

April 25, 2022

**Via e-mail (Jim.Morrissey@lus.sbcounty.gov)**

Mr. Jim Morrissey  
Contract Planner  
San Bernardino County Land Use  
Planning Dept.  
385 N. Arrowhead Ave.  
San Bernardino, CA 92415-0110

**Re: Project Notice (PROJ-2-22-00013) for a 1,932-Acre, 500 MW Utility-Scale Solar Facility in Lucerne Valley**

Dear Mr. Morrissey:

According to 8Minute, the new Sienna Solar project (“Sienna 2”) is merely a relocation of the original Sienna Solar project (“Sienna 1”), so it is supposedly grandfathered in past Policy 4.10’s ban on new utility-scale projects in Lucerne Valley. Board of Supervisors Resolution No. 2019 -17 (which adopted Policy 4.10) states that utility-scale applications that had “been accepted as complete” may “be relocated to other sites under the same policies and regulations.” But Sienna 2 differs so much in size, scope and configuration from Sienna 1 that the former cannot not be considered as a relocation or the latter. In point of fact, Sienna 1 is a new project explicitly barred by Policy 4.10, which prohibits new utility-scale renewable energy projects in Lucerne Valley.

At 1,932 acres, Sienna 1 would be a lot bigger than Sienna 1. 8Minute’s attached figure shows a “Former Sienna Project” – meaning Sienna 1 – that, according to our calculations, comprises 1,390 acres. (And, as noted below, the project footprint of Sienna 2 is actually much bigger than 1,932 acres.)

Sienna 2 would have an output capacity of 500 MW, while Sienna 1 was planned to have an output of up to 450 MW.

The parcels making up Sienna 2 would also have a much different configuration than those comprising Sienna 1, and hence Sienna 2 would inflict more damage than Sienna 1 on the area’s human and natural communities. Sienna 1 centered on two main assemblages of connected and contiguous parcels, while Sienna 2’s parcels would be arrayed in a sprawling, roughly circular pattern that would effectively degrade a much larger area than would Sienna 1,

which would include the large interstitial area encircled by Sienna 2's parcels. Among other things, that interstitial area would have to be crisscrossed with transmission lines and connecting roads, and the land within it would become effectively off-limits to human and natural communities. Hence the true project footprint of Sienna 2 is much larger than 1,932 acres.

If a project that was pending when Policy 4.10 was adopted could be moved to a different location, greatly increased in size and scope, while being completely reconfigured, and still be grandfathered in past Policy 4.10, that would allow developers to make end-runs around Policy 4.10. That would go against everything that the RECE stands for, which makes protection of communities and the environment its first priority. RECE RE Goal 4 (and Objective 4.1) calls for a "new era" of sustainable energy production that "will be compatible with the natural environment and the integrity of unincorporated communities." The RECE's preamble to Goal 4 emphasizes the negative effects that renewable energy development can have on "plant and animal species and their habitats, paleontological resources, artifacts and relics with cultural or historic significance, or critical natural resources such as groundwater." The preamble also mentions that some desert soils are "particularly sensitive" and that there are local concerns "that dust from development may lead to health problems."

Our Board of Supervisors adopted Policy 4.10 because it determined that utility-scale wasn't compatible with Rural Living and Community Plan areas like Lucerne Valley. The only reason that grandfathering is allowed is because the Board of Supervisors didn't want to take away rights of developers who had utility-scale projects under review at the time that Policy 4.10 was adopted. These rights pertain to the projects as described in their CUP applications.

Thanks for the opportunity to comment on the proposed project.

