



PRESERVING LAND FOR FUTURE GENERATIONS

August 9, 2011

Ms. Elizabeth McElligott  
Alameda County Planning  
224 W. Winton Avenue, Rm 111  
Hayward, CA 94544

**Re: *Planned Solar Policies for Alameda County***

Dear Ms. McElligott:

On behalf of the Tri-Valley Conservancy ("TVC"), I am writing in response to Alameda County's development of policies related to the permitting of solar plants in the rural areas of the County.

TVC's mission is to protect agriculture, plant and animal habitat, and scenic lands, while promoting opportunities for public recreation and wildlife protection. Since our founding 16 years ago, we have protected more than 4,200 acres of agricultural and open space land together with 6.5 miles of hiking and walking trails.

One of the biggest questions for the county when it comes to the solar facilities is not whether they should be constructed, but rather their impact. The East Alameda County's fertile farmlands, scenic open space and plant and animal habitats are irreplaceable. They are a heritage that our community should protect.

The County should do as much as it can to prepare itself for future applicants. The exact impact these giant power plants will have in the immediate surrounding environment has not been determined. A whole ecosystem in the county cannot be destroyed by solar panels. Doing so would push back decades of conservation efforts already made by Measure D, ECAP, EACCS, SLVAP to name a few.

The past three years Alameda County, along with multiple agencies, completed the East Alameda County Conservation Strategy. This strategy identifies that there are Sensitive Vegetation Communities, Habitat for Special-Status Plant and Wildlife Groups and CNDDB Occurrences of Special Status Plants and Wildlife within the East Alameda County.

TVC attended both workshops/meetings hosted by Alameda County Planning and also reviewed California's Renewables Portfolio Standard ("RPS") target of 33% by 2020. TVC further appreciates that California law has certain provisions limiting a public agency's ability to regulate the installation of solar facilities.

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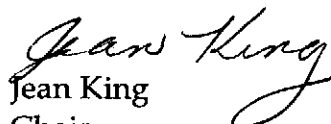
[www.trivalleyconservancy.org](http://www.trivalleyconservancy.org)

TVC is concerned that large-scale solar installations may damage the surrounding environment and change the landscape of a community. Thus, TVC recommends that Alameda County consider the following in drafting policies or ordinances related to solar power plants:

1. The term "solar farm" should be avoided as it is misleading. Instead, the term "solar power plant" should be used as an accurate description of the use proposed.
2. The permitting for solar power plants (as opposed to systems of limited size installed by landowners to power their own operations) should be reviewed on a case-by-case basis and include public input and hearings normally expected of a proposal for such a substantial change in land use, including a full environmental assessment.
3. Applicants should be required to remove and dispose of all equipment and fully restore any agricultural site to its pre-power plant natural condition, which should be in the form of a sufficient bond with escalators for inflation prior to commencing construction of the power plant. This is similar to new requirements being imposed on the windmill operators. Otherwise, inevitably abandoned equipment and other solar improvements will revert to public expense for expensive future removal, cleanup and remediation.
4. No solar power plants should be permitted within the reasonably proximate view shed of areas dependence on rural "feel" and bucolic view shed, including the Tri-Valley wine tourism areas, SLVAP area, present or future residentially proximate areas, and other similar locations.
5. To the extent possible, any agricultural land forfeited to a solar power plant should be mitigated through acquisition by the power plant developer of a permanent offsite agricultural easement. This is in addition to any environmental mitigation required.
6. Solar power plants should be located close to transmission substations, so that power lines will not impact scenic corridors.

Alameda County must appropriately address the regional impact that large solar power plants may have on our environment. Solar power plants may solve one problem, but may create many others. As such, we must learn to conserve our land and develop it properly for green energy.

Sincerely,

  
Jean King  
Chair

**CC:** Alameda County, Supervisor, Scott Haggerty

Alameda County, Community Development Director, Chris Bazar

Alameda County, Office of the County Counsel, Richard Karlsson

Alameda County, Planning Director, Albert Lopez

City of Livermore, Steve Stewart

Alameda County Resources Conservation District, Executive Officer, Kent Reeves

Greenbelt Alliance, Senior Field Representative, Matt Vander Sluis

Sierra Club, Conservation Chair, Dick Schneider