

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



October 29, 2012

Carolina Blengini  
County of Los Angeles  
Regional Planning Department  
Special Projects Section, Room 1362  
320 West Temple Street  
Los Angeles, California 90012

**Pre-Draft Environmental Impact Report Comments  
Silverado Power West Photovoltaic Project  
Environmental Review No. ENV201100109**

Dear Ms. Blengini:

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor Zone. The Rim of the Valley Trail Corridor zone extends into the Sierra Pelona Mountain range. The six proposed project sites (747.1 acres) for solar facilities are located along the northern toe of the Sierra Pelona range.

The ecological viability of the Sierra Pelona Range has a direct bearing on the ecological capacity of the Rim of the Valley Trail Corridor Zone. The Conservancy has consistently commented on every green energy project proposed along the northern flank of this mountain range. The four proposed project located south of Highway 138 are of the greatest concern to this agency. The Conservancy is a constituent entity in the Desert and Mountain Conservation Authority (DMCA) joint powers authority, which most probably will comment on the Draft Environmental Impact Report (DEIR).

A core objective of the Conservancy's comments on green energy projects in these areas has been to provide permanent habitat linkages through every project. The onsite location of each permanent habitat linkage must take into account where probable connections will be with adjacent properties get developed. Ideally the permanent preservation of the highest quality onsite habitat can tie in with onsite land permanently set aside for wildlife movement.

The ability to project where adjacent development will occur requires educated guesses. Terrain, water courses, easements, utilities, and zoning can all improve the accuracy of such projections. The DEIR include such analyses to adequately address potential biological impacts related to habitat connectivity. Such projections and analyses should also take into

account how each of the six subject development parcels can contribute to maintaining habitat linkages to existing public open space land. The prime example is to prevent the isolation of the Antelope Valley Poppy Preserve.

The Conservancy urges the County to set the tone with all projects to require the permanent set aside of a contiguous band of property from one property boundary to the other. A minimum ten percent set aside of one contiguous open space area that spans every project width or length is critical to maintain biological connectivity in the Antelope Valley and between the Antelope Valley and the Sierra Pelona range. The minimum width of any point on such habitat linkages cannot be less than 75 feet. The minimum ten percent set aside area cannot have any fencing other than three-rail post and rail fencing in order to adequately convey wildlife. It also must be free of all lighting and roads, except where an access road must cross the habitat in a near-perpendicular manner.

The set aside of land allow for the orderly creation of habitat linkages and allow conservation agencies to purchase land that enhances such wildlife corridors. In addition the viewshed impacts of project will be reduced. The requested zone changes from light agricultural to heavy agricultural warrant the permanent protection on each property.

Ideally every applicant would voluntarily accept the condition of a conservation easement on the minimum ten percent set aside in favor of a government agency. Only through a conservation easement can there be adequate longterm land protection. If that is not the case, and the County's only option is a recorded deed restriction, then the minimum set aside should be approximately fifteen percent of the property within one contiguous area.

Projects that accept a permanent condition not to fence other flanks of their fields of arrays should receive some type of development benefits not injurious to the environment.

Projects that provide an up front monitoring and maintenance fund greater than \$50,000 to conservation easement holders should also receive some type of extra development benefits.

Fallow and abandoned agricultural land in the Antelope Valley retains excellent habitat linkage potential that can only improve with the slow natural recovery of native vegetation.

The height of photovoltaic arrays can make a great difference in their visual impact potential. We urge the use of the lowest style type array for all projects south a line located one quarter mile north of Highway 138.

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The obvious conservation easement holders are DMCA or the Mountains Recreation and Conservation Authority (MRCA). The easement holder must be a public agency accountable to the public.

Please address any future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address, by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov) and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson