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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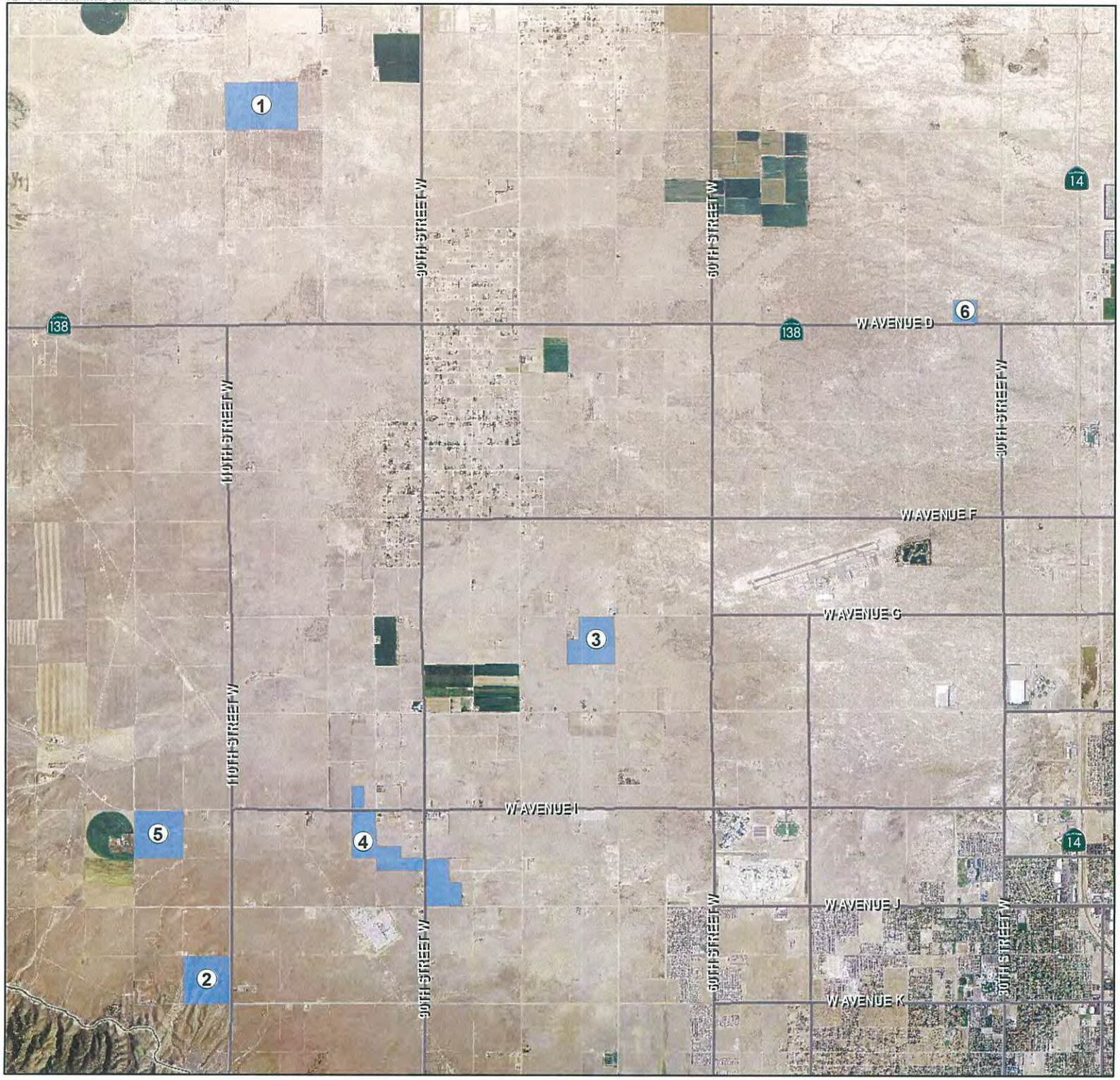
PROJECTS 1-6

