

Law Offices of John A. Belcher

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PASADENA, CALIFORNIA 91105
TELEPHONE (626) 577-5771
FAX (626) 577-7769

February 1, 2019

Via Email: cmonfette@fresnocountyca.gov

Christina Monfette
Fresno County Department of Public Works and Planning
Development Services and Capital Projects Division
2220 Tulare Street, Sixth Floor
Fresno, CA 93721

Re: Little Bear Solar Project (EIR No 7225, CUP Nos. 3550, 3551, 3552, 3553, 3577)

Dear Ms. Monfette:

This law firm represents Save Our Mojave, a 501(c)(3) non-profit organization working to raise public awareness about some of the most pressing issues facing California's deserts. We previously wrote to Fresno County regarding the Draft Environmental Impact Report ("EIR") for the Little Bear Solar Project ("Little Bear Project," letter dated October 8, 2018) and regarding the Final EIR for the Little Bear Project (letter dated November 27, 2018).

The purpose of this letter is to inform the County that Save Our Mojave's concerns regarding the Little Bear Project have been fully resolved. We hereby withdraw our prior comment letters as well as our statement of protest regarding the County's potential certification of the Final EIR.

Sincerely,



John A. Belcher



RECEIVED
FEB 22 2019

CLERK. BOARD OF SUPERVISORS

Jack Castro, City Manager
City of Huron
P.O. Box 339
36311 S Lassen Ave.
Huron, CA 93234
(559) 945-2241
jcastro001@yahoo.com

February 12, 2019

Supervisor Buddy Mendes
County of Fresno
2281 Tulare Street, Room #301
Fresno, CA 93721

Dear Supervisor Mendes,

I am writing today to voice my support for the proposed solar development known as the Fifth Standard Solar Project Complex on 1,590 acres of land south of Huron. The site is part of an approximately 20,000-acre farming operation owned and managed by Woolf Farming & Processing, a large employer in Huron and the surrounding area.

I have seen firsthand how lack of water supplies adversely impact local farming operations and in turn the surrounding community. With the implementation of the Sustainable Groundwater Management Act farms will need every option at their disposal to maintain viable businesses. Solar development - which requires no water - is one such option.

I view solar development as a benefit to the local community and urge the Fresno County to do the same.

Sincerely,

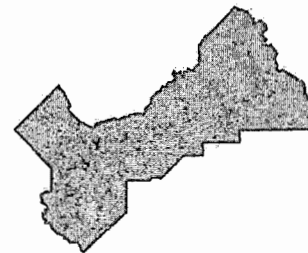


Jack Castro

cc: William M. Kettler, Manager
Development Services and Capital Projects Division
Department of Public Works and Planning
County of Fresno
2220 Tulare Street, 6th Floor
Fresno, CA 93721

"Together We Can"

Fresno County
Farm Bureau
Serving agriculture since 1917



February 14, 2019

Fresno County Board of Supervisors
Attn: Bernice Seidel, Clerk of the Board
2281 Tulare Street, Room 301
Fresno, CA 93721

RECEIVED
FEB 21 2019

CLERK. BOARD OF SUPERVISORS

Re: Little Bear Solar Project

Dear Fresno County Board of Supervisors,

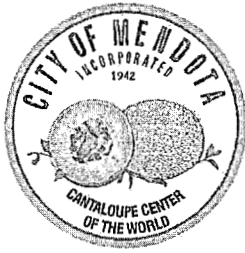
On behalf of the Fresno County Farm Bureau (FCFB), I write in support of First Solar's Little Bear Solar Project (LBSP).

The proposed LBSP is located within Westlands Water District on "retired" irrigated farmland. FCFB believes the site represents the type of responsible solar development that should be pursued in the region. The retired land has little agricultural viability as it does not have a contract for surface water. The LBSP project allows for a use of the property, while preserving prime lands with irrigation water for agricultural production.

We ask the Board to please support the LBSP as a responsible renewable energy development.

