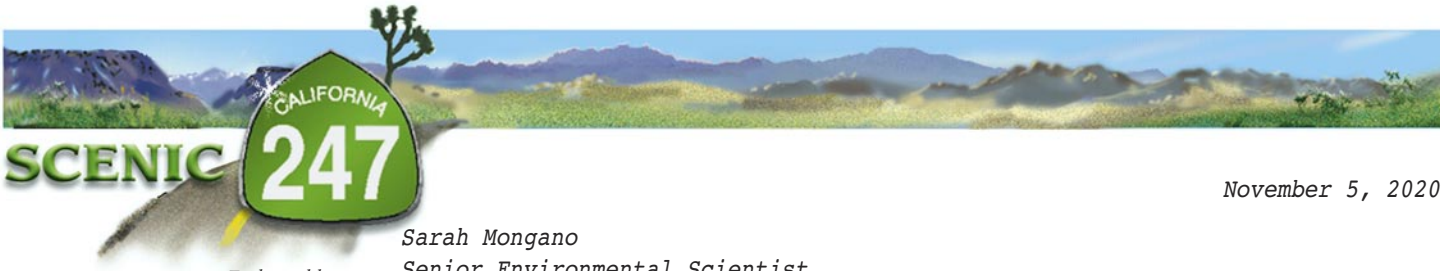

November 5, 2020

Endorsed by:

Homestead Valley
Community Council
www.hvccsite.org

Morongo Basin
Historical Society
www.mbhs.org

Flamingo Heights
Community Association
www.fhca.com

Johnson Valley
Improvement Association
see www.johnsonvalley.com

Hammerking Productions
dave@kingofthehammers.com

Landers Association

Yucca Mesa
Improvement Association
www.yuccamesa.org

Western American
Railroad Museum
www.barstowrailmuseum.org

Lucerne Valley
Chamber of Commerce

Lucerne Valley
Economic Development Association

Lucerne Valley
Market and Hardware

Lucerne Valley Museum

Route 66
Mother Road Museum
www.route66museum.org

Joshua Tree
Gateway Communities
Tourism Committee
www.joshuatreegatewaycommunities.com

Points of Interest Promotions
Lucerne Valley
billlembright@thenewlight.net

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

Morongo Basin
Conservation Association
www.mbconservation.org

Lucerne Valley-Johnson Valley
Municipal Advisory Council

Barstow Chamber of Commerce
www.barstowchamber.com

Morongo Basin
Municipal Advisory Council

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

Scoping Comments for the Proposed Stagecoach Solar Project including Southern California Edison Calcite Substation
File Ref: SCH No. 2020100234 CSLC EIR No. 763; W30213; W26868

The Homestead Valley Community Council (HVCC) is a coalition of community associations in unincorporated communities on State Route 247 in the area mapped in the San Bernardino Countywide Plan as the Homestead Valley.

Summary:
-HVCC seeks State Scenic Highway designation for S.R.247.
-HVCC has submitted the VISUAL ASSESSMENT, core of the designation process.
-HVCC currently works with San Bernardino County Land Use Services on the final steps of scenic designation - the CORRIDOR PROTECTION PLAN.
-The Proposed Stagecoach Solar and SCE Calcite Substation projects are incompatible with scenic designation and corridor protection.
Therefore, the EIR for these projects MUST acknowledge their **significant and unavoidable negative impact** these projects would have on the scenic resources of State Route 247. They cannot coexist with Scenic 247.

Commentary: The Scenic 247 Visual Assessment, under review by County and Caltrans, demonstrates that the Stagecoach Solar array and equipment on State School Lands, the Calcite Substation, and their attendant transmission lines present miles of intrusive visual impact in the Scenic Corridor of S.R. 247. **This intrusion cannot be mitigated in any meaningful manner**, in one of the most scenic areas selected on the entire route.

The HVCC Scenic 247 Committee has opposed elements in these proposals in the past; rejected parts of zombie projects now reassemble themselves. Aside from established environmental and economic injuries to an area designated as "disadvantaged," Aurora Solar LLC ignores or shrugs off clear statements from various levels of government of their intent to preserve scenic and biological resources in the region (see attached review).

The California State Lands Commission envisioned itself as a recognized leader that "champions environmentally sustainable public land management and balanced resource protection for the benefit and enjoyment of all current and future generations of Californians." Now its Mission and Vision seem disregarded as they carried out recent School Lands consolidation in a manner that only "maximizes development potential."

Thank you for your attention to the following details and attachments.