ALL PROJECTS COMBINED ITEMS

VICINITY MAP
AND AERIALS
PROJECTS 1-6

Path: R:\GIS\Projects\4136_Silverado\LA_EIR\MasterEIR.mxd



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

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

PROJECT LOCATIONS

TETRA TECH

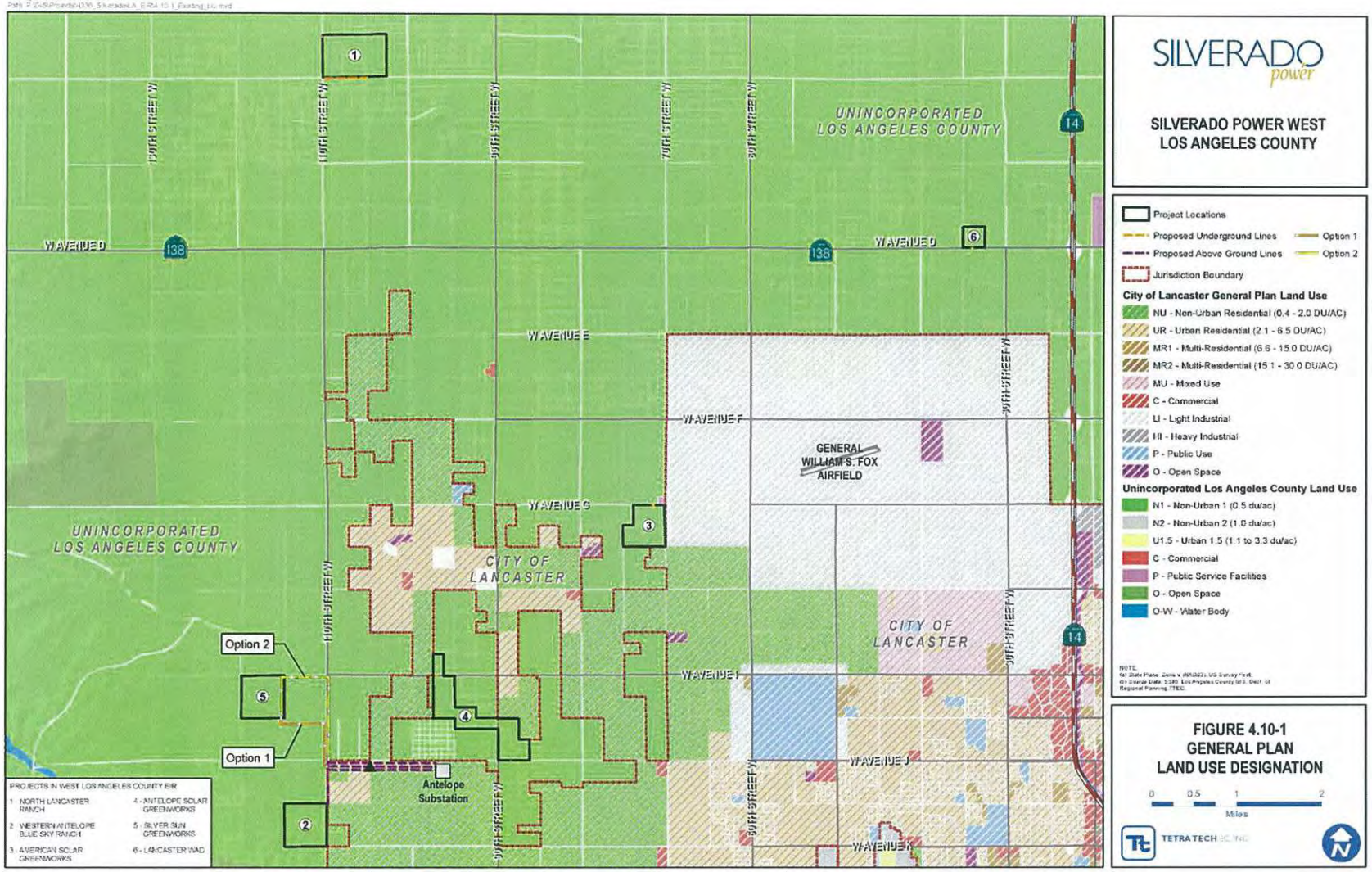
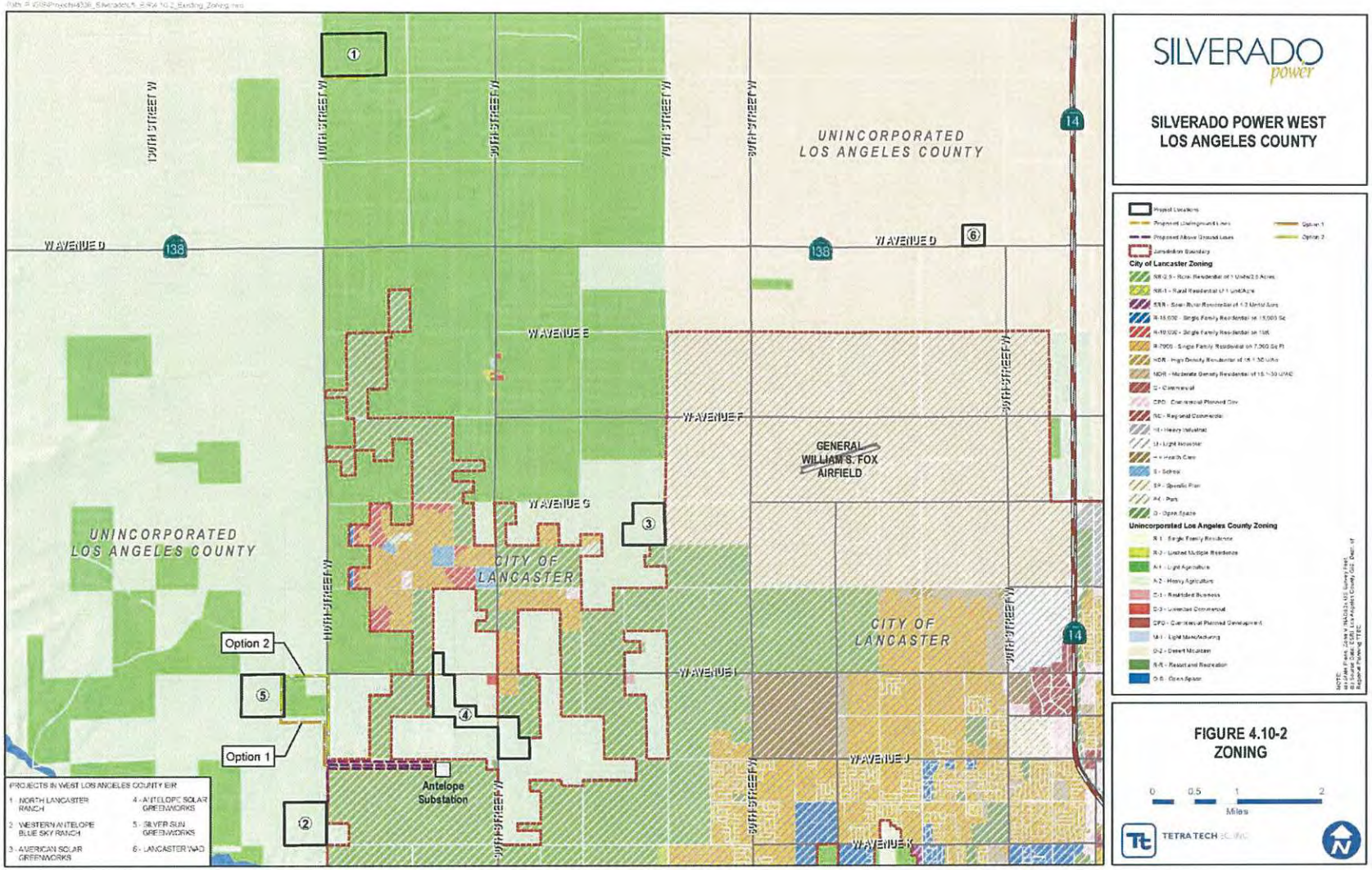


FIGURE 4.10-1
GENERAL PLAN
LAND USE DESIGNATION


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
15TH STREET W
20TH STREET W
25TH STREET W
30TH STREET W
Option 1
Option 2
Antelope
Substation
PROJECTS IN WEST LOS ANGELES COUNTY EIR
1 - NORTH LANCASTER RANCH
2 - WESTERN ANTELOPE BLUE SKY RANCH
3 - AMERICAN SOLAR GREENWORKS
4 - ANTELOPE SOLAR GREENWORKS
5 - SILVER SUN GREENWORKS
6 - LANCASTER NAD
City of Lancaster Zoning
Unincorporated Los Angeles County Zoning
FIGURE 4.10-2
ZONING
0 0.5 1 2
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

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CUP SITE PLANS, ELEVATIONS, AND DIAGRAMS

(Projects 1-6 On Disk)

ENVIRONMENTAL DOCUMENTATION

FEIR (INCLUDING HEARING EXAMINER TRANSCRIPTS), DEIR, CEQA FINDINGS, and MMRP

(Projects 1-6 On Disk and MMRP Hard Copy)

V. MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of project approval and development. The Draft EIR prepared for the Silverado Power West, Los Angeles County Projects identified mitigation measures, where appropriate, to avoid or substantially reduce the environmental impacts associated with the Project. This MMRP is designed to monitor the implementation of those mitigation measures. Accordingly, this MMRP has been prepared in compliance with the requirements of CEQA Section 21081.6 and CEQA Guidelines Section 15097.

This section lists each of the proposed Project Design Features (PDFs) and required Mitigation Measures (MMs) and identifies the corresponding action required for proof of compliance, the mitigation timing, the party responsible for implementation, and the monitoring agency or party responsible for ensuring each measure is adequately implemented.

Mitigation Monitoring and Reporting Program
Silverado Power West, Los Angeles County Projects
Project Nos. R2011-00833, 00798, 00799, 00807, 00801, 00805

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
5.1 AESTHETICS				
A-1 A Fugitive Dust Control Plan to minimize dust (visual pollution) shall be prepared and implemented.	A. Submit Plan to AVAQMD for review and approval	Prior to any ground disturbance activities	Applicant/Construction Manager	LACDRP AVAQMD
	B. Maintain log demonstrating compliance. Site inspection as needed	During construction	Applicant/Construction Manager	AVAQMD
A-2 The Project site shall be maintained free of debris, trash, and waste during construction.	Site inspection	During construction	Applicant	LACDRP
A-3 The Project site shall be visually screened or partially screened during construction by fencing.	A. Submit Site Plans for review and approval	Prior to issuance of applicable building permit	Applicant	LACDRP
	B. Site inspection as needed	During construction	Applicant	LACDRP
A-4 A landscape plan shall be developed for each Project prior to Project construction that shows the detail of a 10-foot wide screening vegetation buffer intended to screen or partially screen the Project visually from area residents or travelers on nearby roadways.	A. Submit landscape plan for review and approval. The landscape plan must be approved prior to grading or building permit.	Prior to 1st grading or building permit whichever comes first for each project.	Applicant	LACDRP/LACFD – support/referral Approval of landscape plan
	B. Implement approved landscape plan	Prior to first energization approval by LADPW B & S	Applicant	LACDRP/LACFD – support/referral Approval of landscape plan
A-5 All lighting shall comply with applicable provisions of the Los Angeles County Outdoor Lighting District Ordinance. Lights shall be limited to types allowed by the ordinance, installed below maximum allowed heights, pointed downwards and shielded to minimize light trespass, and mounted on essential infrastructure rather than on separate light poles except where poles are required by regulation or by governing agency. Lighting will comply with the hours of operation requirements in the ordinance, and utilize automatic control devices to comply with time limits except where permitted by Los Angeles County. Lighting will be maintained in good repair at all times.	Submit final lighting plan for review and approval	Prior to issuance of building permit(s)	Applicant	LACDRP
5.2 AGRICULTURE AND FORESTRY				
No mitigation measures are required for Agriculture and Forestry.	N/A	N/A	N/A	N/A

