the Director of Regional Planning, to independently monitor and report on project compliance. Said monitor may be the same monitor for each of the six Project sites;

j. Permittee shall use tarps over dirt in trucks to limit off-site movement of dust; and

k. Permittee shall make National Institute of Occupational Safety and Health (NIOSH) approved dust masks available to construction workers and shall provide proper training to construction workers prior to construction to protect against dust exposure and possible harmful effects from such dust exposure during dust-generating activities. Permittee shall maintain a log demonstrating said training, available upon request by the Director.

PROJECT SITE SPECIFIC CONDITIONS

44. This grant shall authorize a solar photovoltaic electricity generation facility and construction of a water tank for fireflow purposes in the proposed A-2-2 (Heavy Agriculture-two acres minimum required area) zone.

45. Permittee shall comply with all conditions set forth in the attached County Department of Public Works letter dated April 16, 2014 for Project 1, Fire Department letter dated March 4, 2014 for Project 1, Public Health e-mail dated February 20, 2014 and letter dated October 11, 2013 for Project 1, and Parks and Recreation Department letter dated March 12, 2014 for Project 1.

46. Permittee shall provide on-site notice to the resident of the development located across from the northwest corner of the Project site at least three days prior to start of construction activities.

47. Permittee shall contact the Antelope Valley-East Kern Water Agency (AVEK) engineering group prior to detail design of the Project 1 North Lancaster Ranch Project Site's underground systems to insure no conflict with AVEK underground facilities located along the alignment of West Avenue B adjacent to the Project 1 site.

48. Permittee shall maintain a current contact name, address, and phone number with the Department of Regional Planning at all times, and provide signage at main entrance location(s) with the phone and e-mail contact information for public reference.

Attachments:
Mitigation Monitoring and Reporting Program
Public Works, Fire Department, Public Health, and Parks and Recreation Letters as dated in Condition 44 above.

SZD:KKS
4/22/14

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

April 16, 2014

IN REPLY PLEASE
REFER TO FILE: LD-2

TO: Samuel Dea
Special Projects
Department of Regional Planning

Attention Kim Szalay

FROM: Steve Burger
Land Development Division
Department of Public Works

CONDITIONAL USE PERMIT (CUP) NO. 201100079
PROJECT NO. R2011-00833
NORTH LANCASTER RANCH-PROJECT 1
VICINITY OF 105TH STREET WEST AND AVENUE B
ASSESSOR'S MAP BOOK NO. 3262, PAGE 1, PARCEL NOS. 5 AND 6
UNINCORPORATED COUNTY AREA OF LANCASTER

☒ Public Works recommends approval of this CUP.

☐ Public Works does **NOT** recommend approval of this CUP.

We reviewed CUP No. 201100079 in the unincorporated County area of Lancaster. The project is for the new construction and operation of a 20-megawatt, solar-photovoltaic, power-generating facility in the vicinity of the northwest corner of 110th Street West and Avenue B. The project has been revised to include a 160-acre parcel and is identified as APN 3262-001-005. The project is proposing to balance the site with 5,400 cubic yards of cut and fill and 43,600 cubic yards of overexcavation. Grading shall be limited to only the access roads, substations, tanks, inverter pad, or basins.

Upon approval of the site plan, we recommend the following conditions:

1. Road

1.1 Dedicate right of way, 32 feet from centerline, along the property frontage on Avenue B to the satisfaction of Public Works. An additional 2 feet of right of way will be required beyond the existing 30 feet of public right of way. A processing fee will be required for the dedication.

1.2 Dedicate right of way, 43 feet from centerline, along the property frontage on 110th Street West to the satisfaction of Public Works. A processing fee will be required for the dedication.

1.3 Make an offer of private and future right of way, 32 feet from centerline, along the property frontage on 102nd Street West, 105th Street West, and Avenue A-8 to the satisfaction of Public Works. A processing fee will be required for the offer to dedicate.

1.4 Dedicate or make an offer of a property line return radii of 13 feet at all local street intersections to the satisfaction of Public Works. In addition, dedicate additional right of way for corner cut-offs to meet current Americans with Disabilities Act (ADA) guidelines, where deemed necessary, and to the satisfaction of Public Works. A processing fee will be required for the dedication or offer to dedicate.

1.5 Dedicate or make an offer of a property line return radius of 27 feet at the intersection of Avenue B and 110th Street West. In addition, dedicate additional right of way for corner cut-offs to meet current ADA guidelines and to the satisfaction of Public Works. A processing fee will be required for the dedication.

1.6 Provide a minimum of 10-foot-wide slope and drainage easements along all street frontages to the satisfaction of Public Works.

1.7 Whenever there is an offer of a future street, or a private and future street, provide a drainage statement/letter to the satisfaction of Public Works.

1.8 Construct driveway approaches on 110th Street West and Avenue B to the satisfaction of Public Works. Provide a 10-foot-wide clear zone (nothing planted above 3 feet in height) within the vegetative buffer area on each side of the driveway to the satisfaction of Public Works.

1.9 Obtain an encroachment permit from Public Works' Land Development Division, Permit Section, for all proposed work within the road right of way and private and future streets.

1.10 Repair any public improvements damaged during construction, along the property frontage, to the satisfaction of Public Works.

1.11 Underground all new facilities to the satisfaction of Public Works. A franchise agreement will be required for distribution/transmission facilities within public right of way.

1.12 Acquire street plan approval or direct check status before obtaining grading or drainage permit as applicable.

1.13 Execute an Agreement to Improve for the street improvements prior to the issuance of a building or grading permit as applicable.

2. Grading

2.1 Submit a grading plan for review and approval that complies with the approved hydrology study dated January 31, 2014, or the latest revision, to the satisfaction of Public Works. Grading shall be limited to only the access roads, substations, tanks, inverter pads, or basins. Work within the existing vegetation, where the solar panels are proposed, shall be conducted with minimal disturbance, and the operator shall take all necessary precautions to not use vehicles or machineries for grading or alter the existing grade in these areas.

When vehicles or machineries are deemed necessary for solar field installation work, appropriate ground-protection practices (such as construction mats, stabilizers, or established vegetation) shall be utilized for both dust suppression and to ensure that the vehicles or machineries are compatible with continue and future vegetation growth, to the satisfaction of Public Works. The project's biologist shall confirm that construction practices are compatible with continued and future vegetation growth. Any grading, disking, and scraping to access roads, walkways, required basins, and berms shall be permanently stabilized with an earth-stabilizing product that is acceptable to Public Works, in cooperation with the Departments of Regional Planning and Public Health, to prevent fugitive dust.

2.2 A maintenance agreement may be required for privately maintained drainage devices.

2.3 Provide soil/geology approval of the grading plan from Public Works' Geotechnical and Materials Engineering Division as applicable.

2.4 Obtain all applicable jurisdictional permits. These agencies may include the State of California Regional Water Quality Control Board; State of California Department of Fish and Wildlife; State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources; and US Army Corps of Engineers.

For questions regarding the road and grading conditions, please contact Ruben Cruz of Public Works' Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

3. Building and Safety

3.1 Submit plans and specifications to meet current applicable codes and standards for structures, grading, mechanical, plumbing, and electrical.

3.2 All electrical installations shall comply with the following criteria:

3.2.1 The portions of the project associated with power generation and transmission shall be designed in accordance with the County of Los Angeles, Electrical Code or in accordance with other standards or regulations acceptable to the building official.

3.2.2 The nonpower generation and transmission portion of the project shall be designed in accordance with the County of Los Angeles, Electrical Code or in accordance with other standards or regulations acceptable to the building official.

3.3 Comply with fire, life safety, structural, and accessibility requirements including ADA guidelines.

3.4 Any occupiable building must have a restroom for employees.

3.5 All foundations must be engineered to comply with existing soil conditions.

3.6 Obtain approval from other agencies prior to permit issuance.

For questions regarding the building and safety conditions, please contact Clint Lee of Public Works' Building and Safety Division at (626) 458-3173 or cllee@dpw.lacounty.gov.

4. Drainage

4.1 Comply with the requirements of the Hydrology Study/Water Quality Plan, which was approved on January 31, 2014, to the satisfaction of Public Works.

4.2 Prior to grading plan approval, the applicant shall obtain a Jurisdictional Determination letter or equivalent from the US Army Corps of Engineers and written acknowledgement from State Department of Fish and Wildlife that no jurisdictional surface water drainages occur in the grading footprint. Documentation from jurisdictional agencies shall be obtained to the satisfaction of Public Works.

For questions regarding the drainage conditions, please contact Ernesto Rivera of Land Development Division at (626) 458-4921 or erivera@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Ruben Cruz of Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

RC:tb
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REVISED CONDITIONS
Supersedes Fire Dept. Conditions Dated 10/23/13

COUNTY OF LOS ANGELES FIRE DEPARTMENT

Land Development Unit – Fire Prevention Division
5823 Rickenbacker Road
Commerce, California 90040-3027
Office (323) 890-4243, Fax (323) 890-9783

DATE: March 4, 2014 **Map Date:** 02/13/14

TO: Department of Regional Planning
Zoning Permits – Kim Szalay

PROJECT #: CUP #2011-00833 (Proj 1)

LOCATION: West Avenue B, between 105th Street West & 110th Street West, Lancaster (County)

FIRE DEPARTMENT SOLAR ARRAY FIELD CONDITIONS

General Comments:

1. The proposed solar array field is ***"Cleared"*** to proceed to public hearing.

2. As noted on the site plan, West Avenue B is required to be increased from 18 feet to 20 feet from 110th Street West to the entry of 2nd solar filed.

2. As noted on the site plan, each proposed solar array field will require a minimum of one entry/ exit location due to the size of the field.

3. As noted on the site plan, provide an interior perimeter road and interior access roads as indicated on the site plan. All interior roads shall meet the Fire Department interior access road requirements.

4. The Fire Department is requiring the interior access roads within the solar array fields to have a soil compaction of 90%, OR the apparatus access road shall be excavated and re-compacted to 90%.

5. As noted on the site plan, provide one 10,000 gallon water tank near at the address side entry/ exit gates for each solar field.

6. All fire Protection facilities; including access and water, must be provided prior to and during construction, and for the duration of the project. Please contact FPEA Wally Collins at (323) 890-4243 if there are any questions.

On-site & Off-site Fire Apparatus Access Road Requirements:

1. The fire apparatus on-site & off-site access roads shall be installed and maintained in a drivable condition for the duration of the solar project.

2. The fire apparatus on-site & off-site access roads shall be installed prior to occupancy or operation of the facility.

3. Provide a minimum roadway width of 20 feet, clear-to-the sky, for all on-site & off-site fire apparatus access roads with a minimum centerline turning radius width of 32 feet each turn. The inner radius shall be 22 feet and the out radius shall be 42 feet.

4. The fire apparatus on-site & off-site access roads shall have a soil compaction of 90%, OR the apparatus access road shall be excavated and re-compacted to 90%.

5. Provide a 20-foot interior Fire Department access roads throughout the development.

6. Provide a Fire Department access road around the entire perimeter of each solar project, which shall comply with the above noted requirements.

On-Site Ingress/ Egress Gates:

1. The onsite ingress/ egress gate shall be located on the address side of each property.

2. Each onsite ingress/ egress gate width shall be a minimum 20 feet, clear-to-he sky, with all gate hardware clear of the roadway width.

3. The gates shall be a minimum distance of 40 from the street.

4. Provide an approved "Fire Department Knox Lock" for each ingress/ egress gate.

5. The onsite ingress/ egress gates shall be in compliance with LACoFD Fire Prevention Regulation #5.

6. The facility emergency contact information shall be provided with each limited access device, per LACoFD Regulation 5, and shall be clearly indicated with an appropriate placard at each ingress location. The minimum size of the placard shall be 12 inches X 12 inches.

Water & Water Tank Requirements:

1. This development requires the installation of one water tank at each site. Each water tank is required to have a minimum tank size of 10,000 gallons for "Fire Department" use only.

2. Each water tank shall be clearly identified for "Fire Department Use Only".

Water & Water Tank Requirements Continued:

3. Each water tank shall be located adjacent to the ingress/egress gate located on the address side of the property.

4. Each water tank shall be in compliance with LACoFD Regulation 19, which provide guidance in the installation of a water tank.

5. Each water tank shall have a-low level water local alarm which shall be in compliance with all applicable codes and regulations. The low level water local alarm can be battery operated.

6. Each water tank shall have a Fire Department supply outlet of 2 1/2 inches in diameter with National Standard threads. The supply outlet is to be located 14-24 inches above the finished grade, and is required to be protected by approved barricades.

7. If the outlet is not provided directly off of the tank, provide a 6 inch underground pipe to a 4 inch upright pipe with an outlet of 2 ½ inches with National Standard threads, which is required to be protected by barricades.

Vegetation Management:

1. The clearance of vegetation shall be in compliance with the brush clearance regulation as defined by the Fire Code or as directed by the Fire Official.

2. The vegetation shall be trimmed to a maximum height of 6 inches within the boundaries of the solar array.

3. All electrical transformer vaults or structures shall have all vegetation cleared to mineral soil for a distance of 50 feet.

Electrical Equipment:

1. All electrical disconnect locations shall be clearly identified.

2. All electrical shall be in compliance with all applicable state and local codes.

Kim Szalay Project ①

From: Vicente Banada
Sent: Thursday, February 20, 2014 3:19 PM
To: Kim Szalay
Cc: Eric Edwards
Subject: RE: Project Nos. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5) Permit Consultation - Due March 11, 2014 or earliest date prior as feasible

Hi Kim,

The Department of Public Health-Environmental Health Division has reviewed the information provided for the project identified above and the comments have been met by the revised site plans. Environmental Health recommends the approval of this CUP.

Thanks,

Vicente Banada
Environmental Health Specialist IV
Land Use Program
5050 Commerce Drive
Baldwin Park, CA 91706
(626)430-5381 Tel
(626)813-3016 Fax

From: Kim Szalay
Sent: Tuesday, February 18, 2014 3:34 PM
To: Vicente Banada
Cc: Eric Edwards
Subject: FW: Project Nos. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5) Permit Consultation - Due March 11, 2014 or earliest date prior as feasible

Mr. Banada, as CUP Coordinator for Public Health while Michelle is out of the office, attached PH comments and link below are a re-send of what was sent to Michelle. The required mobile sanitation plan will be provided for PH review and approval prior to construction, as a required condition of the CUP. The mobile sanitation facilities and potable water (bottled) locations are depicted on the site plans per the link below. Please send your response as soon as possible this week.

Thank You,

Kim Szalay

The CUP consultation package for this project is available at the website below. Please review and provide comments by the date specified above or earliest date prior as feasible.
Employee ID & unique password are required to enter the site. If you have any technical issues please contact webadmin@planning.lacounty.gov.

Project link: http://10.2.8.130/content/silverado-power-west-0

Thank you,

Kim Szalay

Mr. Kim K. Szalay, MPL, AICP
Principal Planner
Special Projects Section
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
(213) 974-4876 Direct
(213) 626-0434 Fax
kszalay@planning.lacounty.gov

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COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

CYNTHIA A. HARDING, M.P.H.
Acting Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

JACQUELINE TAYLOR, REHS
Director of Environmental Protection Bureau

PATRICK NEJADIAN, REHS
Chief EHS, Land Use Program

MICHELLE TSIEBOS, REHS
Environmental Health Specialist IV
Land Use Program
5050 Commerce Drive
Baldwin Park, California 91706
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Fifth District

October 11, 2013

TO: Carolina Blengini
Regional Planning Assistant II
Department of Regional Planning

FROM: Michelle Tsiebos, MPA, REHS M.T
Environmental Health Division
Department of Public Health

SUBJECT: CUP Consultation
PROJECT NO. R2011-00798/ R2011-00799/ R2011-00801/ R2011-00805/ R2011-00807/R2011-00833
Silverado Solar Project
LOCATION: 110TH Street West & West Avenue B, Lancaster

See Followup E-mail

( ) Environmental Health recommends approval of this CUP.
(X) Environmental Health does **NOT** recommend approval of this CUP.

The Department of Public Health – Environmental Health Division has reviewed the information provided for the project identified above. The project is proposing the construction and operation of six solar electric generating facilities for the provision of 172 MW of electricity into the local grid.

Prior to the Department clearing this project for public hearing, the requirements listed on the attached reports need to be satisfactorily fulfilled.

For questions regarding the attached reports, please contact the individual listed on the bottom of the report. For all other questions, please contact me at (626) 430-5382.

Potable Water Supply

Hauled water is not an approved source of potable water for this project.

1. An adequate supply of potable water from an approved source shall be provided to serve the sanitary and drinking water needs of the project.

A. If permanent drinking and hand washing facilities are proposed, an on-site well meeting the requirements of Public Health and other applicable laws and regulations shall be required. The applicant shall secure a Well Production Permit and Water Supply Approval from the Drinking Water Program for the installation of the well. A well yield test to establish groundwater sustainability and water quality analysis from an approved laboratory will be required as part of the approval process.

Note: If the well provides potable water to 25 or more persons for more than 60 days per year, the California Safe Drinking Water Act requires that a public water system be established meeting all the requirements of the California Health and Safety Code and the California Code of Regulations.

B. If proposing to use an existing private well, the following information shall be submitted to the Drinking Water Program for review:

1) Copy of Well Driller's Report.
2) If applicable, provide copy of bond density log to confirm presence and depth of sanitary seal per California Well Standards.
3) Copy of a Well Production Permit and Water Supply Approval from the Drinking Water Program for the construction of the water well.
4) Documentation of well yield test in conformance with Public Health requirements. Well yield test results are valid for three (3) years from the date of approval.
5) Laboratory test results indicating the well water meets the drinking water standards established by the U.S. Environmental Protection Agency and the California Department of Public Health.

C. If Mobile Sanitation Facilities are proposed, the applicant shall include in the Mobile Sanitation Plan a description of how potable drinking water will be provided in a manner as to be readily accessible to employees. The plan shall identify the potable water source and method of dispensing. The plan shall also describe how drinking water containers are maintained, including methods to prevent contamination of drinking water. Please see the guidelines attached at the end of this document.

2. Revise the site plan or submit a separate plan to show the location of the existing or proposed well and setback distances from potential sources of contamination within 200 feet, including but not limited to, septic systems, animal stables, etc.

For questions regarding the potable water requirements, please contact Richard Lavin at (626) 430-5420.

Sewage Disposal

1. Sanitary toilet facilities shall be provided to meet Public Health requirements.

A. If permanent toilet facilities are proposed, the applicant shall submit the following information to the Land Use Program for review and approval:

(1) A feasibility report in compliance with Public Health's "A Professional Guide to Requirements and Procedures for Onsite Wastewater Treatment Systems (OWTS)." The guideline is available on-line at www.lapublichealth.org/eh. The design and installation of OWTS shall conform to the requirements of Public Health and other

applicable regulatory agencies. The feasibility report shall include a professionally drawn scaled plot plan to illustrate the following:

a) Location and sizing of proposed OWTS (septic tank and dispersal system), including 100% future expansion dispersal area.

b) Location of all other structures and amenities, including buildings, walls, fences, retaining walls, storage facilities, guard shacks, etc.

c) Location of any existing and proposed water wells and their related components on the project site as well as on neighboring properties within 200 feet of the proposed OWTS.

d) Location of any surface water {e.g. streams, floodways, drainage courses, subdrains, culverts, swales, etc.).

Note: If a public sewer connection is available within 200 feet any part of the proposed building or exterior drainage, all future drainage and piping shall be connected to such public sewer.

(2) Floor plan of the toilet facility showing the location of all plumbing fixtures (i.e. toilets, urinals, hand wash sinks, etc.).

(3) Proof that application for a Waste Discharge Permit (WDR) has been filed with the Los Angeles Regional Water Quality Control Board

B. If mobile sanitation facilities are proposed, the applicant shall submit for review and approval a Mobile Sanitation Facility Plan consistent with Public Health's guideline, "Sanitation Facilities at Remote Worksite Locations." Please see the guidelines attached at the end of this document.

2. Provide a detailed description of the panel cleaning process. Include the chemicals to be used during the cleaning process. Describe how the wastewater generated by cleaning/washing of panels when utilizing a solution other than plain water, will be collected to prevent discharge onto the ground surfaces and how will it be disposed of.

For questions regarding wastewater disposal requirements, please contact Patrick Nejadian at (626) 430-5390.

Noise

The Toxics Epidemiology Program recommends approval of the project upon the following conditions:

Noise mitigation measures "Noise 5.11 (N-1 to N-9)" and Air Quality mitigation measures "AQ 5.3 (AQ-1 to AQ-8)" from the Monitoring Mitigation Reporting Program (MMRP) must be implemented. This includes mitigation measure TT-4.

For questions regarding the above comments, please contact Evenor Masis or Robert Vasquez at (213) 738-3220.

Sanitation Facilities at Remote Worksite Locations

1.0 Background and Purpose

Typically, permanently installed restroom and potable water facilities are required to be provided at worksite locations. In situations where permanent restrooms and potable water facilities are not feasible, the County Department of Public Health (Department) may approve the use of *"mobile sanitation facilities"* consistent with standards specified in Los Angeles County Code, Title 11 and the California Code of Regulations, Title 8.

The purpose of this document is to outline the procedure for obtaining Departmental approval for the use of *"mobile sanitation facilities"* by mobile crews at unattended commercial worksites located in remote areas of the County where conventional restroom facilities are unavailable and/or impractical due to the lack of a potable water supply.

2.0 Definition

A *"mobile sanitation facility"* is a portable restroom facility that is self-contained, and equipped with potable water, a toilet, a hand washing facility, and a waste water storage tank. *[Note: A portable chemical toilet, commonly referred to as a "porta-potty", is not considered a mobile sanitation facility.]*

3.0 Regulatory Requirements

The following requirements are based on provisions of Los Angeles County Code, Title 11 - Health & Safety, and Cal-OSHA sanitation standards in Section 3360, Title 8, California Code of Regulations.

3.1 Mobile Sanitation Facility Plan

An applicant seeking to use a "mobile sanitation facility" in conjunction with a conditional use permit to develop and operate a remote commercial work site shall submit to the Department for review and approval a *mobile sanitation facility plan* to include the following:

3.1.1 The projected number of employees that will use the proposed mobile sanitation facility.

3.1.2 A Site Plan showing the proposed location(s) of the facility.

3.1.3 A service and maintenance schedule for the facility.

3.1.4 Description of how potable drinking water will be provided in a manner as to be readily accessible to employees. Identification of potable water source and method of dispensing (container and single-use cups or bottled water). Description of how drinking water containers are maintained, including methods to prevent contamination of drinking water.

3.1.5 Copy of a service agreement with a permitted toilet rental agency to provide a mobile sanitation facility approved by the Department. If the applicant proposes to design and construct the mobile sanitation facility, design drawings and specifications shall be included.

3.2 Permitting, Maintenance and Storage Requirements

Upon approval of the plan referenced in 3.1 above, the Department will issue an annual operating permit to the applicant. The operating permit will include the following conditions:

3.2.1 The mobile sanitation facility shall be maintained in a safe and sanitary condition so as not to constitute a public health hazard or nuisance.

3.2.2 The mobile sanitation facility must be removed from the work site at the end of each work day, and be returned to an approved storage site.

For questions regarding these requirements, please contact the Department's Land Use Program at (626) 430-5380.

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"

Russ Guiney, Director — John Wicker, Chief Deputy Director

March 12, 2014 — Sent via e-mail:kslalay@planning.lacounty.gov

TO: Kim Szalay
Department of Regional Planning

FROM: Lorrie Bradley, Park Planner
Research and Trail Planning Section

SUBJECT: **PROJECT CONSULTATION**
SILVERADO SOLAR
COUNTY PROJECT NOs.
(1) R2011-00833-(5) (CUP201100079);
(2) R2011-00798-(5) (CUP201100070);
(3) R2011-00799-(5) (CUP201100071;
(4) R2011-00807-(5) (CUP201100076);
(5) R2011-00801-(5) (CUP201100072);
(6) R2011-00805-(5) (CUP201100074); RZC2011000005)

The Department of Parks and Recreation has completed the review of the six conditional use permits (CUPs) and site plans dated 2/11/2014 for the proposed photovoltaic generation facilities mentioned above to allow for the construction and operation of the solar generating facilities and their associated generation tie lines. The Department of Parks and Recreation requests that the Department of Regional Planning condition the above mentioned project with the following conditions as part of the conditional use permit:

R2011-00833 Project 1: North Lancaster Ranch

In concept, the location of the twelve (12) foot wide trail easement dedication for the "Little Buttes Trail", an adopted proposed County trail that runs parallel to the project site (APN 3262-001-006) along West Avenue B, as shown on the site plan dated 2/11/2014 is acceptable.

The Department of Parks and Recreation requires a twelve (12) foot wide multi-use (hiking, mountain biking, and equestrian) trail easement dedication and trail construction, contiguous to West Avenue B, though outside of the road right-of-way, for the purposes of the "Little Buttes Trail".

Trail Easement Recordation Conditions

1. Prior to use and reliance of this conditional use permit, and prior to issuance of a grading permit, building permit or improvement plans, the Applicant shall:

    a. Dedicate by separate document to the County of Los Angeles, a twelve (12) foot wide multi-use (hiking, mountain biking and equestrian) trail easement for purposes of the Little Buttes Trail as shown on the site plan dated 2/11/2014. Trail easement must be outside of the road right-of-way and slope easement. The trail easement shall be recorded as a separate document and the plat map and legal description shall be attached and submitted to the Department of Parks and Recreation for review.

    b. The following language (in exact form) must be shown for multi-use trail dedications on the site plan and in the easement document:

    Title Page: We hereby dedicate to the County of Los Angeles a twelve (12) foot wide multi-use (hiking, mountain biking and equestrian) trail easement for the purposes of the "Little Buttes Trail". Full multi-use (hiking, mountain biking, and equestrian) public access shall be provided for the trail easement.

2. Per Department of Public Works (DPW) requirement, all trail easements must be outside of the road right-of-way and slope easement.

Trail Construction Conditions

1. Prior to grading approval or building permit issuance, or whichever comes first, the applicant shall:

    a. Design and construct all required multi-use trails, shown on the site plans, in a manner consistent with the County of Los Angeles Trails Manual (Trails Manual), as Natural Trail 1 (refer to page 4-13, Table 4.3.1-1, Trail Classification Guidelines.) Any significant deviation from the guidelines within the Trails Manual must be approved in writing by the Department of Parks and Recreation.

2. Applicant shall obtain approval from DPW for the trail crossing location (intersection of West Avenue B and 105th Street West (Future)), and design, including proper signage, suitable for safe trail crossing.

3. The applicant shall provide the submittal of the rough grading plans, which shall include detailed grading information for the segment of trails for dedication to the County of Los Angeles, Department of Parks and Recreation. The detailed grading information for the trail construction, shall include all pertinent information required,

in a manner consistent with the Trails Manual trail construction guidelines, and all applicable codes, but not limited, to the following:

a. Cross slope trail gradients not to exceed four percent (4%) with two (2%) preferred, and longitudinal (running) slope gradients not to exceed twelve percent (12%) for more than fifty feet (50'). The Department of Parks and Recreation will review and may allow slopes greater than twelve percent (12%) on a case by case basis.

b. Bush hammer (or equivalent) porous finish or surface is required on all paved surfaces at minimum width of eight (8) feet wide for driveway trail crossings, and minimum twelve (12) feet width for painted roadway trail crossings.

c. The applicant is required to purchase and install appropriate lodge pole fencing to delineate "Little Buttes Trail" from the trail tread, for user safety, and property security, as approved by the Department of Parks and Recreation.

   i. Trail fencing shall be installed within one (1) foot wide section of the dedicated multi-use trail easement contiguous to the West Avenue B.
   ii. Trail fencing locations and materials shall be approved in writing by the Department of Parks and Recreation.

R2011-00798 Project 2: Western Antelope Blue Sky Ranch

In concept, the location of the twelve (12) foot wide multi-use trail easement dedication the "California Poppy Trail", an adopted proposed County trail located on the west side of 110th Street West, as shown on the site plan dated 2/11/2014 is acceptable.

The Department of Parks and Recreation requires a twelve (12) foot wide multi-use (hiking, mountain biking, and equestrian) trail easement dedication and trail construction on the east side of the project site (APN 3267-015-001) contiguous to, though outside of the 110th Street West road right-of-way, for purposes of the "California Poppy Trail".

Trail Easement Recordation Conditions

1. Prior to use and reliance of this conditional use permit, and prior to issuance of a grading permit, building permit or improvement plans, the Applicant shall:

   a. Dedicate by separate document to the County of Los Angeles, a twelve (12) foot wide multi-use (hiking, mountain biking and equestrian) trail easement for purposes of the California Poppy Trail as shown on the site plan dated 2/11/2014. Trail easement must be outside of the road right-of-way and slope easement. The trail easement shall be recorded as a separate

document and the plat map and legal description shall be attached and submitted to the Department of Parks and Recreation for review.

b. The following language (in exact form) must be shown for multi-use trail dedications on the site plan and in the easement document:

Title Page: We hereby dedicate to the County of Los Angeles a twelve (12) foot wide multi-use (hiking, mountain biking and equestrian) trail easement for the purposes of the "California Poppy Trail". Full multi-use (hiking, mountain biking, and equestrian) public access shall be provided for the trail easement.

2. Per Department of Public Works (DPW) requirement, all trail easements must be outside of the road right-of-way and slope easement.

Trail Construction Conditions

1. Prior to grading approval or building permit issuance, or whichever comes first, the applicant shall:

b. Design and construct all required multi-use trails, shown on the site plans, in a manner consistent with the County of Los Angeles Trails Manual (Trails Manual), as Natural Trail 1 (refer to page 4-13, Table 4.3.1-1, Trail Classification Guidelines.) Any significant deviation from the guidelines within the Trails Manual must be approved in writing by the Department of Parks and Recreation.

2. Applicant shall obtain approval from DPW for the trail crossing location and design, including proper signage, suitable for safe trail crossing.

3. The applicant shall provide the submittal of the rough grading plans, which shall include detailed grading information for the segment of trails for dedication to the County of Los Angeles, Department of Parks and Recreation. The detailed grading information for the trail construction, shall include all pertinent information required, in a manner consistent with the Trails Manual trail construction guidelines, and all applicable codes, but not limited, to the following:

a. Cross slope trail gradients not to exceed four percent (4%) with two (2%) preferred, and longitudinal (running) slope gradients not to exceed twelve percent (12%) for more than fifty feet (50'). The Department of Parks and Recreation will review and may allow slopes greater than twelve percent (12%) on a case by case basis.

b. Bush hammer (or equivalent) porous finish or surface is required on all paved surfaces at minimum width of eight (8) feet wide for driveway trail

crossings, and minimum twelve (12) feet width for painted roadway trail crossings.

c. The applicant is required to purchase and install appropriate lodge pole fencing to delineate "California Poppy Trail" from the trail tread, for user safety, and property security, as approved by the Department of Parks and Recreation.

   i. Trail fencing shall be installed within one (1) foot wide section of the dedicated multi-use trail easement contiguous to the 110th Street West.
   ii. Trail fencing locations and materials shall be approved in writing by the Department of Parks and Recreation.

Trail Construction Conditions for R2011-00833 and R2011-00798

1. Prior to initiation of trail construction, the Applicant shall:

   a. Submit a preliminary construction schedule showing milestones for completing the trail, including installation of lodge-pole fencing. The Applicant's representative shall provide updated trail construction schedules to the Department of Parks and Recreation on a monthly basis. Schedule submittals shall include a "Two Week Look-Ahead" schedule, to reflect any modifications to the original schedule.

   b. Stake the centerline of the trail. The Applicant's representative shall then schedule a site meeting with the Department of Parks and Recreation's representative within the Trails Section for trail alignment inspection and approval.

   c. The Applicant shall notify the Department of Parks and Recreation for a Final Inspection "Trail Walk" within five (5) business days of completion of trail construction, including installation of all required amenities. Any portions of the constructed trail not approved shall be corrected and brought into compliance with the Department of Parks and Recreation's Trails Manual within thirty (30) calendar days. Upon completion of the punch list, the Applicant shall contact the Department of Parks and Recreation to schedule another site inspection.

