## Santa Barbara Audubon Society, Inc.



A Chapter of the National Audubon Society

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October 2, 2014

To: Santa Barbara County Supervisors, Planning Commissioners, and Energy Division Staff

Subject: Santa Barbara County Can and Should Do Better on Solar Project Vegetation

Santa Barbara County requirements for vegetation of the Cuyama Solar Project are much weaker than what other nearby counties have required for similar projects.

I recently travelled through the western Antelope Valley. This is a high-desert environment similar to the Cuyama Valley, which is about 60 miles away. Along Highway 138 I saw a photovoltaic solar facility that had recently been constructed. Vegetative screening had been planted between the highway and solar facility. First Solar, the same company that will build the Cuyama Solar Project, was required by Los Angeles County to plant vegetative screening.

Santa Barbara County <u>did not even consider an alternative</u> that would have required vegetative screening for the Cuyama Solar Project<sup>1</sup>.

In addition, San Luis Obispo County required First Solar to plant native grasses and to use grazing animals to control the grasses within the Topaz Solar Farm in that county. Santa Barbara County had no such requirement for the Cuyama Solar Project.

The Solar Energy Generating System [SEGS] III–VII parabolic trough facilities at Kramer Junction in San Bernardino County also has vegetative screening to reduce visual impacts.

The Cuyama Solar Project will have a stark, industrial look and will not provide any wildlife habitat benefit. As a citizen of Santa Barbara County I am disappointed that my county has approved a project that is less environmentally friendly than those approved by Los Angeles, San Bernardino and San Luis Obispo Counties. I hope that Santa Barbara County will do better in the future.

Yours truly,

Stephen J. Ferry Co-President

Santa Barbara Audubon Society

<sup>1</sup> Despite repeated suggestions by Santa Barbara Audubon for more than two years.

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Vegetative screening planted around First Solar's Antelope Valley Solar Ranch along Highway 138.



Vegetative screening planted around First Solar's Antelope Valley Solar Ranch along Highway 138.



Vegetative screening at Solar Energy Generating System [SEGS] III–VII parabolic trough facilities, Kramer Junction, California (San Bernardino County)<sup>2</sup>

## From Los Angeles County EIR for Antelope Valley Solar Ranch:

Mitigation Measure 5.10-4: Screening Vegetation Landscaping Plan and Maintenance. Prior to issuance of a grading permit, the Applicant shall submit a landscaping plan for the 10-foot-wide strip of Project screening vegetation proposed along both sides of SR-138, to the LACDRP for review and approval. The Plan shall be certified by a registered landscape architect, and shall identify use of temporary irrigation, and the areas on both sides of SR-138 at the Project site to be planted with Joshua trees and/or other native yucca species, and native shrub species, in compliance with the County Drought-Tolerant Landscaping Ordinance. The landscaping shall be installed within 14 months of the commencement of construction activities. The vegetation shall be maintained via selective thinning and removal of invasive weeds and monitored thereafter to promote successful, long-term establishment of the native vegetation to the satisfaction of LACDRP. The landscaped area shall also be maintained free of trash and debris for the Project lifetime to the satisfaction of LACDRP.

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<sup>&</sup>lt;sup>2</sup> From Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands, First Edition - 2013