Betty Munson
Committee Chair
760-364-2646

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Elements of Visual Intrusion by Stagecoach Solar and Calcite Substation Projects in the Scenic 247 Corridor

The Scenic 247 Committee review of the project description deduces from similar facilities extreme intrusions of expanse, height, and distance:

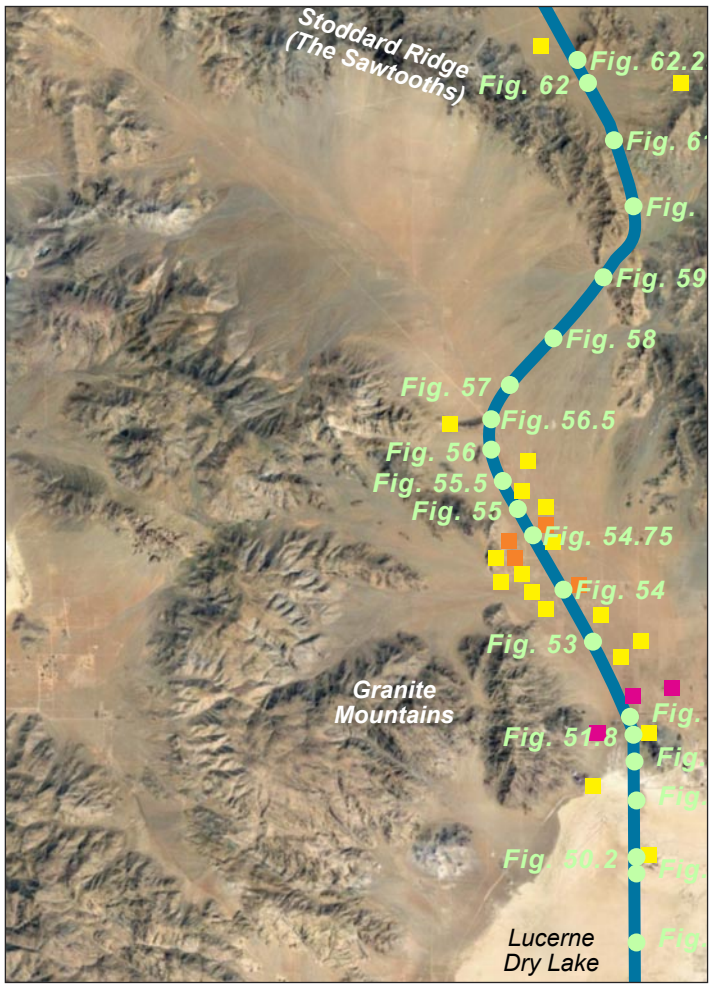
- PV modules and associated infrastructure to be constructed on approximately 1,950 acres
- A 5-acre on-site electric substation with components possibly over 50 feet high, meteorological towers, a storage (battery) system planned to occupy some 100 acres, inverter stations up to 12 feet high, overhead lines supported by even higher poles, plus security fencing, a network of new roads, and a 5,000-sq-ft maintenance building
- an overhead generation tie line (gen-tie line) extending approximately 9 miles south to the proposed SCE Calcite Substation, zigzagging over and along either side of S.R. 247.

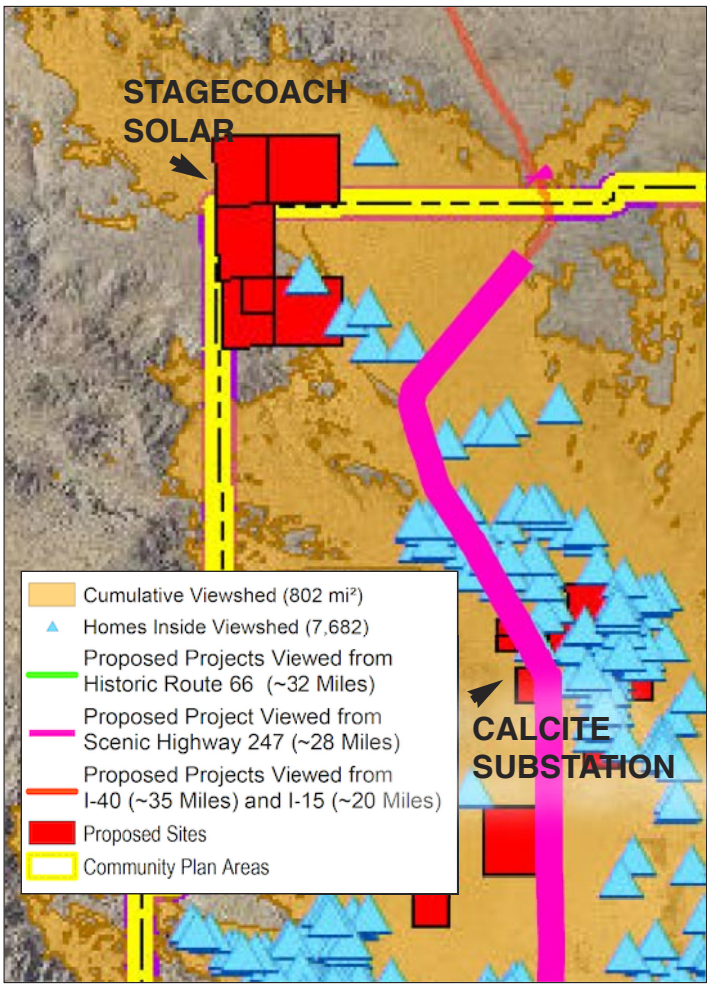
Therefore, the Scenic 247 Committee concludes that this proposed industrial solar project, with its infrastructure, towers, transmission pylons, and associated SCE Calcite Substation:

1) will undoubtedly have a **significant and unavoidable negative impact** on the scenic corridor,

2) will increasingly damage protected biological and scenic resources, and

3) will substantially degrade the existing visual character and quality of the site and its surroundings on both sides of the highway in a manner that cannot be mitigated.