2. Prior to the Department of Parks and Recreation's final acceptance of the constructed trail, the Applicant shall:

   a. Submit electronic copies on CD or DVD (AutoCAD 2005 or newer version) of the As-Built Trail, grading and construction drawings to the Department of Parks and Recreation, Trails Section.

b. Submit a letter to the Department requesting acceptance of the dedicated constructed trail. The Department will issue a trail acceptance letter only after receiving a written request for final trail approval and as-built trail drawings.

Thank you for including this Department in the review of this notice. For any trail related questions, please contact Ms. Olga Ruano at (213) 738-2014 or oruano@parks.lacounty.gov.

c: Regional Planning (K. Szalay)
Parks and Recreation (N. E. Garcia, K. King, J. Rupert, F. Moreno, J. Yom, O. Ruano)

DRAFT ZONE CHANGE RESOLUTION, ORDINANCE, AND MAP PROJECT 1 ONLY

THE REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
PROJECT NO. R2011-00833-(5)
ZONE CHANGE NO. 201100005

WHEREAS, the Regional Planning Commission ("Planning Commission") of the County of Los Angeles ("County") has conducted a public hearing in the matter of Zone Change No. 201100005 on _____:

WHEREAS, the Planning Commission finds as follows:

1. The Project Site is located within the unincorporated area identified as Antelope Valley West on the County's Zoned District Map and near the City of Lancaster, and it is bounded by 110th Street West to the west, 102nd Street West to the east, West Avenue B to the south, and West Avenue A-8 to the north. Approximately 240 acres are located within the unincorporated County area.

2. The permittee, North Lancaster Ranch LLC ("Permittee"), requested approval to change zoning of the 240-acre property from A-1-2 (Light Agriculture-two acres minimum required area) to A-2-2 (Heavy Agriculture-two acres minimum required area) pursuant to Section 22.24.150 of the County Zoning Ordinance ("County Code"). Permittee proposes new development ("Project") within the 240-acre North Lancaster Ranch project site located within Los Angeles County ("Project Site"). The site plan for the Project depicts a required 20-foot setback from the solar arrays to the subject Project's property line, which setback may also include a vegetative buffer 10 feet in width for locations across from sensitive uses. An additional required 10-foot "slope easement" would be dedicated to the County as part of the public rights-of-way around the project. The Project Site would include a perimeter safety and security fence eight feet in height including three-strand barbed wire at the top to protect the public from high voltage electricity and to protect the facility from intrusion. Construction internal to the site would be comprised of solar panels set in arrays with associated inverters, transformers, and two internal substations, with access through the site by compacted interior dirt roads. All of the subject property, with the exception of above-mentioned buffers, would be used for construction of arrays and appurtenant facilities to generate approximately 20 megawatts of solar photovoltaic electricity. The electricity generated would be transmitted through underground transmission lines to tie in to the electrical grid using existing transmission lines or through additional lines limited in length, to the nearest point of connection as depicted on the site plan. Interior drainage basins are required to insure that stormwater flows match pre-existing conditions as it flows through the subject site. This

Project 1 is required to provide a 12-foot trail easement along the southern boundary to provide continuity for a County planned trail.

3. The proposed Zone Change is consistent with the Countywide General Plan and Antelope Valley Areawide General Plan ("Areawide Plan") for the property. The proposed Zone Change to A-2-2 is consistent with the land use designation of N-1 (Non-Urban 1), because the intent of the zoning (to Zone A-2-2) is to implement the land use (Category N-1).

4. The Project is consistent with the proposed A-2-2 zoning classification and complies with development standards of Title 22 of the County Code.

5. Modified conditions of the Project Site and of the surrounding community warrant the adoption of the Zone Change. The Project's location within an area encouraging growth of the solar electricity generation industry and in proximity to existing interconnection facilities, makes the Project Site ideal for further solar electricity generation development, intensifying its designation as a regional source for generating electricity while remaining sensitive to surrounding uses. The existing regulations applicable to the Project Site are primarily reflective of the earlier planned use of the subject property as largely limited to agricultural use. The addition of solar electricity generation facilities and other supporting equipment is a suitable alternative use to agriculture because of the shortage of available water in the Antelope Valley, the low-profile and pollution-free operational nature of a solar array field, and the need to meet California's renewable energy mandates. The existing A-1-2 zoning designation on the proposed Project Site would not allow for solar electricity generation, thereby eliminating the opportunity for the location of such a facility in an area highly suitable for such a use. Therefore, the regulations contained in and the development contemplated by the Zone Change would establish additional and appropriate land use controls to establish the use of the Project Site in a manner that would ensure compatibility with the surrounding community.

6. Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper and property posting.

7. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, CA 90012. The custodian of such documents and materials shall be the Section Head of the Special Projects Section, Los Angeles County Department of Regional Planning.

RESOLVED, That the Regional Planning Commission recommends to the Board of Supervisors of the County of Los Angeles as follows:

1. Change of zone from A-1-2 to A-2-2;

2. That the Board of Supervisors adopt the Environmental Impact Report ("EIR") (including Final EIR dated March, 2013, Draft EIR, California Environmental Quality Act Findings of Fact, and Mitigation Monitoring and Reporting Program), certify its completion and determine that the project, with modifications, will not have a significant impact upon the environment;

3. That the Board of Supervisors find the recommended zoning is consistent with the Los Angeles Countywide General Plan and Antelope Valley Areawide General Plan; and

4. That the Board of Supervisors hold a public hearing to consider the above recommended change of zone.

I hereby certify that the foregoing resolution was adopted by a majority of the voting members of the Regional Planning Commission on the County of Los Angeles on _____.

_____
Rosie Ruiz, Secretary
County of Los Angeles
Regional Planning Commission

VOTE:

Concurring:

Dissenting:

Abstaining:

Absent:

Action Date:

KKS
4/21/14

ZONING CASE NUMBER

ORDINANCE NUMBER _____

An ordinance amending Section 22.16.230 of Title 22 of the County Code, changing regulations for the execution of the Antelope Valley Areawide General Plan of the Los Angles Countywide General Plan, relating to the Antelope Valley West Zoned District No. 115.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1. Section 22.16.230 of the County Code is amended by amending the map of the Antelope Valley West Zoned District No. 115 as shown on the map attached hereto.

SECTION 2. The Board of Supervisors finds that this ordinance is consistent with the Antelope Valley Areawide General Plan of the Countywide General Plan of the County of Los Angeles.

CHANGE OF PRECISE PLAN

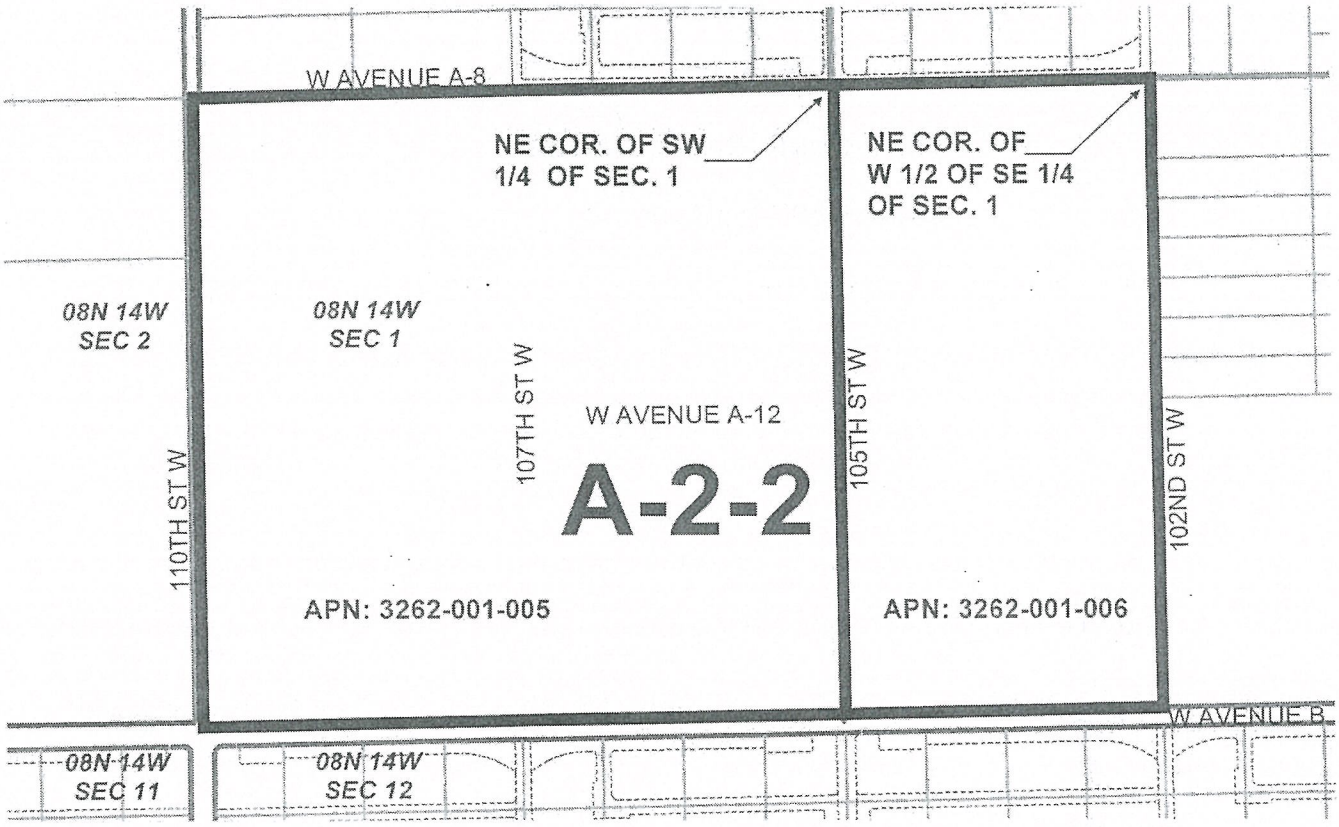
ANTELOPE VALLEY WEST ZONED DISTRICT

ADOPTED BY ORDINANCE: _____

ON: _____

ZONING CASE: ZC201100005

AMENDING SECTION: 22.16.230 OF THE COUNTY CODE



LEGAL DESCRIPTION:

APN: 3262-001-005

THE SW. 1/4 OF SEC.1, T.8N., R.14W. SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.

APN: 3262-001-006

THE W. 1/2 OF THE SE. 1/4 OF SEC. 1, T.8N., R.14W. SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.

LEGEND:

- PARCELS
- STREET / RIGHT OF WAY
- LOT LINE
- CUT/DEED LINE
- EASEMENT LINE
- ZONE CHANGE AREA

N

0 500 1,000 FEET

COUNTY ZONING MAP
405H189

DIGITAL DESCRIPTION: \ZCO\ZD_ANTELOPE_VALLEY_WEST\

THE REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
ESTHER L. VALADEZ, CHAIR
RICHARD J. BRUCKNER, PLANNING DIRECTOR

BURDEN OF PROOF STATEMENTS PROJECT 1

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

ZONE CHANGE APPLICATION BURDEN OF PROOF

Proj. 1

In addition to the information required on the application by Chapter 22.16, Part 2, the applicant for a Zone Change Application shall substantiate to the satisfaction of the Commission the following facts:

(Do not provide one word or Yes/No responses. If necessary, attach additional pages.)

A. That modified conditions warrant a revision in the zoning plan as it pertains to the area or district under consideration; and
For the proposed project, ***Site 6-22***, the County of Los Angeles' (County) Light Agricultural Zone (A-1) does not permit electric generating plants or generating plants that burn fuel, within its zoning district. Zone A-1 allows electric distribution substations, which have greater impacts than a solar photovoltaic (PV) plant. However, since the proposed project is located within Zone A-1; a zone change from Zone A-1 to A-2 is requested.
B. That a need for the proposed zone classification exists within such area or district; and
The County participates in reducing climate change and supports renewable energy goals in California. There is a need for solar energy plants to meet these goals. The County or the Antelope Valley in particular, contains large rural areas to support solar energy plants. Solar energy plants will generate revenue and boost economic development in the predominantly bedroom community of Antelope Valley. The solar era will close in 2 to 3 years once the 33 percent Renewable Portfolio Standard (RPS) has been reached. The proposed project and other similar projects are essential to achieving the RPS.
It would be beneficial for the County to implement the project before the 33 percent RPS has been reached. It would be beneficial for the County to obtain solar projects and revenue now; solar development will stop once the 33% RPS is achieved.
C. That the particular property under consideration is a proper location for said zone classification within such area or district; and
The area surrounding the project contains land predominantly zoned as A-1 and surrounding land is predominantly agricultural land. Most of the agricultural land cannot afford water for crops; thus, most of the land is unused.
A solar generating plant is not as invasive as electric generating plants. Solar plants do not emit noise or air emissions. They do not require high stacks and potential aesthetics and biological impacts can be mitigated. Additionally, solar plants do not change the actual land. For instance, upon removal of the solar panels, the land would retain its original state.
D. That placement of the proposed zone at such location will be in the interest of public health, safety and general welfare, and in conformity with good zoning practice.
The project would not have an adverse affect on the public health, safety, and general welfare. Solar plants are passive uses and rely upon the sun for generating energy. Efforts will be made to provide landscaping for the project to provide an aesthetically pleasing environment. Additionally, since solar plants are not as invasive as electric generating facilities, the proposed project would result in conformity with good zoning practice.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

CONDITIONAL USE PERMIT BURDEN OF PROOF

Pursuant to Zoning Code Section 22.56.040, the applicant shall substantiate the following: Proj. 1

(Do not repeat the statement or provide Yes/No responses. If necessary, attachment additional pages.)

A. That the requested use at the location will not: 1. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or 2. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or 3. Jeopardize, endanger or otherwise constitute a menance to the public health, safety or general welfare.
This 79.09-acre site is well suited to the North Lancaster Ranch solar PV project. The site is on previously-used
agricultural land that is fallow and the site is a very rural location with no neighbors. A PV plant makes no
noise, has no air emissions, will not have a daily person on site, will have all water trucked in for panel
washing, will not have sewer or septic connections, does not create traffic after it is built, and has a
landscaping and environmental design plan to be compatible with the local area.
B. That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
The 79.09 acres will be used to build 20 megawatts of PV. The site has adequate acreage to house the plant-
specific designs for landscaping, fencing, protecting viewsheds, and minimizing impact on local biological
communities will be part of the facility design. All construction areas will be revegetated to native habitat
conditions and specific efforts will be made to make the facility environmentally compatible and to look as
good as possible. There are no specific land uses adjacent to the site other than fallow agricultural fields so
the solar plant will be compatible with the surrounding area.
C. That the proposed site is adequately served: 1. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and 2. By other public or private service facilities as are required.
The 79.09 acres are at the southwest corner of 105th Street West and West Avenue B. The street access to
the site is good and the project will not increase traffic to the location once the project is constructed.
There is no need to improve the streets near the site since no staff are needed to run the plant on a daily
basis. No water or sewer/septic is needed for the facility. Water used for panel washings will be delivered
to the site twice a year. Power line hookups are adjacent to the site and no other utilities are required.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: June 11, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Kim K. Szalay
Principal Planner, Special Projects

SUBJECT: PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 2011000109
ENVIRONMENTAL ASSESSMENT NO. 201100109
SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS 1-6
AGENDA ITEMS 6-11

Additional comment letters regarding the Silverado Power Projects 1-6 have been received and are attached.

If you have any further questions, please contact Mr. Kim Szalay at (213) 974-4876, or, by email at kszalay@planning.lacounty.gov.

KKS

Attachments: Additional Comment Letters

VCS Environmental
EXPERT SOLUTIONS CEQA-NEPA . Biology . Regulatory

RECEIVED
JUN 09 2014
BY:_____

June 3, 2014

Kim Szalay
County of Los Angeles
320 West Temple Street, Room 1362
Los Angeles, CA 90012

SUBJECT: LOS ANGELES COUNTY HEARING JUNE 11, 2014 REGARDING SILVERADO SOLAR

Dear Kim:

On behalf of our client Land Veritas Corp, please consider this letter a request to modify the mitigation requirements for Silverado Project Numbers R-2011-00833, 00799, 00807, 00801, and 00805 which are on the June 11th Regional Planning Commission meeting agenda. Specifically, we would like the Mitigation Monitoring and Reporting Program (MMRP) to be expanded to include the Petersen Ranch Bank (the "Bank") as superior "replacement lands" which allow the lowest mitigation ratio for Silverado, namely a 1:3 ratio.

As you know, the Petersen Ranch is located in the Leona Valley and includes close to 4,000 acres of Swainson's Hawk habitat along with wetlands, alluvial fan, burrowing owl and various other sensitive habitat types and species. The Bank is supported by community members and would preserve a major portion of the Leona Valley as managed open space in perpetuity. Swainson's Hawk expert Pete Bloom has identified the Petersen Bank as one of the areas "best available for nesting and foraging habitat in the Antelope Valley west of State Highway 14."

The Silverado MMRP describes a tiered system of mitigation for Swainson's Hawk for its projects. The Bank meets all of the criteria for the lowest mitigation ratio, as it provides superior nesting and foraging habitat; it is located within 5 miles of an occupied Swainson's Hawk nest; it is within a proposed SEA; it will be protected in perpetuity with a conservation easement that will be held by a California Department of Fish & Wildlife-approved non-profit land trust; and a substantial endowment will be funded concurrent with recordation of the conservation easement to fund long term management. Long-term management tasks include site monitoring and inspection, weed management, access controls, trash removal, grazing management, fence repair and replacement, sign maintenance and other activities to maintain the high quality habitat on site. We would respectfully request that the Condition B-4 of the MMRP be amended as follows:

Replacement land will be provided based on the quality of the mitigation land relative to the impacted habitat. The ratio of such replacement shall be determined as follows:

- *A ratio of one acre of replacement land for each 3 acres of development if the replacement land is superior nesting and foraging habitat* ***either*** *contiguous to occupied nesting and foraging habitat or* ***within the Petersen Ranch Mitigation Bank in the Leona Valley,*** *and within a designated or proposed Significant Ecological Area.*

Thank you for consideration of this request.

Sincerely,

Julie Vandermost
President

Cc: Norm Hinkling, County of Los Angeles
Edel Vizcarra, County of Los Angeles
Tracey Brownfield, Land Veritas

ISAIAH 58
IS NOT THIS THE FAST THAT I HAVE CHOSEN?

ALL NATIONS INTERNATIONAL

June 6, 2014

Department of Regional Planning
320 W. Temple Street, Room 1348
Los Angeles, California 9001

Supervisor Esther L. Valadez, Chair
Supervisor David W. Louie
Supervisor Laura Shell, Vice Chair
Supervisor Curt Pedersen
Supervisor Pat Modugno

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www.allnationsIs58.org

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Teresa Skinner
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Veronica Sanchez
Vice President

Lilibeth Say
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Chastity Carvel
Treasurer

John Bell
Director

Executive Director
Teresa Skinner

The purpose of this letter is to express our concerns regarding the Silverado Power West Los Angeles County Project 4: R2011-00807 (CUP201100076) located at 97th Street West & West Avenue I, Lancaster, CA and the direct impact that it will have on our organizations.

For the last 60 years All Nations International and Sommer Haven Ranch have provided millions of volunteer hours for the underserved in the Antelope Valley, the County of Los Angeles and throughout the world. In 2005, we were issued Conditional Use Permit R2005-02587 for a Private Retreat Center/Agriculture Training Center.

After consulting several technical experts we have devised a plan to mitigate the direct impact that Silverado Power West will have on our retreat center:

1. Install improved weather-stripping to the residential building located on our property.
2. Install Vegetative screening on our property on the East 712 feet of APN 32180002004 and APN 3218002013.
3. Install Silt fencing along the same East side as well the West (approximately 331 feet) and North side (approximately 332 feet) of APN 3218002026. (To minimize rodent and snake migration during construction.)
4. Replace three existing evaporative coolers with equivalent Master Cool Evaporative Coolers with 12" media to minimize fugitive dust inside the house.
5. Install wind fencing on the North and West Sides of the property.
6. Install wind fencing around the house.
7. Install Garden Hoop Houses for the Community Garden Project.
8. Plant approximately 1,000 trees around and throughout the property.

Silverado Power West has offered to increase vegetative screening and install a slated fence, (on their own property) and will provide temporary relocation during construction-related ground disturbing activities for our residents with respiratory health concerns. We have talked about this but it is not feasible because it will severely hinder our entire ministry. So we would have to move our entire ministry or not move at all. We are coming to you because we do not want to appear to be "making a deal".

We feel that these measures must be done for the health of our staff, visitors and the community that frequents our training center. We are not experts and our main concern is health.

We would like the commissioners to rule that Silverado Power West Los Angeles County would be liable for any health issues that would as a result of the extra dust both now and in the future.

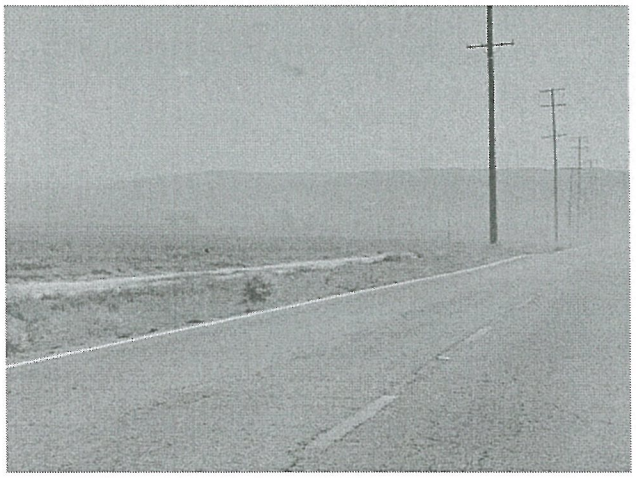
Sincerely,

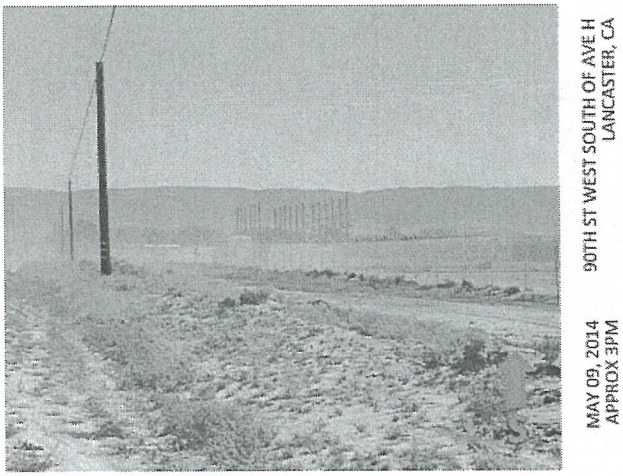
Teresa Skinner

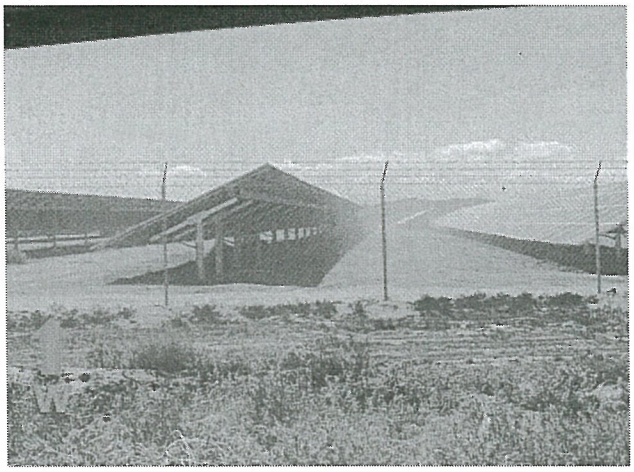
Teresa Skinner
Executive Director
All Nations International

For the sake of our research on two different days May 9 and May 18, 2014 these photos were taken at the Silverado Project located 2 miles north of our location at:

MAY 9, 2014 Approximately 3PM







MAY 18, 2014 Approximately 8AM

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014 APPROX 8AM

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014 APPROX 8AM

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014 APPROX 8AM

Kim Szalay

From: Margaret Rhyne [m.rhyne@verizon.net]
Sent: Monday, June 09, 2014 8:38 AM
To: Kim Szalay
Cc: nhickling@lacbos.org; ontishima1775@gmail.com; JillRMoran@gmail.com; jim.dodson@verizon.net; kj.allen96@gmail.com; kportwest@roadrunner.com; rrhomestead@qnet.com; debbie@dshsolutions.com
Subject: Re: 6 questions regarding the Silverado Project Mitigation Monitoring and Reporting Program

Resending my questions. Questions are in the text below but also attached as a PDF. Not sure why the original email did not get to you intact.

On 06/08/14, Margaret Rhyne<m.rhyne@verizon.net> wrote:

I have six questions in regard to the Silverado Project. I hope that you can answer these questions prior to the hearing on Wednesday:

Mitigation and Monitoring and Reporting Plan for Silverado's 6 Proposed Solar Projects

DUSTCONTROL AND LANDSCAPE PLANS

Many of the crucial details in elements of this project are not included in the FEIR or accompanying documents. These details are consequently not available to the public for comments. Those include the following listed in the Mitigation Monitoring and Reporting Plan:

Fugitive Dust Control Plan that must be submitted to "AQMD for review and approval" prior to any ground disturbance activities

Landscape Plan required to be submitted to both LACDRP and LACFD "Prior to 1st grading or building permit whichever comes first for each project."

1. *1. When will the public be able to view these plans?*

COMPLIANCE LOGS

Many of the monitoring measures listedi n the MMRP require the action: "Maintain logs demonstrating compliance."

2. *2. Will the public have access to those logs in a timely manner?*

Land Acquisition Schedule and Financial Assurances:

From the MMRP:

> "The Applicant shall complete acquisition, or execute an irrevocable option to purchase, of proposed Habitat Management lands and shall provide financial assurances for dedicating adequate funding for impact avoidance, minimization, and compensation measures, if necessary, prior to the issuance of building permits. If an irrevocable option to purchase is utilized, the applicant shallprovide a proposed date of purchase which coincides with construction of the facility."

Regarding these Habitat Management Lands:

Total acreage of impacted land is given under the heading Total Developed Acreage given on Table 3-2 and 3-5 of Section 3.0 of the EIR. This table states the total amount of "developed acreage" to be 943.08acres. (Adding the acreage given for each of the six projects: 238.8, 117.49, 134.14, 254.06, 159.41, 38.18)

3. *3. Will the acquisition of Habitat Management Lands be based on the total acreage of developed or "impacted" land of 943.08 acres?*

4. *4. Will any of this land be allowed to be "on-site" as it was with the West Antelope Solar project?*

5. *5. Will all of this land be in the Antelope Valley IBA (Important Bird Area, as identified by the Audubon Society) as are all 6 of the Silverado Projects?*

6. *6. Finally, in reference to the West Antelope Solar Project, has the Planning Commission been informed that Project 2 of the Silverado Project borders the 84.5 acres of onsite mitigation that was approved for the West Antelope Solar Project? And, although39 acres of Project 2 will be left undeveloped (due to elevation irregularities that would require grading) that the portion of Project 2 bordering the West Antelope Solar onsite mitigation land will be covered with solar arrays?*

Kim Szalay

From: Laura Crane [lcrane@TNC.ORG]
Sent: Monday, June 09, 2014 2:26 PM
To: Kim Szalay
Cc: Erica Brand
Subject: Testimony from The Nature Conservancy on Silverado Power's proposed solar facilities
Attachments: 2014_Silverado_LACountyHearing.pdf

Dear Mr. Szalay,

The Nature Conservancy would like to submit the attached letter as testimony for the Regional Planning Commission meeting on June 11th. Would you please forward the letter to the regional planning commissioners?

If you have any questions, please do not hesitate to contact me at this email address or at (760) 399-7275.

Thank you for the opportunity to comment.

Laura Crane

Please consider the environment before printing this email

Laura Crane
Director, CA Renewable Energy Initiative

lcrane@tnc.org
(415) 418-6513 (Direct)
(760) 399-7275 (Mobile)

nature.org

The Nature Conservancy California
201 Mission Street, 4th Floor
San Francisco, CA 94105

The Nature Conservancy
Protecting nature. Preserving life.™

The Nature Conservancy
Protecting nature. Preserving life.

Attention: Regional Planning Commissioners, Los Angeles County
320 W. Temple Street
Los Angeles, California 90012

Cc: Kim Szalay

Date: June 9, 2014

Subject: Written Testimony for June 11th Meeting

The Nature Conservancy ("the Conservancy") appreciates the opportunity to submit written testimony to the June 11th meeting of the Regional Planning Commission of Los Angeles County. Our written testimony is in regards to planning for renewable energy within the western Mojave region of Los Angeles County and in particular the solar photovoltaic electricity generation facilities proposed by Silverado Power, LLC.

The Nature Conservancy is a global, non-profit organization dedicated to the conservation of biodiversity. We seek to achieve our mission through science-based planning and implementation of conservation strategies that provide for the needs of people and nature. The Conservancy has been actively involved in planning for renewable energy within the Mojave and Sonoran Deserts of California. Most recently, the Conservancy has participated in the Bureau of Land Management's (BLM's) Western Solar Program and in the Desert Renewable Energy Conservation Plan (DRECP), contributing a Mojave Desert Ecoregional Assessment[1] that evaluated conservation value across the ecoregion. In 2012, the Conservancy produced the report, *Solar Energy Development in the Western Mojave Desert: Identifying Areas of Least Environmental Conflict for Siting and a Framework for Compensatory Mitigation of Impacts*[2] ("Western Mojave Desert Assessment").

The Conservancy's principal focus in renewable energy development in the California deserts has been to use science-based analysis to help ensure that renewable energy facilities are sited and conditioned in ways that preserve the remarkably intact and fragile natural communities of California's Mojave and Sonoran Deserts, and to preserve migration corridors and connectivity between key habitat areas.

---

[1] Randall, J. M., S.S. Parker, J. Moore, B. Cohen, L. Crane, B. Christian, D. Cameron, J. MacKenzie, K. Klausmeyer and S. Morrison. 2010. Mojave Desert Ecoregional Assessment. Unpublished Report. The Nature Conservancy, San Francisco, California. 106 pages + appendices. Available at: http://scienceforconservation.org/downloads/mojave_desert_ecoregional_assessment

[2] Cameron, D., S. Parker, B. Cohen, J. Randall, B. Christian, J. Moore, L. Crane, and S. A. Morrison. 2012. Solar Energy Development in the Western Mojave Desert: Identifying Areas of Least Environmental Conflict for Siting, and a Framework for Compensatory Mitigation of Impacts. Unpublished Report. The Nature Conservancy, San Francisco, California. 77 pages. Available at: http://scienceforconservation.org/downloads/west_mojave_assessment

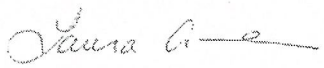
We strongly support the development of renewable sources of energy to mitigate the increasing threat of climate change. However, if not located, built, and operated responsibly, energy projects can negatively impact biodiversity, harm wildlife and their important habitats, and diminish water resources, especially in fragile desert environments. The Conservancy supports siting renewable energy facilities in locations where ecological impacts can be minimized, contained, or mitigated. In California's desert region, these locations are on degraded lands, close to economic centers and existing transmission lines.

The solar photovoltaic electricity generation facilities proposed by Silverado Power, LLC, are examples of projects that meet many of these criteria. For example, the following Silverado Power proposed projects are all sited in areas that the Conservancy identified as highly converted in its Mojave Desert Ecoregional Assessment: American Solar Greenworks (Project No. R2011-00799, CUP No. 201100071), Silver Sun (Project No. R2011-00801, CUP No. 201100072) and Central Antelope Dry Ranch – Antelope Solar Greenworks (. R2011-00807, CUP No. 201100076). Highly converted lands are urban, suburban and agricultural lands that are heavily altered and their ecological context is highly compromised. Siting of renewable energy facilities in highly converted lands minimizes impacts to a wide range of desert wildlife and habitats. In addition, the Conservancy mapped "areas of least conflict" for siting of facilities based on proposed criteria for ecological factors in the California deserts proposed by a number of conservation organizations, using a methodology described in our Western Mojave Desert Assessment. Both the Silver Sun and the American Solar Greenworks proposed projects are located in places that the Conservancy mapped as areas of least conflict.