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
5.3 AIR QUALITY				
AQ-1 Water active sites at least twice daily (locations where soil disturbance is to occur would be thoroughly watered before earthmoving) during construction.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVQMD
AQ-2 All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard in accordance with the requirements of CVC Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).	Site inspection as needed	During construction	Applicant/Construction Manager	LACDRP
AQ-3 All off-road diesel powered construction equipment less than 50 hp shall meet or exceed Tier 2 off-road emission standards. Off-road diesel-powered construction equipment greater than or equal to 50 hp shall meet or exceed Tier 3 off-road emission standards. The construction equipment requirement shall be increased to Tier 4 off-road emission standards by January 1, 2015. Post-January 1, 2015, all off-road diesel-powered construction equipment greater than 50 hp shall meet or exceed Tier 4 off-road emission standards, where available. Verification documentation such as an ongoing log shall be provided to the County of Los Angeles Department of Regional Planning upon request within five business days.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP
AQ-4 During construction, the off-road equipment, vehicles, and trucks shall not be idle more than five minutes in any one hour.	Site inspection as needed	During construction	Applicant/Construction Manager	LACDRP
AQ-5 The off-road construction equipment drivers shall have documented training in operating the equipment efficiently, taking into account ways to reduce the hours of operation of the equipment and/or operate the equipment at a lower load factor.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP
AQ-6 Traffic speeds on all unpaved roads shall be maintained at 15 mph or less.	Site inspection as needed	During construction	Applicant/Construction Manager	AVAQMD LACDRP
AQ-7 During construction, there shall be documented carpools, vanpools, and/or shuttles provided for construction employees.	Submit Transportation Demand Management program for review and approval	Prior to issuance of building permits	Applicant/Construction Manager	LACDRP LACDPW support and referral for trip reduction determination
AQ-8 During array area preparation, mowing shall be used instead of grading and/or disking, and shall be limited to no more than 3.5 acres per day per site to further reduce dust emissions during construction.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP
AQ-9 All interior roads shall use long-lasting non-toxic chemical soil stabilizers designed for long-term dust stabilization on dirt roads.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
AQ-10 Interior array areas shall have re-established pre-existing vegetation or be established with drought tolerant, native, or native compatible vegetation, to the greatest extent feasible, approved by the County biologist and compliant with Fire Department requirements, within two years of energization authorization of an array area by the Department of Public Works, Building and Safety Division, to provide long-term dust stabilization under the arrays.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager/Biologist	LACFD LACDRP
AQ-11 Earth disturbing activities shall be suspended and/or additional water shall be applied to meet Rule 403 criteria if wind gusts exceed 25 miles per hour.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP AVAQMD
AQ-12 Construction activity shall utilize electricity from power poles on or adjacent to the Project sites rather than use of temporary diesel power generators and/or gasoline power generators when electricity with adequate circuit capacity is available from power poles in proximity to construction areas.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
AQ-13 In the event temporary night lighting is necessary for construction or maintenance purposes, lighting not requiring the use of diesel or gasoline driven generators shall be used.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
5.4 BIOLOGICAL RESOURCES				
B-1 Prior to the issuance of a grading permit, a qualified biologist shall be retained by the Applicant as the lead biological monitor subject to the approval of the LACDRP and CDFW. That person shall ensure that impacts to all biological resources are minimized or avoided, and shall conduct (or supervise) pre-grading field surveys for species that may be avoided, affected, or eliminated as a result of grading or any other site preparation activities. The lead biological monitor shall ensure that all surveys are conducted by qualified personnel (e.g. avian biologists for bird surveys, herpetologists for reptile surveys, etc.) and that they possess all necessary permits and memoranda of understanding with the appropriate agencies for the handling of potentially-occurring special-status species. The lead biological monitor shall also ensure that daily monitoring reports (e.g., survey results, protective actions, results of protective actions, adaptive measures, etc.) are prepared, and shall make these monitoring reports available to DRP and CDFW at their request.	A. Retain qualified Biologist(s)	Prior to issuance of Grading Permit	Applicant/Construction Monitor	LACDRP CDFW
	B. Field Surveys	Prior to grading permit	Applicant	LACDRP CDFW
	C. Maintain daily monitoring reports	During Construction	Applicant/Construction Monitor	LACDRP CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
B-2 Pre-Construction surveys will be conducted prior to ground disturbance at each project site. These surveys will include all special-status species identified as having the potential to be present on the project site; including, but not limited to, badger, kit fox, southern grasshopper mouse, and the species listed below. • Pre-survey information gathering will include reviewing of all available agency nest data and mapping. • A focused pre-construction Swainson's hawk survey shall be conducted to locate any nesting sites within 5 miles of Projects 1 – 6. If Swainson's hawks or their active nests are located within 500 feet of the project sites, all construction-related work shall be postponed and CDFW will be consulted. • Project-related activities likely to have the potential of disturbing suitable bird nesting habitat, which includes ground nesting birds, shall be prohibited from February 1 through August 31, unless a qualified monitoring biologist conducts nesting bird surveys prior to any construction-related disturbance to confirm the absence of active bird nests or bird nesting habitat. Disturbance shall be defined as any activity that physically removes or damages vegetation or habitat or any action that may cause disruption of nesting behavior such as loud noise from equipment or artificial night lighting. Surveys shall be conducted weekly, beginning no later than 30 days and ending no earlier than 3 days prior to the commencement of disturbance. If an active bird nest is discovered, disturbance within 500 feet for raptors shall be postponed until the nest is vacated, offspring are independent of the nest area and there is no evidence of further attempts at nesting. Limits of avoidance shall be marked with high-visibility flagging or fencing. The Applicant shall record the results of the recommended protective measures and submit the records to LACDRP and CDFW to document compliance with applicable state and federal laws pertaining to the protection of native birds. • A pre-construction burrowing owl survey shall be conducted on each site prior to grading. Pre-construction surveys for burrowing owl shall be conducted weekly, beginning no later than 30 days and ending no earlier than 3 days prior to the commencement of disturbance. The surveys shall follow the protocols set forth by the California Burrowing Owl Consortium (1993 and 2012). If burrowing owls are found during the pre-construction survey, then replacement burrows and habitat must be provided prior to the commencement of construction. The Applicant shall be prepared to provide artificial replacement burrows in the event that owls are	Pre-construction surveys for special-status species that have been identified as having potential to occur on site	Prior to grading or as specified per species	Applicant	LACDRP CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
detected, either as wintering or breeding individuals. Wintering individuals may be evicted with the use of exclusion devices followed by a period of seven days to ensure that animals have left their burrows. When it can be assured that owls are no longer using the burrows, the burrows can be hand excavated and collapsed under the supervision of the avian biologist. Breeding owls must not be disturbed and must be allowed to complete the raising of young until the fledglings can forage independently of adults and it can be confirmed that further attempts at nesting shall not be undertaken. When this has been confirmed, the owls can be evicted as described above for wintering animals. • Pre-construction surveys shall be conducted for special-status ground-dwelling reptiles, including but not limited to coast horned lizard and northern California legless lizard. Surveys shall be conducted by placing coverboards on the ground 4 to 6 weeks in advance of the survey effort, checking weekly for such species. Any special-status reptiles or other species determined important by the qualified biological monitor (i.e., biologist must be appropriately permitted for collection and relocation activities) occurring within the work area prior to the start of work shall be collected and relocated to areas outside of the designated work zones.				