Left: Map detail from Scenic 247 Visual Assessment showing photography (Figures) viewpoints in Section 4 South, between Lucerne Dry Lake and the entry into Goat Pass
Right: Map detail showing Scenic Corridor 247 and cumulative proposed projects in its viewshed

SCENIC CALIFORNIA 247

Excerpts from Landscape Architect Narrative: Views and Intrusions in the Scenic 247 Visual Assessment

Existing transmission lines rate as minor to moderate intrusions. Increase in numbers or size because of original Calcite proposal or its cumulative affects would constitute a major intrusion throughout.

Figure 51.5W - *Scenic View with Intrusion: The scenic Granite Mountains, viewed from PM 51.5 looking west. Creosote bushes begin to populate the landscape. Transmission lines may be discernible running along the base of the mountains at a distance of two miles.*

Figure 52N - *Intrusion: The three parallel SCE transmission lines cross the highway just north of PM 52.*

SEE THE ENTIRE VISUAL ASSESSMENT FOR SCENIC HIGHWAY 247
http://scenichighway247.com/documents.html

Excerpts from Landscape Architect Narrative: Views and Intrusions in the Scenic 247 Visual Assessment

Existing transmission lines rate as minor to moderate intrusions. Increase in numbers or size because of original Calcite proposal or its cumulative affects would constitute a major intrusion throughout.

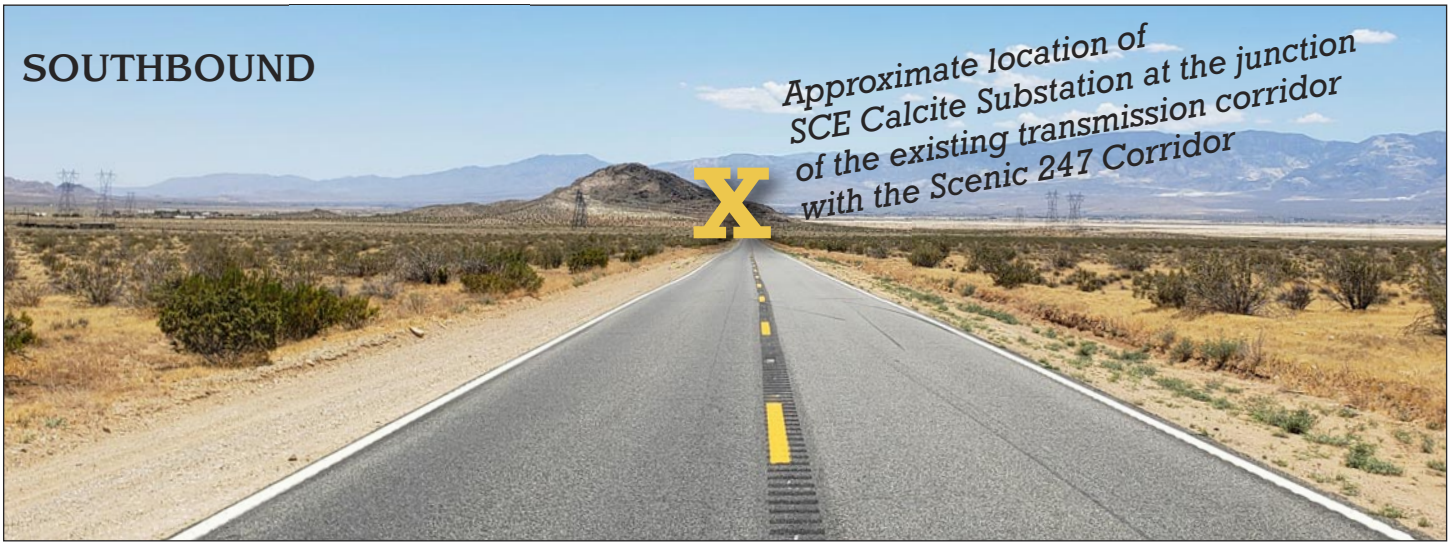


Figure 53S - *Scenic View with Intrusion: Peterman Hill, viewed as Scenic by the southbound traveler from PM 53. The SCE transmission lines are visible here to the southbound traveler as they cross the highway ahead.*