We appreciate the emphasis that Los Angeles County has placed on planning for renewable energy within the western Mojave. This planning is critical given that the western Mojave contains important ecological values, including some species that exist nowhere else on Earth, and has very high solar resource potential, and is in close proximity to the largest energy market in California.

If you have any questions, please do not hesitate to contact me at (760) 399-7275 or lcrane@tnc.org.

Sincerely,



Laura Crane
The Nature Conservancy

BAYSIDE FINANCIAL GROUP

Steven G. Thompson
President
Real Estate Broker
DRE # 00519403

COMMERCIAL REAL ESTATE

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(650) 207-3172 mobile • (650) 655-7696 fax
stevebayside@yahoo.com

June 6, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am the current landowner of APNs 3218001002 and 3218001003, which are a part of the Antelope Solar Greenworks project proposed by Silverado Power. I am writing to express support for the proposed Antelope Solar Greenworks Solar Generating Facility (SGF) located in the Antelope Valley in unincorporated Los Angeles County. The project will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

The recession has hit the Antelope Valley hard and over the past few years thousands of people have lost their jobs. Silverado plans to utilize local businesses during construction and employ as much local labor as possible. The project will create much needed jobs as well as indirect economic stimulus that will help boost the local economy.

Silverado has worked closely with the Los Angeles County Department of Regional Planning, state and local agencies, community groups and area residents to ensure the project is developed in a responsible manner. The project will have negligible environmental impacts, provide direct access to existing electrical infrastructure, and enable the development of a cost-effective project to deliver clean, renewable, domestically-produced energy to the region.

Silverado Power is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. I appreciate the integrity of Silverado Power as they have developed this project. I encourage the Los Angeles County Regional Planning Commission to approve the Conditional Use Permit for the Antelope Solar Greenworks project.

Sincerely,

Steve Thompson
Real Estate Broker/Co-Manager
2555 Flores St. Suite 555
San Mateo, CA 94403

RECEIVED
JUN 09 2014
BY:

Kim Szalay

From: Margaret Rhyne [m.rhyne@verizon.net]
Sent: Tuesday, June 10, 2014 11:19 AM
To: Kim Szalay
Cc: nhickling@lacbos.org; cglass@ix.netcom.com; jolesh1@yahoo.com; JillRMoran@gmail.com; jim.dodson@verizon.net; kj.allen96@gmail.com; kportwest@roadrunner.com; rrhomestead@qnet.com; debbie@dshsolutions.com; ontishima1775@gmail.com; DesertMama1@gmail.com
Subject: Re: Comments: Silverado FEIR v2
Attachments: V2 FAVOS RE SILVERADO HEARING JUNE 22.pdf

Corrected some typos. Please use this version.
Thank you

On 06/10/14, Margaret Rhyne<m.rhyne@verizon.net> wrote:

Attached you will find formal comments on the Silverado FEIR on behalf of Friends of Antelope Valley Open Space.
Thank you for passing these comments along to the Planning Commission,
Margaret Rhyne
Member, Friends of Antelope Valley Open Space
www.avopenspace.org

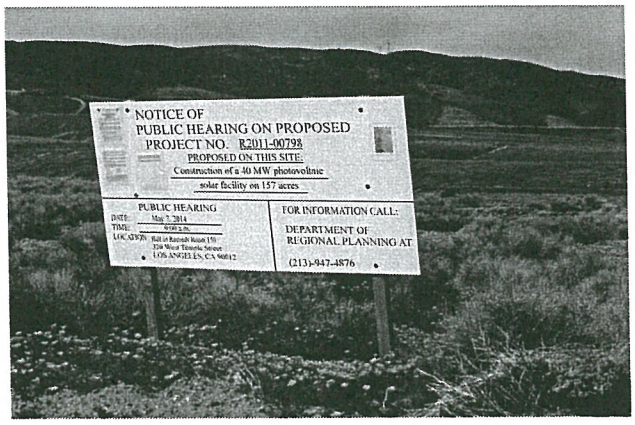
Surveys conducted after three years of drought vastly undervalue biological value of land to be impacted

EIR Section 4.4.3 "The project sites consists of predominately depauperate landscape (i.e. bare ground, disturbed salt brush scrub habitats, non-native grasslands, and developed lands). Project lands are generally limited in the total number and variety of plant and wildlife species, and lacks high biomass density and biological diversity."

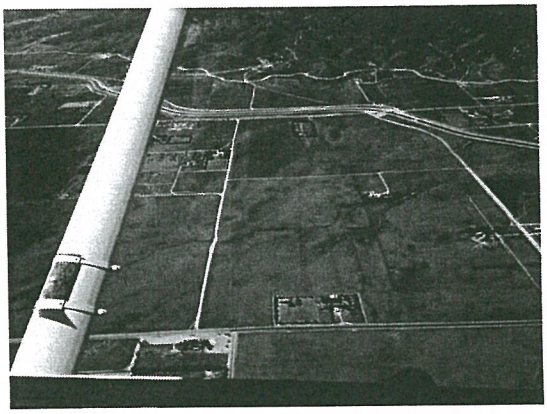
Below are photos of the bare ground referenced in the EIR, a document that also states that "the scenic character on the valley floor is generally low." These are photos of that "bare" land with "low" scenic value— lands that tens of thousands visit and photograph every spring precisely because of the vibrant scenic value created by a widespread bloom of diverse California native wildflowers. Photos take March and April

View from 110th Street looking northwest
Includes lands approved for West Antelope Solar

Silverado Project 2



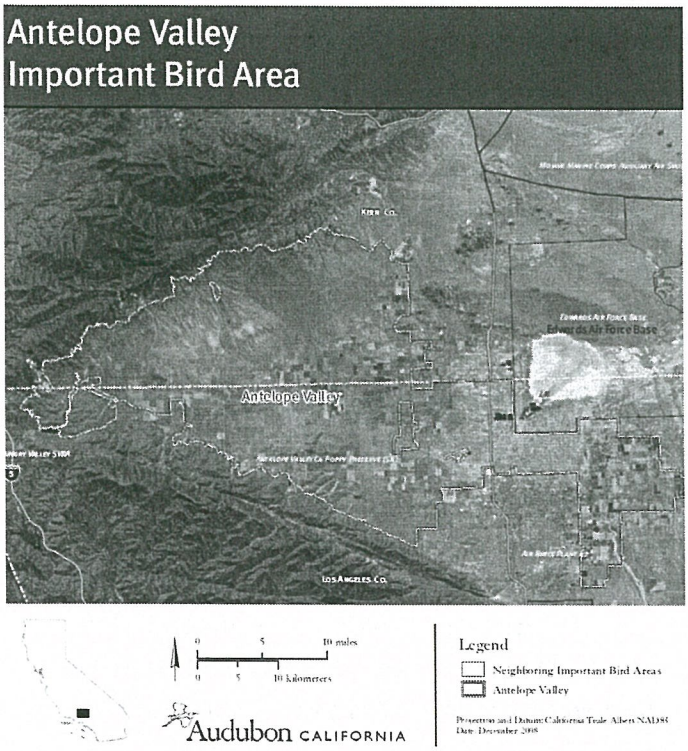
Silverado Project 2



Aerial view of Western Antelope Valley

This past spring, annuals in these wildflower fields included: California poppy, goldfields, California primrose, Mojave suncups, wild rhubarb, prickly poppy, desert dandelion, tidy tips, Fremont pincushion, several varieties of forget-me-nots, owls clover, several varieties of buckwheat, wishbone bush, silver puff, locoweed, several varieties of lupine and more. And of course, as the annuals return so do painted lady butterflies (all over the valley this spring) and other insects, followed by the birds and rodents that feed on them and so on up the food chain to burrowing owls and Swainson's hawks and of course other mammals and raptors.

Evidence that would have resulted in a more accurate assessment of biological values was ignored.



In light of the severe drought conditions it is disturbing that no effort was made to use evidence that could be gathered from other sources of information about the biological and scenic importance of the area. At least two sources of documentation could have been included in the EIR as this information was sent to Regional Planning as part of the NOP comment period. However this information was ignored:

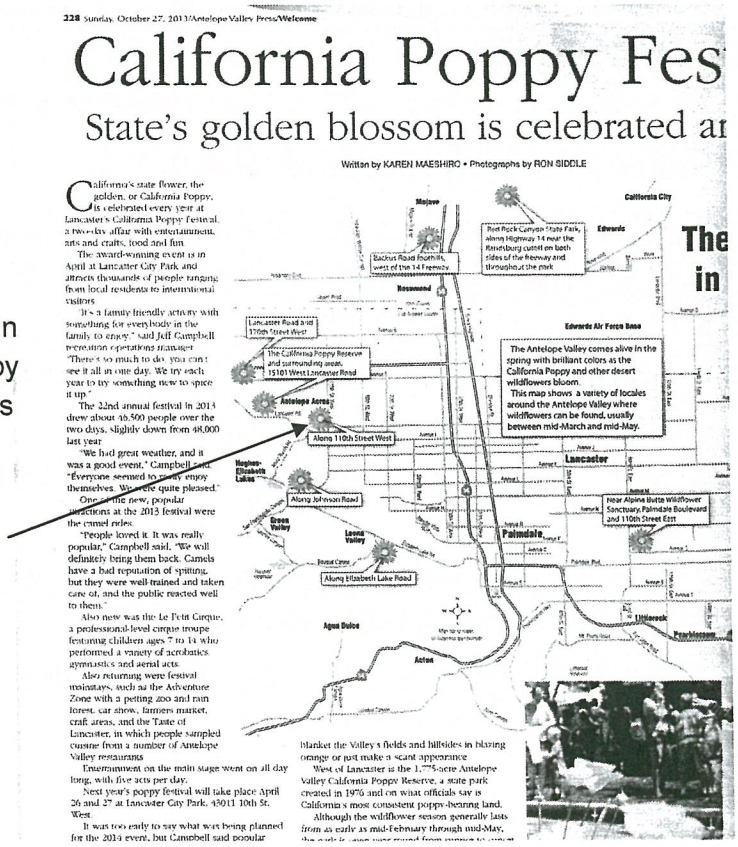
1. Designation of the Area by the Audubon Society as a "Globally Important Bird Area" **one of only 424 in the entire world!** This is not mentioned in the EIR. (Map to the left)
2. Documentation of wildflower blooms in the local publication *Antelope Valley Welcome* Magazine published by the Antelope Valley Press, shown below. Map include with the article shows the location of Project 2 as a well-known prolific wildflower area.

"State's Golden Blossom Celebrated in the Antelope Valley"

Antelope Valley Press, October 27, 2013
Antelope Valley Welcome Magazine

From the article, "The Antelope Valley comes alive in the spring with brilliant colors as the California Poppy and other desert wildflowers bloom. This map shows a variety of locales around the Antelope Valley where wildflowers can be found.."

One of those "locales" is "Along 110th Street" Location of Silverado Project 2


228 Sunday, October 27, 2013/Antelope Valley Press/Welcome

California Poppy Fes

State's golden blossom is celebrated ar

Written by KAREN MAESHIRO • Photographs by RON SIDDLE

California's state flower, the golden, or California Poppy, is celebrated every year at Lancaster's California Poppy Festival, a two-day affair with entertainment, arts and crafts, food and fun.

The award-winning event is in April at Lancaster City Park and attracts thousands of people ranging from local residents to international visitors.

It's a family friendly activity with something for everybody in the family to enjoy," said Jeff Campbell, recreation operations manager. "There's so much to do, you can't see it all in one day. We try each year to try something new to spice it up."

The 22nd annual festival in 2013 drew about 48,500 people over the two days, slightly down from 48,000 last year.

"We had great weather, and it was a good event," Campbell said. "Everyone seemed to really enjoy themselves. We were quite pleased."

One of the new, popular attractions at the 2013 festival were the camel rides.

"People loved it. It was really popular," Campbell said. "We will definitely bring them back. Camels have a bad reputation of spitting, but they were well-trained and taken care of, and the public reacted well to them."

Also new was the Le Petit Cirque, a professional-level cirque troupe featuring children ages 7 to 14 who performed a variety of acrobatics gymnastics and aerial acts.

Also returning were festival mainstays, such as the Adventure Zone with a petting zoo and rain forest, car show, farmers market, craft areas, and the Taste of Lancaster, in which people sampled cuisine from a number of Antelope Valley restaurants.

Entertainment on the main stage went on all day long, with five acts per day.

Next year's poppy festival will take place April 26 and 27 at Lancaster City Park, 43011 10th St. West.

It was too early to say what was being planned for the 2014 event, but Campbell said popular

blanket the Valley's fields and hillsides in blazing orange or just make a scant appearance.

West of Lancaster is the 1,745-acre Antelope Valley California Poppy Reserve, a state park created in 1976 and on what officials say is California's most consistent poppy-bearing land.

Although the wildflower season generally lasts from as early as mid-February through mid-May,

Mojave
California City
Red Rock Canyon State Park, along Highway 14 near the Kern/Inyo county line on both sides of the freeway and throughout the park
Edwards
Backus Road frontage, west of the 14 Freeway
Rosamond
Lancaster Road and 170th Street West
Edwards Air Force Base
The California Poppy Reserve and surrounding areas, 15101 West Lancaster Road
Antelope Acres
The Antelope Valley comes alive in the spring with brilliant colors as the California Poppy and other desert wildflowers bloom. This map shows a variety of locales around the Antelope Valley where wildflowers can be found, usually between mid-March and mid-May.
Along 110th Street West
Lancaster
Hughes-Elizabeth Lakes
Along Johnson Road
Near Alpine Butte Wildflower Sanctuary, Palmdale Boulevard and 110th Street East
Green Valley
Leona Valley
Palmdale
Along Elizabeth Lake Road
Agua Dulce
Acton
Littlerock
Pearblossom

To take such a limited "snap shot" of the project areas by focusing solely on a survey done under extreme drought conditions to the exclusion of all other sources of information does a great disservice to the effort to maintain the biodiversity and rural character of the Antelope Valley. This is particularly problematic if subsequent projects will be allowed to site this very flawed valuation of the biological and aesthetic value of Antelope Valley lands to justify construction of future industrial solar projects.

In addition, because project evaluation of impacted lands relies on incomplete information, calculations of mitigation land will also be inaccurate. At the very least, Project 2, next to mitigation land and Project 5, next to a working alfalfa ranch and an active Swainson's hawk nest as defined by CDFW, should have a higher valuation for the purposes of computing ration of impacted land to mitigation required.

FEIR Reflects Inadequate Responses to Project Concerns

We see no changes in the FEIR that adequately address many concerns expressed in letters sent during both the NOP and EIR review process. Many of the responses reference the landscaping plan as mitigating for damage to viewsheds. However, this landscape plan contains no details about plants to be utilized and has a vastly optimistic estimate of water needed to maintain those plants. If water is provided for just a few years, many plants will begin to die after watering is ended. Particularly impacted will be trees that are also sited in the EIR as providing enhanced habitat for Swainson's hawk. The Antelope Valley contains many examples of trees once established as wind breaks that have died and in many cases been cut down for firewood with only the stumps remaining once farmers stopped irrigating adjacent fields. The public needs **details about the landscape plan that include a plant list; provisions for irrigation for the length of the project; and a plan for continued onsite maintenance of the landscaping by caretakers who are trained to take out invasive species (Russian thistle and mustard) while allowing native annuals to grow.**

Questions Remain

Other unanswered concerns include:

- **Will the acquisition of Habitat Management Lands be based on the total acreage of developed or "impacted" land of 943.08 acres?**
- **Will all mitigation be offsite?**
- **Will all mitigation land be in the Western Antelope Valley and secured prior to construction?**
- **Will the public have access to the compliance logs mentioned in the MMRP in a timely manner?**
- **Will the public have the ability to review the Fugitive Dust Control Plan** required by the MMRP prior to implementation?
- **Will the public have the ability to review the Landscape Plan** required by the MMRP prior to implementation?

FEIR Contains Ludicrous and Unsupported Assertions

Particularly egregious is the statement that "from a distance, proposed SGFs would not appear dissimilar to agricultural fields." This statement and other statements concerning scenic value of the area are clearly a matter of opinion and have no place in what is supposed to be a fact based, scientific document. **They should be removed.**

In fact actual scientific surveys at solar installations refute the assertion concerning the similarity of solar arrays to agricultural lands and do so in a manner that demonstrates an alarming threat to migratory birds—a particular concern in the Antelope Valley Globally Important Bird Area. In the article "Water Birds Turning Up Dead at Solar Projects in the Desert" published by KCET Rewire, author Chris Clarke writes:

> "it seems very likely that reflections from solar facilities' infrastructure, including photovoltaic panels and mirrors, may well be attracting birds in flight across the open desert, who mistake the board reflective surfaces for water. With millions of years of evolutionary experience telling birds that broad expanses of glare and reflectivity on the ground mean "water," it's not hard to figure out why water birds might veer miles out of their way to head for solar facilities."

The article goes on to describe how birds who do mistake the solar panels for water die both from contact with the panels and from falling to the ground in between, as once on the ground in the midst of the panels, they are not able to extricate themselves and die from starvation, injury or predation. Photo to the right shows what photovoltaic panels really look like to humans "from a distance." It also illustrates the "lake effect" that impacts birds. So it turns out that both birds and humans view expanses of solar panels very differently from fallow agricultural fields or open desert. (Full article sited included with this document)

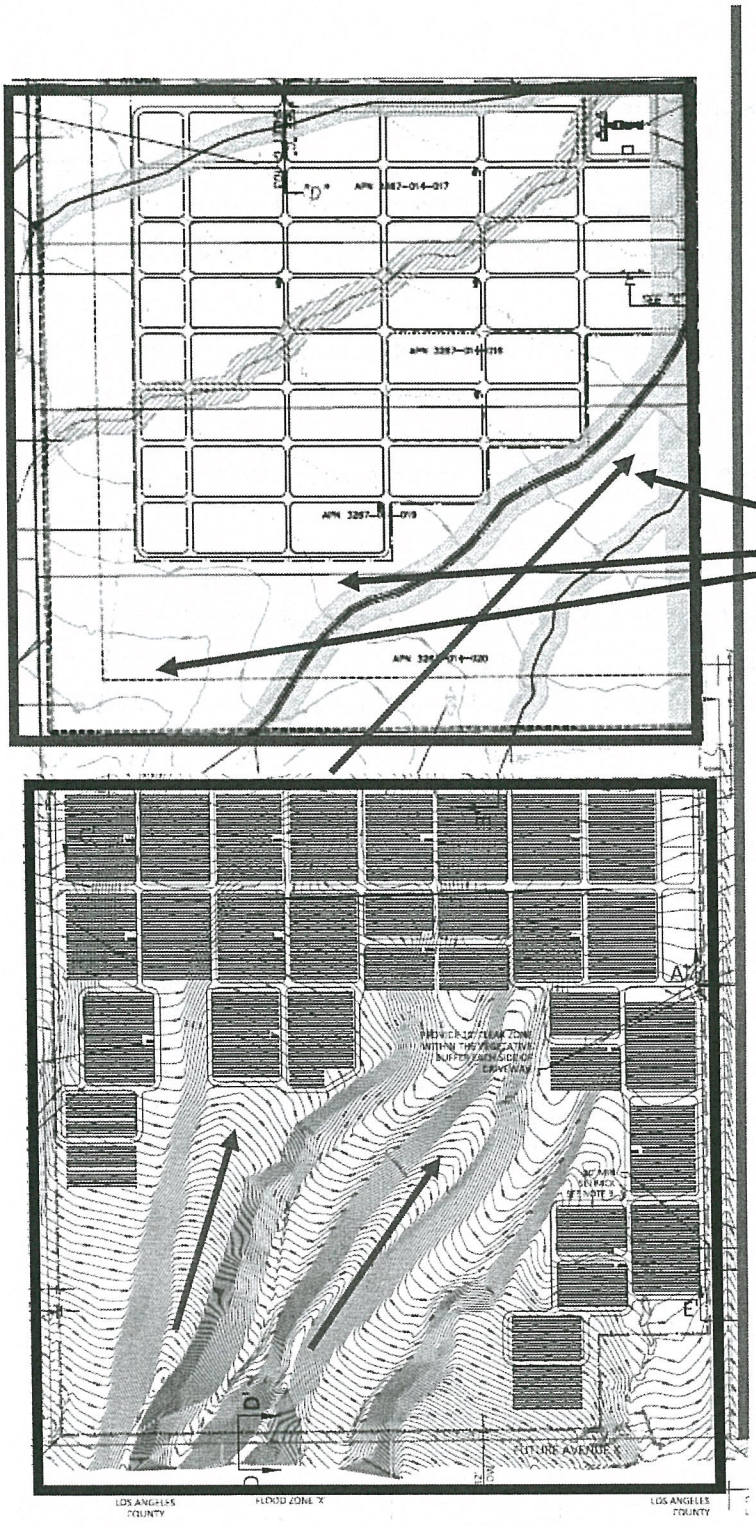
Lake Effect: Photovoltaic Panels in the Desert
Nevada Desert (Eldorado Project)

FEIR Estimation of Cumulative Impacts Incomplete

Missing from project maps are the other solar installations planned or built near Silverado's 6 proposed LA County Projects. Since many of these projects are also to be built by Silverado (on land annexed by the City of Lancaster although not contiguous with other city lands) this would be an easy matter to include them on project maps. **However, these projects and others are missing, giving a vastly skewed view of cumulative impacts. All maps for this project should include clear representations of existing and approved projects.**

Particularly problematic is information missing from Project 2 maps. This project will be built west and directly across 110th Street from City of Lancaster annexed property planned for solar panels. North of this parcel is the LA County approved West Antelope Solar Project B.

West Antelope Solar was approved with 84.5 acres of onsite mitigation. **This planned mitigation land will be bordered on east 110th Street, on the north by West Antelope solar panels and, if approved, on the south by Silverado's Project B solar panels. (Please see next page for map.)**



West Antelope B

Silverado Project 2

Ephemeral Wash

West Antelope Solar
84.5 acres Onsite
Mitigation Land

110th Street

"Poppy" Trail

West Antelope
Solar Arrays

Silverado Project
2 Solar Arrays

North

Solar

Water Birds Turning Up Dead at Solar Projects in the Desert (http://www.kcet.org/news/rewire/solar/water-birds-turning-up-dead-at-solar-projects-in-desert.html)

by Chris Clarke
on July 17, 2013 4:30 PM

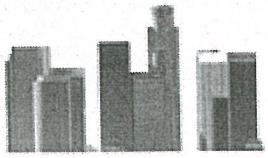
A bufflehead, a duck generally found in open water, discovered between two rows of mirrors 25 miles from the nearest open water at the Genesis solar project | Photo: Genesis Solar

[This story has been updated.] Big desert solar installations have a problem: They seem to be imperiling water birds. A ReWire investigation has revealed that since mid-March, two large industrial solar power plants in California's remote, arid desert may have killed or injured more than 20 birds commonly associated with lakes or wetlands rather than the open desert surrounding the projects.

Story Continues Below

Like

SOCAL CONNECTED
WEDNESDAYS, 8 PM
REBROADCAST
FRIDAY, 8 PM & SUNDAY, 6:30 PM



Support KCET

The two facilities in Riverside County are the 550-megawatt Desert Sunlight Solar Farm being built near Eagle Mountain by First Solar for owners NextEra Energy Resources, GE Energy Financial Services, and Sumitomo Corporation of America, and the 250-megawatt Genesis Solar Energy Project being built by NextEra about 25 miles west of Blythe. According to compliance documents builders of the two projects have filed with the California Energy Commission (CEC), as well as personal communication with solar developer press representatives, water birds accounted for about half of at least 37 reported incidents of bird injury or mortality at the two projects.

The water birds killed and injured range in species from **yellow-headed blackbirds,** which tend to congregate in the vegetation that surrounds ponds and streams, to the once-critically endangered brown pelican whose lifestyle involves fishing by diving into open water.

[**UPDATE**: after we went to press, ReWire learned that the toll also includes two individuals of the dramatic wading bird species great blue heron. Details **here**.]

Other water birds found dead or injured by biologists at the two projects include eared, western, and pied-billed grebes, the duck species surf scoter, red breasted merganser and bufflehead, the dramatic-looking black-crowned night heron, double-crested cormorants, American coots, and the federally Endangered Yuma clapper rail (**as we reported last week**).

Other birds reported dead or injured at the two facilities in that time period include warblers, goldfinches, a common raven, and a barn owl.

In addition, representatives from First Solar and NextEra have told ReWire of a few incidents not yet included in compliance reports, including deaths of three juvenile brown pelicans and a black-crowned night heron at Desert Sunlight, and another brown pelican found July 10 at the Genesis project.

Most of the mortalities were discovered by project biologists or other staff, and consisted of finding carcasses in varying stages of decay. At least one bird, the red-breasted merganser found in April at Desert Sunlight, was alive when discovered but died shortly after. In addition to the birds listed as injured or killed, the compliance records note a number of birds finding their way into fenced and netted areas or discovered in some distress on the sites, but released apparently no worse for wear.

Construction projects of any nature pose threats to birds, both during construction and after. That's evidenced by the fact that residential and commercial buildings, communications towers, and other human artifacts take

an astounding toll of bird injuries and mortalities. **According to the American Bird Conservancy,** as many as a billion birds die each year due to collisions with glass windows, another 200 million or so from collisions with power lines and communications towers, and about 380 million from collisions with vehicles or other roadway hazards.

So facilities like Desert Sunlight and Genesis that incorporate power lines, thought to account for at least some of the small bird deaths recorded, and roadways that bring construction traffic into areas where there hadn't been much traffic before, are likely to see consequent bird mortality.

And both companies have assured ReWire that the incidents distress them, and that they're working with appropriate agencies to minimize the deaths. A statement sent along by Desert Sunlight spokesperson Ashley Hudgens confirming the deaths of the juvenile pelicans and night heron, for instance, stresses the company's efforts:

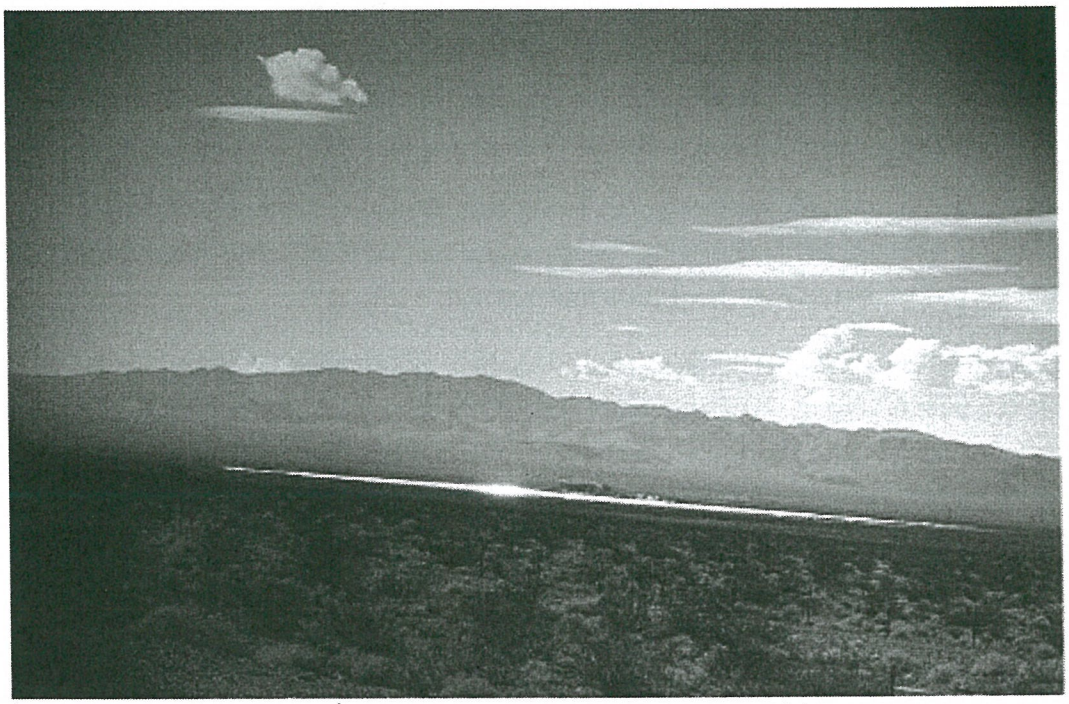
> *In recent weeks biologists at Desert Sunlight Solar Farm found three juvenile Brown Pelicans and a Black-crowned Night-heron. Biologists alerted the Bureau of Land Management, the California Department of Fish and Wildlife, and the U.S. Fish and Wildlife Service. Desert Sunlight is cooperating with the agencies and will work with them on next steps.*
>
> *Unfortunately it is common for birds, especially juveniles, to become exhausted or die if they stray outside of their migratory path. Biologists are examining regional flyways and migratory patterns for more information.*
>
> *Project biologists also recover injured or exhausted birds so they can be safely released or transported to rehabilitation centers.*
>
> *Desert Sunlight takes the health of native and protected wildlife and plant species very seriously. Biologists are on site daily to ensure that wildlife and plants are protected during the construction process.*

NextEra's Steve Stengel expressed similar concerns in an email.

No one wants to kill birds unnecessarily, and the companies' efforts to mitigate and reduce the toll are laudable. But what explains the astonishing percentage of water birds injured at these hyper-arid sites?

Scientists haven't weighed in on what might account for a disproportionate number of bird kills at solar facilities: the topic is very new. But as ReWire mentioned in covering the Yuma clapper rail mortality on July 10, it seems very likely that reflections from solar facilities' infrastructure, including photovoltaic panels and mirrors, may well be attracting birds in flight across the open desert, who mistake the broad reflective surfaces for water.

Here's a 2008 photo of the Nevada Solar One project to illustrate what we mean:



Nevada Solar One glare | Photo: **e pants**/Flickr/**Creative Commons License**

With millions of years of evolutionary experience telling birds that broad expanses of glare and reflectivity on the ground mean "water," it's not hard to figure out why water birds might veer miles out of their way to head for solar facilities. Both photovoltaic solar panels, as used at Desert Sunlight, and mirrors like Genesis uses pose that reflective glare attractant.

It may be that photovoltaic arrays resemble lakes more closely than do mirrors, at least to the eyes of birds. Light reflecting off non-metallic surfaces tends to become polarized. Both water and the semiconducting surfaces of photovoltaic panels are non-metallic, which means the glare from one might well resemble the glare from the other if birds are sensitive to light polarization, which **many are.**

The California desert is part of the **Pacific Flyway,** one of four major bird migration corridors in North America. Historically, lakes in arid and semi-arid parts of the west were important rest and refueling stops for long-distance migrants. In the last two centuries human activity has altered, displaced, or dried up many of the lakes and wetlands migrating birds once depended on as they traveled the Pacific Flyway, and remaining rest stops such as the Salton Sea, the Great Salt Lake, or even smaller sites like the artificial Lake Tamarisk in the western Chuckwalla Valley of Riverside County are crucial, widely separated oases in the desert section of the Flyway.

Add reflective areas that resemble water to the mix, and you have a recipe for avian deaths by the hundreds as unsuspecting, tired migrating birds try to come in for a water landing on fields of solar panels and mirrors.

And with thousands of acres of those solar panels and mirrors due to be added to the migration corridor between the Colorado River and the Coachella Valley as Palen, Blythe, and McCoy solar projects come

online, the issue of water bird deaths promises to become far more pressing than it already is.

ReWire will be tracking this issue as it develops.

Appended below is a list of bird deaths and injuries at Desert Sunlight and Genesis of which ReWire is aware. Water birds are indicated by an asterisk (*). Other solar projects aren't included only because we haven't looked at them yet. Some birds injured since May and June will not have been formally reported. Some injuries and fatalities will not have been recorded by project biologists, as injured birds may leave the scene undetected to expire elsewhere from their wounds.

- Genesis, March 13, lesser goldfinch
- Genesis, March 19, lesser goldfinch
- Genesis, March 28, bufflehead* found between mirrors
- Desert Sunlight, April 3 eared grebe*
- Desert Sunlight, April 15 surf scoter*
- Genesis, April 17, black-throated grey warbler
- Genesis, April 17, house wren
- Genesis, April 17, orange-crowned warbler
- Desert Sunlight, April 18 great-tailed grackle
- Desert Sunlight, Week of April 21 red breasted merganser* found live on site, died in transport prior to release.
- Genesis, April 25, barn owl injured, taken to rehab
- Genesis, May 1, pied-billed grebe* (in evap pond netting)
- Genesis, May 1, eared grebe* injured, to rehab
- Desert Sunlight, May 6 double crested cormorant*
- Desert Sunlight, May 8 Yuma clapper rail*
- Genesis, May 8, Wilson's warbler (poss. line strike)
- Genesis, May 14, yellow-headed blackbird* injured, taken to rehab
- Genesis, May 15, hermit thrush (bulldozer)
- Genesis, May 16, Wilson's warbler
- Genesis, May 16, Townsends warbler
- Genesis, May 16, unidentified bird
- Genesis, May 22, western grebe* injured, taken to rehab
- Genesis, May 22, yellow warbler
- Genesis, May 23, warbler, species unknown
- Genesis, May 24, unidentified sparrow
- Genesis, May 30, American coot*
- Desert Sunlight, June 4 common loon*

- Desert Sunlight, June 5 eared grebe*
- Desert Sunlight, June 5 western grebe*
- Desert Sunlight, June 5 western grebe* live, released after consultation.
- Desert Sunlight, June 6 American coot*
- Desert Sunlight, June 6 double crested cormorant*
- Desert Sunlight, June 9 Common raven
- Genesis, June 10, brown pelican* injured, sent to rehab
- Desert Sunlight, June 19 hummingbird (species not mentioned)
- Genesis, July 10, brown pelican*
- Desert Sunlight, July 10 brown pelican*
- Desert Sunlight, July 11 brown pelican*
- Desert Sunlight, July 13 brown pelican*
- Desert Sunlight, July 15 black-crowned night heron*

Leona Valley Town Council

P·O· Box 795 • Leona Valley • CA 93551

Anthony Curzi
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California

Re: Project Nos. R2011-00833-(5), R2011-00798-(5), 2011-00799-(5) / Silverado Power West

Dear Mr. Curzi:

The Leona Valley Town Council wishes to express concern over the solar energy project that is proposed on five non-contiguous sites in the West Antelope Valley. The solar developments, including this proposal, are now hop-scotching across the West Antelope Valley (rather than clustering) in such a manner that will result in a lack of safe avian migratory areas, even with suitable nesting habitat, thereby creating eco-traps in which birds are encouraged to breed and flourish but will most assuredly reach death as a result of the renewable energy contiguous location. This will have a ripple affect across the animal food chain as well as cause blight to an already economically disadvantaged Antelope Valley.

The proposal will adversely impact several protected species. Furthermore, it does not provide long-term economic benefit to the Antelope Valley while depleting our visual, environmental and other resources. Additionally, the County of Los Angeles has failed to fully resolve the issue of dust storms at other solar projects in the Antelope Valley, which have resulted in roadway blindness and have increased the risk of Valley Fever to those who reside in the area. We have repeatedly advised the County of this adverse impact and it has not been adequately addressed, corrected and mitigated. If not mitigated, it is the responsibility of the County of Los Angeles Health Department and the taxpayers to undertake the expensive care of individuals who will become ill as a result of the adverse impacts, via Valley Fever, of these cumulative projects.

The County of Los Angeles has also failed to address the cumulative impacts of all of the wind and solar projects in the West Antelope Valley that are a result of a single government mandate. Because these projects are being reviewed separately, piecemealing has resulted, which is a violation of the California Environmental Quality Act. While we appreciate that you found our input offering "good points", as of our last comment letter, we are again advising you that the County of Los Angeles is now in violation of CEQA and NEPA relative to the cumulative impacts. The lack of completion of the County's Renewable Energy Plan does not negate the existing responsibility to comply with CEQA and NEPA for current renewable energy projects.

RE: Silverado Power West

We do not believe there has been sufficient protection put in place relative to air quality. Nearly all of the areas included in the West Mojave Plan (which includes the Antelope Valley) have recorded concentrations of pollutants in excess of national and state ambient air quality standards for PM10 and a variety of others. In addition, the presence of numerous new dirt roads invites vehicle trespass that would compound the problem of particulates in the air. Construction and maintenance activities will cause serious air quality issues for wildlife and human inhabitants of the desert. Vast amounts of water will be required to subdue dust. Water, as a dust mitigation measure, could have a reverse impact and subsequent consequences as it helps in the propagation of the arthroconidia (spores) of Coccidioides immitis This proposal should include a mechanism to prevent off-road use; and trip/travel reductions during and after projects have been constructed.

The Leona Valley Town Council has completed an analysis of the proposed County Renewable Energy Plan. Much of our concerns regarding this project proposal are contained in this document. We have attached for your edification.

While we do not support the proposed project, we do support mitigation on an acre for acre basis, particularly since there are protected species in this location. Therefore, if this project is approved we recommend that fully endowed (in advance of project) mitigation credits be obtained from the geographically closest mitigation bank, Petersen Ranch, which is between 100th and 110th Street West, south of West Avenue K and extends to south of Elizabeth Lake Road. Petersen Ranch supports species such as the tricolored blackbird, Swainson's Hawk and burrowing owl habitats that will be adversely impacted by the proposed project. The tricolored blackbird is pending designation by the State of California as "endangered". The proposed renewable energy sites are foraging areas for this species. Information on Petersen Ranch Mitigation Bank can be found here: http://landveritasmitigationbanks.com/petersen-ranch/

Respectfully,

Alice M. Wollenman

Leona Valley Town Council

Cc: Norm Hickling, Deputy to Supervisor Michael D. Antonovich

June 3, 2014

Leona Valley Town Council
P·O· Box 795 • Leona Valley • CA 93551

Thuy Hua
LA County Department of Regional Planning
320 W Temple St 13th Floor
Los Angeles CA 90012

Re: Renewable Energy Ordinance – May 2014 Draft

Dear Ms. Hua:

Thank you for giving us the opportunity to submit comments on the proposed Renewable Energy Ordinance as part of the scoping process. The Ordinance will dramatically impact uses, health and development in the North County area. Because of the dynamic proposed changes, it is important to provide input in order to retain our rural communities while prudently addressing how such projects shall be integrated into the existing land use framework. We held the submission of our comments until after your presentation to our community, input from residents and completion of your most recent draft. The Leona Valley Town Council reserves the right for additional review and commentary should further changes to the draft Renewable Energy Ordinance occur.

Our concerns are addressed on the pages that follow.

Respectfully,

Alice M. Wollman

Alice Wollman
Vice President
Leona Valley Town Council

Cc: Supervisor Michael D. Antonovich
Norm Hickling, Deputy to Supervisor Antonovich

The following is for your consideration

Section 22.08.040 D

Under definition for "decommissioning": "Decommissioning" means the removal of a use from service, which includes safe storage, dismantling, disposal, recycling, removal of concrete pads, and/or site restoration. We object to the use of the word **"or"** for site restoration. With respect to site restoration, how will a site be "restored"? Does this include the replanting of native plant species? How long or how many attempts shall be made to perform "site restoration"? What if the project becomes bankrupt? Will there be some sort of an escrow account? Or stipend set aside for future decommissioning?

22.52.1610 Applicability:

A. Other technologies should include solar and wind energy too.

D. (2) Replacement for maintenance purposes should specify that replacement of equipment should be of the same or lesser size/height. The size/height and footprint may not be increased.

Section 1. Section 22.08.040:

"Decommissioning": Please describe how and what is to be restored on the site once the project is decommissioned? Does this mean the 500-1,000+ year old Joshua trees that were removed or destroyed are to be replanted? What level of restoration is going to occur? We request a performance bond requirement for all renewable energy projects.

Section 3. Section 22.08.190:

With respect to a "small scale" solar energy system: How will the County determine what the necessary demand is for a single-family dwelling? How is the 150% calculated? What is the formula that determines how much energy is required to support a dwelling? Does this include secondary structures? An entire site? All of the ancillary improvements? If demand is to be used "off-site" does this mean a private residential property can develop enough energy to sell privately to adjacent properties? The sentence "Any energy generated by a wind energy system that exceeds the on-site energy demand may be used offsite" is vague. Specificity is required for this ordinance and this should not be left open to interpretation. Does this mean we can all start our own mini energy businesses on our private residential sites?

Section 4. Section 22.08.210

Utility-scale renewable energy facility, structure mounted: If each utility scale energy facility is comprised of pedestals on which the energy device is placed, does this constitute structure mounted? The definition of "structure" needs to be expanded to what it is likely intended to be: office building, apartment complex, school or other public facility.

22.52.1620 Permit Requirements

With respect to Utility-Scale Renewable Energy Facilities, Structure Mounted: All systems are a combination of structure and ground mounts.

Small-Scale Renewable Energy System: The permit process requires a minor conditional use permit for a small scale wind energy system. Will this type of CUP address protected views-capes and ridgelines? Or, will anyone and everyone be able to place these towers on a ridge or within an adjacent property's prime view? Is it permissible to place a small scale solar array on top of a ridgeline, blighting a protected ridge? What is the criteria for the site plan review? Is it merely to ascertain setback requirements?

Utility Scale Renewable Energy Facility: Because "structure mounted" has not been adequately explained, it appears that a minor site plan review is all that is required, even if some low structure is built by a developer to circumvent the conditional use permit process in A1, A2, Commercial and Manufacturing zones. While the intent of the County may be for placement on existing buildings, does this also mean if an energy Developer installs rudimentary carports that will never be used, that the CUP process is then circumvented?

Based upon a review of the chart, large scale utility projects with ground mounting systems will be supported only by those sufficiently large sites in heavy agricultural zones (A-2), commercial or industrial zones. Where in the County of Los Angeles are there sites that are sufficiently large to accommodate a large scale project? Did the County of Los Angeles determine where such sites are located? There are sites that are sufficient in size in the Santa Monica Mountains; however, most are exempt because of the coastal zone limitation as well as a scenic drive restriction. While we support these limitations, it truly is for the benefit of the coastal areas while further directing any and nearly all potential renewable energy projects to the Antelope Valley. We further assert that the majority of those lots sufficient in size to support a large scale renewable energy project (outside scenic or coastal areas) are in the Antelope Valley. This appears to be a fact rather than a statement as the County of Los Angeles Planning Department has emphasized outreach for the Renewable Energy portion of the County Plan to the Antelope Valley. While we understand that the County is under an obligation to produce a certain amount of renewable energy, it appears District 5 of Los Angeles County is shouldering, by percentage, nearly the entire burden.

The Antelope Valley has a very high unemployment rate and family incomes are already below the state average. The Antelope Valley, as a whole, is an economically disadvantaged area and renewable energy projects do not produce permanent, high paying jobs. Furthermore, the increased amount of dust produced by these projects increases the risk of Valley fever in an already economically disadvantaged area. "A review by the CDC (Goodman, 1994) of the

medical records in Kern County, California showed that coccidioidomycosis accounted for approximately $66 million in direct costs of hospitalization and outpatient care during the period 1991-1993." (USGS report) The large scale utility projects will not provide energy to the Antelope Valley, but will service more affluent areas in the Bay area, Los Angeles and beyond. With respect to CEQA and NEPA, the Antelope Valley will receive disparate impacts in the form of socioeconomic discrimination on low income communities. These communities already bear the brunt of disproportionately high environmental burdens, and will continue to do so based on how the County Renewable Energy Plan inadvertently or purposely directs by statute the large scale utility projects to the Antelope Valley. This Plan makes it easier to build harmful projects in low-income areas. There is a pervasive pattern of siting the most dangerous, environmentally degrading facilities in communities with predominantly low-income residents and minorities. This trend is driven in large part by zoning requirements, low property costs, and the fact that many low-income communities lack the political clout and/or education to effectively oppose these projects.

22.52.1630, Standards for Small Scale Solar Energy Systems

Item "B" states that the height shall not exceed the zone by more than 5 feet. Please address where and how this measurement is applied, even if contained elsewhere in the County code.

22.52.1640. Standards for Temporary Meteorological Towers

Access Roads: Please provide a standard for temporary access roads with ingress/egress points. Does this mean that these roads will require temporary grading? A grading permit? Please address the issue of runoff, land/mudslide and dust. Will such facilities be permitted in a landslide or liquefaction zone?

Setback Requirements: there is a failure to consider the bounce and/or roll of the tower apparatus, which will exceed the 1.25 system height;

Maintenance: Please identify a minimum schedule for maintenance. What is "regularly scheduled"? Is that weekly, monthly, yearly?

22.52.1650 Standards for Small-Scale Wind Energy Systems

During the Plan presentation before the Leona Valley Town Council meeting we discussed the noise of a small scale system. According to our own environmental expert, 60 dBA SEL is the equivalent noise level of a heavy traffic street. This figure has not been reduced, although discussion and facts were presented to the County at our Town Council meeting. If there are multiple towers contained in one small community, the noise will be overwhelming, particularly in a town with hillsides bordering a valley on multiple sides (like Leona Valley) which will exacerbate the high noise levels.

22.52.1660. Standards for Ground Mounted Utility-Scale Renewable Energy Facilities

Access Roads: Please provide a standard for temporary access roads with ingress/egress points. Does this mean that these roads will require temporary grading? A grading permit? Please address the issue of runoff, land/mud slide and dust. Will such facilities be permitted in a landslide or liquefaction zone?

Fencing: Non-opaque fencing is permitted; as is fencing of eight feet in height "regardless of any other fencing standards." Many Community Standards Districts have fencing guidelines in order to create an open, non-view obscuring environment. This standard now trumps what is considered a community value.

Fencing of solar facilities, building roads and transmission lines will transect enormous portions of habitat, and impede movement of wildlife who travel through "wildlife corridors" that, according to the Western Governors Association, have never been adequately mapped. There is concern that this transection will further isolate interconnected habitats, and create "islands" of parkland and protected areas that will reduce biodiversity.

Drought tolerant native or non-native vegetation: How is it determined to be infeasible? Is insufficient water supply a cause for not requiring vegetation? By the way, if water is insufficient, then the project should not be placed in the location. Please explain how or why plantings would be infeasible.

Light sensor or motion sensor lighting for the main facility: Should comply with the Dark Sky standard of unincorporated Los Angeles County.

Setbacks: 30 feet in agricultural zones is insufficient to allow for bounce and roll.

Signs: Please state minimum and maximum size of the signs.

Site disturbance: It is stated that existing vegetation may be removed (except for root systems), but sensitive or unique plant species are not addressed. Existing policy resulted in the clear cutting of a Joshua tree grove off of West Avenue "M" as this industrially zoned site had no environmental restrictions as a result of the County policy. If this were a grove of oak trees, there would be permits pulled and mitigation for the removal of each oak tree, yet in the world, Joshua trees are rarer and a unique species only found in the Mojave Desert. It is impossible to replace a grove of Joshua trees by the nature of the species, which grows only one to three inches per year. A fifty foot tall tree is minimally 200 years old, yet the County has failed to implement

a strategy to protect Joshua woodlands and the lack of policy to protect these indigenous species will further degrade an already at risk environment.

An additional issue with site disturbance is that clearing of desert vegetation can invite invasive species that can escape developed areas and spread and further disturb sensitive desert species. A mitigation requirement should be in place to prevent invasive plant species from spreading off site.

Fugitive Dust Emission: The Plan addressed fugitive dust during construction, but not after construction is completed. Dust storms emitting from renewable projects in the West Antelope Valley off of Highway (138) have resulted in blindness to drivers and put the general public at risk due to the increased risk of transmission of Valley Fever, asthma and other ailments.

C. immitis grows in the upper (5 - 20 cm) horizons of soils in endemic areas" Although some growth sites have been identified, their distribution and recognition throughout the entire endemic area of the southwestern U.S. is poorly known.

Water Quality Protection: Shall the projects be permitted to use herbicides? How will weeds be cleared? What efforts will be made to protect the ground water as the result of use of potential herbicides?

Impacts to Birds and Bats: The County of Los Angeles is relying exclusively on the State guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development; however, the "guidelines" have not satisfied issues at other facilities, including one facility (Kern County/DWP) that has the highest song bird kill rate in the United States. Furthermore, the County has failed to address any plan to protect migratory birds from solar facilities.

In February 2014, the Wall Street Journal published an article regarding solar arrays catching migratory birds on fire. There are two large issues that will be difficult, if not impossible to mitigate and the County should address in advance of any policy from the State of California. The large collection of mirrored solar arrays has resulted in bird wings getting singed or catching fire. "U.S. Fish and Wildlife Service told state regulators that they were concerned that heat produced by the project could kill golden eagles and other protected species. The agency also is investigating the deaths of birds, possibly from colliding with structures, found at two other, unrelated solar farms. One of those projects relies on solar panels and the other one uses mirrored troughs. Biologists think some birds may have mistaken the vast shimmering solar arrays at all three installations for a lake and become trapped on the ground after landing." The article refers to solar farms located here, in the Mojave Desert. The Antelope Valley is classified as an internationally recognized Important Bird Area. The solar developments are now hop-

scotching across the West Antelope Valley (rather than clustering) in such a manner that there will be no safe migratory areas, even with suitable nesting habitat, thereby creating eco-traps in which birds are encouraged to breed and flourish but will most assuredly reach death as a result of the renewable energy contiguous location. This will have a ripple affect across the animal food chain.

Set Back for Facilities Using Wind Resources: the chart recommends two times the facility height. On multiple occasions, wind turbines have fallen off of high towers, and have had accelerated rolls and over-turns onto Highway 58, where the largest wind energy plants are located. Two times the height does not address bounce or a potential defect in the wind turbines and can result in danger, if not death, to members of the general public.

NOT ADDRESSED IN DRAFT

Environmental Mitigation

We have observed that mitigation is required on large scale solar projects. In fact, a most recent approval required a mitigation of 2 acres for every 1 acre destroyed. However, the County failed to address how and in what time frame this is to be mitigated. The mitigation was required over a period of 40 years, but it did not state the mitigation should be done in advance of the permit. The solar company took this to mean that they could mitigate a couple acres each year until the end of forty years. There is specific LEGAL language that is required for mitigation in the environmental permitting process. The County Planning Department does not appear to have obtained legal input from an expert in environmental law. This language should be prepared in advance of the approval of the Renewable Energy plan. Language such as "fully endowed", "in advance" are all pertinent features. Often, there is a risk of bankruptcy on these projects, therefore, performance bonds and an endowment must be required. Additionally, with mitigation on a per acre basis, the mitigation should take place in the area in which the environmental degradation has occurred.

Because the majority of renewable energy projects will require mitigation, it is important to incorporate a mitigation banking standard as part of the proposed Renewable Energy Ordinance. It is recommended that all renewable energy projects that require habitat or waters of the Federal or State and/or CEQA mitigation should utilize mitigation banks in Los Angeles County that have conservation easements and endowments in place to fund long-term habitat management in perpetuity.

The County should be mindful that allowing utility-scale solar facilities on thousands of acres of land primarily in one area (Antelope Valley) is akin to scraping clean and fencing thousands of acres of desert habitats that can never be restored, much like primeval forest once cut can never be "primeval" again.

Significant Ecological Areas

The document does not address the development of renewable facilities in Significant Ecological Areas. While it unlikely to prohibit such development, there should be an additional layer of protection for those significant areas through a conditional use permit process, including an environmental study, regardless of the zoning. Utility scale Renewable Energy production *is* an industrial use.

Conversion of Prime Farmland

The proposed plan encourages the conversion of prime farmland into renewable energy development. What is important is we don't allow this 21st century 'Gold Rush' to get out of hand and jeopardize our food security, our watersheds, habitat areas and health to future generations. We don't have to put large-scale solar on prime farmland just because it is close to a substation. Presently, many farmers in the West Antelope Valley have allowed their land to go fallow in order to join the 21st Century gold rush for renewable energy. This is resulting in the conversion of a rural lifestyle into a temporary financial gain for a handful. Once other, more reliable, energy producers are created at a lower cost, the large footprint of renewable energy will place a permanent scar on the Antelope Valley, regardless of decommissioning rules. The rich rural history of the Antelope Valley will become just that, history.

Fire

The County proposal fails to address issues pertaining to renewable energy development in areas classified for High Fire (Class IV) Severity Area or a High Wind Severity Area. For example, should an area with High Fire and Wind Severity be developed with 500 foot tall wind energy towers, the surrounding communities will be put at risk as emergency aircraft will not be able to access the area and exit routes for communities will be hampered if not blocked, putting the public at extreme risk.

Ground Water Depletion

Desert wildlife is dependent on surface water, springs, seeps, creeks, wetlands, and seasonal streams. Little, if any, rainfall percolates downward to reach the water table. Pumping on utility scale or by cumulative numbers of smaller operations will cause groundwater depletion and loss of surface water that would be devastating to fish, plants, riparian communities, birds, reptiles, mammals, and microscopic organisms living in the desert soil, causing collapse to ecosystems that depend on these resources. Please address preventative measures with respect to this issue.

Structure Testing

Wind energy tower structures should be engineered and tested to withstand the strongest of historical wind events.

Placement Restriction

Restrict placement of solar facilities to areas directly adjacent to sources of water that are transported from outside the area via aqueduct or pipeline, so no groundwater pumping need occur, or require water to be hauled via truck tanker. (This can offset the benefit of renewable energy, when truck trips are factored in.)

Installation Types

In the rush to meet the high demand for renewable energy projects at a low cost, some Developers are obtaining solar panels from foreign manufacturers. Due to the demand for solar panels, manufacturers in China are reportedly cutting corners, and as a result, are seeing high failure rates. It is feasible that with a high failure rate due to a lower quality work product, a Developer could walk away from a project, particularly if government subsidies are eliminated. Furthermore, some foreign manufacturers are using lead components that leach into the soil. Therefore, it is most important to obtain a bond or some other means of guaranteeing decommissioning a project; second, it is also important to complete soil studies for those Developers using foreign components, both for testing for lead deposits that could leach into the ground water; and to ascertain if on site pesticides have leached into the soil.

Air Quality

Studies indicate that the desert is valuable as a carbon sink. Will the large-scale removal of vegetation required for solar plants seriously reduce this value? Evaluation of the cost/benefit of this loss should be weighed against the value of the so called renewable energy produced. Assure that loss of a project's carbon dioxide sink's capability will be completely offset and produce a clear net carbon dioxide reduction benefit. Monitor, and review in an ongoing way, a solar plant's carbon footprint.

Nearly all of the areas included in the West Mojave Plan (which includes the Antelope Valley) have recorded concentrations of pollutants in excess of national and state ambient air quality standards for PM10 and a variety of others. In addition, the presence of numerous new dirt roads invites vehicle trespass that would compound the problem of particulates in the air. Construction and maintenance activities will cause serious air quality issues for wildlife and human inhabitants of the desert. Vast amounts of water will be required to subdue dust. Water, as a dust mitigation measure, could have a reverse impact and subsequent consequences as it helps in the propagation of the arthroconidia (spores) of Coccidioides immitis This plan should include a mechanism to prevent off-road use; and trip/travel reductions during and after projects have been constructed.

Consider all impacts of air pollution, including drift from other areas as total to that area, regardless of the source, when evaluating solar projects. Do not allow subtraction of transported ozone in determining attainment and non-attainment areas.

Refuse multisource projects that use a small portion of solar energy production to facilitate approval and then use natural gas or some other greenhouse gas producing fuel to make electricity. Solar plants should be one hundred percent solar-only, and should only be considered for facilitated permit processes.

Separately Analyzing Aspects of the Total Project is Piecemealing

The County of Los Angeles is creating this Renewable Energy Plan as part of the General Plan, which is presently being updated. At community meetings throughout the Antelope Valley we were also told that the "plan" was being created due to the need, the high demand and creation of renewable energy projects in the County of Los Angeles as part of the mandated and established Renewable Portfolio Standard (RPS) by the State of California.

During the September 29, 2011 LADWP Barren Ridge scoping meeting in Leona Valley, the community was informed of other potential projects by energy developers that are presently in the LADWP "queue", waiting in line in the event this project is approved. A similar circumstance had arisen with Southern California Edison's Tehachapi Renewable Energy Project. Wind and solar renewable energy projects were in Edison's "queue" and are now being executed with plans to connect to the new Edison 500kv transmission lines. The cumulative impacts were never assessed or addressed. Upon the Record of Decision, these projects began a permit process and were therefore, a foreseeable event in violation of the California Environmental Quality Act. Based upon immediate past events we believe those projects in the County "queue" as well as solicitations not yet in the system, should also be considered as part of the whole project, with plans to connect to the LADWP/Edison transmission lines. The projects in the "queue" as well as this proposed County Renewable Energy Plan are in fact part of the whole action.

The Los Angeles County Renewable Energy Plan proposal, the LADWP Barren Ridge Project and the Tehachapi Renewable Transmission Project are part of the same mandated and established Renewable Portfolio Standard (RPS) by the State of California. As such, all of these projects are part of the same cumulative impacts of the same action. When completing an environmental study of all of these issues, the County planning department must address the cumulative impacts to the Antelope Valley as the result of their "plan" which coincides and, in fact, helps implement all of these renewable energy projects in one specific area in the County of Los Angeles. These projects need to fall under review of a separate environmental impact report that should be undertaken specifically for the Antelope Valley.

CEQA defines "project" as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonable foreseeable indirect physical change in the environment...." (CEQA Guidelines, § 15378, subd. (a); see also CEQA Guidelines, §15063, subd. (a)(1) {the lead agency must consider "all phases of project planning, implementation and operation.}). NEPA similarly requires that the DEIS succinctly describe the environment affected. (40 C.F.R. § 1502.15) An Agency cannot treat one project as a succession of smaller projects, none of which, by itself, causes significant impacts. (Burbank-Glendale-Pasadena Airport Authority v. Hensier (1991) 233 Cal. App. 3d 577, 592{"CEQA mandates environmental considerations do not become submerged by chopping a large project into little ones"}; see also NEPA mandate that connected projects be included in the DEIS, 40 C.F.R. § 1508.25, subd. (a); Blue Ocean Preservation Society v Walkins (D. H1.1991) 754 F. Supp. 1450.)

A project description must include all relevant parts of a project, including reasonably foreseeable future expansion or other activities that are part of the project. (Laurel Heights I, 47 Cal. 3d at 396.). The California Supreme Court in Laurel Heights I stated that "an EIR must include an analysis of the environmental effects of future expansion or other action if "(1) it is a reasonably foreseeable consequence of the entire project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." (Id.). The lack of one concrete project description violates CEQA in that it precludes the public from intelligent participation in the analysis of the project (County of Inyo v. City of Los Angeles (1977) 71 Cal. App. 3d 185, 197). (See also NEPA requirements regarding connected actions, 40 C.F.R. §§ 1508.7, 1508.8, 1508.23, 1508.25, subd. (a)(2) and subd (c).) The proposed Renewable Energy Plan is, in fact, incorporating and part of several projects, including proposed renewable energy projects. The "Plan" is being created as a result of the TRTP and Barren Ridge projects. Thereby, this Renewable Energy Plan is part of a larger project, and as such, is a reasonably foreseeable consequence of the initial project, the mandated and established Renewable Portfolio Standard (RPS) by the State of California.

Further, piecemealing results in an inaccurate project description because essential pieces of the project(s) are not included. "An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (Burbank-Glendale-Pasadena Airport Authority, 233 Cal. App. 3d at 592.) "A curtailed, enigmatic or unstable project description draws a red herring across the path of public input" (County of Inyo. 71 Cal. App. 3d 185 at 193; McQueen v Board of Directors (1988) 202 Cal. App. 3d 1136, 1143 overruled on another point in Western States Petroleum Associates v. Superior Court (1995) 9 13 Cal. 4th 559, 570, fn 2; Mira Monte Homeowner's Association v County of Ventura (1985) 165 Cal. App. 3d 357, 365.). Because the project description is limited by piecemealing, the public and decision makers are being deprived of the ability to understand impacts from the synergistic

effects, conflicts and cumulative impacts of all of the collective projects associated with the renewable energy plans that were created as a result of Barren Ridge and the Tehachapi Renewable Energy projects. This includes the proposed Renewable Energy Plan for the County of Los Angeles.

Kim Szalay

From: Mitch Glaser
Sent: Tuesday, June 10, 2014 1:53 PM
To: Kim Szalay
Subject: FW: RE tomorrow

From: Vizcarra, Edel [mailto:EVizcarra@lacbos.org]
Sent: Tuesday, June 10, 2014 1:47 PM
To: Sorin Alexanian; Mitch Glaser
Subject: FW: RE tomorrow

From: Hickling, Norm
Sent: Tuesday, June 10, 2014 1:47 PM
To: Vizcarra, Edel
Cc: Osuna, Susie
Subject: FW: RE tomorrow

Another opposition letter regarding Silverado. This is a ministry that serves the world with food and medical support. They bring folks to their site in west Lancaster to train them how to farm for the own villages subsistence.

You can read what their reaction and concern is. Please route to the planning commissioners

Thanks and all the best

Norm Hickling
Supervisor Antonovich Antelope Valley Field Office
1113 Ave M-4, Suite A
Palmdale, Ca 93551
661-726-3600

From: Teresa Skinner [mailto:tskinner@as.net]
Sent: Tuesday, June 10, 2014 1:36 PM
To: Hickling, Norm
Cc: 'John Bell'
Subject: RE tomorrow

Dear Norm,

After all of the research and the advice that we have received ...including a friend who was out of work for three months as a direct result of dust storms from the solar project around her property, we feel that it is safest for us to take the stand that if solar is coming into this area then we need to be relocated.

We are looking at the long term impact... not just during construction. For Silverado it's just construction and they are out of here but we are the ones who have to carry the burden long term.

We chose this serene desert property with its quietness and beauty because it gave us the ability to do what we do. We thank you Norm for assisting us to move here and to get the Conditional Use Permit so that we could continue our work with those who need this type of environment for their mental, physical and spiritual wellbeing.

We do not have the resources, the extra finances, man hours, etc. to protect ourselves and the community that comes daily to our ministry from the elements that the solar project will create.

I wanted to let you know where we stood before we go and talk to the commissioners tomorrow.

We will do the best we can... Like you said it will be up to them.

Again thank you!

Respectfully Yours,

Teresa Skinner
Executive Director
All Nations International
www.allnationsIs58.org

Kim Szalay

From: S Z [ontishima1775@gmail.com]
Sent: Tuesday, June 10, 2014 1:58 PM
To: Hickling, Norm; DRP Special Projects
Subject: Comments, Silverado FEIR
Attachments: CCWAV Silverado FEIR Letter.pdf

Please find attached comments from our group, Concerned Citizens of the Western Antelope Valley. It would be greatly appreciated if you would forward these comments to the Planning Commission, Supervisor Antonovich and Mr. Vizcarra at the Supervisor's Office. Also, please let me know you have received and forwarded. Thanks so much.

Best Regards,
Susan Zahnter

Concerned Citizens of West Antelope Valley
Susan Zahnter & Dick Hague, Members
P.O. Box 786
Lake Hughes, CA 93532

10 June 2014

SENT VIA EMAIL

Mr. Kim Szalay, Planner, Special Projects
320 West Temple Street 13th Floor
Los Angeles, CA 90012
specialprojects@planning.lacounty.gov

Dear Mr. Szalay,

RE: Silverado West, Projects 1-6

Ultimately, the Draft Environmental Impact Review (DEIR) and the Final Environmental Impact Review (FEIR) for these six projects consist of promises. Promises that all the significant impacts will be reduced to "less than significant." These are words that have meaning in the planning and CEQA process, words on pages that will have great impacts to people, i.e., rural communities and property owners adjacent to the projects; and special-status or protected species of wildlife and wildlflower/ native grasslands supporting those species of the western Antelope Valley. In this FEIR we do not see anything different. We have been repeatedly disappointed by promises of all other project proponents to provide adequate landscape screening, adequate mitigation of scenic impacts; dust control; and manage subsequent ill-effects to property owners unfortunate enough to live on property near projects, and we have yet to see a project follow guidelines of the California Department of Fish and Wildlife(CDFW) for adequate mitigation to Swainson's hawks, burrowing owls, migratory bird foraging and nesting habitats.

One must assume the Los Angeles County Department of Regional Planning has a responsibility to assure the EIR and the FEIR are accurate representations of fact and that impact assessments and mitigations are suited to those impacts. There is no assurance or evidence, thus far, that the implementation of mitigations suggested in the review documents will result in actually achieving objectives or performance standards. Raptor expert, K. Shawn Smallwood, remarking on the West Antelope Solar Project, states:

> It has long been known that mitigation pursuant to CEQA has often either failed or has not been implemented, but with no consequences to the take-permit holder (Silva 1990). There should be consequences for not achieving mitigation objectives or performance standards. The project proponents should be required to provide a performance bond in an amount that is sufficient for an **independent party** to achieve the mitigation objectives originally promised, and in this case, the promises should be much more substantial. A fund is needed to support named individuals or an organization to track the implementation of mitigation measures. Report deadlines should be listed, and who will be the recipients of the reports. In my professional opinion, the Neg Dec's lack of specific monitoring details renders it inadequate and uncertain and makes it impossible to gauge whether to what extent any mitigation measures will lessen potentially significant impacts on species. If these measures

> are not clearly laid out in the Neg Dec, then there will be no basis to determine that impacts will be less than significant once implemented. Furthermore, without adequate funding allocated in advance, there is no certainty that any proposed mitigation will actually take place.

Even though Dr. Smallwood's comment is in response to a Negative Declaration, it speaks to the necessity of such monitoring and satisfaction of implemented mitigation, and also subsequent effects on areas of renewable energy development. The argument that cumulative impacts are diminished or insignificant because other nearby projects have provided mitigation to lessen their impacts to less than significant would, in turn, be basing those impacts on inadequate evaluation and monitoring not yet performed post-construction, and when these projects may be in construction phases during overlapping times. There should also be proof that significant impacts are avoided by the measures suggested, otherwise they remain significant impacts.

Swainson's Hawk and Burrowing Owl Mitigation

Will there be surveys done that will prove the proposed projects will have reduced their impacts to Swainson's hawks? As I have mentioned in my response to the DEIR, all of these projects are within a five mile range of two Swainson's hawk nests (only ten breeding pairs in the Antelope Valley), and in fact, project two is directly adjacent to one known nesting site, and all the projects are within five miles of either known nesting site. The project proponents have suggested a range of mitigation land scenarios that do not comply with the CDFW's Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles And Kern Counties, California, June 2, 2010. In the section titled "Monitoring and Mitigation Plan Recommendations, number 3, it says, **"The plans should call for mitigating loss of Swainson's hawk foraging habitat by providing HM [Habitat Management] lands within the Antelope Valley Swainson's hawk breeding range at a minimum 2:1 ratio for such habitat impacted within a five-mile radius of active Swainson's hawk nest(s).** The Department considers a nest active if it was used one or more times within the last 5 years." Moreover, the CDFW's response letter to the NOP for Silverado Projects states:

> Based on known nesting locations and foraging accounts, DFG concludes that the construction of the project would result in loss of potential foraging and/or nesting habitat for Swainson's hawk. Foraging habitat for Swainson's hawk includes dry land and irrigated pasture, alfalfa, fallow fields, low-growing row or field crops, rice land, and cereal grain crops (CDFG 1994). Swainson's hawk may also forage in non-native annual grassland, and other desert scrub habitats that support suitable prey base.

In spite of this information provided by CDFW before the creation of the Draft Environmental Impact Review (DEIR), the document has seriously underestimated the impacts to breeding Swainson's hawks, and persisted in describing the project areas as "depauperate." Neither the DEIR, nor the FEIR have satisfied this mitigation requirement, in spite of the CDFW NOP, and the Swainson's Hawk Survey Protocols. Due to the significant impacts determined by CDFW, no reduction in acreage should be traded for quality of habitat. If anything improvement should be made, as indicated: **"Foraging habitat should be moderate to good with a capacity to improve in quality and value to Swainson's hawks, and must be within the Antelope Valley Swainson's hawk breeding range. Foraging habitat with suitable nest trees is preferred"** (CDFW Swainson's Protocols, page 8).

We argue as well for the improvement of burrowing owl habitat, that will most likely coincide with hawk mitigation land. CDFW's Staff Report on Burrowing Owl Mitigation 2012, Appendix F, Mitigation Management Plan, Item 3, states "Enhancement of the conserved lands (enhancement of reproductive capacity, enhancement of breeding areas and dispersal opportunities, and removal or control of population stressors). This argues for substantial effort at replacing lost habitat with improved conditions, not with using on site mitigation, or lands that have the potential to become fragmented by other projects. Mitigation Management also suggests minimum annual surveys over 5-10 year span to evaluate population size. Furthermore, as set forth in more detail in Appendix A:

> **In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. The current scientific literature supports the conclusion that mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat area for breeding, foraging, wintering,dispersal, presence of burrows, burrow surrogates, presence of fossorial mammal dens, well drained soils, and abundant and available prey within close proximity to the burrow.**

The intent of acquiring mitigation lands would be to select available parcels that would replace lost breeding/foraging/winter foraging habitat and enhance the overall quality of habitat for a variety of species. Additionally, the mitigation plans should include bird fatality reports for all species, since the recent reports of bird deaths from collision with solar panels.

Dust Control, Landscaping, Scenic Areas

As I stated in my letter addressing the DEIR, dust control measures following the Antelope Valley Air Quality Management District's Rule 403 have proven inadequate in controlling and mitigating fugitive dust. The continued assertion by the FEIR that this Rule 403 shall prove adequate in controlling fugitive dust is defective. Soil stabilizers were blown away with soil during several wind events during 2013. Also, Doctor of Environmental Engineering, Petra Pless has indicated that "visible dust is only an indicator that *Coccidiodes ssp* spores may be airborne in a given area". . ."may be present in air that appears relatively clear and dust free. . . Thus, implementation of dust control measures only when visible dust is present, will not provide protection to workers and the general public. . . In order to reduce exposure, soil disturbing activities should be timed to according to an area's rainy season" (Correspondence, West Antelope Solar (LACoRP), Lozeau Drury LLP, 20 November 2013).

Landscaping plans will not eliminate destruction to viewshed and wildflower fields that comprise project areas. The unlandscaped perimeter of AV Solar Ranch One is a good example of what our industrialized rural agricultural areas look like after construction. The small pine trees that line the perimeter fence along Highway 138 have failed to thrive, and those that survive will take at least ten years to provide screening, windbreak, or habitat. It is possible that rubber rabbit brush, watered, will grow seven to eight feet. If the landscaping extended to the entire perimeter of each project area, planted on a berm, it might be capable of *somewhat disguising* the solar panels, but must be replanted periodically.

There is no mitigation offered for the destruction of wildflower fields. The wildflower fields of the Antelope Valley bring visitors from all over the world, and are part of the Los Angeles County's Scenic Highway Element, 1974. While those roads around listed are not officially designated State Highways, they were chosen for their scenic qualities, and despite claims of suitably shielding hundreds and thousands of acres, with barbed wire, chain link fencing, 10,000gallon water tanks, and the panels

themselves, there is no mitigation to less than significant impact. As I stated in my DEIR letter, the General Plan, Land Use Section/Scenic Highways, III-55, says " Commercial or industrial uses should be conducted entirely within closed buildings, except for restaurants, recreational uses and gasoline service stations."

Finally, I am concerned that the DEIR and the FEIR, as written, will become part of the record. CEQA allows subsequent projects and programmatic EIRs to use studies and information from previously certified documents. Unless all of the concerns listed in my DEIR letter, this letter, and all of the concerns of other respondents can be adequately addressed, I request that the FEIR *not* be certified, and projects postponed or denied until review documents can be amended to the satisfaction of residents and other concerned citizens mindful of significant impacts to their health and happiness, and that of their natural surroundings. The FEIR should include detailed alternative plans for each significant impact area, if the situation occurs that sufficient mitigation is not attained with measures outlined in the current document, and Mitigation Monitoring reports should be available to the public on a regular basis. Once the FEIR is amended, it should be recirculated for public review.

Sincerely,

Susan Zahnter

Susan Zahnter
Member, Concerned Citizens of the Western Antelope Valley

Dick Hague
Member, Concerned Citizens of the Western Antelope Valley

Copy to: Supervisor Michael D. Antonovich, Planning Deputy Edel Vizcarra, Field Deputy Norm Hickling, Planning Director Richard Bruckner, Renewable Energy Planner Jay Lee

Norm

CAS16811

Concerned Citizens of Western Antelope Valley
Friends of Antelope Valley Open Space
Three Points-Liebre Mountain Town Council, VP

Meeting, 23 April 2014, Fire Station 129, Lancaster's

Dear Supervisor Antonovich,

We truly appreciate the time you have taken to meet with us today. I have several concerns pertaining to industrial-scale renewable energy in the Western Antelope Valley.

We have asked Regional Planning to describe at what point the proliferation of utility-scale renewable energy development would tip the scales and change our rural communities recognized by the current Antelope Valley Areawide Plan as " [having] a wide variety of very low density, rural villages which are worthy of protection. Each is uniquely identifiable for its surroundings. Their residents express a sense of community pride and local identity. . . it is important to sustain these areas a unique, low-density 'living environments'" and supposedly protected by the General Plan and the Antelope Valley Areawide Plan. They said they did not know.

There are policy statements in planning documents that state they seek to "Promote air quality that is compatible with health, well-being, and enjoyment of life. The public nuisance, property and vegetative damage, and deterioration of aesthetic qualities that result from air pollution contaminants should be prevented to the greatest degree possible." So far, we have not seen any Best Management Practices that have been able to control the problems associated with air quality, although the ordinance relating to grading and solar projects may help. Letters from local city officials and AQMD have stated that the District's Rule 403, which outlines requirements for controlling fugitive dust is inadequate, and re-vegetation rates have an 80 percent failure rate. The photos of West Antelope Solar Project area, before and after rain shows what long term damage from tires can do.

For me, aesthetics have been an important feature in considering effects of renewable energy on local communities that have scenic routes identified in the Scenic Highways Element of the General Plan, 1974. Supposedly EIRs and MNDs address the impacts through landscaping plans that are no match for the beauty of the natural areas they propose to change. Chain-link fencing topped with barbed wire provides and industrial appearance to these projects, and small trees planted on north and east facing views, as at AVSR 1, will take many years to reach windbreak and effective screening height (see photos of AVSR1), east and west views.) Additionally, the General Plan, in its Land

Use Section/Scenic Highways, III-55 states, "Commercial or industrial uses should be conducted entirely within closed buildings, except for restaurants, recreational uses and gasoline service stations."

Repeatedly, significant impacts are explained away as "mitigated to less than significant." Planning policies that have the appearance of protecting rural communities and scenic areas are swept aside. They are no good to us if they are unenforceable, or can be overridden each time a project developer wants to rush a project because their financing, subsidies, or contracts will expire.

This leads me to finally ask, on behalf of our Town Council, that planning documents be posted and adequate time be allotted for public review. In the case of Silverado—5,500 pages, plus planning documents with ten days for review. (You have probably seen the email I sent recently expressing the need for this; see attached.) I also ask that Planning Commission Meetings concerning projects of such a nature--essentially industrializing our rural areas, be held in the Antelope Valley. To RP's credit, a hearing officer conducted a meeting in Lancaster for Silverado, but I assert it is not quite the same as commissioners seeing people show up for hearings, and is filtered through the hearing officer to the Planning Commissioners. We have asked for meetings here, and have been told it is too expensive. An alternative might be to hold meetings much like BOS meetings that are teleconferenced from the Lancaster Library.

Sincerely,

Susan Zahnter

Susan Zahnter
Member, CCWAV, FAVOS
Vice President, Three Points-Liebre Mountain Town Council

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

June 9, 2014

Ms. Susan Zahnter
Post Office Box 786
Lake Hughes, CA 93532

Dear Ms. Zahnter:

SILVERADO POWER WEST, LOS ANGELES COUNTY
SOLAR ENERGY PROJECTS 1-6

Thank you for your recent correspondence to Supervisor Michael D. Antonovich regarding your concerns pertaining to utility-scale renewable energy projects in the Antelope Valley, including the Silverado Power West, Los Angeles County Solar Energy Projects Nos. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), and R2011-00805-(5) (Silverado Projects). Supervisor Antonovich has requested that the Department of Regional Planning (Department) respond to you directly with a copy to his office.

I understand that you and other residents are concerned about the proliferation of renewable energy facilities in the West Antelope Valley, particularly with regard to health issues related to dust, aesthetic and visual impacts, and implementation of planning policies designed to protect local communities. The County is committed to ensuring that all renewable energy projects approved in the unincorporated areas fully mitigate their environmental impacts and are appropriately conditioned to minimize land use and other impacts.

With regard to dust controls, the Board adopted a Motion on May 14, 2013, directing the Department to improve mitigation measures and conditions related to grading and dust control in collaboration with the Departments of Public Works and Public Health. The Department's response, dated January 28, 2014, is attached to this letter. These dust controls and other measures are required conditions of approval for all solar projects going forward until such time as the Renewable Energy Ordinance is adopted. I anticipate that this Ordinance will include similar requirements

Pertaining to aesthetics and visual impacts, the Department has consistently enforced the Board's policy regarding the undergrounding of privately-owned transmission lines that directly serve renewable energy facilities, and solar panel arrays are restricted to ten feet in height or less to preserve long range views. Safety considerations and electrical utility regulations require perimeter fencing around utility-scale projects, and

electrical substations have specific design limitations regarding heights of equipment and fencing materials used, and other technical specifications limiting the aesthetic screening capability of such facilities.

.

All renewable energy applications in the Antelope Valley are subject to the policies of the Antelope Valley Areawide General Plan (Local Plan). The Local Plan encourages utility-scale electricity generation in the context of protecting the local community. To date, the County has approved five renewable energy projects: (1) AV Solar Ranch One, (2) Alpine Solar, (3) Sun Power Antelope Valley Solar (located in both Los Angeles and Kern Counties), (4) Rutan, and (5) West Antelope Solar Energy Project. With the exception of the Rutan Project (which did not require a public hearing), all projects have gone through the public hearing process and environmental review.

Though severe dust storms have been difficult to mitigate for developments under construction, all of these projects have been required to provide mitigation measures to protect the community. Additionally, each project is required to set aside preservation lands. In total, the approved projects entail the development of 4,481 acres and the preservation of approximately 2,532 acres of mitigation land. These projects will generate clean electricity compared to an equivalent amount of power generated by traditional fossil fuel sources.

Regarding concerns over the proliferation of solar projects in the West Antelope Valley, many applications for renewable energy have been withdrawn. In fact, of the 37 projects submitted since 2009, 23 have been withdrawn. Furthermore, two projects (NextEra Blue Sky Wind Energy Project and the Iberdrola Quail Lake Photovoltaic Project) are not proceeding at this time. Seven projects are currently active, including the six Silverado Projects.

Regarding public input pertaining to these projects, you may recall that a Hearing Examiner public hearing for the proposed Silverado Projects was conducted at the end of January of this year in the local community to take testimony on the subject projects as analyzed in the Draft Environmental Impact Report (Draft EIR). The testimony and responses to public comments were prepared and presented in a Final Environmental Impact Report (Final EIR) for the Regional Planning Commission (Commission) to consider at its scheduled May 7, 2014, public hearing. The public hearing before the Commission was continued to June 11, 2014, to allow more time for public review and input. I would also like to mention that we are conducting a "pilot project" to allow Antelope Valley citizens to provide testimony to the Commission directly through an audio-video conference set-up at the Department's Antelope Valley Field Office on June 11, 2014, starting at 9:00 a.m.

Regarding long-term considerations, after releasing the first draft of the Renewable Energy Ordinance on October 3, 2013, and receiving public feedback at its meeting on October 26, 2013, the Department released the second draft of the Renewable Energy Ordinance on May 5, 2014, and received additional public comments through June 4, 2014. I hope that you and other citizens will continue to be involved in our long-range planning processes, as they will help create a better framework for processing renewable energy projects in an efficient and equitable manner that respects State renewable energy mandates, while being sensitive to the local environment and local communities' concerns.

We appreciate your input and we trust that we have provided thorough answers through the above-mentioned Final EIR responses to your comments on the issues you and others have raised on the Draft EIR.

Thank you for your interest in these matters. Additional information may be found on the Department's website at planning.lacounty.gov/energy and the Silverado Projects in particular at planning.lacounty.gov/case/view/silverado/. If you have further questions, please contact Mr. Kim Szalay of my staff at (213) 974-4876 or by email at kszalay@planning.lacounty.gov. Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m.

Sincerely,

Richard J. Bruckner
Director

RJB:MC:SZD:KKS:kks:ems

Attachment

c: Supervisor Michael D. Antonovich (Edel Vizcarra, Norm Hickling)

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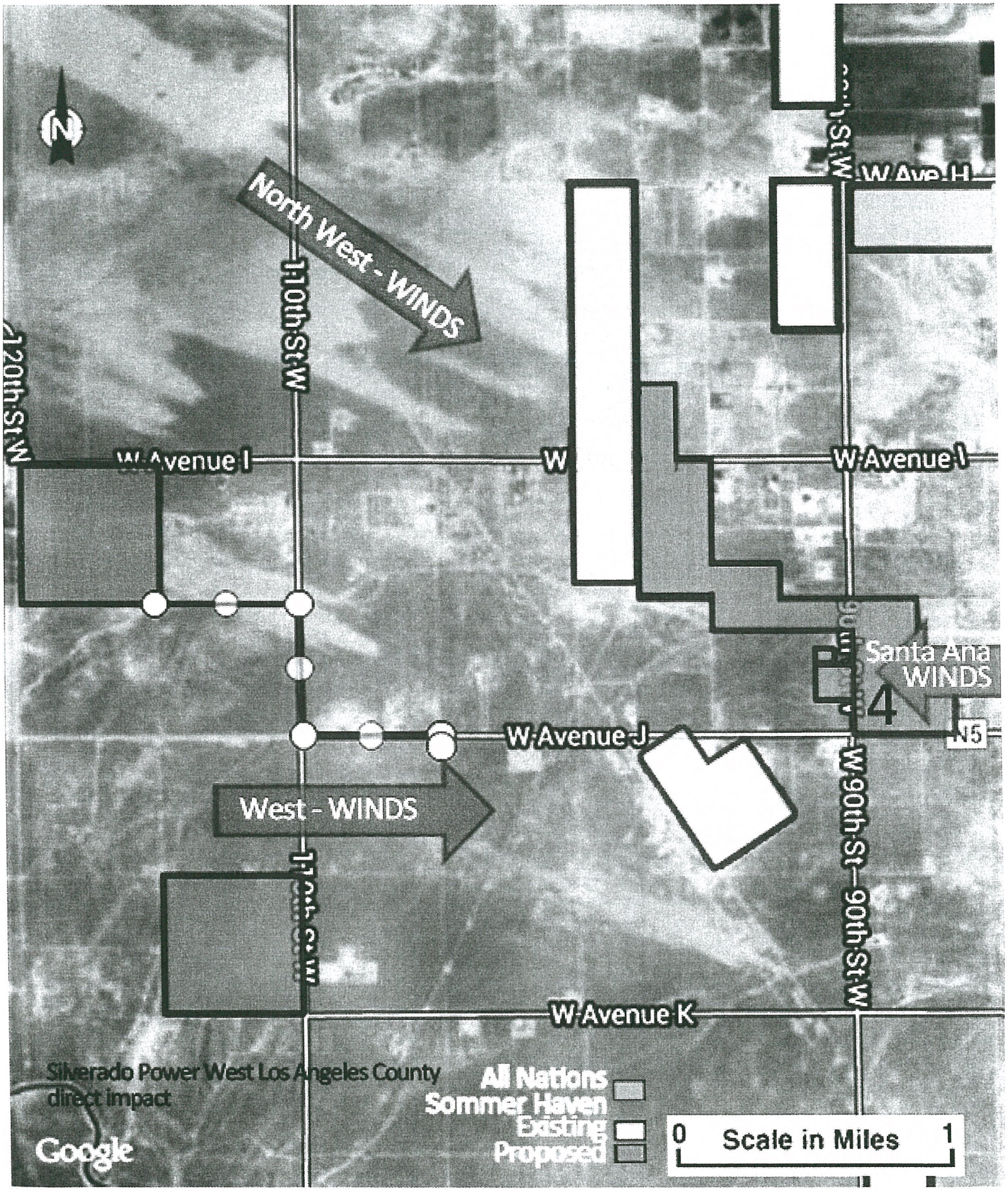
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Proposed
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Scale in Miles
1
Google

LAND VERITAS

Contact
877.445.8699
bankmanager@landveritas.com
http://landveritasmitigationbanks.com

Key Facts

Location

- Leona Valley and Elizabeth Lake, within unincorporated Los Angeles County

Property Size

- 4,236 acres

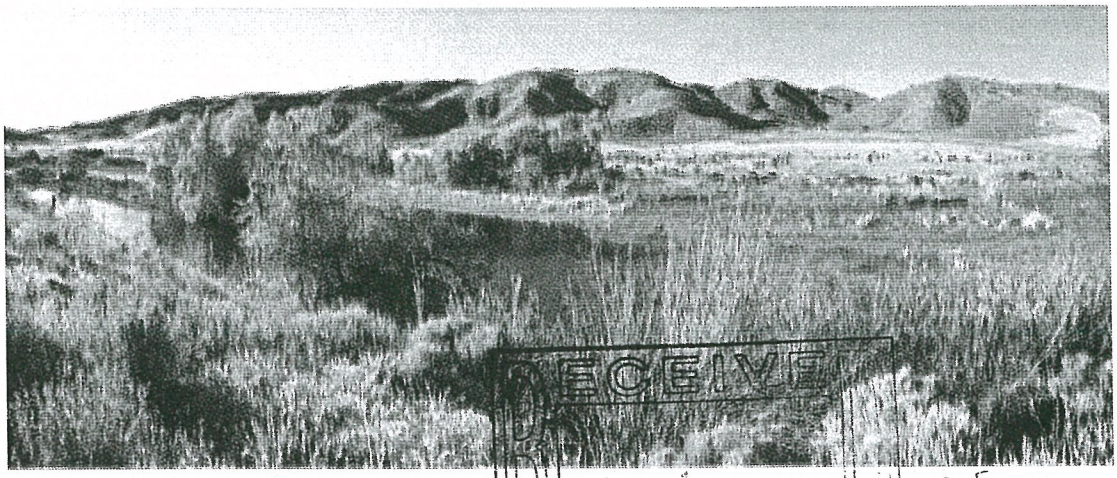
Target Resources

- Wetland & Riparian Habitats
- Desert Wash & Alluvial Floodplain
- Oak & Juniper Woodlands
- Native Grasslands
- Mixed Chaparral & Scrub Communities

Potential Habitat for

- Swainson's Hawk
- California Red-Legged Frog
- Burrowing Owl
- Coast Horned Lizard
- Loggerhead Shrike
- Western Pond Turtle
- Tri-Colored Blackbird
- Willow Flycatcher
- Golden & Bald Eagle

The Petersen Ranch Mitigation Bank



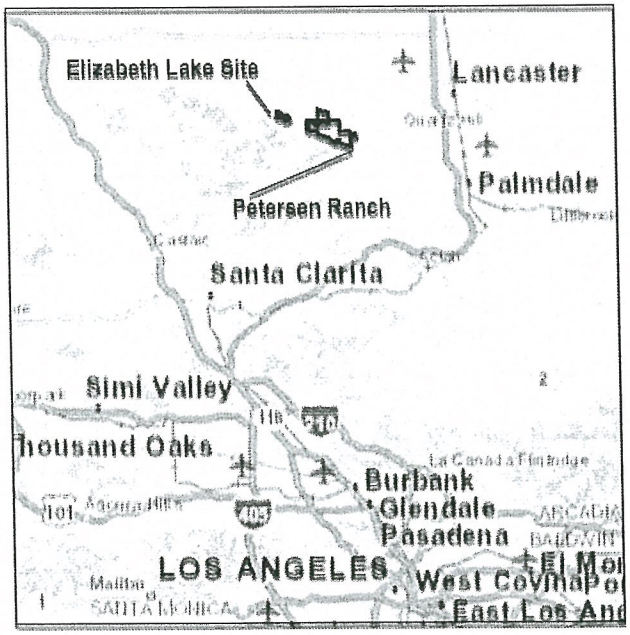
Land Features

The bank consists of two sites in unincorporated Los Angeles County: the 3,919 acre Petersen Ranch near Leona Valley and the 317 acre Elizabeth Lake site on the shores of Elizabeth Lake. It is within the boundaries of both the proposed San Andreas Rift Zone Significant Ecological Area and the Desert Renewable Energy Conservation Plan Area. The bank sites are topographically and biologically diverse with dominant vegetative communities including riparian habitats, desert wash, alluvial floodplain, native grasslands, mixed chaparral and scrub communities. There is extensive foraging and nesting habitat for Swainson's hawk.

Several other sensitive wildlife species exist in this vicinity including California red-legged frog, burrowing owl, coast horned lizard, loggerhead shrike, western pond turtle, tri-colored blackbird, golden eagle, bald eagle, willow flycatcher, patch-nose snake, yellow warbler, and yellow breasted chat.

Service Area

The bank property drains to both the Santa Clara River and Antelope-Fremont Valley watersheds, resulting in a service area covering 4.4 million acres. It offers mitigation for numerous special status species and habitats and for impacts to wetlands/waters, providing mitigation for several regulatory programs including the Army Corps, Regional Water Quality Control Board, CA Department of Fish & Wildlife, and CEQA. The bank approval process is underway and expected to be completed by late 2014.



RECEIVED
JUN 11 2014
Items 6-11 / Silverado

June 11, 2014

44505 90th St West, Lancaster Ca 93536

Commissioners

Re: Proposed Solar Projects of Silverado Power West adjacent and to the west of above property.

As The President of Sommer Haven Ranch International a Non-Profit organization operating on and from the above address I have several urgent concerns regarding the proposed installation of the said Solar Projects.

Sommer Haven Facilitates Community garden projects on site providing training and resources for the community both local and international (The Rotary club partners with us on the Community Gardens)

Livestock are also on the property, they are used for training purposes.

We have staff who reside on this property.

During the proposed construction of these solar projects.

There is going to be an increase of dust.

Rodents and other wildlife will be forced to migrate and this will be towards our property.

Both of these issues are serious hazards on plants especially those for food.

Dust destroys plant life and excessive layers are breeding grounds for fungus and bacteria.

Rodents and other wildlife are going to increase also destroying the communities' food resources.

The livestock and the human residents will have increased health issues because of the dust and danger from the increase of wildlife- Snakes and others.

We have many people who volunteer, come for training to improve their lifestyle, come for retreat "to the farm' for refreshing.

I am voicing my concern as the above issues will have detrimental effects on all issues mentioned.

We will not get volunteers or those needing a community garden plot or those seeking training or for retreat because of the increased hazards and health risks.

We have already seen an increase of dust storms since installation of other solar around us and I feel that any further installation of these plants around us will increase these above mentioned issues.

This will be very detrimental to all our projects and outreaches that have been operating in this Valley for 60 years.

Sincerely

Annella Whitehead

PRESIDENT OF SOMMER HAVEN RANCH INT'L

Community unites for needy

MEALS ON WHEELS
Sommer Haven International's new 2010 Freightliner tractor-trailer will be used in the organization's food distribution program in Littlerock. Sommer Haven previously used a 1993 Freightliner, which over the years has transported more than 30 million pounds of donations, feeding an average of 15,000 people per week.
CHRISTINA RAMOS
Valley Press

Distributors raise $35,000 for fresh food supplier

By GERRY PRICE
Valley Press City Editor/Assignment

LITTLEROCK — Several dozen Antelope Valley residents concerned about feeding the homeless and otherwise less fortunate gathered Friday in the parking lot of Dos Testamentos Church at 100th Street East and Palmdale Boulevard to celebrate the acquisition of a 2010 Freightliner tractor-trailer for Sommer Haven International.

Founded by the late Rev. Agnes I. Numer in 1954, Sommer Haven over the years supplied many of the organizations feeding the less fortunate with fresh food.

For the past 18 years, Sommer Haven has used a 1993 Freightliner, which over the years has transported more than 30 million pounds of donations, feeding an average of 15,000 people per week.

This year, however, California Air Resources Board regulations dictated that this truck needed $20,000 in upgrades to make it legal to operate in California by the first of next year.

"We were facing a very sad and challenging situation at the thought of having to stop this work that has gone on for over 40 years" said Gordon Skinner, director of distribution for Sommer Haven, "but our amazing distributors, who never want this weekly food distribution to end, rose to the occasion and God blessed us to be able to raise the $35,000 we needed in less than 3 months."

The organization's desperate need brought an amazing demonstration of what can be done by a united group of community nonprofits who join their hearts to work together as one family to serve the most needy in the Antelope Valley, Skinner said.

The replacement tractor-trailer was purchased with a $25,000 grant from the Antelope Valley Air Quality Management District coupled with donations from Sommer Haven's 60 active food distributors who raised $35,000, plus what Skinner described as a "generous price" offered by Selec Trucks of Los Angeles LLC, which gave the organization a discount of almost $10,000.

See UNITES on A5

UNITES: 'We never buy our food and we never sell it'

From A1

"We give all of the glory to God for providing the donations of food for us to pick up and distribute every week for 40 years. We are thankful to have been a part of serving the Antelope Valley by distributing through so many of this valley's amazing charities"

provisions come about time after time as God faithfully works behind the scenes to bless and provide for this work. We never buy our food and we never sell it. It is given freely by God and we give it freely to those who need it most and we trust God to meet our bud-

HENRY DANPOUR
1752 W. Avenue K
Lancaster, Ca 93534
Tel: (310) 444-8900 Fax: (310) 444-9626
Email: ahsdd66@gmail.com

June 9, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am the current landowner of APNs 3203002011,-2,-3, and -4 which are a part of the Antelope Solar Greenworks project proposed by Silverado Power. I am writing to express support for the proposed Antelope Solar Greenworks Solar Generating Facility (SGF) located in the Antelope Valley in unincorporated Los Angeles County. The project will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

The recession has hit the Antelope Valley hard and over the past few years thousands of people have lost their jobs. Silverado plans to utilize local businesses during construction and employ as much local labor as possible. The project will create much needed jobs as well as indirect economic stimulus that will help boost the local economy.

Silverado has worked closely with the Los Angeles County Department of Regional Planning, state and local agencies, community groups and area residents to ensure the project is developed in a responsible manner. The project will have negligible environmental impacts, provide direct access to existing electrical infrastructure, and enable the development of a cost-effective project to deliver clean, renewable, domestically-produced energy to the region.

Silverado Power is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. I appreciate the integrity of Silverado Power as they have developed this project. I encourage the Los Angeles County Regional Planning Commission to approve the Conditional Use Permit for the Antelope Solar Greenworks project.

Sincerely,

Henry Danpour

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0036
(916) 319-2036
FAX (916) 319-2136

Assembly
California Legislature

STEVE FOX
ASSEMBLYMEMBER, THIRTY-SIXTH DISTRICT

May 5, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing to express support for Silverado Power's six proposed Solar Generating Facilities (SGFs) located in the Antelope Valley in unincorporated Los Angeles County. The projects will have a combined generating capacity of 172 megawatts, enough electricity to power more than 51,000 homes. The projects will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

As the current Assemblymember representing the 36th Assembly District and the Antelope Valley, I encourage alternative energy in our area and recently co-authored and passed AB 1060 advocating for smart renewable energy development in the Desert Renewable Energy Conservation Plan area. Silverado's projects compliment green energy initiatives that I support and are sited in a Competitive Renewable Energy Zone that represents the state's selection for cost effective and environmentally friendly renewable energy development.