Sincerely,

Ryan Jacobsen
CEO



CITY OF MENDOTA

"Cantaloupe Center Of The World"

February 12, 2019

Nathan Magsig, Chairman
Fresno County Board of Supervisors
Fresno County Hall of Records
2281 Tulare Street, Room 301
Fresno, CA 93721

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FEB 21 2019

CLERK. BOARD OF SUPERVISORS

Honorable Supervisor Magsig,

On behalf of the City Council of the City of Mendota, I am writing to convey our strong support of the Little Bear Solar Project, and to encourage the Fresno County Board of Supervisors to overturn the denial of the Fresno County Planning Commission.

The approval of the Little Bear Solar Project is of utmost importance to the community of Mendota due to the lasting environmental and economic impacts that it will have as a result of its close proximity to the City. The project puts land that has been intermittently used or left fallow for many years to consistent and productive use. Construction on land that, in recent history, has been underused or not utilized at all will minimize the amount of dust, fertilizers, and other pollinary irritants close to our City.

The project will also further support the County's energy policy goal to contribute to California's long-term renewable energy development and greenhouse gas reduction goals. The project will generate renewable solar electricity that will offset the emission of air pollutants that would have resulted from producing an equivalent amount of electricity from fossil fuel-fired generators.

Moreover, the construction of a project this considerable in size will provide a significant economic benefit to Mendota. These benefits include the creation of hundreds of jobs and a stimulation of our local economy through the purchase of needed construction materials and supplies.

It is of concern that it was unclear to both the project's applicant, and to the City, why the project was denied by the Fresno County Planning Commission. In today's political climate it is more important than ever that legislative and advisory bodies avoid creating a perception of decisions being made based on narrow interests. We believe that this project provides benefits to a wide scope of interests, especially for all of the County of Fresno.

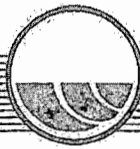
We fully support the project and urge the Fresno County Board of Supervisors to approve the appropriate Unclassified Conditional Use Permits.

Respectfully,

Robert Silva
Mayor
City of Mendota



CC: Honorable Supervisor Brian Pacheco
Honorable Supervisor Sal Quintero
Honorable Supervisor Buddy Mendes



Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (559) 224-1523, FAX (559) 241-6277

February 20, 2019

County Board of Supervisors
Attention: Bernice Seidel, Clerk of the Board
2281 Tulare Street, Room 301
Fresno, CA 93721

RECEIVED
FEB 21 2019

CLERK. BOARD OF SUPERVISORS

Re: First Solar's Appeal of the Planning Commission's Decision to Deny a Conditional Use Permit for the Little Bear Solar Project

Dear Honorable Supervisors,

The purpose of this letter is to provide additional information for the Board that may bear on its consideration of First Solar's appeal of the Planning Commission's denial of its Conditional Use Permit Application for the proposed Little Bear Solar Project (Project). It is our understanding that during the Planning Commission meeting there was uncertainty as to whether the parcels that are proposed for the Project are productive agricultural parcels. As the landowner, Westlands Water District (District) believes it can provide some perspective on the parcels' status.

The District acquired the subject parcels pursuant to a December 11, 2002 legal settlement between the original landowner(s), the United States, and the District over the failure to provide drainage service. The settlement required that the District take title to the land subject to a covenant that prohibits irrigation from any source. Additionally, the District no longer allocates water from its Central Valley Project Water Service Contracts to these parcels. Finally, under implementation of the Sustainable Groundwater Management Act, the District, acting as the Groundwater Sustainability Agency for the Westside Subbasin, does not plan to make an annual groundwater pumping allowance to these parcels.

Since the District acquired the parcels, they have been dry farmed and grazed with limited success. The District believes that the highest and best use of these parcels is solar development. The Project will provide economic stimulus to westside communities and improved tax base for Fresno County.

I plan to attend the meeting on February 26, 2019 and will make myself available to answer any additional questions the Supervisors may have. I may also be contacted at 559-241-6241.

Sincerely,

Russ Freeman
Deputy General Manager - Resources



February 12, 2019

Fresno County Board of Supervisors
Fresno County Hall of Records
2281 Tulare Street, Room 301
Fresno, CA 93721

RECEIVED
FEB 21 2019

RE: Little Bear Solar Project

CLERK. BOARD OF SUPERVISORS

Dear Board of Supervisors:

On behalf of the Fresno County Economic Development Corporation (EDC), I am writing to express my support for First Solar's Little Bear Solar Project, and to encourage approval of this project by you, the Fresno County Board of Supervisors.

The Fresno County EDC is a private non-profit organization established to market Fresno County as the premier location for business prosperity. We not only facilitate site selection for new businesses within Fresno County, but we also assist in the retention and expansion of local businesses. Thus, we support projects like the Little Bear Solar Project that will create hundreds of jobs in one of Fresno County's most economically-distressed regions while moving towards a more sustainable future.

First Solar's project will generate wages and benefits for approximately 500 high-paying construction jobs as well as provide a substantial financial investment into the community. The project will enhance the local economy and boost revenue for local businesses.

Another benefit to Fresno County will be from the production of clean, renewable energy that will help meet its stated renewable energy goals. No water will be used to generate electricity and there will be no air emissions or waste production during operations. This project will generate 180-megawatt (MW) alternating current (AC) on approximately 1,280 acres of retired Westlands Water District lands near Mendota, California, providing power output for roughly 54,000 homes.

Thank you for considering our support for the Little Bear Solar Project. Should you have any questions regarding this matter, please contact me at 559.476.2513 or via email at leager@fresnoedc.com.

Sincerely,

Lee Ann Eager, President/CEO
Fresno County Economic Development Corporation

LAE/cw

BRYANT L. JOLLEY

CERTIFIED PUBLIC ACCOUNTANTS

Bryant L. Jolley C.P.A.
Ryan P. Jolley C.P.A.
Darryl L. Smith C.P.A.
Jaribu Nelson C.P.A.
Lan T. Kimoto
Jeffrey M. Schill

February 21, 2019

RECEIVED
FEB 21 2019

Fresno County Board of Supervisors
Fresno County Hall of Records
2281 Tulare Street, Room 301
Fresno, CA 93721

CLERK. BOARD OF SUPERVISORS

Re: Support for First Solar's Little Bear Solar Project

Dear Board of Supervisors:

My name is Bryant Jolley, I reside at 6685 N Sequoia, Fresno, Ca 93711 and own the two parcels just to the west of the Little Bear Solar Project that is coming before you for approval on February 26. I've had the pleasure of working with the First Solar team over the last 4 years on the original project and they have been great to work with. Their existing power lines run across my property for nearly a mile and I have had no issues with them. When one considers the additional tax revenues to be generated by this project with little or no impact on services, it would appear to be a very desirable project. I recommend that you consider approving the Little Bear Solar project.

Sincerely,



Bryant Jolley

To: Nathan Magsig
Chair, Fresno County Board of Supervisors
2281 Tulare St. Room #300
Fresno, CA 93721-2198

RECEIVED
FEB 21 2019

Submitted via email to: Clerk/BOS@co.fresno.ca.us

CLERK. BOARD OF SUPERVISORS

Date: February 20, 2019

Subject: Comments of The Nature Conservancy on the Final Environmental Impact Report for the Little Bear Solar Project

The Nature Conservancy (the Conservancy) is writing in response to the Final Environmental Impact Report (FEIR) for the Little Bear Solar Project (the Project) in Fresno County. We appreciate that Fresno County completed a full Environmental Impact Report for the Project under the California Environmental Quality Act (CEQA).

The Conservancy's mission is to protect the lands and waters on which all life depends. As part of that mission, the Conservancy is addressing climate change and helping to transition California to a carbon-free economy and clean energy future. This will require tremendous investments in the development of renewable energy over the next several decades. Local jurisdictions, such as Fresno County, will play an important role in advancing renewable energy to meet California's climate goals, alongside other land use objectives.