Very truly yours,

BRIAN HAMMER  
Analyst and Adjunct Professor (owner of  
home in Lucerne Valley)

SUSAN HAMMER  
(Owner of home in Lucerne Valley)

MORONGO BASIN CONSERVATION  
ASSOCIATION

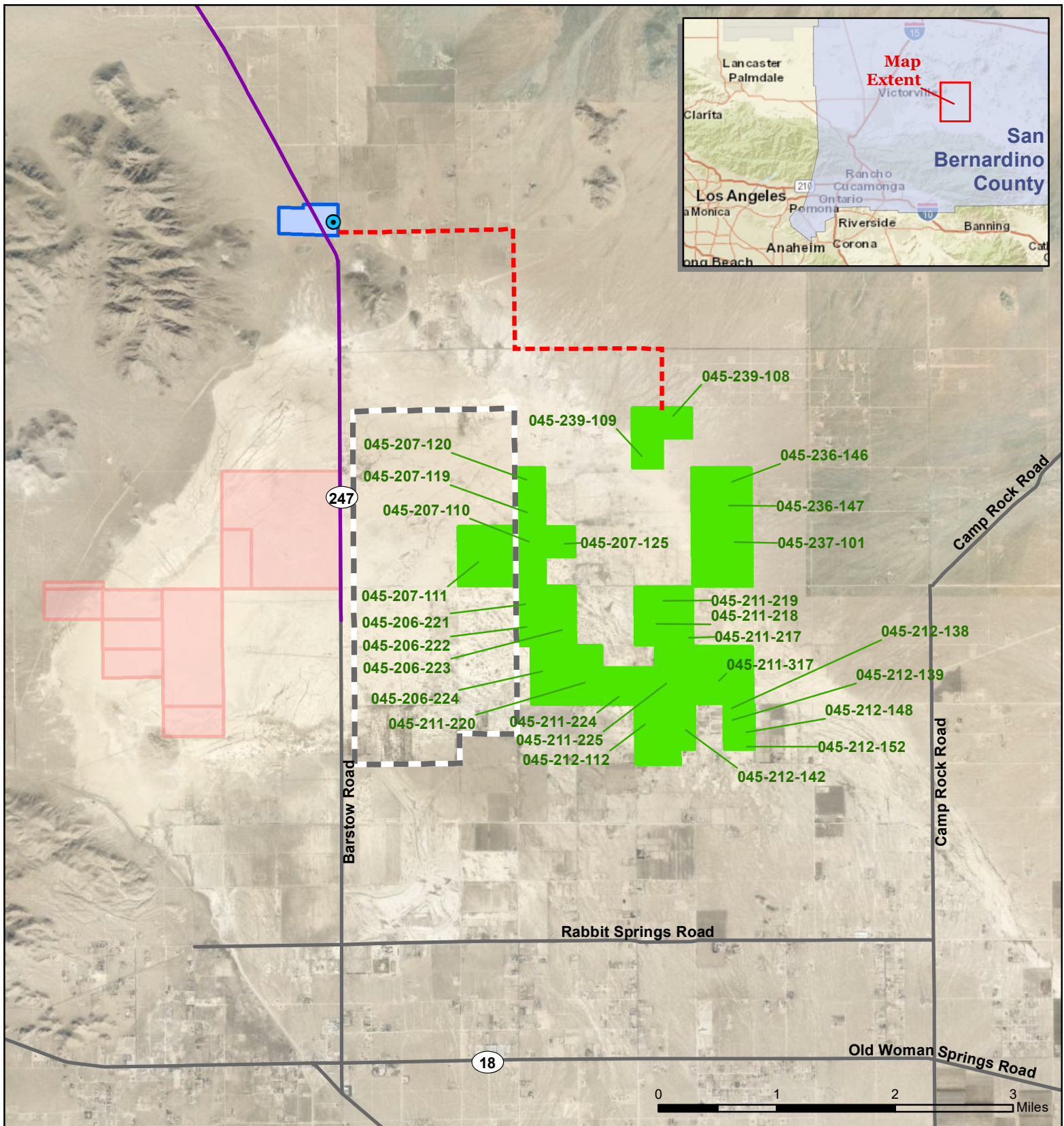
MOJAVE COMMUNITIES  
CONSERVATION COLLABORATIVE

Steve Bardwell, President

Lorrie L. Steely, Founder

Attachment

cc: Board of Supervisors for  
San Bernardino County



## Sienna Solar Farm

San Bernardino County, CA



- Point of Interconnection
- Anticipated Gen-Tie Line Alignment
- Proposed State Scenic Highway 247 Segment A
- Approximate Location of Preferred Solar Development Area

- Former Sienna Project
- Current Sienna Project
- Proposed Southern California Edison (SCE) Calcite Substation Location