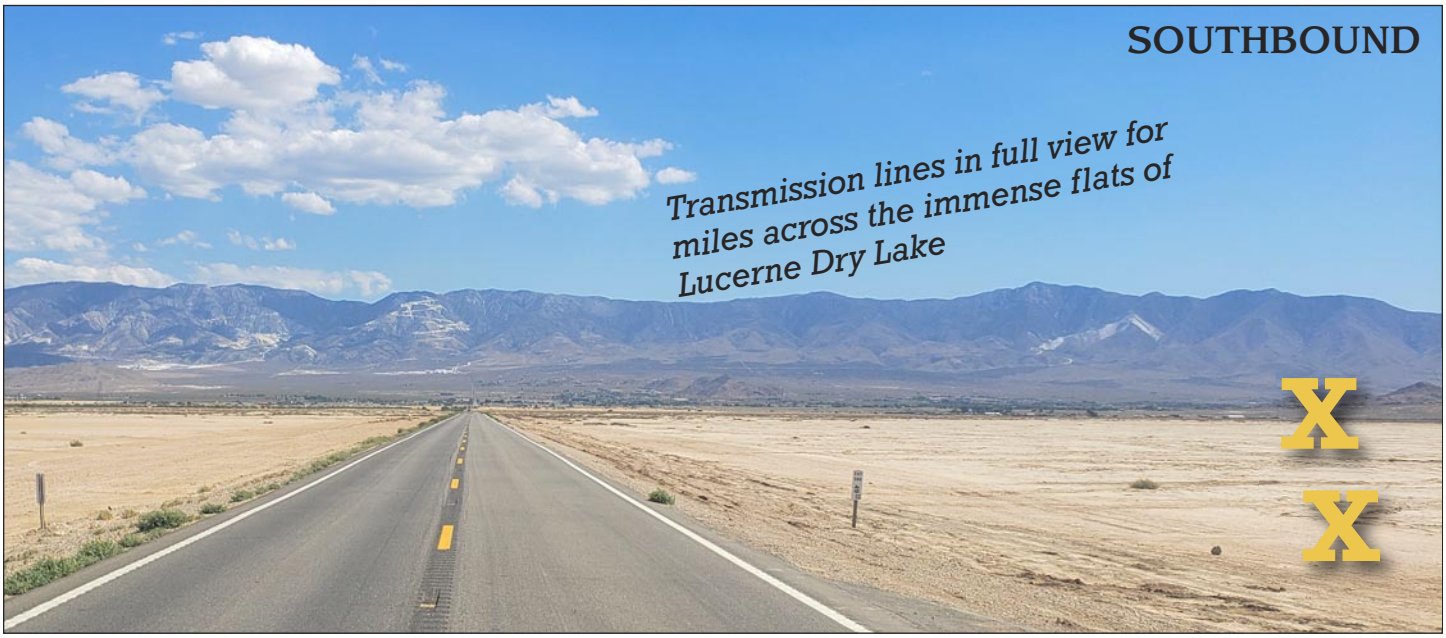


Figure 49S - *Scenic View with Intrusion: The mines on the San Bernardino Mountains above Lucerne Valley become discernible as intrusions at about PM 49 looking south.*

SEE THE ENTIRE VISUAL ASSESSMENT FOR SCENIC HIGHWAY 247
http://scenichighway247.com/documents.html

SCENIC 247 CALIFORNIA

Excerpts from Landscape Architect Narrative: Views and Intrusions in the Scenic 247 Visual Assessment

Existing transmission lines rate as minor to moderate intrusions. Increase in numbers or size because of original Calcite proposal or its cumulative affects would constitute a major intrusion throughout.

Figure 56.25N - *Scenic View: Approaching Lucerne Valley Cutoff Road. Looking north from PM 56.25, vivid views open up ahead, with few visual intrusions for the northbound traveler.*

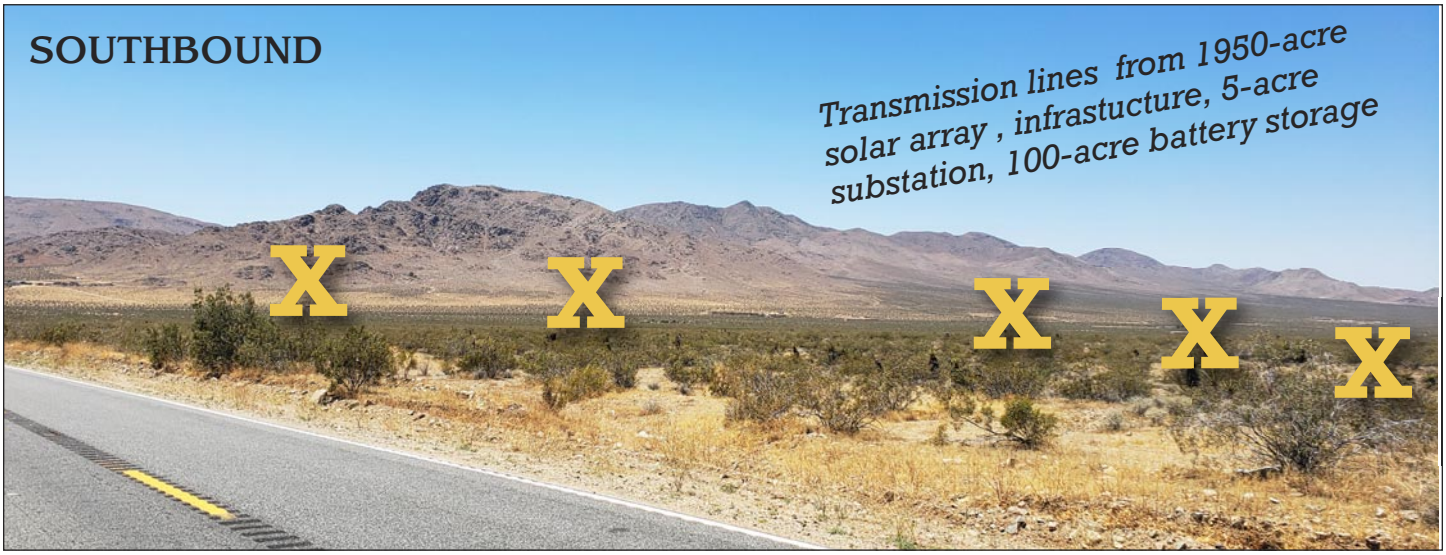


Figure 58SW - *Scenic View: Looking southwest toward Sidewinder Mountain from PM 58 over the vast open valley crossed by Lucerne Valley Cutoff.*

