



Audubon CALIFORNIA

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September 20, 2011

Regional Planning Commission
County of Los Angeles
c/o: Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

RE: ANTELEOPE VALLEY SOLAR PROJECT

By EMAIL: ahurtell@planning.lacounty.gov
acurzi@planning.lacounty.gov

Dear LA County Regional Planning Commission:

In recognition of the growing threats to human and ecological communities presented by the release of greenhouse gases and the resultant climate change, we have championed the aggressive development of both energy conservation and renewable energy generation to reduce those threats. In locations throughout our state Audubon at the state level, and our chapters at a local level, have successfully collaborated on the development of renewable energy facilities—striking a balance between landscape conservation priorities and renewable energy.

On behalf Audubon California's 150,000 members and supporters, we would like to offer our support for Antelope Valley Solar Project, a large scale solar project proposed in Kern County and Los Angeles County by Renewable Resource Group.

National Audubon Society has recognized Antelope Valley as a *Globally Important Bird Area*^{1,2}. The Important Bird Areas Program, administered by the National Audubon Society in the United States, is part of an international effort to designate and support conservation efforts at sites that provide significant breeding, wintering, or migratory habitats for specific species or concentrations of birds. Sites are designated based on specific and standardized criteria and supporting data.

Antelope Valley was labeled as “globally important” for several reasons. The remnant Joshua Tree Woodland in this area supports one of the farthest-west populations of Le Conte's Thrasher in the state. 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. Fields that receive effluent from local water treatment facilities can support hundreds of White-faced Ibis and shorebirds, and these fields support a group of around 200 Long-billed Curlews in fall and winter.³

¹ National Audubon Society. 2010. <http://iba.audubon.org/iba/viewState.do?state=US-CA>

² National Audubon Society. 2008. Important Bird Areas in the U.S. Available at http://web4.audubon.org/bird/iba/usibac/2009_P8/CA270m_AntelopeValley08.pdf

³ National Audubon Society, 2008. <http://iba.audubon.org/iba/profileReport.do?siteId=270>



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p.2.

Our comments on the DEIR issued by Kern County as Lead Agency included comments on the loss of foraging habitat for Swainson's Hawk as a significant impact on biological resources of the project. In the FEIR, Kern County has required mitigation of 1:1 in the form of conservation easements on agricultural farmland in the Antelope Valley that has been identified by California Department of Fish & Game as foraging habitat for Swainson's Hawk in order to reduce the impacts of the project on Swainson's Hawk to less than significant. We understand that the mitigation measure adopted by Kern County will also serve as mitigation for the Los Angeles County portion of the project. Swainson's Hawk nest and forage in Los Angeles County as well as Kern County in the Antelope Valley. Swainson's Hawk is a listed species under the California Endangered Species Act.

With the adoption and implementation of this and other mitigation measures that reduce the impacts of the project on our birds, and because this project meets our criteria for an environmentally responsible renewable energy project through siting on previously disturbed lands with low conflict with biological resources, near transmission and roads, near the electrical load center, and near cities that need jobs, we can offer our support for the Project and urge the Planning Commission to approve it.

Thank you for consideration of our comments, and for your efforts to meet our Renewable Energy goals in California.

Sincerely,

Garry George
Renewable Energy Project Director
ggeorge@audubon.org