Los Angeles County has been hard hit by the recession and construction jobs in the region have decreased by 26 percent since 2007. Silverado's projects will create approximately 40 to 150 construction jobs at each site. Eighty-five percent of construction work is expected to come from the local workforce and many of the construction subcontracts will be assigned to firms based in the region. Additionally, the projects have the potential to introduce millions of dollars into the local economy through construction materials purchases and tax revenue. This is the kind of economic stimulus our region desperately needs.

Silverado is committed to all aspects of responsible project development including the mitigation of dust. Silverado has met on a regular basis with area residents and regional dust control experts. The culmination of this planning resulted in an aggressive dust mitigation strategy that has already been successfully implemented at other Silverado projects in the region. Silverado also has committed to

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lancaster ca
it's positively clear

R. Rex Parris Mayor
Marvin E. Crist Vice Mayor
Ronald D. Smith Council Member
Ken Mann Council Member
Sandra Johnson Council Member
Mark V. Bozigian City Manager

June 9, 2014

Esther L Valadez, Chair
Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Re: Silverado Solar Projects

Dear Commissioner Valadez,

As City Manager of the City of Lancaster, I want to express my support for Silverado Power's six proposed solar generating facilities in the Antelope Valley. The City of Lancaster has aggressively worked to pursue responsible alternative energy solutions that better the environmental and economic conditions in the local community and Antelope Valley Region. These projects create jobs, generate revenue, and generally have a smaller environmental impact than other types of development. Specifically, these types of facilities generate less air pollutants than conventional power facilities, utilize less water than residential and commercial developments, and tend to be sited on previously disturbed property which results in fewer biological and cultural impacts.

Silverado Power is an established solar developer who has entitled and developed several solar facilities within the City of Lancaster in a responsible and well-thought out manner. The City recognizes that dust is a problematic and sensitive issue in the Antelope Valley and as such, has been very pleased with the manner in which Silverado Power has conducted their construction activities. The lack of dust from construction activities show Silverado Power's respect for the area's residents and neighboring communities and has been noted by both the City and the Antelope Valley Air Quality Management District.

The City is pleased to have Silverado Power as part of our community and strongly support the approval of their projects.

Sincerely,

Mark V. Bozigian
City Manager

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014

SUMMER SOLAR LLC CURRENT PROJECT
90TH ST WEST SOUTH OF AVE H, LANCASTER CA
MAY 18, 2014

RECEIVED
JUN 04 2014
BY:

May 22, 2014

Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Silverado Power West
Final EIR
Projects No. R2011-00833, 00798, 00799, 00807, 00801, and 00805
Conditional Use Permits and Zone Changes

I am very much in favor of solar energy systems on buildings, homes, and over parking spaces. I am opposed to massive solar generating facilities covering and claiming thousands of scenic acres of desert, open land, and old farmlands that will be surrounded by chain-link fence with barbed-wire.

Irresponsible planning is the result of impulsive changes to zoning and use permits to meet the terms of special projects.

Los Angeles County Supervisors and Planners are responsible to their constituents and taxpayers who have chosen their location to live because of its special qualities and favorable characteristics. People expect this uniqueness to remain the same as when they originally choose to reside somewhere.

The six Silverado Power West projects offer to transform acres of unoccupied land into a patchwork of industrialized grounds. Renewable energy generating facilities are full-fledged, huge (yes, maybe quiet) stations that hook up to everywhere. They will not benefit, enhance, or do anything positive for nearby communities, and the one in which I live.

Economics is an issue that cannot be brought up in an environmental hearing, but I and many, many people are very worried about their property value declining once their homes are surrounded by increasing numbers of solar fields.

A number of renewable energy projects border Antelope Acres and do not stretch the imagination of travelers through the area. What used to be a pleasurable, relaxing drive is a surreal pass through a bleak, fortified territory. Knowing now what it's like, has changed my expectations of renewable energy.

WATER

As long as renewable energy projects are renewing energy on thousands of acres of land, they must also be conserving water by keeping it in the ground, not extracting it for other uses and reserving a great environmental resource for the future.

Section 1.3 (DEIR) page 1-4 the Projects are *proposing* to use out of basin water for construction and operation.
Section 4.14.4.1 Proposed Water Supply Options for Projects 1-6

Adjudication Allocation

No groundwater shall be pumped for the operational life of the projects.

On-site Wells, Import Water to Basin

The Project has claimed in a public hearing that it will use out of basin water. That is not good enough unless the word propose is deleted from the DEIR and the Projects must use out of basin water for construction and operation.

Alternatives

Section 1.4.6 of the DEIR states that alternative sites would likely have equal or greater environmental impacts since the lands presently selected are **previously disturbed** and generally **have less environmental value** compared to several other properties in the area.

Additionally, other alternative sites would **not** meet project objectives as pre-arranged PPAs and interconnection for the potential project sites **are already** in place. The applicant has performed due diligence in selecting project sites.

This is deceptive, not due diligence.

Alternative sites would not have been convenient due to the fact Silverado has similar projects with Lancaster that are contiguous and a cause for industrial build out. Approval of these projects will escalate the rush to exploit open space.

Viewshed

Project land is described in the EIR as previously degraded, unproductive farmland, fallow, mostly disturbed agricultural land, and unproductive agricultural land. Does that imply it is only worthy to be developed?

A visual blight on the landscape may be acceptable in an industrial district or city, but in the country it's disturbing to see.

Mitigation for visual impacts to the aesthetics is inadequate if only intended to screen some of the Projects. Every project should be landscaped and screened on all sides (by vegetation). Using chain-link barbed wire fence is very ugly and prison-like anywhere. Los Angeles County should take more positive steps to encourage alternative energy in a way that would not change the character of an area or disrupt and divide rural uniqueness little by little.

Cumulative Impacts

It is unclear how six new renewable energy projects, when added to twenty-nine other projects in the same area cannot be considered cumulative, or having accumulative impact to the environment.

I can only wish that Regional Planning will not approve these projects and instead promote solar renewable energy systems on residences and buildings instead of open space agricultural opportunity areas.

Sincerely,

Judith Fuentes

Judith Fuentes
47458 92nd Street West
Antelope Acres, CA 93536
661-723-1882

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: June 5, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Samuel Z. Dea
Section Head, Special Projects

SUBJECT: PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 2011000109
ENVIRONMENTAL ASSESSMENT NO. 201100109
SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS 1-6
AGENDA ITEMS 6-11

Please refer to the materials provided for the May 7, 2014 public hearing, including staff report, EIR disk, etc.

Additional comment letters regarding the Silverado Power Projects 1-6 have been received and are attached.

The suggested motion for the public hearing on June 11, 2014 follows the below staff recommendation.

STAFF RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing: Staff recommends the Planning Commission adopt Environmental Assessment No. 201100109 Environmental Impact Report State Clearinghouse Number 2012061068, approve the CEQA Findings of Fact, adopt the Mitigation Monitoring and Reporting Program, and approve Project Numbers R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), and R2011-00805-(5), Conditional Use Permit Numbers 201100079, 201100070, 201100071, 201100076, 201100072, and 201100074, and adopt a resolution recommending approval to the Board of Supervisors of Zone Change Number 201100005 associated with Project Number R2011-00833, subject to all requirements and provisions of the Mitigation Monitoring and Reporting Program and Conditions of Approval.

SUGGESTED MOTIONS:

ENVIRONMENTAL (PROJECTS 1-6)

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND ADOPT THE ENVIRONMENTAL IMPACT REPORT STATE CLEARING HOUSE NO. 2012061068 AND COUNTY ENVIRONMENTAL ASSESSMENT NO. 201100109 PREPARED FOR PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), AND R2011-00805-(5) PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPT THE CEQA FINDINGS OF FACT, AND ADOPT THE MITIGATION MONITORING AND REPORTING PROGRAM.

(PROJECT 1)

I MOVE THAT THE REGIONAL PLANNING COMMISSION ADOPT THE RESOLUTION RECOMMENDING APPROVAL TO THE BOARD OF SUPERVISORS OF ZONE CHANGE NO. 201100005, AND APPROVE PROJECT NO. R2011-00833 AND CONDITIONAL USE PERMIT NO. 201100079, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

(PROJECT 2)

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE PROJECT NO. R2011-00798 AND CONDITIONAL USE PERMIT NO. 201100070, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

(PROJECT 3)

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE PROJECT NO. R2011-00799 AND CONDITIONAL USE PERMIT NO. 201100071, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

(PROJECT 4)

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE PROJECT NO. R2011-00807 AND CONDITIONAL USE PERMIT NO. 201100076, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

(PROJECT 5)

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE PROJECT NO. R2011-00801 AND CONDITIONAL USE PERMIT NO. 201100072, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

(PROJECT 6)

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE PROJECT NO. R2011-00805 AND CONDITIONAL USE PERMIT NO. 201100074, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL.

If you have any further questions, please contact Mr. Kim Szalay at (213) 974-4876, or, by email at kszalay@planning.lacounty.gov.

SZD:KKS

Attachments: Additional Comment Letters

May 21, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 W. Temple Street
Los Angeles, CA 90012

Re: Notice of Public Hearing
Silverado Power West, Los Angeles County
Project 6 Lancaster WAD; APN 3115-010-004; 38.49 acres; 5 MW; 35th Street West and West Avenue D

Dear Ms. Valadez:

It is my understanding that the Regional Planning Commission of Los Angeles will conduct a public hearing concerning certain land use proposals including the subject property noted above. I am sending this letter to show my support for this land use proposal.

To me it is a win-win proposition for all concerned. This proposal, like the others before the Planning Commission not only greatly help the economy, but provide clean power, a direction in which I believe our country should be moving. I fail to see how the granting of this proposal brings any negative impact to the community.

Will you please give this matter your utmost consideration. I wish to thank you in advance for taking the time and your attention to reading this letter.

Very truly yours,

William J. Friedl

WJF:kkh

April 24, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing on behalf of All Valley Surveying to express support for Silverado Power's six proposed Solar Generating Facilities (SGFs) located in the Antelope Valley in unincorporated Los Angeles County. The projects will have a combined generating capacity of 172 megawatts, enough electricity to power more than 51,000 homes. The projects will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

The recession has hit the small businesses in the Antelope Valley hard and over the past few years thousands of people have lost their jobs. Silverado plans to utilize local businesses during construction and employ as much local labor as possible. The projects will create much needed jobs as well as indirect economic stimulus that will help boost our local economy.

As a local business in the region, All Valley Surveying has already benefited from Silverado's commitment to hiring local businesses. We provided design survey and mapping services for all of these projects and hope to also provide construction staking services which would result in hiring additional local employees.

Silverado Power is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. We have enjoyed our business relationship with the Silverado Power staff. We appreciate the outreach efforts that Silverado has undertaken and we look forward to them being a part of our community. All Valley Surveying encourages the Los Angeles County Regional Planning Commission to approve the Conditional Use Permits for the six projects.

Sincerely,

Larry E. Jernigan

Larry E. Jernigan
Owner
All Valley Surveying
44965 10th Street West
Lancaster, CA 93534

CAPITOL OFFICE
STATE CAPITOL
SACRAMENTO, CA 95814
(916) 651-4021

DISTRICT OFFICES
848 W. LANCASTER BLVD., SUITE 101
LANCASTER, CA 93534
(661) 729-6232

23920 VALENCIA BLVD., SUITE 250
SANTA CLARITA, CA 91355
(661) 286-1471

14343 CIVIC DRIVE, FIRST FLOOR
VICTORVILLE, CA 92392
(760) 843-8414

California State Senate

SENATOR
STEVE KNIGHT
TWENTY-FIRST DISTRICT

COMMITTEES
SELECT COMMITTEE ON DEFENSE & AEROSPACE
CHAIR
GOVERNANCE & FINANCE
VICE CHAIR
LEGISLATIVE ETHICS
VICE CHAIR
VETERANS AFFAIRS
VICE CHAIR
ENERGY, UTILITIES & COMMUNICATIONS
INSURANCE
PUBLIC SAFETY

June 2, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing to express support for Silverado Power's six proposed Solar Generating Facilities (SGFs) located in the Antelope Valley in unincorporated Los Angeles County. The projects will have a combined generating capacity of 172 megawatts, which will be enough electricity to power more than 51,000 homes. The projects will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

Like many other communities, Los Angeles County has been hard hit by the recession and construction jobs in the region have decreased by 26% since 2007. Silverado's projects normally create approximately 40 to 150 construction jobs at each site. More than 80% of construction work is expected to come from the local workforce and many of the construction subcontracts will be assigned to companies based in the region. In addition, the projects have the potential to pump millions of dollars into the local economy through construction materials purchases and tax revenue. This is economic stimulus our region desperately needs and welcomes.

Silverado has done their due diligence and worked closely with the Los Angeles County Department of Regional Planning, state and local agencies, community groups and area residents to ensure the projects are developed in a responsible manner. Silverado's proposed projects have negligible environmental impacts, provide direct access to existing transmission infrastructure, and enable the development of cost-effective projects to deliver clean, renewable, domestically-produced energy to the region.

Silverado Power is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. As the representative legislator for the citizens of the Antelope Valley, I welcome their projects in our community. I urge the Los Angeles County Regional Planning Commission to approve the Conditional Use Permits for the six projects.

Sincerely,

Steve Knight, Senator
21st Senate District

Patricia Wanderer

RECEIVED
JUN 04 2014
BY:

May 21, 2014

Esther L Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing to ask your support of the Lancaster WAD project under proposal by Silverado Power. We have been involved in owning and developing property in the area for several years. The latest recession has hit the area hard and many have lost their jobs. This project would serve both the economy and the need for a renewable energy source well. It appears that great care has been taken for minimal impact on the environment and is a project that will help deliver clean energy to the area.

Silverado Power has a good reputation for being a responsible solar company in the Antelope Valley and I believe they deserve the opportunity to develop this project.

Thank you for considering my support of this project.

Most sincerely,

Patricia Wanderer

Patricia Wanderer
1360 Nelson Road
Bozeman, MT 59718

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: May 29, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Samuel Z. Dea
Section Head, Special Projects

SUBJECT: PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 2011000109
ENVIRONMENTAL ASSESSMENT NO. 201100109
SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS 1-6
AGENDA ITEMS 6-11

The Los Angeles County Board of Supervisors, 5th District Supervisor, Michael D. Antonovich requested that the Silverado Power West, Los Angeles County Projects 1-6 public hearing scheduled for May 7, 2014, be continued to a date certain that would include attendance by the 5th District Commissioner, Pat Modugno, who was not able to attend the May 7, 2014 public hearing. Consequently, staff recommended that the May 7, 2014 public hearing be continued to June 11, 2014.

Please refer to the materials provided for the May 7, 2014 public hearing, including staff report, EIR disk, etc. Additional comment letters regarding the Silverado Power Projects 1-6 have been received and are attached.

The suggested motion for the public hearing on June 11, 2014 follows the below staff recommendation:

STAFF RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing: Staff recommends the Planning Commission adopt Environmental Assessment No. 201100109 Environmental Impact Report State Clearinghouse Number 2012061068, approve the CEQA Findings of Fact, adopt the Mitigation Monitoring and Reporting Program, and approve Project Numbers R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), and R2011-00805-(5), Conditional Use Permit Numbers 201100079, 201100070, 201100071, 201100076, 201100072, and 201100074, adopt a resolution recommending approval to the Board of Supervisors of Zone Change Number 201100005 associated with Project Number R2011-00833, subject to all requirements and provisions of the Mitigation Monitoring and Reporting Program and Conditions of Approval.

SUGGESTED MOTION:

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING, AND ADOPT THE ENVIRONMENTAL IMPACT REPORT STATE CLEARING HOUSE NO. 2012061068 AND COUNTY ENVIRONMENTAL ASSESSMENT NO. 201100109 PREPARED FOR PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), AND R2011-00805-(5) PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPT THE CEQA FINDINGS OF FACT, AND ADOPT THE MITIGATION MONITORING AND REPORTING PROGRAM.

I MOVE THAT THE REGIONAL PLANNING COMMISSION ADOPT THE RESOLUTION RECOMMENDING APPROVAL TO THE BOARD OF SUPERVISORS OF ZONE CHANGE NO. 201100005, AND APPROVE CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, AND 201100074, SUBJECT TO THE FINDINGS AND CONDITIONS OF APPROVAL FOR EACH PROJECT.

If you have any further questions, please contact Mr. Kim Szalay at (213) 974-4876, or, by email at kszalay@planning.lacounty.gov.

SZD:KKS

Attachments: Additional Comment Letters

April 1, 2004

Michael Antonovich
Antelope Valley
1113 West Ave. M-4, Ste. A
Palmdale, CA 93551

Dear Supervisor Antonovich:

I live within 50 feet of the proposed project for solar panels.

The dust stirred by the solar panel construction will leave bare earth which will increase the dust raised by our heavy winds. The Valley Fever fungus will also be stirred up.

A few years ago Antelope Valley had the highest occurance of Asthma in the entire United States.

I, myself, have severe asthma and also COPD. My health will be greatly compromised and possibly the length of my life could be shortened.

Virginia Russell
44505 - 90th St. W.
Lancaster, CA 93536

april 1, 2014
Michael Astonovich
Antelope Valley
1113 W. Avenue M-4 Suite A
Palmdale, Ca 93551

Re: Silverado Power West
Los Angeles County Project
The stirring up of the dust will effect my health. I have a compromised immune system due to my diabetes making me more Suspectable to valley fever and health problems which the construction of the Solar projects cause. I am greatly concerned about how this will effect the work that goes on at 44505 90th St. W. Lancaster.

Jennene Jeffrey
44505 90th St. W.
Lancaster, CA
93536

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

Woe Silverada Power
who got That Money

April 3, 2014

You do not mention the 1000s of trucks that go through town or the diseases they cause like "Valley Fever".

State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

SUBJECT: FINAL ENVIRONMENTAL IMPACT REPORT
SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS
COUNTY PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 201100005
ENVIRONMENTAL REVIEW NO. 201100109
STATE CLEARINGHOUSE NO. 2012061068

RECEIVED
MAY 05 2014
BY:

The County of Los Angeles has prepared the Final Environmental Impact Report (FEIR) for the Silverado Power West, Los Angeles County Projects. The Los Angeles County Regional Planning Commission will consider and may certify this FEIR at its May 7, 2014 public hearing. We are transmitting this FEIR to you as an informational document so that you will have a complete record of actions relating to the EIR. The County is not soliciting comments on the FEIR. The FEIR is made available to the public as information only.

If you have any questions concerning this, please contact Mr. Kim Szalay at (213) 974-4876, Monday through Thursday between 7:30 a.m. and 6:00 p.m. Our offices are closed on Fridays.

Mr Szalay — and others
Mr Dea —

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Richard J. Bruckner
Director

Samuel Z. Dea, Supervising Regional Planner
Special Projects Section

18 Years with AFP 42 Restoration Advisory Board — never will be able to clean up — millions spent

Joseph Yoo
Korean Vet
1-661-266-1779
and others in Pa-

SZD:KKS
Enclosure

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

May 14, 2014

The attached letter dated March 29, 2014 was received from Teresa Skinner from All Nations International. Attached to her letter were 175 identical petition letters signed by various residents and other interested parties regarding the Silverado Power West, Los Angeles County Projects 1-6. Five of them are included as examples. All 175 signed petitions will be included in the public record.

Also attached is a direct staff response to Ms. Skinner which was requested by Supervisor Antonovich,

Kim Szalay
Principal Planner

CAS6730

ISAIAH 58
IS NOT THIS THE FAST THAT I HAVE CHOSEN?

ALL NATIONS INTERNATIONAL

March 29, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

ALL NATIONS INTERNATIONAL
44505 90th Street West
Lancaster, CA 93536
Tel +1661 722-7078
Text +1661 618-7663
Fax +1661 718-8110
www.all-nations.org

Board of Directors
Teresa Skinner
President

Veronica Sanchez
Vice President

Lilibeth Say
Secretary

Chastity Carvel
Treasurer

John Bell
Director

Executive Director
Teresa Skinner

Re: Silverado Power West, Los Angeles County Project

Dear Supervisor Antonovich:

The solar projects that surround our property concern us.

Multiplying sandstorms through solar projects surrounding us may disable our ability to be the sanctuary we have offered to this valley for almost 60 years.

Last year, our visitor from Kampala, Uganda, East Africa suffered incredible sandstorms where we could not see and would not go out of our home.

Mr. Antonovich, for the last ten years, All Nations International is located at 44505 90th St West, Lancaster, CA 93536. We are on the outskirts of Antelope Acres next to Del Sur, in the Antelope Valley.

Since 1954, All Nations International and Sommer Haven Ranch have been a sanctuary in the desert. We are a retreat center, agricultural training center and church. We are also the headquarters for Sommer Haven Ranch an organization in the Antelope Valley that feeds 12 to 15,000 people every week through networking with churches and local organizations.

Mr. Antonovich, we provide a sanctuary for people looking for spiritual refreshing. Frequently, leaders from other countries come to receive refreshing, refocus and training returning to their more difficult lives with renewed hope. Local people and national people come for refreshing, some have been abused and some are here learning how they may return to the right track of their life. Several on site compromised breathing.

What sir, can we do to ensure these projects will not cause more sandstorms?

Our board very much appreciates your consideration of this matter.

Sincerely,

Teresa S

Teresa Skinner
Executive Director
All Nations International

+175 Petitions

April 1, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

Re: Silverado Power West, Los Angeles County Project

Dear Supervisor Antonovich:

It is with extreme concern that we write this letter.

It has come to our attention that All Nations International and Sommer Haven Ranch located on 44505 90th St West Lancaster, CA 93536 are going to have Solar Projects built around their property. These organizations have been an integral part of this valley for almost 60 years and hold an important international influence.

Please be advised that:

1. The property is a Retreat Center and Sanctuary frequented by local and international individuals who come for personal refreshing.

2. The property is an Agricultural Training Center servicing the community through fostering awareness and providing training in gardening, proper food handling practices and animal husbandry.

3. Sommer Haven Ranch feeds 15,000 people weekly with essential food items.

4. People come to All Nations to receive training in areas of Personal Development, Disaster Relief, Religious Studies and Leadership Training.

The air quality for this property will be extremely compromised during and after construction of the Solar Projects. This will affect trainees, guests and several staff members who already have compromised breathing. There are recent documented reports in California that Valley Fever has increased because of the construction of Solar Projects.

Please give immediate attention to a plan that will maintain the health and safety of the resident staff as well as local and international trainees.

Sincerely,

Sign Name: Vergie White Print Name: VERGIE H. WHITE

Address: 45455 3rd St. EAST, LANCASTER CA 93535

Contact Phone: 661- 942-1948

April 1, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

Re: Silverado Power West, Los Angeles County Project

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Sincerely,

Sign Name: Barbara McNairy Print Name: Barbara McNairy

Address: 13162 Date Palm Dr. Palmdale 93551

Contact Phone:

April 1, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

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Sincerely,

Sign Name: [signature] Print Name: Brantley Tyra

Address: 2536 Peaceful way Lancaster, CA 93535

Contact Phone:

April 1, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

Re: Silverado Power West, Los Angeles County Project

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Sincerely,

Sign Name: Charlisa Haynes Print Name: [illegible]

Address: 3119 W. Lumber St. Lancaster Ca

Contact Phone: (661) 965-9571

April 1, 2014

Supervisor Michael D. Antonovich
c/o Norm Hickling, Field Deputy
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

Re: Silverado Power West, Los Angeles County Project

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Sincerely,

Sign Name: [signature] Print Name: Jeffrey H. Gee

Address: P.O. Box 8396 Lancaster, Ca. 93539

Contact Phone: 661 524 3449

Board of Supervisors
County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

May 5, 2014

RECEIVED
MAY 12 2014
BY:_____

Ms. Teresa Skinner
All Nations International
44505 90th Street West
Lancaster, CA 93536

Dear Ms. Skinner:

Thank you for your recent correspondence.

By copy of this letter, I am asking that Mr. Richard Bruckner, Director of the Department of Regional Planning, look into your concerns and respond directly to you, with a copy of his response to my Antelope Valley office.

Again, thank you for writing.

Sincerely,

Mike Antonovich

MICHAEL D. ANTONOVICH
Supervisor

MDA:nhd

c: Mr. Richard Bruckner ✓

ROOM 869 KENNETH HAHN HALL OF ADMINISTRATION, 500 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012
TELEPHONE (213) 974-5555 • FAX (213) 974-1010 • WEBSITE: www.antonovich.com • E-MAIL: fifthdistrict@lacbos.org

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

May 20, 2014

Ms. Teresa Skinner
44505 90th Street West
Lancaster, CA 93536

Dear Ms. Skinner

SILVERADO POWER WEST, LOS ANGELES COUNTY
SOLAR ENERGY PROJECTS 1 - 6

Thank you for your recent correspondence to Supervisor Michael D. Antonovich regarding the public hearing process for the Silverado Power West, Los Angeles County Solar Energy Projects, specifically in relationship to fugitive dust concerns pertaining to Project 4 (R2011-00807-(5)). Supervisor Antonovich has requested that the Department of Regional Planning respond to you directly with a copy to his office.

At this time staff is preparing case materials for distribution to the Regional Planning Commission, including your letter and the approximately 175 petitions provided for the upcoming public hearing, continued to June 11, 2014. Using the following weblink: http://planning.lacounty.gov/case/view/silverado/ please refer to the Project Specific Materials Project 4, Conditions of Approval No. 42, a-k, pertaining to dust control measures, and the Mitigation Monitoring and Reporting Program Air Quality Section.

We appreciate your input and look forward to hearing from you regarding the public hearing on these projects. If you have any questions, please feel free to contact Mr. Kim Szalay of my staff at (213) 974-4876 or by e-mail at kszalay@planning.lacounty.gov. Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m.

Sincerely,

Richard J. Bruckner
Director

RJB:MC:SZD:KKS:ems

c: Supervisor Michael D. Antonovich (Edel Vizcarra, Norm Hickling)

S_AP_051514_5DAY_SKINNER

The Robert J. Novak Living Trust dated December 13, 2000
Robert J. Novak, Trustee
5219 North Casa Blanca Drive
Paradise Valley, Arizona 85253

RECEIVED
MAY 27 2014
BY:

May 22, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Re: Silverado Power West, Los Angeles County
Project Nos. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807(5), R2011-00801-(5), R2011-00805-(5)
Conditional Use Permit Nos. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
Zone Change No. 201100005
Environmental Review No. 201100109
EIR State Clearing House No. 2012061068

Dear Commissioner Valadez:

We understand that the Notice of Public Hearing previously set for May 7, 2014 was continued until June 11, 2014 on the above-referenced projects. A copy of the Notice of Public Hearing is enclosed for your ease.

We write this letter as a developer, property owners, and long-time lenders in the Inland Empire area.

We are very familar with these Projects and urge your support and approval.

We have also summered in California for many years. Given the mandate for clean renewable energy, the need for clear air, and the ongoing desire to make and keep California a great place to live, your support is sought on a personal and family level.

Sincerely,

The Robert J. Novak Living Trust, dated December 13, 2000
Robert J. Novak, Trustee

Enclosure

RJN/leh

May 18, 2014

Esther Valadez, Commissioner
Los Angeles County Regional Planning Commission
320 West Temple St
Los Angeles, CA 90012

Dear Commissioner Valadez,

I understand there is a hearing to take place on the Lancaster WAD project purposed for development by the Silverado Power group. I am the trustee for our family trust that owns land in that area and would like to ask for your positive vote on this. The area seems perfect for this type of energy project and my siblings and I are big advocates of alternative, clean energy for our country. I believe this project, by these reputable developers, would help provide both solar energy and jobs for the people of this area that was so impacted by the recent downturn in the economy.

I hope you will consider this project and give your support to it.

Thank you,

, trustee

Kristin Zetzer, Trustee
WBZ Trust
2770 Outlaw Lane
Belgrade, MT 59714

RECEIVED
MAY 27 2014
BY:

CRGM Clinical Research Group of Montana

May 20, 2014

Esther Valadez, Chair
Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Valadez:

I have been an owner of several parcels of land in the area that is now under consideration for the development of a solar project, the Lancaster WAD being proposed by Silverado Power. I have made several trips to the region and realize the impact the recession has had on the economy there. This project would seem to address many issues that would result in a possible outcome for the both the people and economy of the regions as well as producing a much needed clean, renewable energy source for the region. Silverado Power has an excellent reputation in the field of solar energy and I am sure would minimize any environmental impact that the project may have. For these reasons, I would ask for your support on this project.

Thank you for your consideration.

Best regards,

Alan A. Wanderer, MD,
General Partner
Wanderer Partners, LLLP
950 Stoneridge Drive
Suite 1
Bozeman, MT 59718

RECEIVED
MAY 27 2014
BY:

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: May 7, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Samuel Z. Dea
Section Head, Special Projects

SUBJECT: PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
CONDITIONAL USE PERMIT NOS. 201100079, 201100070, 201100071, 201100076, 201100072, 201100074
ZONE CHANGE NO. 2011000109
ENVIRONMENTAL ASSESSMENT NO. 201100109
SILVERADO POWER WEST, LOS ANGELES COUNTY PROJECTS 1-6
AGENDA ITEMS 6-11

The Los Angeles County Board of Supervisors, 5th District Supervisor, Michael D. Antonovich requested that the Silverado Power West, Los Angeles County Projects 1-6 public hearing scheduled for May 7, 2014, be continued to a date certain that would include attendance by the 5th District Commissioner, Pat Modugno, who is not able to attend the May 7, 2014 public hearing. Consequently, staff recommends that the May 7, 2014 public hearing be continued to June 11, 2014.

Additional comment letters regarding the Silverado Power Projects 1-6 have been received and are attached.

Suggested Motion for continuation of public hearing to June 11, 2014:

"I MOVE THAT THE REGIONAL PLANNING COMMISSION PUBLIC HEARING FOR AGENDA ITMES 6-11 BE CONTINUED TO JUNE 11, 2014."

If you have any further questions, please contact Mr. Kim Szalay at (213) 974-4876, or, by email at kszalay@planning.lacounty.gov.

SZD:KKS

Attachments: Additional Comment Letters

To: The Honorable Members of the LA County Regional Planning Commission:

Date: 5 May 2014

From: Stephen DeGrey, Palmdale Resident

Subject: Comments on Proposed Construction of Solar Facilities

1. Irregular Issue with Signage:

After attempting to contact the Planning Commission to get more information via the phone number posted on the sign notifying the public of the hearing, I discovered that the posted phone number connected to a FAX machine somewhere in downtown Los Angeles. In fact, of the 4 signs I observed, all had erroneous, transposed phone numbers.

The posted phone number on the signs is:	213-947-4876
The correct phone number to contact the LACRPC Project Lead is:	213-974-4876

I expect this was most likely a QA error at the printer, but the effect was to frustrate the public's ability to contact the Planning Commission's Project Lead to answer questions, gather information, and provide feedback. Perhaps any decision should be delayed until the correct information can be posted for the required length of time.

2. Opposition to Project R2011-00798: Point 1 Negative Visual Impact on the Residents of the AV and Leona Valley.

Of all the solar projects proposed, this one is the most onerous. This property is in the rolling foothills on the south west side of the AV, west of 110th St West and bounded by Ave's J and K.

This is a scenic, lushly vegetated (for the desert) area enjoyed by many people driving to and from Leona Valley, out to the Poppy preserves, and on their way to Highway 138. In addition, this is a very popular and scenic auto, motorcycle and bicycle route. Compared to the many square miles of barren and flat wasted ex-farm land to the north and east, this area looks like an oasis. There are very few areas like this in the valley, please do not destroy it by paving it over with solar panels.