SEE THE ENTIRE VISUAL ASSESSMENT FOR SCENIC HIGHWAY 247
http://scenichighway247.com/documents.html

SCENIC CALIFORNIA 247

Excerpts from Landscape Architect Narrative: Views and Intrusions in the Scenic 247 Visual Assessment

The construction and operation of this solar project will present a major intrusion into on of the least developed, most dramatic landscapes in the Scenic 247 Corridor destroying Section4 South entirely

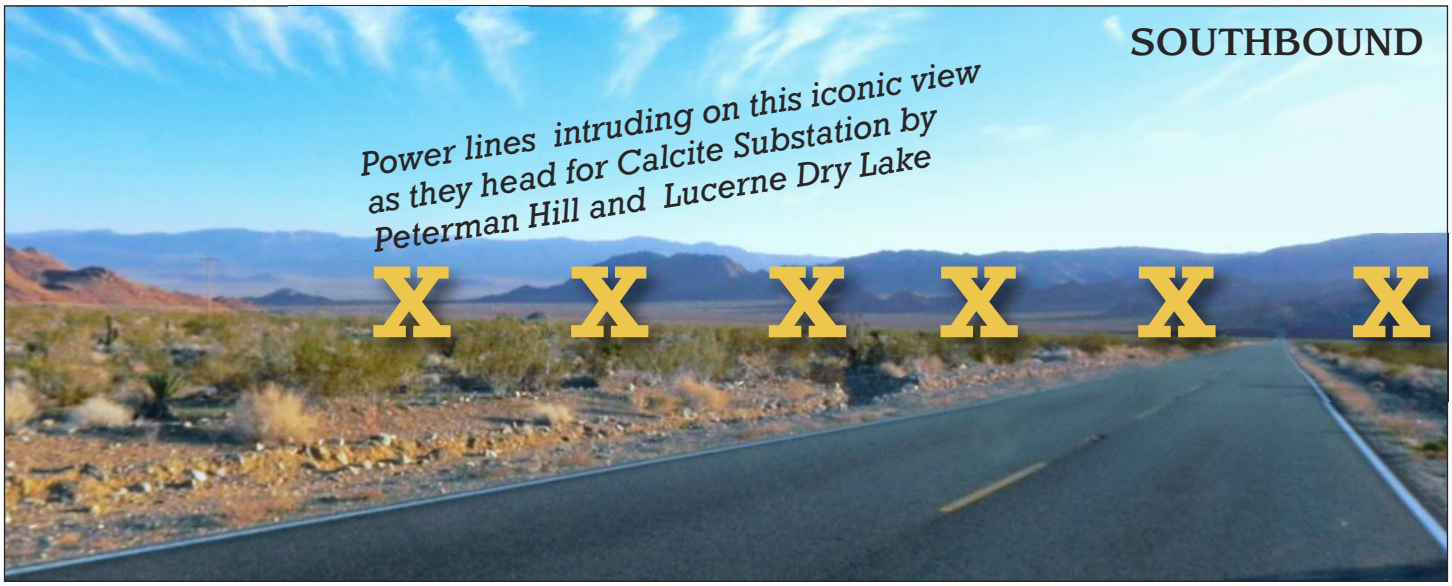


Figure 59S - *Scenic View: Looking southeast from PM 59 with the foothills of the Ord Mountains in the foreground to the east, past the Granite Mountains and Peterman Hill in the mid-ground, then over Lucerne Dry Lake to the San Bernardino Mountains beyond.*