B-3 During grading, earthmoving activities, and other construction activities the biological monitor shall be present to inspect and enforce all mitigation requirements and to relocate any species that may come into harm's way to an appropriate offsite location of similar habitat. The biological monitor shall be authorized to stop specific grading or construction activities if violations of mitigation measures or any local, state, or federal laws are suspected. The biological monitor shall file a report of the monitoring activities with LACDRP and CDFW. If ongoing biological monitoring of construction activities reveals the presence of any special-status reptiles within an active work area, then work shall be temporarily halted until the animals can be collected and relocated to areas outside of the designated work zones. Work areas shall be surveyed for special-status reptile species, such as the coast horned lizard and northern California legless lizard, during construction activities. During the construction, surveys shall be conducted by placing coverboards on the ground in appropriate work areas and checking them weekly for such species. Any special-status reptiles occurring within the work area shall be collected and relocated to areas outside of the designated work zones.	Biological Monitoring	During construction	Applicant	LACDRP CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
B-4 Mitigation lands shall be acquired for Swainson's hawk, burrowing owl, special-status migratory and wintering birds, and alkali mariposa lily. Swainson's hawk: Impacts due to development of the projects shall be mitigated by the acquisition of good quality Swainson's hawk habitat targeted within the Antelope Valley. Land shall be purchased or placed in a conservation easement or other suitable deed restriction and managed to maintain suitable habitat in perpetuity. The proposed development is not expected to result in the "take" of Swainson's hawk; however, the Applicant shall be required to consult CDFW in the event of take, which may result in additional mitigation prescribed by CDFW. Although the Projects are not expected to result in "take" of Swainson's hawk, mitigation will still be required to alleviate the effects of cumulative impacts on raptor, migratory bird, and burrowing owl habitats: 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 contiguous to occupied nesting and foraging habitat, and is within a designated or proposed Significant Ecological Area (SEA). • A ratio of one acre of replacement land for each 2 acres of development if the replacement land is unoccupied irrigated land, contiguous to occupied habitat and providing superior quality foraging habitat with trees or other such nesting habitat; • A ratio of 1 acre of replacement land for each acre of development if the replacement land provides similar foraging and nesting habitat. Burrowing Owl: Mitigation for any occupied burrowing owl burrows found during pre-construction surveys will include a comprehensive tiered approach: • Pre-construction and construction monitoring surveys conducted by a qualified biologist to detect potential new owl activity onsite; • Disturbance avoidance of occupied burrows during nesting period February 1 – August 31; • Impact avoidance of occupied burrows; • Burrow exclusion and closure and offsite relocation (>100 m), as described previously in in B-2, will be conducted for unavoidable impacts to occupied burrows (after consultation with CDFW). • Minimizing impacts by protecting in-place any owls, their burrows,	A. Acquire mitigation lands for Swainson's Hawk	Prior to 1st either grading or building permits	Applicant	LACDRP CDFW
	B. Acquire mitigation lands for Burrowing Owl	Prior to 1st either grading or building permits	Applicant	LACDRP CDFW
	C. Pre-construction survey for Alkali Mariposa Lilies	Prior to 1st either grading or building permits	Applicant	LACDRP CDFW
	D. If necessary Acquire Alkali Mariposa Mitigation land	Prior to 1st either grading or building permits	Applicant	LACDRP CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
and their immediate habitat by establishing setback zones and visual screens for burrows adjacent to construction activity; by placing visible markers, and by conducting construction worker awareness training. Setback widths will be applied as appropriate to the level of existing disturbance and owl stage of activity (e.g., for low to moderate construction-related disturbance activity outside the nesting season near burrows in currently high-traffic or disturbance areas, it is assumed owls are adapted to human disturbance and will not need a large setback). • Mitigating unavoidable impacts to habitat: restore temporary impacts to pre-existing conditions; replace nesting/occupied and satellite burrows lost with the same number of suitable burrows on the mitigation site. Mitigation acreage for foraging habitat provided for Swainson's hawk will be sufficient to replace lost burrowing owl habitat because the hawk's replacement habitat will be in-kind or better (i.e., the Project habitat is low quality overall and mitigation habitat will be at least the same quality as the lost habitat OR will have higher quality habitat features overall, such as increased vegetative structure, higher numbers of prey species, less disturbance, and less potential for predation by domestic animals, etc.). Specific habitat considerations as provided in the CDFW 2012 burrowing owl guidance will be considered in selecting the overall habitat replacement acres for the project. Alkali Mariposa Lily: Alkali mariposa lily will be avoided to the greatest extent possible. If pre-construction surveys reveal individuals that cannot be avoided, mitigation of lost alkali mariposa lily shall be provided at a minimum 1:1 ratio. This acreage will be calculated with input from LACDRP and CDFW. Additionally, because alkali mariposa Lilies have locally available seed sources, plantings of the lilies on appropriate soil types on Projects shall be implemented in selected areas. The lilies may also be transplanted from areas planned for disturbance to more suitable locations in the Project area. Transplantation locations must be situated within adequately buffered areas to be found suitable. For all species the mitigation acreage may be located within the Project sites, but outside of the area of development, subject to LACDRP and CDFW approval, if acreage of sufficient quantity and quality exists.				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
B-5 Review and Approval of Habitat Management Lands Prior to Acquisition: The Applicant shall provide a mitigation land acquisition proposal to LACDRP and CDFW for their approval before acquiring the property. The proposal shall discuss the suitability of the property by comparing it to the selection criteria. As a part of the preparation of the land acquisition proposal, acreage quantification by habitat category will be developed with LACDRP and CDFW based on the following criteria: Habitat Management Land Selection Criteria: The Applicant must identify the region within which lands shall be acquired, and the type and quality of habitat to be acquired. Detailed criteria and acreage for each habitat category will be developed with Los Angeles County and CDFW. Foraging habitat shall be assessed as 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. Habitat Management Lands Acquisition: Prior to initiating ground-disturbing activities, the Applicant shall provide a proposal to LACDRP and CDFW for off-site mitigation land to be restored, enhanced, or maintained according to the requirements of the biological mitigation measures in this EIR. The proposal will require that mitigation lands identified shall be preserved as open space in perpetuity. Within 45 days of acquiring the mitigation land(s), the Applicant shall record a permanent deed restriction on the mitigation land(s) to be preserved as open space. The deed restriction or conservation easement language shall be submitted to LACDRP and CDFW for review and approval prior to recordation. Alternatively, should a conservation easement on the mitigation land be offered, the permanent conservation easement shall be recorded to the satisfaction of LACDRP and CDFW. The Applicant shall establish a fund sufficient for the restoration, enhancement, and maintenance of the mitigation land(s) until such time when the mitigation land(s) become self-sustaining and until such time as the mitigation land(s) meet the requirements of this mitigation measure. The fund shall be established within 90 days of mitigation land(s) acquisition in an amount acceptable to the LACDRP and CDFW.	A. Obtain approval of habitat management lands	Prior to Acquisition	Applicant	LACDRP CDFW
	B. Record a permanent deed restriction or conservation easement on mitigation land(s)	Within 45 days of acquiring land(s)	Applicant	LACDRP CDFW
	C. Establish fund in the amount acceptable to LACDRP and CDFW for restoration, enhancement, and maintenance of the mitigation lands	Within 90-days of mitigation land(s) acquisition	Applicant	LACDRP CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Land Acquisition Schedule and Financial Assurances: 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 shall provide a proposed date of purchase which coincides with construction of the facility.				
B-6 Prior to alteration of any streambeds, the Applicant shall enter into an agreement with the CDFW, pursuant to Sections 1601 through 1603 of the State Fish and Game Code.	Enter into an agreement with CDFW pursuant to sections 1601 through 1603	Prior to alteration of Streambed	Applicant	CDFW
B-7 Within all interior portions of the site within and adjacent to the proposed solar arrays, re-vegetation shall be accomplished (excluding interior roads as follows: Vegetation seeded in these areas shall comprise locally-sourced, native species if available, or, native compatible as approved by the County biologist if sufficient locally-sourced native seed stock not available, approximating low-growing communities such as native perennial or annual grasslands (i.e., wildflower fields). Shrub species shall not be used due to these species inability to survive continued vegetation trimming. Vegetation shall be maintained in accordance with Los Angeles County Fire Department regulations.	Revegetation of interior site, excluding interior roads	After construction	Applicant	LACDRP