3. Opposition to Project R2011-00798: Point 2 Negative Impact on Wildlife in the Foothills.

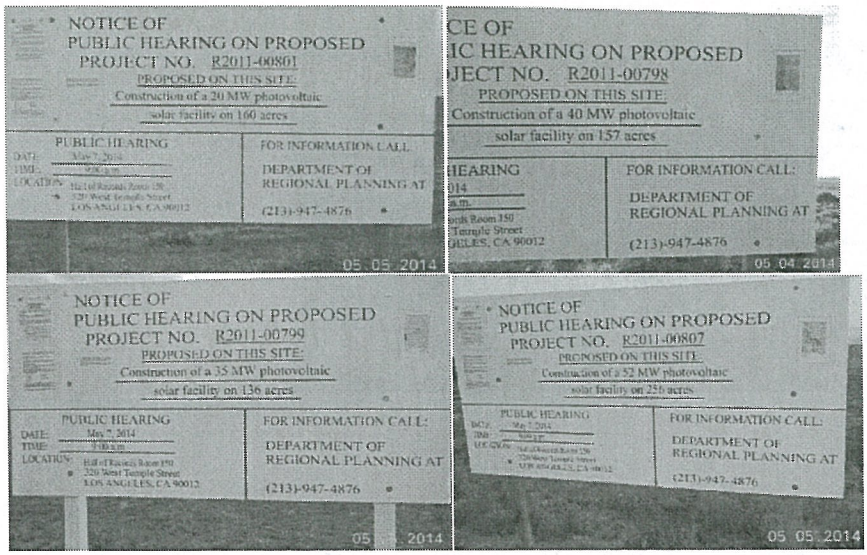
This property supports an abundance of wildlife including small mammals, lizards, snakes and birds including burrowing owls, red tailed hawks and road runners. There are very few areas left in the valley like this as most have been stripped of vegetation and nutrients by decades of farming. In addition, there exists a wide variety of plant life including rabbit brush and the California Poppy.

4. Opposition to Project R2011-00798: Point 3 Negative Impact from Dust Generation on the West AV and Lancaster.

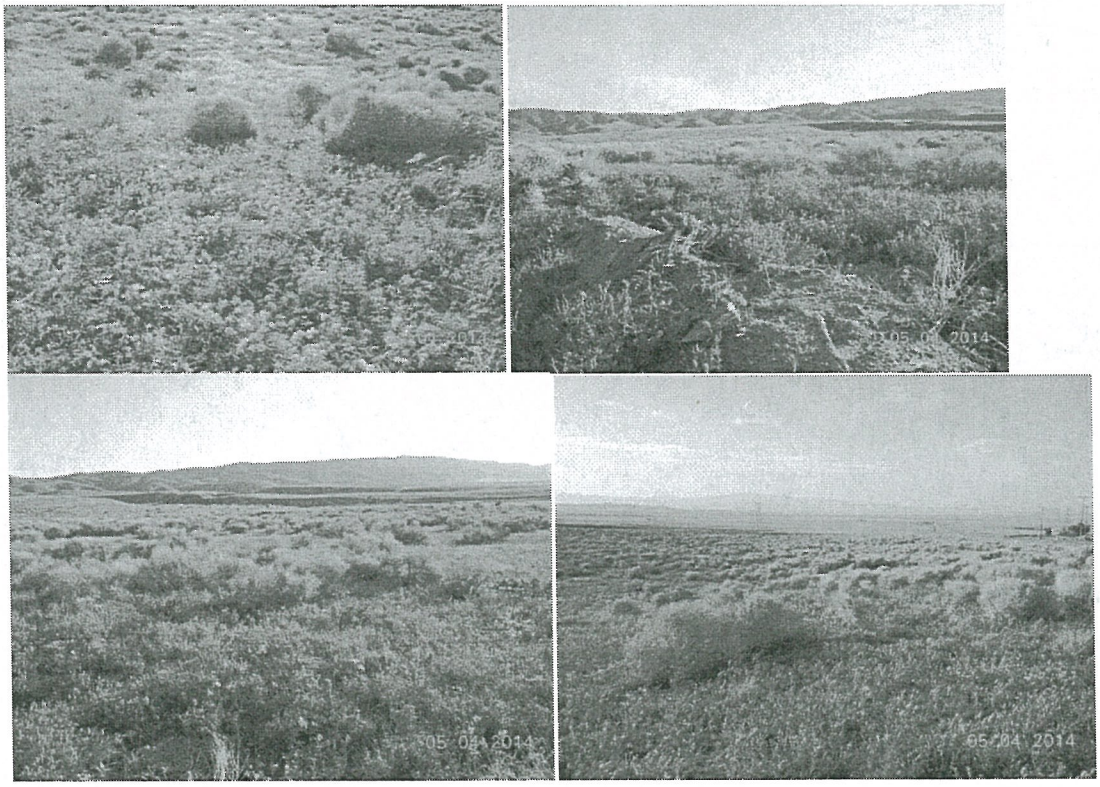
The wind commonly blows in the 20-30+ mph range in this part of the valley, and mostly from the West or South West. If you examine the downwind track, it leads directly to some of the most highly populated areas in the AV, including all of Lancaster. We already live in one of the dustiest areas around due to devastating farming techniques which consumed much of the ground water and left the land stripped and barren and existing solar facilities. Why build a solar facility where it will have such a direct contribution to dust generation for those living in the AV?

Photographic Documentation:

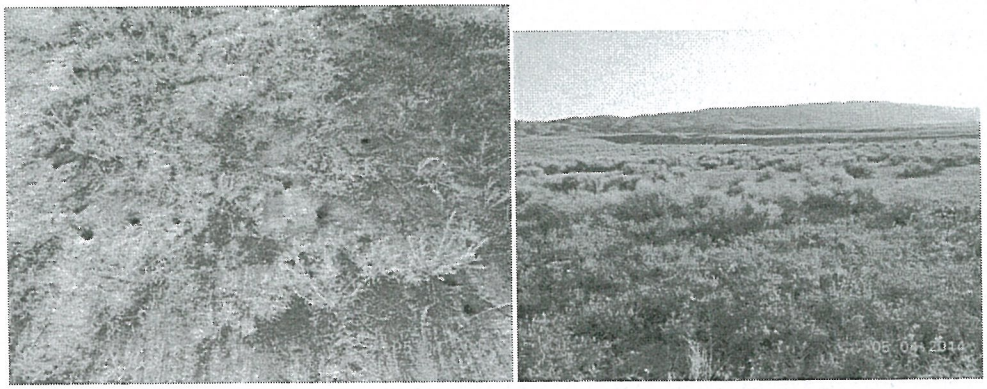
1. **Signs with wrong phone number:**



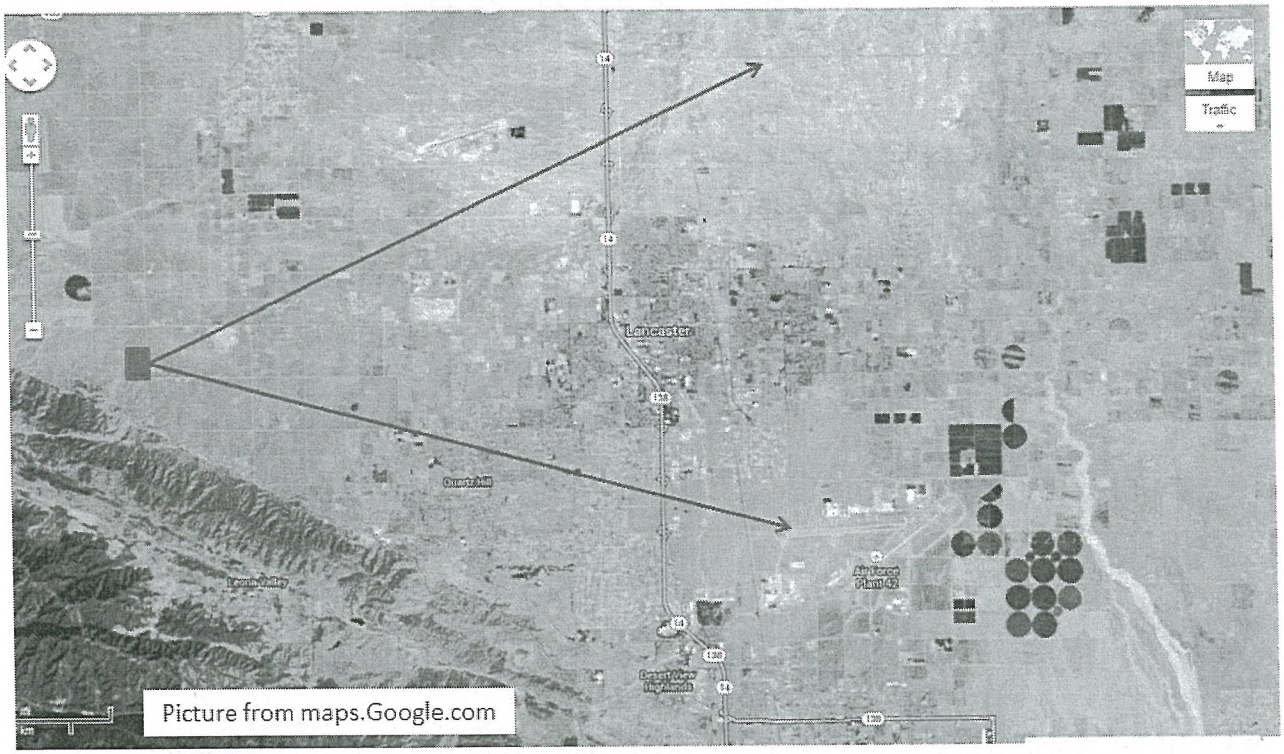
2. **Point 1**



3. **Point 2**



4. **Point 3**



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

DATE: May 1, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie, Commissioner
Curt Pedersen, Commissioner
Pat Modugno, Commissioner

FROM: Samuel Z. Dea
Section Head, Special Projects

SUBJECT: PROJECT NOS. R2011-00833-(5), R2011-00798-(5), R2011-00799-(5), R2011-00807-(5), R2011-00801-(5), R2011-00805-(5)
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Additional comment letters regarding the Silverado Power Projects 1-6 have been received and are attached including an additional letter from representatives of the Fernandeno Tataviam Band of Mission Indians Tribal Historic & Cultural Preservation Committee, Lancaster Chamber of Commerce, and letters from the public.

If you have any further questions, please contact Mr. Kim Szalay at (213) 974-4876, or, by email at kszalay@planning.lacounty.gov.

SZD:KKS

Attachments: Additional Comment Letters

Larry J. Ortega Sr.
Tribal President

Tribal Historic & Cultural Preservation Committee
Steve Ortega
Chairman
Berta Pleitez

Fernandeño Tataviam Band of Mission Indians
Tribal Historic & Cultural Preservation

March 6, 2014

Carolina Blengini
County of Los Angeles Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Silverado Power West Project

Dear Carolina Blengini,

The Fernandeño Tataviam Band of Mission Indians thanks you for the request of consultation for your proposed project. Your project has been identified as breaking ground in traditional Tataviam tribal lands and may disturb culturally sensitive deposits.

In accordance with the National Historic Preservation Act of 1966, consultation with the tribe is legally mandated. Failure to comply with the minimum consultation requirement will result in the notification of such to applicable lead agencies. Moreover, it is required that federal agencies consult with tribal authorities before permitting archaeological excavations on tribal lands (16 U.S.C. §§ 470aa–470mm). Additionally, it is necessary to protect and preserve the access to all, if any, sites the tribe believes sacred (42 U.S.C. § 1996). As expressed in 14. Cal.Code Regs §15064.5, if significant Native American artifacts that meet the definition of a "historical resource" are found, work shall not resume until the archaeologist has recovered them for the tribal monitor.

Please contact our offices so we can begin consultation. The Tataviam charge standard fees to fund the necessary and extensive research required to fulfill your needs. Attached is information regarding our consultation rates.

Regular updates in regards to your project would be greatly appreciated. We are looking forward to working with you on this matter to the satisfaction of all those involved

Sincerely,

Caitlin Gulley
Tribal Historic and Cultural Preservation
cgulley@tataviam-nsn.us

RECEIVED
APR 23 2014
BY:_____

1019 Second Street, Suite 1 | San Fernando | California, 91340 | (818) 837-0794 | Fax (818) 837-0796

TRIBAL CULTURAL RESOURCES SERVICES

The Fernandeño Tataviam Band of Mission Indians (Tribe) has the necessary qualifications, experience and abilities to provide Native Monitoring for scared lands and burial sites to the Client. Also the Tribe is prepared to work with the Client to provide any and all documentation needed to facilitate permit process. The Tribe is agreeable to provide Native Monitoring and Consulting on the terms and conditions as set out in this Agreement.

SUMMARY OF GENERAL TERMS & CONDITIONS

1. Native Monitoring and Consulting

The Tribe would provide the services consisting of Tribal Consulting and Monitoring (the "Services"), and the Tribe would also provide the services if agree upon duration the solid disturbance of the project.

2. Compensation

For the Services provided by the Tribe will pay to the Tribe in accordance to the Fee Structure. Compensation will be set upon terms agree by both interested parties as the Services are render.

3. Fee Structure

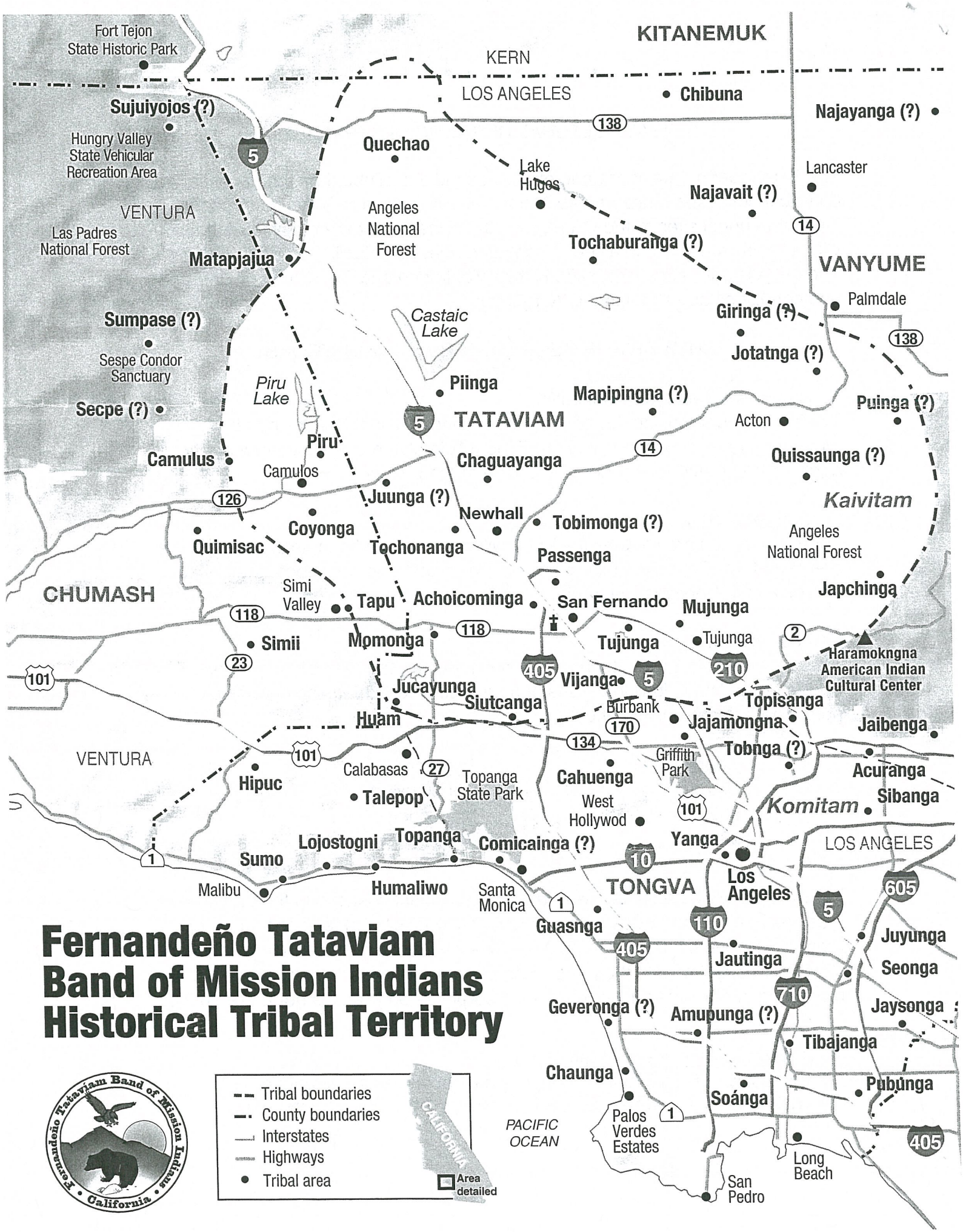
Time spent on the project by professional, monitor, and clerical personnel will be billed hourly. The following ranges of hourly rates for various categories of personnel are currently in effect:

Hourly Rate	Category
$75	Consultation
$55	Monitoring
$35	Clerical

Hourly rates will be adjusted semi-annually to reflect changes in the cost-of-living index as published. If overtime for nonprofessional personnel is required, the premium differential figured at time and one-half of their regular hourly rates are charged at direct cost to the project. Unless otherwise stated, any cost estimate presented in a proposal is for budgetary purposes only, and is not a fixed price.

4. Capacity/Independent Contractor

It is expressly agreed that the Tribe would be acting as an independent contractor and not as an employee in providing the Services hereunder.



Fernandeño Tataviam Band of Mission Indians Historical Tribal Territory

LANCASTER
CHAMBER OF COMMERCE

April 24, 2014

Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing on behalf of the Lancaster Chamber of Commerce to express support for Silverado Power's six proposed Solar Generating Facilities (SGFs) located in the Antelope Valley in unincorporated Los Angeles County. The projects will have a combined generating capacity of 172 megawatts, enough electricity to power more than 51,000 homes. The projects will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

Los Angeles County has been hard hit by the recession and construction jobs in the region have decreased by 26 percent since 2007. Silverado's projects will create approximately 40 to 150 construction jobs at each site. Eighty-five percent of construction work is expected to come from the local workforce and many of the construction subcontracts will be assigned to firms based in the region. In addition, the projects have the potential to introduce millions of dollars into the local economy through construction materials purchases and tax revenue. This is economic stimulus our region desperately needs.

Silverado has worked closely with the Los Angeles County Department of Regional Planning, state and local agencies, community groups and area residents to ensure the projects are developed in a responsible manner. Silverado's proposed projects have negligible environmental impacts, provide direct access to existing transmission infrastructure, and enable the development of cost-effective projects to deliver clean, renewable, domestically-produced energy to the region.

Silverado Power is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. We appreciate the outreach efforts that Silverado has undertaken and we look forward to them being a part of our community. The Lancaster Chamber of Commerce encourages the Los Angeles County Regional Planning Commission to approve the Conditional Use Permits for the six projects.

Sincerely,

Sandy Smith
Chief Operating Officer
Lancaster Chamber of Commerce

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

April 30, 2014

Richard J. Bruckner
Director

Ms. Annella Whitehead
44505 90th Street West
Lancaster, CA 93536

Dear Ms. Whitehead:

SILVERADO POWER WEST, LOS ANGELES COUNTY
SOLAR ENERGY PROJECTS 1 - 6

Thank you for your recent correspondence to Supervisor Michael D. Antonovich regarding the public hearing process for the Silverado Power West, Los Angeles County Solar Energy Projects (Projects 1-6). Supervisor Antonovich has requested that the Department of Regional Planning respond to you directly with a copy to his office.

At this time staff is providing case materials, including your letter, for distribution to the Regional Planning Commission for the upcoming public hearing. The public hearing was originally scheduled and noticed for 9:00 a.m., May 7, 2014, at the downtown hearing room located at 320 West Temple Street, Los Angeles, CA 90012, Room 150. The hearing will be continued to Wednesday, June 11, 2014, at the downtown hearing room. You are welcome to testify on either date, although no decision will be made on the matter until the June 11 hearing date. The department is also exploring the possibility of remote testimony from our Lancaster field office on June 11. If this interests you, please contact staff for further details.

Your questions about air quality, health, and safety are addressed in the Environmental Impact Report, within the conditions of project approval, and in the mitigation monitoring and reporting program required as part of the conditions of project approval. A link to these documents is as follows: http://planning.lacounty.gov/case/view/silverado/ .

We appreciate your input and look forward to hearing from you regarding the public hearing on these projects. If you have any questions, please feel free to contact Mr. Kim Szalay of my staff at (213) 974-4876 or by e-mail at specialprojects@planning.lacounty.gov. Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m.

Sincerely,

Richard J. Bruckner
Director

RJB:MC:SZD:KKS:ems

c: Supervisor Michael D. Antonovich (Edel Vizcarra, Norm Hickling)

K_AP_043014_5DAY_WHITEHEAD

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

April 30, 2014

TO: Supervisor Michael D. Antonovich
Fifth Supervisorial District

Attention: Edel Vizcarra
Norm Hickling

FROM: Richard J. Bruckner
Director

RESPONSE TO MS. ANNELLA WHITEHEAD REGARDING THE SILVERADO POWER WEST, LOS ANGELES COUNTY SOLAR ENERGY PROJECTS 1 - 6

Attached is a copy of our response to Ms. Annella Whitehead regarding the Silverado Power West, Los Angeles County Solar Energy Projects 1 - 6. I trust this meets with your approval.

If you have any questions, please feel free to contact Mr. Kim Szalay of my staff at (213) 974-4876 or by e-mail at specialprojects@planning.lacounty.gov.

RJB:MC
SZD:KKS:ems

Attachment

Board of Supervisors
County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

April 11, 2014

Ms. Annella Whitehead
44505 90th Street West
Lancaster, CA 93536

Dear Ms. Whitehead:

Thank you for your recent correspondence.

By copy of this letter, I am asking that Mr. Richard Bruckner, Director of the Department of Regional Planning, look into your concerns and respond directly to you, with a copy of his response to my Antelope Valley office.

Again, thank you for writing.

Sincerely,

Mike Antonovich

MICHAEL D. ANTONOVICH
Supervisor

MDA:cbd

c: Mr. Richard Bruckner ✓

RECEIVED
APR 21 2014
BY:_____

ROOM 869 KENNETH HAHN HALL OF ADMINISTRATION, 500 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012
TELEPHONE (213) 974-5555 • FAX (213) 974-1010 • WEBSITE: www.antonovich.com • E-MAIL: fifthdistrict@lacbos.org

April 1, 2014
Supervisor Michael D. Antonovich
Antelope Valley
1113 W. Avenue M-4, Suite A
Palmdale, CA 93551

Re: Silverado West, Los Angeles County Project Panel

To whom it may concern.

I live at 44505 90th St. West, Lancaster. I am deeply concerned about the Solar Projects slated for construction around my home. Not only is this address my place of residence, it is the headquarters of All Nations International and Sommer Haven Ranch. These organizations host community projects such as gardening, animal husbandry; offer Religious Training and educational workshops; and provide sanctuary for local and international individuals seeking personal refreshment.

During construction of the Solar Projects, the digging of the dirt will unearth bacteria and mold spores. With the winds this is going to be a major health hazard. This affects people as well as our livestock.

- After construction the land will still be exposed continuing to affect the air quality.
- This raises an alarm, as there have been reports of an increase of Valley Fever in the surrounding areas.
- The sites will also have large equipment and heavy machinery along our street, posing a danger to us and those who come for volunteer work and seminar training.
- One of our elderly staff already has breathing difficulties, this situation will only exacerbate these situations.

My petition is:

A. Apply specific methods to keep dust at a minimum during construction of all the proposed solar construction.

B. Provide our property with continued ability to protect it from the dust during and after construction.

Maybe: A tree barrier along the perimeters of our property.
A mister system around the houses to settle the dust.
Or other means to have good air quality.

This will of course have to be maintained for the life of the solar projects.

With sincere and urgent attention:

Annella Whitehead

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

NOTICE OF PREPARATION
AND
NOTICE OF SCOPING MEETING

DATE: June 13, 2012

OVERALL DEVELOPMENT TITLE:

Silverado Power West Los Angeles County
Project 1: R2011-00833 (CUP201100079, RZC201100005), North Lancaster Ranch
Project 2: R2011-00798 (CUP201100070), Western Antelope Blue Sky Ranch
Project 3: R2011-00799 (CUP201100071), American Solar Greenworks
Project 4: R2011-00807 (CUP201100076), Antelope Solar Greenworks
Project 5: R2011-00801 (CUP201100072), Silver Sun Greenworks
Project 6: R2011-00805 (CUP201100074), Lancaster WAD
Environmental Review No. ENV201100109

PROJECT ADDRESSES:

Project 1: 105th Street West & West Avenue B, Lancaster, CA
Project 2: 110th Street West & West Avenue K, Lancaster, CA
Project 3: 70th Street West & West Avenue G, Lancaster, CA
Project 4: 97th Street West & West Avenue I, Lancaster, CA
Project 5: 120th Street West & West Avenue I, Lancaster, CA
Project 6: 35th Street West & West Avenue D, Lancaster, CA

OVERALL DEVELOPMENT APPLICANT:

Silverado Power, LLC
44 Montgomery Street, Ste. 3065
San Francisco, California 94104

CEQA LEAD AGENCY:

County of Los Angeles
Department of Regional Planning
320 W. Temple Street, Room 1348
Los Angeles, California 90012

The County of Los Angeles is the lead agency and will prepare the Environmental Impact Report (EIR) for six proposed solar generating facilities (SGFs) referred to as the "Overall Development". In compliance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the County of Los Angeles is sending this Notice of Preparation (NOP) to each responsible agency,

interested parties, and federal agencies involved in approving the proposed Overall Development and to trustee agencies responsible for natural resources affected by the proposed Overall Development. Within 30 days after receiving the Notice of Preparation, each agency shall provide the County of Los Angeles with specific written details about the scope and content of the environmental information related to the agency's area of statutory responsibility.

The purpose of this NOP is to solicit the views of your agency as to the scope and content of the environmental information germane to your agency's statutory authority with respect to the proposed Overall Development. Your agency may need to use the EIR prepared by our agency when considering your permit or other approval for the proposed Overall Development.

Overall Development Location

The Overall Development is located in the northern portion of unincorporated Los Angeles County, in the western portion of the Antelope Valley. The applicant, Silverado Power, proposes to develop six solar generating facilities at six site locations throughout western Antelope Valley. These six sites together would include development of approximately 747.1 acres and would produce 172 megawatts (MW) of solar power in total. The Overall Development is primarily located on fallow unproductive farmland. The area where these sites are located is rural land west of the State Highway 14.

Overall Development Description

Silverado Power, LLC (Silverado Power) is a utility scale solar photovoltaic (PV) developer proposing the development of six solar PV sites (referred to as the Overall Development) addressed in this EIR. The Overall Development is located in an area of the western Antelope Valley that was historically used for agricultural activities. Production and economic constraints led to the cessation of agricultural activities in the area, resulting in disturbed and vacant land. Silverado Power has located six SGFs on disturbed and vacant land throughout the western Antelope Valley.

The Overall Development proposes to increase electricity generated from renewable technology by generating 172 MW of electrical energy from the sun. Recent legislation enacted in California encourages the development of renewable energy resources to reduce reliance on fossil fuels, diversify energy portfolios, reduce greenhouse gas emissions, and assist creation of "green" jobs within the state of California.

The Overall Development proposes to assist California in meeting the newly established Renewable Energy Portfolio Standards (RPS). Senate Bill 14 established RPS targets for California, stating, "all retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020." State government agencies have been directed to take all appropriate actions to implement this target in all regulatory proceedings, including siting, permitting, and procurement for renewable energy power plants and transmission lines. The six sites qualify as an eligible renewable energy resource as defined by the California Public Resources Code.

The Overall Development proposes siting to limit impacts to the environment and the local community by:

- Using disturbed land or land that has been previously degraded from prior use
- Using existing electrical distribution facilities, rights-of-way, roads, and other existing infrastructure where possible to reduce the need for new electrical support facilities
- Limiting impacts to threatened or endangered species or their habitats, wetlands and waters of the United States, cultural resources, and sensitive land uses
- Limiting water use

Silverado Power has acquired rights to the real properties and filed zoning applications with the County of Los Angeles for the six solar sites. Environmental studies, Overall Development siting and planning, and interconnection agreements have been ongoing since 2010. The lead agency for this document is the County of Los Angeles. Silverado Power has held several meetings in the Antelope Valley area to inform the public about all aspects of the Overall Development. The Overall Development proposes delivering power to the Southern California Edison (SCE) electrical grid beginning in late 2013. The SGFs would be constructed in phases, followed by commercial operation for an estimated 35 years.

Each of the six SGFs would be designed and built using the same or similar method. The Overall Development would employ a series of photovoltaic (PV) module arrays to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facilities would deliver the electrical output to the existing regional transmission system.

The PV modules would convert sunlight into low-voltage direct current (DC) power, which is subsequently transformed by an inverter into alternating current (AC) power. The PV modules are made of a semiconductor material through which electrons flow to convert light (photons) to electricity (voltage).

Each SGF would consist of the following elements:

- PV modules
- PV Module mounting system
- Balance of system and electrical boxes (e.g., combiner boxes, electrical disconnects)
- Electrical inverters and transformers
- Electrical AC collection system, including switchgear
- Data monitoring equipment
- Access roads and chain link perimeter security fencing

A regional Operations and Maintenance (O&M) facility to serve all six SGFs would be located in an existing permitted space within Los Angeles County. Each SGF requires a CUP from Los Angeles County for the construction and operation of the SGF.

Entitlement Requirements and Discretionary Approvals

Discretionary approvals required for implementation of the proposed Overall Development may include, but are not limited to, the following:

- Certification of an Environmental Impact Report
- Zone Change for Project 1 from A-1 (Light Agricultural) to A-2 (Heavy Agricultural)
- Approval of six Conditional Use Permits, one for each of the SGFs, to authorize the development of Projects 1-6 to operate a SGF
- Additional County and other governmental actions as determined necessary

General Plan Designation

The Antelope Valley Areawide General Plan designation for the Project sites is N1 (Non-Urban 1).

Board of Supervisors District

District 5, Michael Antonovich.

Environmental Issues to be evaluated in the EIR

- Aesthetics*
- Agricultural Resources
- Air Quality*
- Biological*
- Cultural*
- Energy
- Geology and Soils*
- Hazards and Hazardous Materials
- Hydrology and Water Quality*
- Land Use and Planning
- Noise*
- Public Services
- Transportation and Traffic*
- Utilities and Service Systems
- Climate Change and Green House Gases, GHG*

*Technical Studies being prepared

Notice of Preparation Review and Comments

The review period for the NOP will be from **June 20, 2012** to **July 20, 2012**.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but not later than July 23, 2012. Please direct all written comments to the following address. In you written response, please include the name of a contact person in your agency.

Carolina Blengini
County of Los Angeles Regional Planning Department
Special Projects Section
320 West Temple Street, Room 1362
Los Angeles, California 90012

Tel: (213) 974-1522
Fax: (213) 626-0434
Email: cblengini@planning.lacounty.gov

Public Scoping Meeting

To assist in local participation, a Scoping Meeting will be held to describe the proposed Overall Development and to solicit suggestions from the public and responsible agencies regarding the content of the Draft EIR.

Date: Saturday, July 14, 2012 from 9:00 a.m. to 1:00 p.m.

Location: Lancaster Library, 601 West Lancaster Boulevard. Lancaster, CA 93534

Location of Review Materials

The County of Los Angeles Department of Regional Planning is soliciting input based on your views and opinions concerning the scope of the EIR for the proposed Overall Development.

Additional copies of the Notice of Preparation are available for the public review on the Department of Regional Planning website http://planning.lacounty.gov/case/view/silverado/ , as well as at the follow libraries:

Lancaster Library
601 West Lancaster Blvd.
Lancaster, CA 93534

Canyon Country Jo Anne Darcy Library
18601 Soledad Canyon Rd.
Santa Clarita, CA 91351

Lake Los Angeles Library
16921 East Avenue O, #A
Palmdale, CA 93591

Quartz Hill Library
42018 North 50th St. West
Quartz Hill, CA 93536

Antelope Valley Bookmobile
601 West Lancaster Blvd.
Lancaster, CA 93534

OVERALL DEVELOPMENT DESCRIPTION

1.0 OVERALL DEVELOPMENT LOCATION AND SETTING

Silverado Power, LLC (Silverado Power) is a utility scale solar photovoltaic (PV) developer proposing the development of six solar PV Projects (referred to as the Overall Development) in the western portion of Antelope Valley, located in the northern portion of unincorporated Los Angeles County. These six solar generating facilities (SGFs) together would cover 747.1 acres and would produce 172 megawatts (MW) of solar power in total. The Overall Development is located on unproductive farmland that is no longer used for farming. The area where these Projects are located is rural land west of State Route 14.