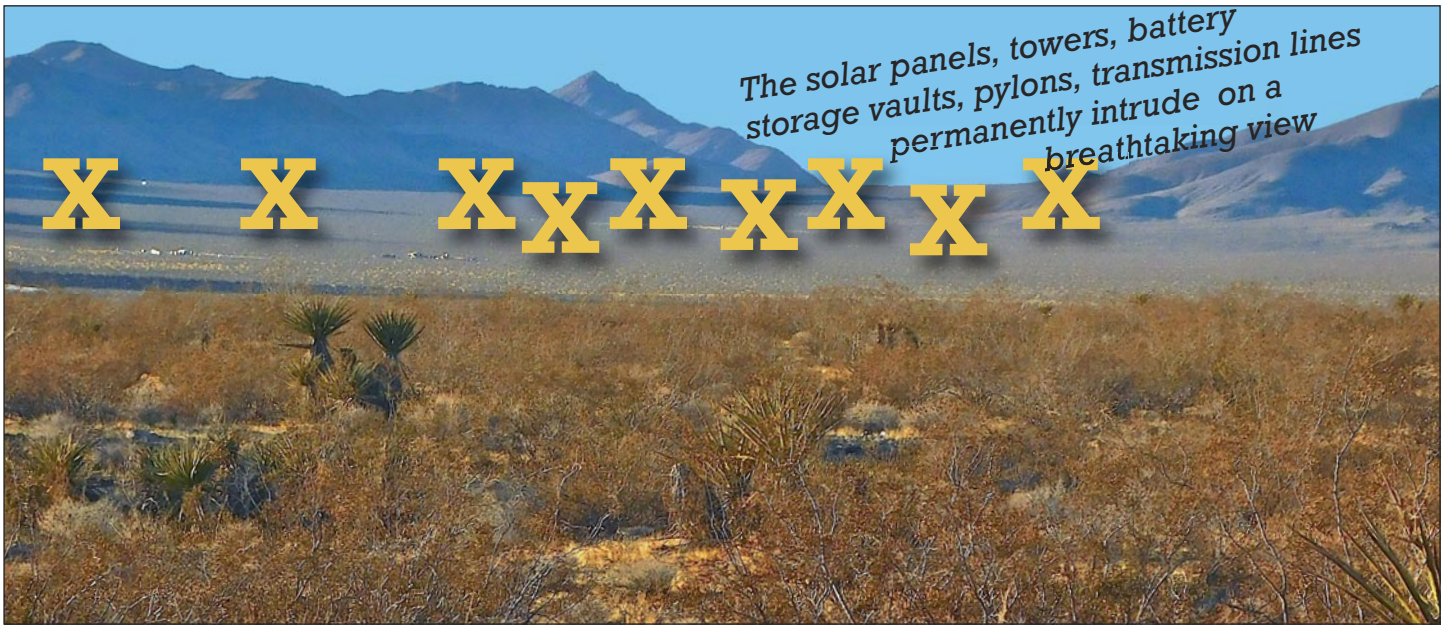


Figure 58W - *Scenic View: The beautiful wide valley traversed by Lucerne Valley Cutoff Road comes into prominence as the northbound traveler approaches Goat Pass. Zoom view from PM 58, looking west to the pass leading to historic Stoddard Wells Road.*

SEE THE ENTIRE VISUAL ASSESSMENT FOR SCENIC HIGHWAY 247
http://scenichighway247.com/documents.html

Regulatory and Legislative Protections in Place Affecting the Scenic 247 Corridor

Sited in a gently-sloping valley encircled by DRECP-designated Areas of Critical Environmental Concern and Linkage Networks, one would assume such designations would preclude industrialization of the scenic corridor. However, planners seem to have overlooked, or ignored, these designations when applied to this landscape.

Calcite substation could accommodate utility-scale projects besides these proposed. This would induce further utility-scale development degrading the region. Just the prospect of a new Calcite substation triggered an influx of project proposals in its vicinity. Three more utility-scale projects queued up to interconnect with Calcite. If permitted, this would have the **cumulative, substantial and unavoidable** impact of industrialization of more than 8,000 acres in Lucerne Valley.

Developers have proposed siting Calcite substation in an existing transmission corridor which already intrudes on the Scenic 247 corridor. Substation towers and infrastructure would be quite visible across the flat expanses of Lucerne Dry Lake.

Scenic Designation

The County has designated S.R. 247 as scenic.
The State has established it as eligible for scenic designation, therefore it has scenic protection under Chapter 27 of the California Department of Transportation Standard Environmental Reference:
"The intent of the State Scenic Highway Program is to protect and enhance California's natural scenic beauty. If a highway is listed as eligible for official designation, it is also part of the Scenic Highway System and **care must be taken to preserve its eligible status.**"
—Department of Transportation website:
http://www.dot.ca.gov/ser/vol1/sec3/community/ch27via/chap27via.htm#scenic

We must also point out that Caltrans submitted the following comment on the DRECP:
"Ensure each energy project considers impact upon officially designated and eligible State Scenic Highways."
—Landscape Architecture website:
http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm

Furthermore, see the California Streets and Highways Code, specifically sections 260, 263, and 263.1:
Section 260. (Added by Stats. 1963, Ch. 1788.) Cite as: Cal. Sts. & High. Code §260.
"It is the intent of the Legislature in designating certain portions of the state highway system as state scenic highways to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special
scenic conservation treatment. It is further declared to be the intent of the Legislature in designating such scenic highways to assign responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate thereto and to indicate, in broad statement terms, the
location and extent of routes and areas requiring continuing and careful co-ordination of planning, design, construction, and regulation of land use and development, by state and local agencies as appropriate, **to protect the social and economic values provided by the State's scenic resources.**

Section 263. (Amended by Stats. 1991, Ch. 775, Sec. 6.) Cite as: Cal. Sts. & High. Code §263.
"The state scenic highway system is hereby established and shall be composed of the highways specified in this article. The highways listed in Sections 263.1 to 263.8, inclusive, are either eligible for designation as state scenic highways or have been so designated...

