

Jocelyn Swain
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: Conditional use Permit No. 16-02 (CUSs 16-02a and 16-02b)
Conditional Use Permit No. 16-07

Dear Ms. Swain,

I am an Antelope Acres resident, I live in very close proximity to the above referenced projects, and I strongly oppose the projects, primarily due to the cumulative impacts, which are not being adequately analyzed or addressed. Please rectify the discrepancies located within the Initial Study.

Please enter into the record, the following comments regarding impacts requiring drastically improved mitigation measures, to adequately address the cumulative impacts of utility scale solar:

I. AESTHETICS

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

“The proposed projects would change the visual character of the project sites in that they would replace a total of 414 acres of primarily fallow/disturbed agricultural fields with photovoltaic solar electric generating facilities.”

- Fallow/disturbed agricultural fields in desert areas are known to be prone to wind erosion. On page 35 under section VI.b. of your Initial Study, you state “the project sites are rated as having a “none to slight” risk for soil erosion when cultivated or cleared of vegetation”. That statement is inaccurate, and your findings cannot be based on such information.

“While this would change the character of the existing sites, the proposed projects would be compatible with the other energy uses that have been developed in the western half of Lancaster, specifically those solar facilities immediately south of the project site.”

- This use is only compatible with other ENERGY uses. Normalizing this large scale industrial use without requiring acceptable setbacks from residences and other sensitive receptors must be stopped to protect the health, safety and welfare of the citizens.

“Additionally, high voltage transmission lines run through the area ultimately connecting into the Antelope Substation and as part of the Barren Ridge project.”

- To adequately mitigate, the transmission lines must be addressed as part of cumulative impact reviews for utility scale solar projects through the Antelope Valley.

III AIR QUALITY

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

“The proposed projects, in conjunction with other development as allowed by the General Plan, would result in a cumulative increase in pollutants. However, since the emissions associated with the construction and operation of the proposed projects would be less than significant; their contribution would not be cumulatively considerable.”

- To adequately assess the cumulative effect, the City must include the entire area surrounding the site, not just City land. The site is surrounded by County land, none of which is not addressed in the City’s General Plan. There are numerous County projects that have been approved or are in the pipeline, in addition to those that currently exist. To effectively mitigate, the City must consider all current and upcoming projects, both City and County.

IV. BIOLOGICAL RESOURCES

a-b) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans... ?

- Appropriate mitigation must address the cumulative effect of current and upcoming projects on habitat for identified species throughout the Antelope Valley, on both City and County land. Determining appropriate mitigation measures individually by project fails to adequately address the problem as a whole, which is growing rapidly throughout the Antelope Valley as solar development continues.

- Each of the two Site Surveys were conducted in a single day. There is no mention of the timespan for the survey. If the surveyors failed to record data during the overnight hours, they would be unable to document nocturnal animals such as fox. There are a large number of nocturnal animals in the area.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment... *“Construction of the solar projects throughout the Antelope Valley would lead to a cumulative loss of habitat for a variety of plants and animals. The project sites contain suitable habitat for burrowing owls and other nesting birds. Mitigation measures have been identified to reduce these impacts to a less than significant level.”*

- The mitigation measures are not included in the report. It is mentioned that they have been “identified”, and that the biological impact fee is in addition to the required mitigation measures.

“Additionally, the City requires the payment of a biological impact fee to address the cumulative loss of biological resources within the Antelope Valley. This fee is put in to a separate account which is utilized to acquire conservation habitat.”

- To properly mitigate, the conservation habitat must be located within a short distance of the impacted area to allow displaced animals an opportunity to relocate. Providing habitat for other species in distant locations does absolutely nothing to mitigate the impacts on the individual animals and species that are being displaced by the project.

b) Does the project have impacts that are individually limited, but cumulatively considerable? *“Other solar projects have been approved or are undergoing review in the City of Lancaster and in the unincorporated areas of Los Angeles County. These projects, if constructed, would result in a large number of acres being converted to solar generating facilities which could generate cumulative impacts.”*

- I AGREE. To properly mitigate, the City and County must work together to combine data and maps into documents that adequately addresses the cumulative impacts.
- The Antelope Valley is home to the only major Poppy Reserve in the WORLD. The City of Lancaster benefits from tourism generated by the annual Poppy Festival. As hillsides and fields that were once covered in poppies are replaced by steel and glass, that tourism will dissipate.

The cumulative impact on the overall character and appeal of the once beautiful Antelope Valley is overwhelming, especially for those of us who call Antelope Acres “HOME”.

Thank you for your time.

Sincerely,