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Serving the Antelope-Fremont Valleys and Upper Santa Clara River Watersheds

July 6, 2011

Department of Regional Planning  
County of Los Angeles

re: AV Solar Ranch I, First Solar

Ladies and Gentlemen:

Antelope Valley Conservancy wishes to express our deep concern about the AV Solar Ranch project site fire that burned over 70 acres on July 2, and the use of unauthorized entities to negotiate and oversee mitigation for the project.

The AV Solar Ranch project site is located over 24 miles from the nearest Los Angeles County Fire Station. In remote western Antelope Valley locations, the Conditional Use Permits and Mitigation Plans should require fire trucks on site, at the developers' cost, whenever workers are present and until a Certificate of Occupancy is issued. ***If this was not required by the Mitigation Plan, we respectfully request that it be required now.*** These wild lands are state and national treasures that sustain a variety of species, including threatened native bee populations that pollinate 35 to 39 percent of \$1 billion agricultural industry. They must be stewarded accordingly.

Second, local and national news sources have reported that the conservancy chosen to hold mitigation lands at the AV Solar Ranch I project was actually chosen by the Antelope Acres Town Council. As we have discussed with DRP personnel, and delineated in our recent letter, lead agencies are legally responsible to ensure integrity in mitigation stewardship and cannot delegate the negotiation and/or stewardship of mitigation to third-party entities that have not undergone due diligence to ensure their ability to oversee environmental compliance with integrity, including compliance with all laws. In addition to conflicts of interest with the Antelope Acres Town Council and CA State Parks Poppy Reserve personnel, neither the Desert Mountain Conservation Authority nor Mountains Recreation Conservation Authority appear to have undergone any due diligence review by Los Angeles County, and neither holds Authorization from the Department of Fish and Game to hold mitigation lands. ***Therefore, we respectfully request the mitigation for the AV Solar project be delegated to an Authorized entity (such as State Parks Foundation, Center for Natural Lands Management, Antelope Valley Conservancy, et al.) and we request the County to ensure the sufficiency of the mitigation endowment via a Property Analysis Record (PAR) Valuation and confirm its payment in full before the project is allowed to proceed.***

Antelope Valley Conservancy supports properly sited and managed development, and appreciates the learning curve involved in fast-tracking renewable energy projects. We would appreciate your time in responding to these requests.

Respectfully Submitted,  
Board of Directors, Antelope Valley Conservancy  
By Wendy Reed, President