Section 263.1. (Amended by Stats. 1994, Ch. 1220, Sec. 27.) Cite as: Cal. Sts. & High. Code §263.1.
"The state scenic highway system shall include: Routes 28, 35, 38, 52, 53, 62, 74, 75, 76, 89, 96, 97, 127, 150, 151, 154, 156, 158, 161, 173, 197, 199, 203, 209, 221, 236, 239, 243, **247**, 254, and 330 in their entirety.

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Stagecoach and Calcite Unavoidable Negative Environmental Impacts to Report in the Scenic 247 Corridor

Aside from all the environmental and justice considerations, the EIR for the Stagecoach Solar and Calcite Substation Projects MUST concede the **significant and unavoidable negative impacts** these projects would have on the Scenic Corridor of State Route 247, noting the significant intrusions they would introduce into our Visual Assessment (see below), as well as conflicting with the mission of the California State Lands Commission and the numerous government policies and codes referenced above in these comments.

Tourism The Scenic 247 Committee's campaign for Scenic Highway status dovetails with the County tourism program. Scenic 247 links urban centers and a recreational gold mine in the San Bernardino Mountains and the Mojave Desert.

Scenic Highway designation itself makes a proven magnet for travelers.

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

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

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

Visual Impact The major consideration for development in a Scenic Corridor is Visual Impact, how compatible is it with the character of the area? (Note: Many states and countries treat their rural and wild scenery as a natural resource, which it is). Stagecoach/Calcite are NOT compatible.

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

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

The County and California need revitalizing, not government-imposed depression, not ghost towns. Promises of local jobs from the energy developers never materialize; instead we witness destruction of desert habitat and private property values as the power generated flows to urban use.*

The Scenic 247 corridor is a valuable and irreplaceable resource for conservation. Industrial exploitation cannot coexist in it.

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

* See Appendix: Market Value Impact of Commercial Solar Farms

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Market Value Impact of Commercial Solar Farms and Diversified Solar on Property Values in San Bernardino County

Prepared by John Miller
Residential Real Estate Appraiser
January 07, 2015

… **the industrialization of these communities will be the most likely consequence of the development of these projects**. If left unchecked the market will clarify itself and the residential use of the land surrounding these projects will most likely be minimized if not completely eliminated and the expansion of Commercial Scale solar projects on the land surrounding the existing projects will increase. This will further push residential development and use of the land out of these areas and solidify these areas as Commercial Scale Solar / Industrial Zones **devoid of any and all residential use rural or otherwise.**

Size and footprint of the development

Size and appearance of a new development, in the case of the development of a Community Scale Solar development with a new substation and powerlines, are important in determining the visual impact. As such, the larger a structural feature, the more it is likely to be visible and have a visual impact. The visual impact can also create or change the market perception of a community. For instance, development of a 20 story high rise hotel building in the middle of Yosemite Valley would alter or otherwise change the appeal of the valley for the majority of the market participants. While there is a need for lodging in the Yosemite Valley and every year demand increases, developing the project would diminish the visual appeal of the area and alter the perception of the area as a whole.

While this is a dramatic illustration of the impact that a development can have on a given market as a whole, it demonstrates the fundamental principle that is the basis for considering not only the impact that such a development would have on those properties adjacent to the development but also the impact that such a development has on the neighborhood or local market as a whole.

As evidenced in the development of these projects within several already impacted communities,the ability to mitigate the impact on view is very limited at best.

Valuation Components

1. TYPE OF USERS

Visual sensitivity will vary with the type of users. Recreational sightseers or residents are most likely highly sensitive to any changes in visual quality, whereas workers or other uninterested parties, who pass through the area on a regular basis, may not be as sensitive to change.

2. AMOUNT OF USE

Areas that are seen and utilized by large numbers of people are potentially more sensitive.

Protection of visual values usually becomes more important as the number of viewers increase.

This is evident when evaluating the total number of negative comments when projects are proposed in or near residential neighborhoods as opposed to industrial zones.

3. PUBLIC INTEREST

The visual quality of an area may be of concern to local, State, or National groups. Indicators of this concern are usually expressed in public meetings, letters, newspaper or magazine articles, newsletters, land-use plans, etc. Public controversy created in response to proposed activities that would change the landscape character is therefore considered.

4. ADJACENT LAND USES

The interrelationship with land uses in adjacent lands can affect the visual sensitivity of an area.

For example, an area within the view shed of a residential area may be very sensitive, whereas an area surrounded by commercially developed lands may not be visually sensitive.

5. SPECIAL AREAS

Management objectives for special areas such as Natural Areas, Wilderness Areas or Wilderness Study Areas, Wild and Scenic Rivers, Scenic Areas, Scenic Roads or Trails, and Areas of Critical Environmental Concern (ACEC), frequently require special consideration for the protection of the visual values. This does not necessarily mean that these areas are scenic, but rather that one of the management objectives may be to preserve the natural landscape setting.

Property for sale next to Cascade Solar in Joshua Tree, just as construction began

The management objectives for these areas may be used as a basis for assigning sensitivity levels.