5.5 CULTURAL RESOURCES				
CUL-1 In the event cultural resources are encountered during construction of the Projects, all ground-disturbing activities within the vicinity of the find shall cease and a qualified archaeologist and Native American Monitor shall be notified of the find. The archaeologist, in consultation with the Native American Monirot shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to recordation and excavation of the finds and evaluation and processing of the finds in accordance with § 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood or shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the resources are determined to be unique historic resources as defined under § 15064.5 of the CEQA Guidelines, Mitigation Measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate Mitigation Measures for significant resources could include but not be limited to avoidance or capping,	A. Archaeological monitoring and Native American monitor when there is a find	During earthmoving activities	Applicant/Construction Manager/Qualified Archaeologist	LACDRP NAHC
	B. Maintain log demonstrating compliance	During earthmoving activities	Applicant/Construction Manager/Qualified Archaeologist	LACDRP
	C. Site inspection as needed	During earthmoving activities	Applicant/Construction Manager/Qualified Archaeologist	LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further earthwork shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered because of mitigation will be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study. This Mitigation Measure shall apply to all Projects.				
CUL-2 In the event of an accidental discovery or recognition of any human remains, California State Health and Safety Code § 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to CEQA regulations and PRC § 5097.98. This Mitigation Measure shall apply to all Projects.	A. Archaeological and Native American monitoring	During construction	Applicant/Construction Manager/Qualified Archaeologist/NAHC representative	LACDRP NAHC
	B. Maintain documentation demonstrating compliance	During construction	Applicant/Construction Manager/Qualified Archaeologist	LACDRP
	C. Site inspection as needed	During construction	Applicant/Construction Manager/Qualified Archaeologist	LACDRP
CUL-3 Project 4 construction of gen-tie lines shall maintain the right of way buffer zones prescribed by SCE for this historic electric transmission line resource, which is an active transmission line. This Mitigation Measure shall apply to Project 4 only.	Site inspection as needed	During construction	Applicant/Construction Manager/Qualified Archaeologist	LACDRP
CUL-4 Project construction for Project 4 shall maintain a one acre undisturbed area surrounding the Del Sur Cemetery site. This Mitigation Measure shall apply to Project 4 only.	A. Submit pre-construction surveys	Prior to construction	Applicant/Qualified Archaeologist	LACDRP
	B. Construction monitoring by qualified Archaeologist	During construction	Applicant/Qualified Archaeologist	LACDRP
	C. Submit construction monitoring documentation	Applicant/Qualified Archaeologist	Applicant/Qualified Archaeologist	LACDRP
	D. Site inspection as needed	Applicant/Qualified Archaeologist	Applicant/Qualified Archaeologist	LACDRP
CUL-5 A County approved archaeologist will be retained to initiate and supervise cultural resource monitoring during Project related earthwork in areas of the Project that are within 50 feet from certain significant cultural resources, specifically from the defined perimeter of site CA-LAN-1579H (Project 4). If resources are identified, the procedures outlined in CUL-1 will be followed and/or CUL-2 (as necessary). This Mitigation Measure shall apply to Project 4 only.	A. Archaeological monitoring	During Project related earthmoving activities	Applicant/Construction Manager/Qualified Archaeologist	LACDRP
	B. Maintain log demonstrating compliance	During Project related earthmoving activities	Applicant/Construction Manager/Qualified Archaeologist	LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
PALEO-1: A qualified paleontologist shall be retained by the Applicant prior to excavations reaching 10 feet in depth or greater. A The paleontologist shall develop and execute a Paleontological Resource Mitigation and Monitoring Program and supervise a paleontological monitor whom shall monitor all ground-disturbing activities associated with such excavations. The Program will outline the procedures to follow in regards to paleontological resources (e.g. monitoring protocols, curation, data recovery of fossils, reporting). If fossils are found during such excavation, the paleontological monitor shall be authorized to halt ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment according to the Program.	Paleontological Monitoring	During Project related earthmoving activities	Applicant/Construction Manager/Qualified Paleontologist	LACDRP LAC Natural History Museum support/referral
5.6 GEOLOGY AND SOILS				
No mitigation measures are required for Geology and Soils.	N/A	N/A	N/A	N/A
5.7 GREENHOUSE GAS EMISSIONS				
GHG-1 All off-road diesel powered construction equipment less than 50 hp shall meet or exceed Tier 2 off-road emission standards. Off-road diesel-powered construction equipment greater than or equal to 50 hp shall meet or exceed Tier 3 off-road emission standards. The construction equipment requirement shall be increased to Tier 4 off-road emission standards by January 1, 2015. Post-January 1, 2015, all off-road diesel-powered construction equipment greater than 50 hp shall meet or exceed Tier 4 off-road emission standards, where available. Verification documentation such as an ongoing log shall be provided to the County of Los Angeles Department of Regional Planning upon request within five business days.	A. Submit operating permit(s) as required	Prior to commencement of construction	Applicant	AVAQMD LACDRP
	B. Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP
GHG-2 During construction, the off-road equipment, vehicles, and trucks shall not be idle more than five minutes in any one hour.	Site inspection as needed	During construction	Applicant/Construction Manager	AVAQMD LACDRP
GHG-3 The off-road construction equipment drivers shall have proper training in operating the equipment efficiently, taking into account ways to reduce the hours of operations of the equipment and/or operate the equipment at a lower load factor.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	AVAQMD LACDRP
GHG-4 Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.	Site inspection as needed	During construction and grading	Applicant/Construction Manager	AVAQMD LACDRP
GHG-5 During construction, there shall be documented carpools, vanpools, and/or shuttles provided for construction employees.	Maintain log demonstrating compliance	Prior to Building Permit	Applicant/Construction Manager	AVAQMD LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
5.8 HAZARDS/HAZARDOUS WASTES				
HH-1 Prior to the start of construction activities, a Hazardous Materials Management Plan shall be implemented for each project.	Submit Hazardous Materials Management Plan	Prior to start of construction	Applicant	DTSC
HH-2 Prior to the start of construction activities, a Hazardous Waste Management Plan shall be implemented for each project.	Submit Hazardous Waste Management Plan for each Project	Prior to start of construction	Applicant	DTSC
HH-3 Prior to the start of construction activities on the parcel containing the historic UST at the location of Project 1, a Phase I ESA will be completed. This mitigation measure only applies to Project 1.	Phase I ESA	Prior to issuance of grading permit(s)	Applicant	LACDRP
HH-4 Prior to the start of construction activities, a closure permit for the UST will be verified or obtained from the Los Angeles County Fire Department, Health Hazardous Materials Division. This mitigation measure only applies to Project 1.	Closure permit or verification for UST – Project 1 site	Prior to issuance of grading permit(s)	Applicant	LACFD
HH-5 Construction activities shall be halted if previously unidentified soil contamination is observed or indicated by testing during any earthwork activities. Construction will be halted or redirected until such soil contamination is evaluated and disposed of and/or treated	Testing of soil contamination	Prior to start of construction	Applicant	DTSC LACDRP
5.9 HYDROLOGY/WATER QUALITY				
Construction				
HYDRO-1 Education and training for Property Owners, Tenants, Occupants and Employees. Appropriate educational materials and training for preventing stormwater pollution and additional BMP Fact Sheets from the California Stormwater Best Management Practice Handbooks can be found at www.cabmphandbooks.com. Practical information material will be provided to employees on general good housekeeping practices. These materials will describe, but are not limited to, spill prevention and control and the use of chemicals, petroleum products, pesticides and fertilizers that should be limited to the property, with no discharge of wastes directly or indirectly to gutters, catch basins or the storm drain system. Information will be distributed directly to the employees as well as being posted in public areas. This Mitigation Measure shall be implemented at Projects 1 – 6 for the entire duration of construction activities. The required materials shall be available at each project site and a log kept to show education has occurred prior to the start of construction.	Maintain log demonstrating compliance of Educational materials and training for Property Owners, Tenants, Occupants, and Employee	During Construction	Applicant	LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
HYDRO-2 A spill contingency plan will be prepared by the owner/building operator. As a minimum the Spill Contingency Plan will "mandate the stockpiling of cleanup materials, notification of responsible agencies, disposal of cleanup materials and documentation." This Mitigation Measure shall be implemented at Projects 1 – 6 for the entire duration of construction activities.	Submit spill contingency plan	Prior to grading permit	Applicant	LACDRP
HYDRO-3 No hazardous materials are anticipated to be stored on-site. If deemed otherwise, a designated representative of the owner shall provide information to the Fire Authority in accordance with requirements of the Health & Safety Code. This Mitigation Measure shall be implemented at Projects 1 – 6 for the entire duration of construction activities.	Maintain log demonstrating compliance	During construction and operations	Applicant/Construction Manager	LACFD
HYDRO-4 A designated representative of the owner shall provide information to the Fire Authority in compliance of the current requirements of the County of Los Angeles Fire Code. This Mitigation Measure shall be implemented at Projects 1 – 6 for the entire duration of construction activities.	Submit all applicable information	Prior to grading permit	Applicant	LACFD
Operation				
HYDRO-5 Site waste receptacles shall be emptied on a weekly basis or more often if containers approach overflowing. Upon inspection any debris or rubbish will be picked up and the site cleaned. The trash area/room is NOT to be cleaned by hosing down. The type of materials used to clean the area and storage of said materials will be determined by the Contractor. Signage will be posted that lids shall be kept closed at all times. This Mitigation Measure shall be implemented at Projects 1 – 6 at all times during facility operations.	A. Include waste collection and disposal methods in construction contract specifications	During operation	Applicant	LACSD LACDRP
	B. Maintain log demonstrating compliance	During operation	Applicant	LACSD LACDRP
5.10 LAND USE AND PLANNING				
No mitigation measures are required for Land Use and Planning	N/A	N/A	N/A	N/A
5.11 NOISE				
N-1 Construction operations would not occur between 7:00 p.m. and 7:00 a.m. on weekdays or Saturday, or at any time on Sunday with the exception of limited low-noise generating potential night work with Los Angeles County Department of Regional Planning and Public Works approval.	Maintain log of construction equipment arrivals and exit times demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
N-2 Construction site and access road maximum speed limit of 15 miles per hour shall be established and enforced during the construction period.	Site inspection as needed	During construction	Applicant/Construction Manager	LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
N-3 Electrically-powered equipment shall be used instead of pneumatic or internal combustion powered equipment, except for devices like trucks, loaders, dozers, and other heavy equipment.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
N-4 Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable, and no closer than 1,000 feet, from noise-sensitive receptors.	A. Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
	B. Inclusion of requirement for a Noise Control Plan	During construction	Applicant/Construction Manager	LACDRP LACDPH – Health Officer for referral
N-5 The use of noise-producing signals, including horns, whistles, alarms, and bells are prohibited except where required by OSHA or for safety or emergency warning purposes required by other regulatory agencies.	Site inspection as needed	During construction	Applicant/Construction Manager	LACDRP
N-6 Project-related public address or music systems used on-site shall not be audible at any adjacent receptor.	Site inspection as needed	During construction	Applicant/Construction Manager	LACDRP LACDPH – Health Officer for referral
N-7 All noise-producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specifications which are in compliance with any applicable legally required equipment noise standards. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and/or other noise control features that are readily available for that type of equipment. Mobile sound barriers with a sound transmission class of 19 or greater will be used for pile driving on Projects where received sound levels at the nearest NSR are predicted to be above the County construction noise limit of 60 dBA during the day.	A. Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP LACDPH – Health Officer for referral
	B. Site inspection as needed	During Construction	Applicant/Construction Manager	LACDRP
With respect to mitigation during operation, potential impacts associated with on-site substations are considered. Depending on the Project's acoustic design goals, final substation design may incorporate appropriate mitigation measures, including: **N-8** Siting substations to achieve NEMA sound ratings at sensitive receptors as described in Section 4.11.5.2 not to be closer to the property line of sensitive receptors than the following distances for each individual project: • Project 1 – 325 feet with a NEMA sound rating of 74 dBA • Project 2 – 1,511 feet with a NEMA sound rating of 81 dBA • Project 3 – 650 feet with a NEMA sound rating of 74 dBA	A. Submit acoustical report demonstrating substation design compliance with applicable noise standards	Prior to issuance of relevant building permit(s)	Applicant	LACDRP LACDPH Health Officer
	B. Construct structures in compliance with noise limit requirements of applicable County codes.	During construction	Applicant/Construction Manager	LACDRP LACDPH
	C. Submit post-construction noise measurements verifying compliance upon request	Prior to issuance of certificate of occupancy	Applicant	LACDRP LACDPH Health Officer – for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
• Project 4 (two transformers) – 1,000 feet with a NEMA sound rating of 77 dBA • Project 5 – 748 feet with a NEMA sound rating of 82 dBA				
With respect to mitigation during operation, potential impacts associated with on-site substations are considered. Depending on the Project's acoustic design goals, final substation design may incorporate appropriate mitigation measures, including: **N-9** The Applicant shall choose to use NEMA low noise rated transformer equipment which will achieve 10 dBA or greater noise reduction as compared to standard NEMA-rated transformers of a similar size and rated capacity to ensure that Project noise impacts would be less than significant.	A. Submit acoustical report demonstrating substation design compliance with applicable noise standards	Prior to issuance of relevant building permit(s)	Applicant	LACDRP LACDPH Health Officer
	B. Construct structures in compliance with noise limit requirements of applicable County codes.	During construction	Applicant/Construction Manager	LACDRP LACDPH
	C. Submit post-construction noise measurements verifying compliance upon request	Prior to issuance of certificate of occupancy	Applicant	LACDRP LACDPH Health Officer – for support/referral
5.12 PUBLIC SERVICES				
No mitigation measures are required for Public Services	N/A	N/A	N/A	N/A
5.13 TRANSPORTATION/TRAFFIC				
TT-1 Prior to issuance of first grading or building permit, Applicant shall document and submit all required information and/or material pertaining to the pavement conditions of construction routes for the Projects, including the formula for calculation of the Projects' fair share of any repair or reconstruction of construction routes to the satisfaction of LACDPW. Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of construction routes attributable to the Projects as agreed to by LACDPW. The timing of any necessary repairs and/or reconstruction of construction routes and the required payment by the Applicant shall be determined by LACDPW.	Submit Projects' road survey	Prior to issuance of first grading or building permit	Applicant	LACDPW
TT-2 The County, including LACFD Fire Stations 78 (for R2011-00801) and 130 (for R2011-00798, 00799, 00805,00807, & 00833) shall be notified at least three days in advance of any street closures that may affect fire and/or paramedic responses in the area. The Applicant shall provide alternate route (detour) plans to the County, including three sets to LACFD, with a tentative schedule of planned closures, prior to the beginning of construction.	Provide street closure notifications	Three days prior to any street closures impacting fire and/or paramedics	Applicant/Construction Manager	LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
TT-3 Stagger construction work shifts before or after peak traffic hours.	A. Maintain log demonstrating compliance	During construction	Applicant	LACDRP LACDPH Health Officer – for support referral Caltrans
	B. Site inspection as needed	During construction	Applicant	LACDRP LACDPH Health Officer – for support referral Caltrans
TT-4 Schedule truck deliveries during off peak hours.	Maintain log of truck arrivals and exit times demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
TT-5 Limit water truck deliveries during the AM peak hour to 30 percent of the daily water truck trips.	Maintain log of truck arrivals and exit times demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
TT-6 Encourage carpooling between construction works.	Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	LACDRP
5.14 UTILITIES				
No mitigation measures are required for Utilities.	N/A	N/A	N/A	N/A
List of Acronyms: B & S – building and safety BMP – Best Management Practice CEQA – California Environmental Quality Act CASQA – California Association of Stormwater Quality Agencies CBC – California Building Code CDFW – California Department of Fish and Wildlife CUP – Conditional Use Permit CVC – California Vehicle Code dBA – decibels (acoustics) DPR – Department of Parks and Recreation ESA – Environmental Site Assessment hp – Horsepower LACDPW – Los Angeles County Department of Public Works LACFD – Los Angeles County Fire Department mph – miles per hour NEMA – National Electrical Manufacturers Association OSHA – Occupational Safety and Health Administration PRC – Public Resources Code ROW – Right of Way				

SCE – Southern California Edison SWPPP – Stormwater Pollution Prevention Plan UFC – Uniform Fire Code UST – Underground Storage Tank WATCH – Work Area Traffic Control Handbook LACDPH – Los Angeles County Department of Public Health LACSD – Los Angeles County Sanitation District				

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 6oth 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 <u>minimum</u> 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 <u>observed within the last three years</u> (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
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, lac; ANTONOVICH, Michael, lac; 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

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.

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)-947-4876

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.

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

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.

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: Margaret Rhyne [m.rhyne@verizon.net]
Sent: Tuesday, April 15, 2014 9:38 AM
To: Kim Szalay; DRP Special Projects
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- **Postponement of May 7 Hearing**
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- **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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Sent: Tuesday, April 15, 2014 9:16 AM
To: S Z
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Sincerely,

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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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)

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R2011-00807-(5), R2011-00801-(5), R2011-00805-(5); Conditional Use Permit Nos. 201100079, 201100070, 201100071,
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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.

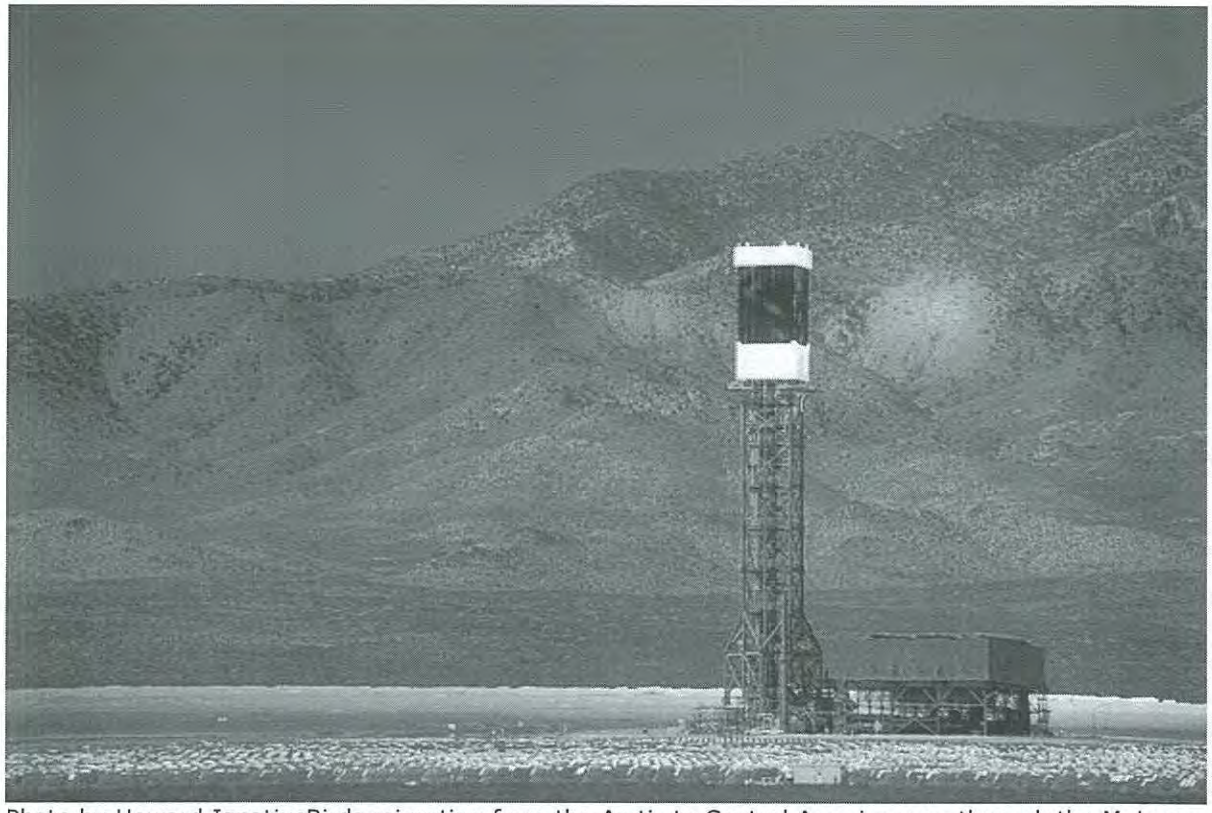


Photo by Howard IgnatiusBirds migrating from the Arctic to Central America pass through the Mojave: Ivanpah could conceivably depress bird populations across half a continent.

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 & 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 D 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, 68 ravens, rabbits, coveys of quail, a gopher and a hawk, and a half dozen owls come & go. You and D 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 solar 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-~~04~~
(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.

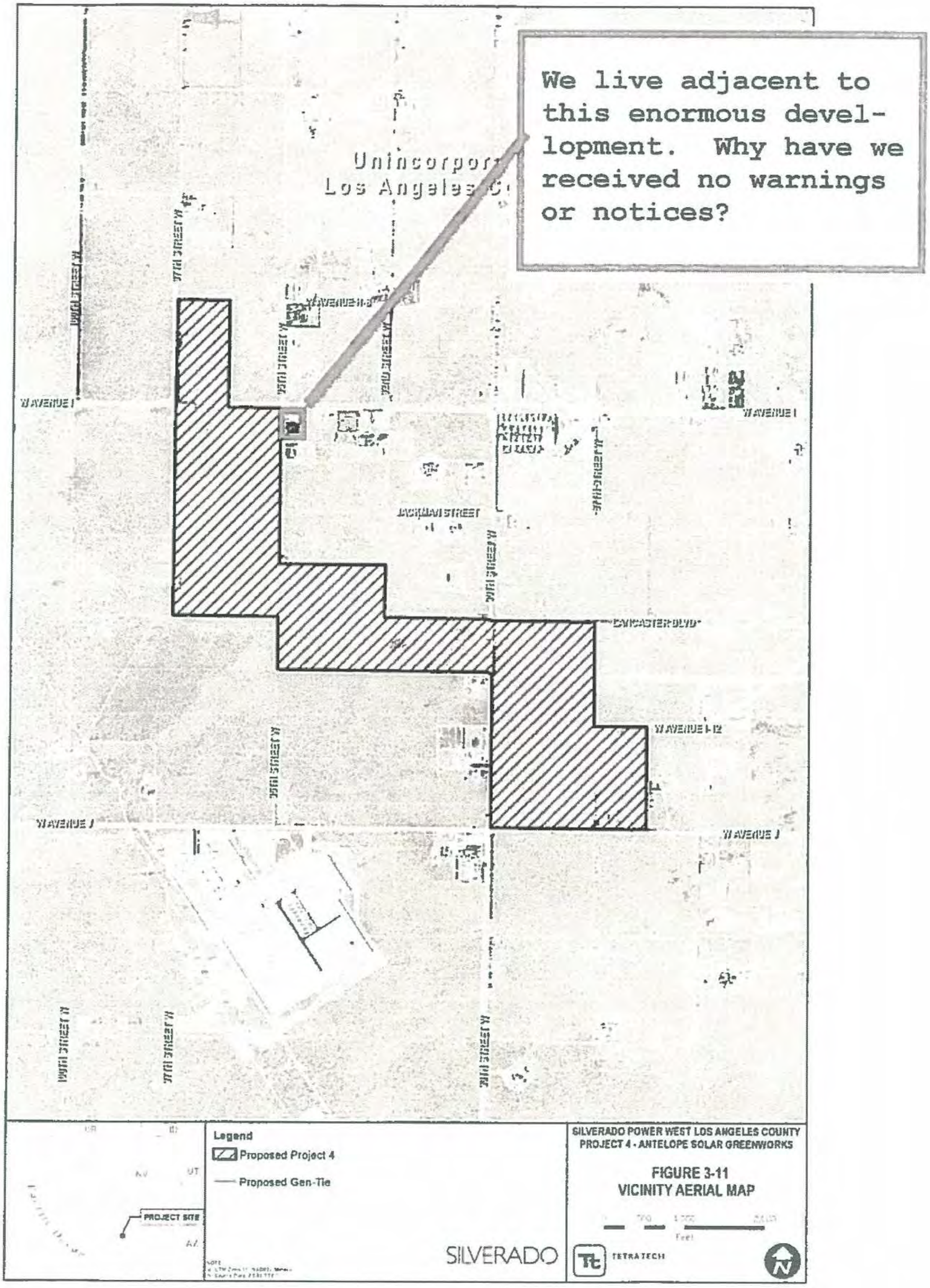
Do you favor or oppose this "Silverado" solar project? Are you confident that developers and regulators are following the rules to notify residents of their plans? We feel sorely abused. Do you have any advice for us? Is this a done deal?