Each of the six solar Projects are intended to be developed separately, but will be analyzed by one Environmental Impact Report (EIR). The requirements of the California Environmental Quality Act (CEQA) in Section 17175 (3) provide that an EIR be prepared for an overall development where smaller individual Projects would be carried out in phases. For the purpose of this EIR, the term "Overall Development" will refer to all six of the SGFs.

The six SGFs to be developed are given below by project number, name, acres and mega-watts (MW):

Project Number	Project Name	Acres	MW
1	North Lancaster Ranch	80	20
2	Western Antelope Blue Sky Ranch	157	40
3	American Solar	135.61	35
4	Antelope Solar Greenworks	256	52
5	Silver Sun Greenworks	80	20
6	Lancaster WAD	38.49	5

1.1 DESCRIPTION OF THE OVERALL DEVELOPMENT SETTING

1.1.1 Overview of the Region

The Overall Development is located in the Antelope Valley in unincorporated Los Angeles County and is all west of the Antelope Valley Freeway (State Route 14). All six SGFs are between 30th Street West and 120th Street West. On the north-south axis, the SGFs are between Avenue K to the south and Avenue A to the north. The SGFs range from approximately 39 to 256 acres in size and from 5 to 52 MW in solar generation capacity (See Figure 1 for a map of the SGFs).

1.1.2 Land Description and Uses

The Antelope Valley consists of high desert terrain bounded by the San Gabriel Mountains to the south, portions of Kern County to the north, Ventura County to the west, and San Bernardino County to the east. The Antelope Valley is characterized by relatively flat land,

punctuated by occasional buttes. In general, the Antelope Valley floor is bowl-like, with the low point located near the center of the playas or dry lakes to the northeast, and consists primarily of alluvium soils. Generally, the area alluvium is composed of unconsolidated to moderately consolidated, poorly sorted cobble, gravel, sand, silt, and clay. Elevation within the Antelope Valley ranges from 2,300 to 3,500 feet above mean sea level (amsl).

The Antelope Valley is located in a very arid part of California and as such usually receives less than 10 inches of precipitation per year, mostly in the form of rainfall; infrequent snowfall events are also known to occur within the Antelope Valley. Temperatures within the Antelope Valley range from below freezing in the winter to over 100 degrees Fahrenheit in the summer. Winter temperatures are typically above freezing.

The Overall Development vicinity, as shown in the aerial photograph provided in Figure 1, includes a variety of land uses, although a majority of the surrounding lands are unoccupied agricultural and grazing lands. The nearest unincorporated residential communities are Antelope Acres, Quartz Hill and Fairmont. The incorporated City of Lancaster is to the east of the Project sites.

Land uses surrounding the six solar Projects consist of mainly open space, light agricultural, low density single family, and undeveloped grazing lands. Historically, agriculture has been a primary land use in the Antelope Valley. Some properties in the area are still utilized for agriculture; however, the majority of properties do not have enough water to irrigate crops. Many of these properties have ceased farming activity over the last two decades and remain as unproductive fallow land. South of the Antelope Valley in the San Gabriel Mountains is the Angeles National Forest.

1.1.2.1 Zoning

Projects 2, 3, 4, and 5 are located within the County of Los Angeles Heavy Agricultural Zone (Zone A-2). Project 6 is located within the County's Desert Mountain Zone (D-2), which allows any uses permitted in Zone A-2. Zone A-2 allows electric distribution substations, electric transmission substations, and generating plants with a Conditional Use Permit (CUP). Project 1 is currently located within Zone A-1, or Light Agricultural Zone, which does not permit electric generating plants or generating plants that burn fuel within its zoning district. Therefore, a Zone Change is being processed for Project 1.

1.1.2.2 General Plan

The proposed Overall Development is expected to be consistent with the County of Los Angeles General Plan and the Antelope Valley Areawide General Plan N1 (Non-Urban 1) land use designation. The individual Projects meet the definition of a "utility installation" referenced in the listing of non-urban non-residential land uses allowed in remote areas designated Non-Urban 1. Projects 1 through 6 are all located within the County's General Plan Non-Urban designation and would not require a General Plan Amendment.

The Overall Development would first consist of construction and then operation of the six solar Projects. The SGFs would be constructed in phases and each of them operated for an estimated 35 years.

Each SGF would consist of the following elements:

- PV modules
- PV Module mounting system
- Balance of system and electrical boxes (e.g., combiner boxes, electrical disconnects)
- Electrical inverters and transformers
- Electrical AC collection system, including switchgear
- Data monitoring equipment
- Access roads and chain link perimeter security fencing

A regional operations and maintenance (O&M) facility to serve all six SGFs would be located in an existing permitted space within Los Angeles County. Each SGF requires a CUP from Los Angeles County for the construction and operation of the SGF.

1.2 OVERALL DEVELOPMENT BACKGROUND

Silverado Power has acquired rights to the real properties and filed CUP applications with the County of Los Angeles for the six solar Projects. Environmental studies, the Overall Development siting and planning, and interconnection agreements with Southern California Edison (SCE) have been ongoing since 2010. The lead agency for this document is the County of Los Angeles. Silverado Power has held several meetings in the Antelope Valley area to inform the public about all aspects of this Overall Development. The Overall Development would begin delivering power to the SCE electrical grid in late 2013.

Each of the six solar power Projects would be designed and built in a very similar manner. Each of the six Projects would employ a series of photovoltaic (PV) module arrays to convert sunlight into electrical energy without the use of heat transfer fluid or cooling water. The facilities would deliver the electrical output to the existing regional transmission system.

The PV modules would convert sunlight into low-voltage direct current (DC) power, which is subsequently transformed into alternating current (AC) power through an inverter. The PV modules are made of a semiconductor material through which electrons flow to convert light (photons) to electricity (voltage). This process is known as the PV effect.

1.3 OVERALL DEVELOPMENT CHARACTERISTICS

The six SGFs will be designed and built in the same or similar method and will have similar Overall Development characteristics. The SGFs would utilize PV technology on fixed-tilt or tracker mounting supports. The major components of the proposed Overall Development are described as follows.

1.3.1 Solar PV Generating Facilities

The SGFs are designed for optimum performance and ease of maintenance. The Overall Development would construct series of PV module arrays mounted on racking systems, which are typically supported by a pile-driven foundation design. The foundation design would be determined based on the full geotechnical survey. The module mounting system, or racking system, would have a fixed-tilt or tracker PV array configuration and would be

oriented south to maximize the amount of incident solar radiation absorbed over the course of the year.

A series of PV arrays would be funneled and combined at combiner boxes located throughout the solar field; the electrical current would then be collected and combined prior to feeding the inverters. The solar field would be laid out in a PV block design to allow adequate area for maintenance in the way of clearances or access roads.

Inverters would be consolidated in areas to minimize cable routing and trenching and ensure minimal electrical losses. The AC out from the inverters would be routed through an AC collection system and consolidated within system switchgear. The final output from the SGF would be processed through a transformer to match the interconnection voltage. Electrical safety and protection systems would be provided to meet regulatory codes and standards. The energy would be delivered to the regional electrical distribution network.

A security perimeter fence with appropriate signage for public protection would be installed. Points of ingress/egress would be accessed by locked gates for facility services and maintenance.

Additional information for the specific elements of the SGF is provided in the following sections.

1.3.2 Photovoltaic Modules

The SGFs would require installation of PV modules. The total number of PV modules required would depend on the technology selected, optimization evaluation, and detailed design. The market conditions, economic considerations, and the environmental factors would be taken into account during the detail design process. The following PV module technologies or equivalent are being considered for incorporation into the Overall Development:

- PV thin-film technology
- PV crystalline silicon technology
- Fixed-tilt configuration
- Tracking design configuration

The modules configured with a fixed tilt would be oriented toward the south and angled at a degree that would optimize solar resource efficiency. For the tracking configuration, the modules would rotate from east to west over the course of the day. Modules would be non-reflective and highly absorptive.

1.3.3 Standard Installation, Array Assembly, and Racking

There are a variety of module mounting systems and manufactures that are available in the solar industry, the majority of which can be mounted on a variety of foundations. Fixed-tilt, single-axis trackers, and dual-axis trackers, all of which provide various levels of energy efficiency, are under consideration for the Overall Development. The final racking system would be determined by optimization evaluations and economic assessments and incorporated into the detailed design.

The module mounting system provides the structure that supports the PV module arrays. The foundations are typically cylindrical steel pipes/piles, which would be driven into the soil using pneumatic techniques, similar to hydraulic pile driving. The final foundation design would be determined based on the geotechnical survey for the Overall Development location. Once the foundation has been installed, the module mounting system would be installed to support the PV modules. For a tracking configuration, motors would be installed to drive the tracking mechanism. The PV modules would be delivered to the Overall Development location during construction to support the installation schedule.

The module mounting system would be oriented in rows within a PV design block, presenting a standard and uniform appearance across the facility. The panel configuration would be uniform in height and width.

1.3.4 Collection, Inverters, AC Collection, and Transformers

Modules would be electrically connected into strings. Each string would be funneled by electrical conduit (typically underground) wiring to combiner boxes located throughout the solar field power blocks. The output power cables from the combiner boxes would be again consolidated and feed the DC electricity to inverters, which convert the DC to AC.

Underground electrical cables would be installed using ordinary trenching techniques, which includes excavation of trenches to accommodate conduits. Wire depth, and trench backfill would be in accordance with local, state, and federal codes.

The AC energy would be stepped up to the appropriate interconnection voltage by system transformers to match the voltage at the grid interconnection. As required, switchgear cabinetry would be provided where necessary for circuit control.

All electrical inverters, transformers, and gear would be placed on concrete foundation structures. The SGFs would be designed and laid out in MW increments/blocks including inverter equipment.

Commissioning of equipment would include testing, calibration of equipment, and troubleshooting. All electrical equipment, inverters, collector system, and PV array systems would be tested prior to commencement of commercial operations.

1.3.5 SGF Substations

For SGF projects that require a new substation, the area would be appropriately graded and excavated to accommodate transformer equipment, the control building foundation, and oil containment area. Foundations for the substation would be constructed with reinforced concrete.

Structural components in the substation area would include:

- Transformers, switchgear, and safety systems
- Footings and oil containment system for transformers

1.3.6 SGF Interconnection Descriptions

Each inverter would be fully enclosed and pad mounted and will be approximately 90 inches in height. The AC output of two inverters would be fed via underground cable into the low-voltage side of the inverter step-up transformer, generally within 20 feet of the inverters. Each transformer would be mounted on a concrete pad and enclosed together with switchgear and a junction box. Transformers are typically 87 inches in height. The high-voltage output of the transformer would be combined in series via underground collector cables to the junction box of the nearest transformer, ranging from as little as 60 feet to as much as 700 feet. The collector system cables would be tied throughout the SGFs at underground junction boxes to the main underground collector cables, which would be composed of a larger wire gauge, to the location of the generator step-up transformer (GSU). The main collector cables would rise into the low-voltage busbar and protection equipment that would be enclosed together with the GSU. The primary switchgear includes the main circuit breaker and utility metering equipment, and it would be enclosed separately but pad-mounted together with the GSU. Both the GSU and the primary switchgear would stand approximately 87 inches in height. The output of the switchgear would be the start of the generation tie-line (gen-tie). The gen-tie would consist of three phases of overhead conductor and a disconnect switch on 55-foot wood poles.

1.3.7 Data Collection Systems

Each SGF facility would be designed with a comprehensive Supervisory Control and Data Acquisition (SCADA) system for remote monitoring of facility operation and/or remote control of critical components. Within the SGFs, the fiber optic, or other cabling required for the monitoring system, would be installed throughout the solar field leading to a centrally located (or series of appropriately located) SCADA system cabinets. The external telecommunications connections to the SCADA system cabinets may be through either wireless or hard-wired telecommunications to a centralized data collection center.

The system would also include a meteorological data collection system. The station would have several weather sensors: a pyranometer for measuring solar irradiance, a thermometer to measure air temperature, a barometric pressure sensor, and two wind sensors to measure speed and direction. These sensors would be connected to a data logger, which would compile the data for transmission to the data collection center.

1.3.8 Overall Development Construction

The construction for each facility would consist of three major phases: (1) site preparation, (2) PV system installation testing and startup, and (3) site cleanup/restoration. “Best Practices” would be required during all construction phases of the Overall Development. A Storm Water Pollution Prevention Plan incorporating BMPs for erosion control would be prepared and approved before the start of construction. The Overall Development would also comply with applicable post-construction water quality standards adopted by the Regional Water Quality Control Board.

1.3.9 Site Preparation

Construction of each PV facility would begin with initial clearing and grading of the staging areas. Access to the Projects from public roads would be improved to appropriate standards for the construction period. The staging areas typically include construction offices, a first aid

station and other temporary buildings, worker parking, truck loading and unloading facilities, and an area for system assembly. Road corridors would then be surveyed, cleared, and graded to bring equipment, materials, and workers to the areas under construction. Buried electrical lines, PV array locations, and the locations of other facilities may be flagged and staked in order to guide construction activities. Each SGF would be enclosed by a security fence. The fenced area would include at least two gates. A secured controlled main access gate would be located at the entrance.

BMPs for erosion control during SGF preparation, initial erosion, and sedimentation controls would be employed. In addition, water truck reloading stations (as required) would be established for dust control.

1.3.10 PV System Installation

PV system installation would include earthwork, grading, and erosion control, as well as construction of the plant substation and erection of the PV modules, supports, and associated electrical equipment. System installation would begin with teams installing the mounting and steel/concrete piers support structures. The exact design would be finalized pending evaluation of soil conditions. The methods may include (but are not limited to) vibration-driven screw piles or aboveground ballast foundations. This step would be followed by panel installation and electrical work.

Concrete would be required for the footings, foundations, pads for the transformers, and substation equipment. Concrete would be produced at an off-site location by a local provider and transported to the Overall Development Projects by truck. The enclosures housing the inverters would have a pre-cast concrete base. Final concrete specifications would be determined during detailed design engineering consistent with applicable building codes.

The PV modules require a moderately flat surface for installation. Some earthwork, including grading, fill, compaction, and erosion control cultivation, may be required to accommodate the placement of PV arrays, foundations or footings, access roads, and drainage features. Erosion control techniques used during construction may include the use of silt fencing, straw bales, temporary catch basins, inlet filters, and truck tire muck shakers. Construction of the PV arrays includes the installation of support beams, module rail assemblies, PV modules, inverters, transformers, and buried electrical cables.

Wastes generated during construction will include the following: cardboard, wood pallets, copper wire, scrap steel, common trash, and wood wire spools. Silverado Power does not expect to generate hazardous waste during construction. However, field equipment used during construction would contain various hazardous materials such as hydraulic oil, diesel fuel, grease, lubricants, solvents, adhesives, paints, and other petroleum-based products contained in construction vehicles.

1.3.11 Overall Development Operation and Maintenance

Upon commissioning, the Overall Development would enter the operational phase. For the duration of the operational phase, the Overall Development would be operated and monitored remotely, with regular on-site personnel visitations for security, maintenance, and system monitoring. There would be no full-time SGF personnel on-site during operation. The Overall

Development's PV arrays produce electricity passively with minimal moving parts; therefore, maintenance requirements would be limited. Any required planned maintenance would be scheduled to avoid peak-load periods, and unplanned maintenance would typically be responded to as needed depending on the event. An inventory of spare components would be readily available from a remote warehouse facility.

Other operational details are summarized in the following sections.

1.3.12 Operations

Silverado Power would ensure consistent and effective facility operations by:

- Responding to automated alarms based on monitored data, including actual versus expected tolerances for system output and other key performance metrics
- Communicating with customers, transmission system operators, and other entities involved in facility operations

1.3.13 Maintenance

The maintenance performed on the Projects would consist of equipment inspection and replacement. Maintenance would occur during daylight hours when possible. However, maintenance activities on the PV modules and DC systems would be performed at night. Maintenance program elements include:

- Managing a group of prequalified maintenance and repair firms who can meet O&M needs of the facility throughout its life
- Creating a responsive, optimized cleaning schedule
- Responding to plant emergencies and failures in a timely manner
- Maintaining an inventory of spare parts to ensure timely repairs and consistent plant output
- Systematically maintaining a log to effectively record and track all maintenance problems
- Performing maintenance of the SGF as required to clear obstructive ground cover

1.3.14 Security

To ensure the safety of the public and the facilities, the Projects would be fenced and signs would be posted. Security measures would be installed as necessary to prevent and/or deter unauthorized access. Access to the Projects would be controlled, and gates would be installed at the roads entering the property.

1.3.15 Land Reclamation Plan

A Reclamation (Decommissioning) Plan for each solar Project will be prepared and submitted for approval to Los Angeles County prior to the beginning of grading for each of the six Projects. The plan will assure the land is protected during operation and returned to a beneficial use upon termination of the use of the land as a solar site.

1.3.15.1 Timeline for Reclamation Plan

The life of each facility is presently proposed to be 35 years. The reclamation plan will be implemented in the early summer of the year the facility closes. Removal of the equipment will

take three months and after that, the completion of the reclamation will take two months. For example, if the facility closes by May 1, then the equipment would be removed by August 1 and the final reclamation would be completed by October 1, thus allowing the reclamation to be completed outside of the rainy season and before winter begins.

1.3.15.2 Removal of All Chemicals

Once the power facility is shut off, a first step will be to remove all chemicals, fuels, oils, transformer oils, and other potential hazards chemicals and wastes from the SGFs. These will be disposed of in accordance with Los Angeles County, California, and federal laws.

1.3.16 Removal of Equipment

All equipment and H-beam foundations will be removed from the SGFs so that it may be used as productive wildlife habitat or farmland without further work.

Solar modules will be unbolted from the support structures and consolidated in the laydown area. The modules have value and will be sold to an off-site recycler. They will be loaded onto trucks in batches and moved off-site. Bids will be taken from vendors whose costs will include purchasing the equipment and removing it from a site consolidation area.

The H-beams supporting the panels will have been driven up to 12 feet deep. These H-beams will be pulled out of the ground and the entire length of beam moved to the lay down area where they will be cleaned, stockpiled, and consolidated. The H-beams have value and will be sold to an off-site recycler. They will be loaded onto trucks in batches and moved off-site by the selected recycler.

The top layer of soil will be removed from all buried electrical conduit trenches with a backhoe and the electrical conduit will be pulled out of the ground by the backhoe. All electrical conduits will be moved to the lay down area and stockpiled. The conduit has value and will be sold to an off-site recycler. They will be loaded onto trucks in batches and moved off-site by the selected recycler.

The inverters will be removed from the SGFs and moved onto an impermeable base in the lay down area. Care will be taken that no leaks or spills occur from this temporary storage area. The inverters have value and will be sold to an off-site recycler. They will be loaded onto trucks in batches and moved off-site..

The electrical substation will be removed and the components moved to the lay down area. Care will be taken that no leaks or spills occur from this temporary storage area. The substation equipment has value and will be sold to an off-site recycler. This will be loaded onto trucks in batches and moved offsite. A bid to purchase the electrical substation “as is” and “where is” will be solicited. The concrete foundation for the substation will also be removed.

The H-beam pile foundations for the inverter boxes and the substation will be pulled up with a back hoe. None of the H-beams will be left in the ground. These will be sold to a recycler as specified above.

The chain link fence will be taken down and sold with the other scrap material. Any other miscellaneous equipment will be removed from the SGFs.

All road and pathways will be removed and restored to the previous or better condition than prior to construction.

1.3.17 Contouring, Erosion, and Sediment Control

Contouring of the SGFs will be conducted using standard grading and farming equipment to return the land to approximately match the pre-construction surface conditions. The SGFs drainage features will be restored to their original condition. Temporary erosion and sediment control measures such as use of sediment fences, hay bales, mulch, and soil stabilizers will be used as needed. As noted above the original site conditions will be recorded prior to beginning construction on the SGFs.

1.3.18 Land Reclamation

This section of the plan will provide information on the post-closure uses of the site which may be wildlife habitat, crops, or some other use. Details of ground treatments, erosion control, fertilization, seed sources, vegetation planting methods, and irrigation systems will be added to the plan before it is implemented. It is unknown at this time if solar will continue to be utilized on this land in excess of 35 years, and thus the future long-term use of the site will be updated periodically with the reclamation plan as it becomes better known.

1.4 DESCRIPTION OF SIX INDIVIDUAL SGF PROJECTS

1.4.1 Project 1 – North Lancaster Ranch

Silverado Power plans to develop the proposed North Lancaster Ranch SGF as described herein. The proposed Project would have a generating capacity of 20 megawatts alternating current (MW-AC) and be located on approximately 80 acres of primarily unproductive agricultural land in Los Angeles County. The facility would operate year-round, producing electric power during daytime hours.

1.4.1.1 Project and Interconnect Location

The North Lancaster Ranch SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately 12 miles northwest of downtown Lancaster. The power generated by the SGF would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.805275°, -118.324064°. Electricity would be delivered to the existing SCE 66 kilovolt (kV) transmission line via an undergrounded 0.5-mile gen-tie originating at the DC collection system within the SGF. The 66 kV transmission line is 0.5 miles due west of the facility.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 20 MW. The facility is expected to be producing power by the second quarter of 2014.

1.4.1.2 Construction

The proposed schedule is to begin Project preparation and construction in the fourth quarter of 2013, complete construction within approximately six months, and be commercially operational by the second quarter of 2014.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours of construction. The SGF is expected to create 100 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

1.4.2 Project 2 – Western Antelope Blue Sky Ranch

Silverado Power plans to develop the proposed Western Antelope Blue Sky Ranch SGF as described herein. The proposed Project would have a generating capacity of 40 MW-AC and be located on 157 acres of disturbed land in Los Angeles County. Of the 157 acres, approximately 118 acres will be developed for the purpose of solar power generation. The facility would operate year-round, producing electric power during daytime hours.

1.4.2.1 Project and Interconnect Location

The Western Antelope Blue Sky Ranch SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately 11 miles west of downtown Lancaster. The power generated by the SGF would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.687562°, -118.300466°. Electricity would be delivered to the existing SCE Antelope Substation via an undergrounded 2-mile gen-tie originating at the DC collection system within the SGF. The Antelope Substation is located 1.5 miles northeast of the facility.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 40 MW. The facility is expected to be producing power by the fourth quarter of 2013.

1.4.2.2 Construction

The proposed schedule is to begin site preparation and construction in the first quarter of 2013, complete construction within approximately eight months, and be commercially operational by the fourth quarter of 2013.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours

of construction. The SGF is expected to create 140 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

1.4.3 Project 3 – American Solar Greenworks

Silverado Power plans to develop the proposed American Solar Greenworks SGF as described herein. The proposed Project would have a generating capacity of 35 MW-AC and be located on 135.61 acres of primarily unproductive agricultural land in Los Angeles County. The facility would operate year-round, producing electric power during daytime hours.

1.4.3.1 Project and Interconnect Location

The American Solar Greenworks SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately seven miles northwest of downtown Lancaster. The power generated by the SGF would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.732654°, -118.255107°. Electricity would be delivered to the existing SCE 66 kV transmission line adjacent to the northern border of the property.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 35 MW. The facility is expected to be producing power by the second quarter of 2014.

1.4.3.2 Construction

The proposed schedule is to begin site preparation and construction in the fourth quarter of 2013, complete construction within approximately eight months, and be commercially operational by the second quarter of 2014.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours of construction. The SGF is expected to create 130 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

1.4.4 Project 4 – Antelope Solar Greenworks

Silverado Power plans to develop the proposed Antelope Solar Greenworks SGF as described herein. The proposed Project would have a generating capacity of 52 MW-AC and be located on 256 acres of primarily unproductive agricultural land in Los Angeles County. The facility would operate year-round, producing electric power during daytime hours.

1.4.4.1 Project and Interconnect Location

The Antelope Solar Greenworks SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately 8.0 miles northwest of downtown Lancaster. The power generated by the Project would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.689088°, -118.288985°. Electricity would be delivered to the existing SCE 66 kV transmission line adjacent to the southern border of the property. Additionally, this Project will have interconnection points at 34.695766°, -118.289538° and 34.704051°, -118.301546° to the existing distribution lines.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 52 MW. The facility is expected to be producing power by the fourth quarter of 2013.

1.4.4.2 Construction

The proposed schedule is to begin site preparation and construction in the first quarter of 2013, complete construction within approximately nine months, and be commercially operational by the end of the fourth quarter of 2013.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours of construction. The SGF is expected to create 160 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

1.4.5 Project 5 – Silver Sun Greenworks

Silverado Power plans to develop the proposed Silver Sun Greenworks SGF as described herein. The proposed Project would have a generating capacity of 20 MW-AC and be located on 80 acres of primarily unproductive agricultural land in Los Angeles County. The facility would operate year-round, producing electric power during daytime hours.

1.4.5.1 Project and Interconnect Location

The Silver Sun Greenworks SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately 11 miles west of downtown Lancaster. The power generated by the SGF would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.687562°, -118.300466°. Electricity would be delivered to the existing SCE Antelope Substation via an undergrounded 3-mile gen-tie originating at the DC collection system within the SGF. The Antelope Substation is 2.5 miles southeast of the facility.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 20 MW. The facility is expected to be producing power by the second quarter of 2014.

1.4.5.2 Construction

The proposed schedule is to begin site preparation and construction in the fourth quarter of 2013, complete construction within approximately eight months, and be commercially operational by the second quarter of 2014.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours of construction. The SGF is expected to create 100 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

1.4.6 Project 6 – Lancaster WAD

Silverado Power plans to develop the proposed Lancaster WAD SGF as described herein. The proposed Project would have a generating capacity of 5 MW-AC and be located on 38.49 acres of primarily unproductive agricultural land in Los Angeles County. The facility would operate year-round, producing electric power during daytime hours.

1.4.6.1 Project and Interconnect Location

The Lancaster WAD SGF is located in an unincorporated northern section of Los Angeles County. The Project is approximately six miles north of downtown Lancaster. The power generated by the SGF would be connected to SCE's existing transmission network with the voltage transformation equipment and system safety equipment constructed on the Project. The SGF would ultimately interconnect at 34.776892°, -118.191271°. Electricity would be delivered to the existing SCE 12.47 kV distribution line adjacent to the southern border of the Project.

The interconnection process has been initiated and a queue position with the California Independent System Operator has been secured for 5 MW. The facility is expected to be producing power by the fourth quarter of 2013.

1.4.6.2 Construction

The proposed schedule is to begin site preparation and construction in the third quarter of 2013, complete construction within approximately five months, and be commercially operational by the fourth quarter of 2013.

Construction of the Project begins with site preparation and grading through equipment setup and commencement of commercial operation. The on-site workforce would consist of laborers, electricians, supervisory personnel, support personnel, and construction management

personnel. Construction would generally occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities would be conducted consistent with Los Angeles County regulations regarding hours of construction. The SGF is expected to create 40 new jobs at peak crew size during the construction phase and would provide full- and part-time positions over the life of the facility for O&M activities.

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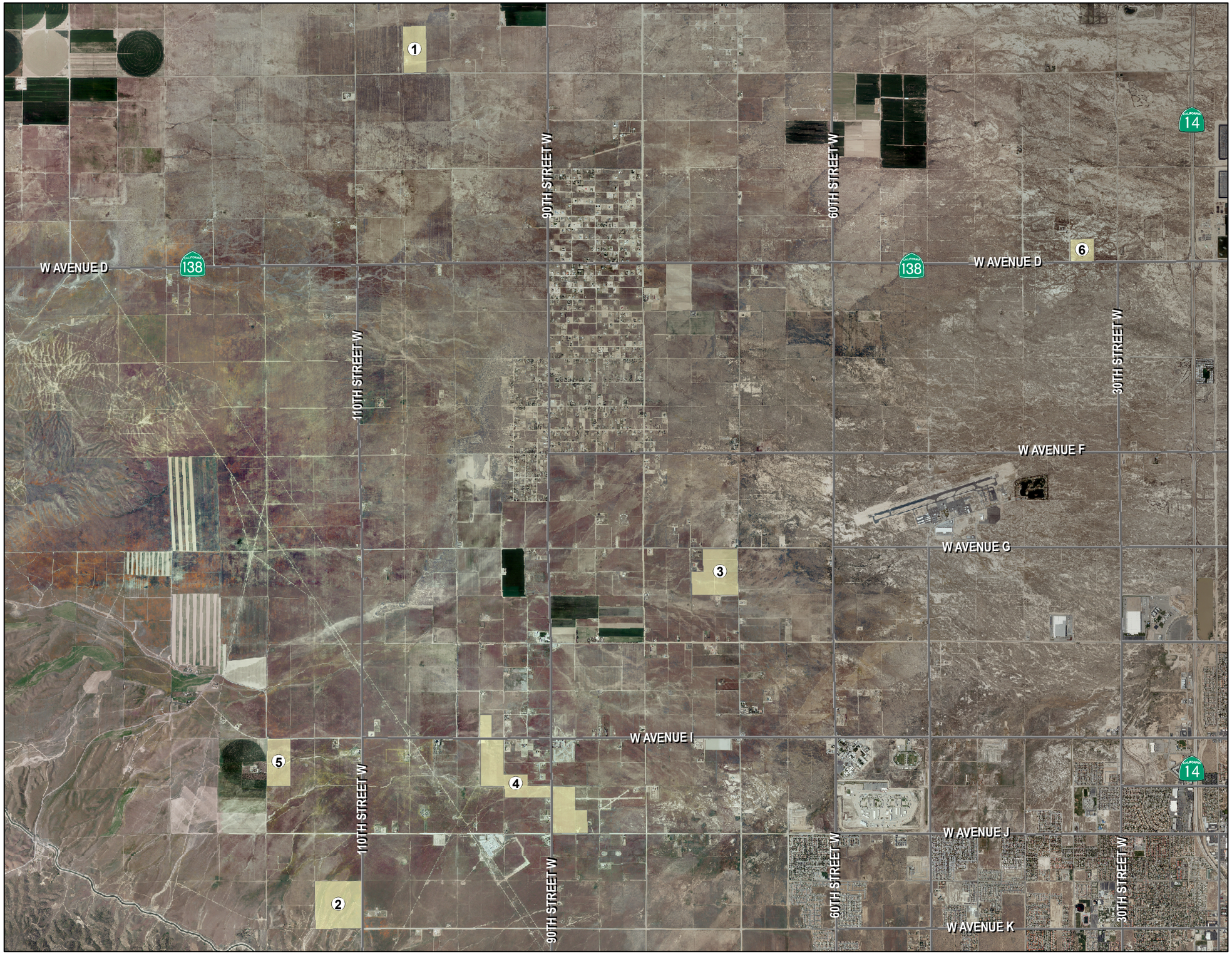
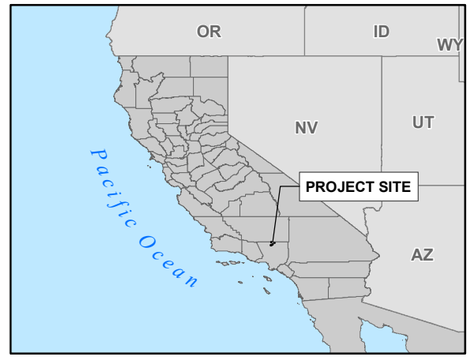


SILVERADO power

SILVERADO POWER WEST
LOS ANGELES COUNTY



LEGEND

PROJECT 1 - NORTH LANCASTER RANCH

PROJECT 2 - WESTERN ANTELOPE BLUE SKY RANCH

PROJECT 3 - AMERICAN SOLAR GREENWORKS

PROJECT 4 - ANTELOPE SOLAR GREENWORKS

PROJECT 5 - SILVER SUN GREENWORKS

PROJECT 6 - LANCASTER WAD

NOTE:
(a) State Plane, Zone V (NAD83), US Survey Feet.
(b) Source Data: ESRI, TTEC.

FIGURE 1
SILVERADO POWER WEST
LOS ANGELES COUNTY
PROJECTS

0 0.5 1 2
Miles

TETRA TECH EC, INC.