According to this method, visual quality is rated according to the presence and characteristics of seven key components of the landscape. These components include landform, vegetation, water, color, adjacent scenery, scarcity and cultural modifications.

Market Impact Analysis

The Market Impact Analysis is utilized to estimate the impact associated with development of Community Scale Solar projects in residential areas of the Mojave Desert area of San Bernardino County. The opinions and data utilized were developed from interviews with members of impacted communities, data on Land and Homes sales from Local MLs and Title companies, as well as review of previous studies and reports and the experts cited in this report.

IMPACTS

1. What is the risk that development of Community Scale Solar will affect or impact the views or scenic vistas within a Residential Zoned Community?

In my research, I found that the overwhelming majority of residents within the viewshed of the solar projects have a negative opinion of the aesthetic impact associated with a solar farm within the community. The most common response was that the facilities are **blight on the community** or that the projects turn the neighborhood into an industrial zone.

My inspection of several Community Scale Solar developments revealed that the facilities are significantly impactful on the view and appearance of the community if placed proximate residential properties. When appropriately placed proximate existing industrial properties or in areas that are otherwise protected by a topographic, vegetative or other natural feature, the impact is considered to be nominal.

Therefore, based on the research, interviews and inspections, my opinion is that **the impact is Significant**

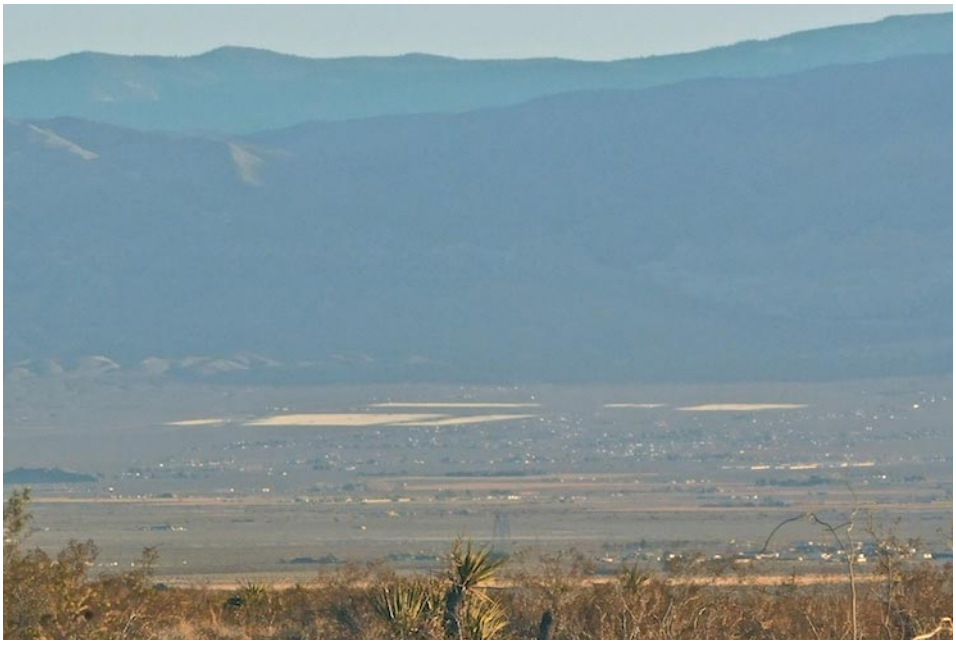
TOPOGRAPHY

Topography is one of the most important factors to siting a solar project, specifically, the position of the project on the slope on which the project sits. This is because the projects that have the most visual exposure to a community typically face the most opposition and are therefore the most likely to impact a potential buyer or seller of impacted property. This was evidenced on several occasions when interviewing homeowners in Lucerne Valley and Yucca Valley. When asked the question, "Do you support or oppose wind and why?" the response was an emphatic "No on Wind". When the respondents were asked why, they inevitably stated "Because it kills my view" or "I don't want to have to look at those ugly things on my hill side."

Conversely when asked the question, "Would you support or oppose a community scale solar project in your area?" the same people stated that they have no problem with solar. When asked why, they almost universally stated "because they don't impact my view" or "they are flat and so I can't see them".

However when asked if they would support a solar project being placed next door, All of the respondents stated "no" or "absolutely not". The fact is that most people on the valley floor looking up at the mountains do not want to have their view altered by wind turbines and most people on the hills or sloped areas do not want to have their view of the valley altered by utility scale solar farms. Therefore, based on the research and interviews my conclusion is, based on the location of the projects at a given point on the slope of the surrounding land, **the impact on property values within the viewshed is Significant** based on its location, and should be considered as it can be either negative or neutral based on the location and mitigation measures.

While the prospects of finding a speculative investor for the 17 parcels of land as residential development land are low, these 17 parcels are going to attract attention as possible future solar farm land. The value of land for this type of development land is significantly higher and as such the owners will be inclined to sell. This will further expand the development of solar in the area and result in the Industrialization of an area that had an intended use of growing agricultural crops and single family residential developments for small farms and ranches as stated in the General plan of San Bernardino County.



Lone Valley industrial solar fields in the community of Lucerne Valley