Many thanks,

Bernie Walp

Elizabeth Bryan

encl: map


We live adjacent to this enormous devel-lopment. Why have we received no warnings or notices?
W AVENUE I
W AVENUE I
JACKMAN STREET
LANCASTER BLVD
W AVENUE I-12
W AVENUE J
W AVENUE J
PROJECT SITE
Legend
Proposed Project 4
Proposed Gen-Tie
SILVERADO
SILVERADO POWER WEST LOS ANGELES COUNTY
PROJECT 4 - ANTELOPE SOLAR GREENWORKS
FIGURE 3-11
VICINITY AERIAL MAP
Feet
TETRATECH

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?

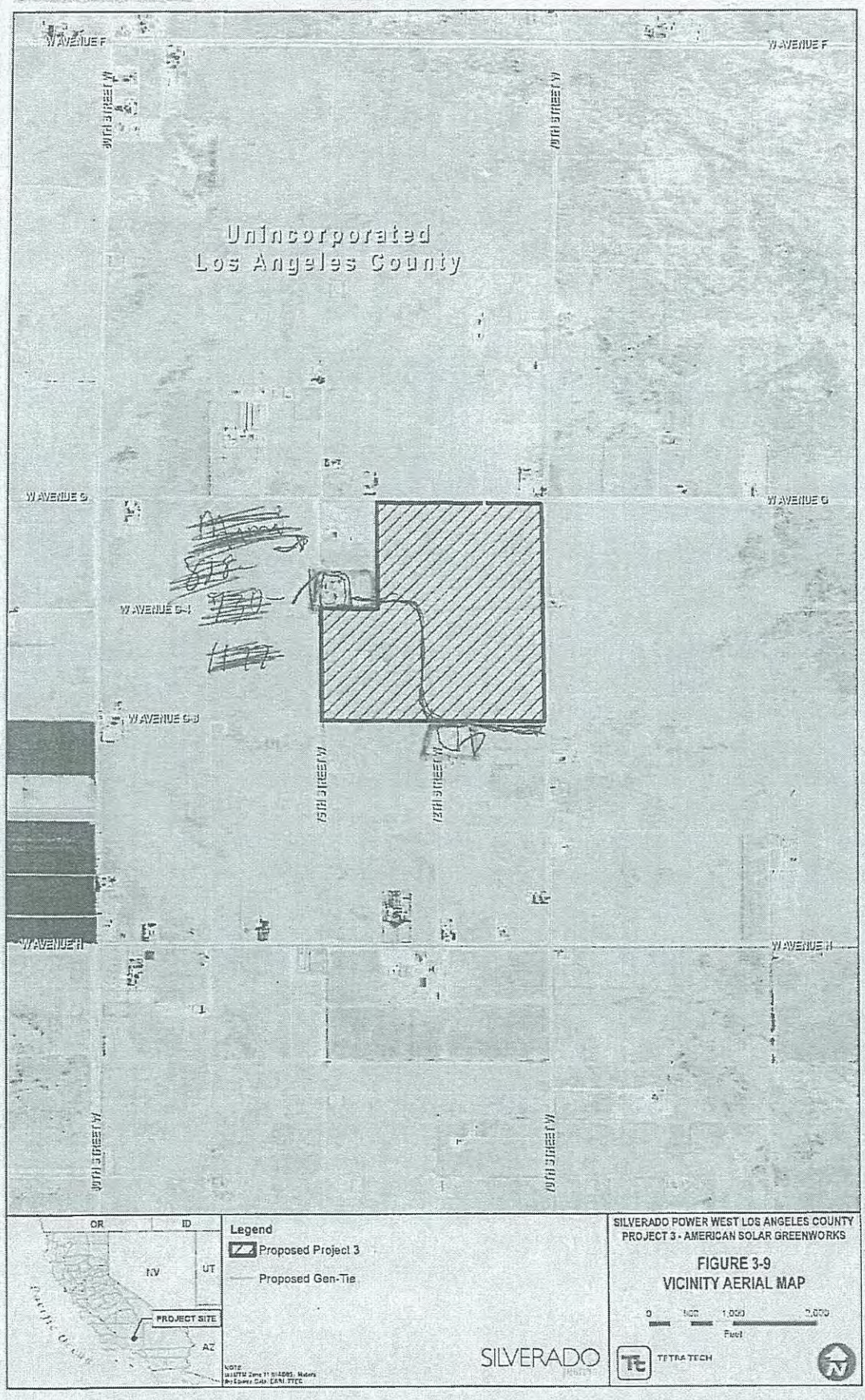
3. How specifically will the current road that is 72nd St. W. and it's current access to G-4 be addressed when demolished and removed?

*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 F
10TH STREET W
10TH STREET W
Unincorporated
Los Angeles County
W AVENUE G
W AVENUE G
W AVENUE G-1
W AVENUE G-2
15TH STREET W
12TH STREET W
W AVENUE H
W AVENUE H
10TH STREET W
10TH STREET W
OR
ID
NV
UT
AZ
PROJECT SITE
Legend
Proposed Project 3
Proposed Gen-Tie
SILVERADO
TETRA TECH
SILVERADO POWER WEST LOS ANGELES COUNTY
PROJECT 3 - AMERICAN SOLAR GREENWORKS
FIGURE 3-9
VICINITY AERIAL MAP
Feet

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:

<u>Aesthetics</u>

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

APPLICANT'S OUTREACH (Projects 1-6)

SILVERADO power

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

	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** Silverado provided letter with information on area projects. **September 13, 2011** Silverado met with Superintendent and District representatives. **May 16, 2012** Silverado met with Del Sur School Principal. **August 20, 2012** 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** Silverado met with District members to discuss projects. **August 6, 2012** Silverado provided update, answered additional questions. **January 9, 2014** Silverado met with District members to provide update. **January 15, 2014** Silverado met with the Lancaster Cemetery District Board to discuss preservation memorandum. **February 18, 2014** 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** Met with GAVEA board to describe projects. **August 13, 2012** Silverado presented to GAVEA. **April 19, 2012** Silverado gave update presentation to board. **July 19, 2012** 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** Silverado met with Chamber to introduce projects. **November 28, 2012** 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.

SILVERADO power

	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.