The Conservancy supports development of renewable energy that has a low impact on natural and working lands and water resources. In 2015, we completed a study that demonstrates we can meet California's renewable energy targets without sacrificing our state's conservation goals¹. In 2016, a study called "A Path Forward" was completed and identified over 400,000 acres of least conflict lands for solar PV in the San Joaquin Valley². However, with a high electrification scenario for California, reaching our climate goals with in-state resources could require on-going development that may reach up to 1 million acres of solar PV in California³, and it is predicted much of this solar may be developed in the San

¹ Wu, G., N. Schlag, D. Cameron, E. Brand, L. Crane, J. Williams, S. Price. 2015. Integrating Land Conservation and Renewable Energy Goals in California: A Study of Costs and Impacts Using the Optimal Renewable Energy Build-Out (ORB) Model. Technical Report. 34 pages plus appendices.

<https://www.scienceforconservation.org/products/integrating-land-conservation-and-renewable-energy-goals>

² <https://www.law.berkeley.edu/wp-content/uploads/2016/05/A-PATH-FORWARD-May-2016.pdf>

³ Deep Decarbonization in a High Renewables Future: <https://www.ethree.com/wp-content/uploads/2018/06/Deep-Decarbonization-in-a-High-Renewables-Future-CEC-500-2018-012-1.pdf>

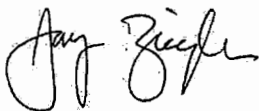
Joaquin Valley. We are going to need to look for opportunities for solar PV development that minimizes natural resource, land use, economic and community impacts

After reviewing the FEIR for the Project, the Conservancy believes that development of solar PV in this area would have minimal impact to natural resources, especially when considering implementation of the mitigation measures outlined in the FEIR. The location of the Project does not overlap with any of the avoidance areas (Category 1 or 2) from the Renewable Energy Transmission Initiative⁴, nor does it overlap with avoidance areas from The Nature Conservancy's 2016 Optimal Renewable Resource Buildout study. The Project is located on agricultural land where irrigation is not allowed, so it has either lain fallow or has been dry farmed in recent years. Additionally, the Conservancy has not identified this area as a high priority for endangered species habitat restoration in the San Joaquin Valley. Lastly, the Project is not adjacent to protected area or conservation land, and instead is adjacent to another solar project and a prison.

In conclusion, we support Fresno County's approval of solar PV projects that are sited in places that avoid areas that have been pre-identified as high conflict from an environmental perspective. By siting solar PV development away from places of highest environmental value, we can meet California's aggressive renewable energy goals while also protecting conservation values.

Thank you,

Sincerely,



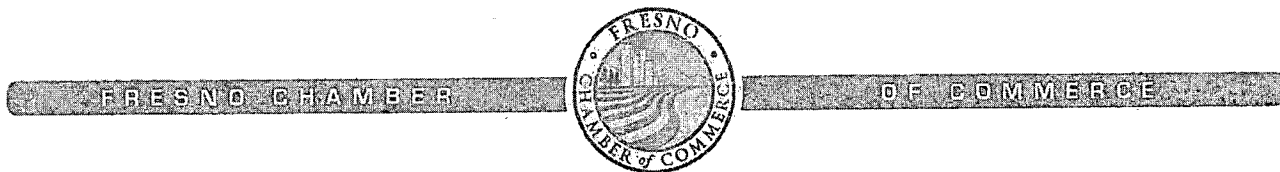
Jay Zeigler
Director of External Affairs and Policy
The Nature Conservancy in California

⁴ The Renewable Energy Transmission Initiative avoidance areas for Category 1 & 2 can be viewed by following this link: <https://databasin.org/datasets/4d3ea2e9c6d848e6be75f07d02884191>

CC:

Christina Monfette,
Department of Public Works and Planning
Development Services and Capital Projects Division
2220 Tulare St. Suite A, Fresno, CA 93721
Main Office: (559) 600-4230 Direct: (559) 600-4245
cmonfette@fresnocountyca.gov

John "Jack" Garamendi
Professional Evaluation Group, Inc.
jgaramendi@proegroup.com
209-675-8050



RECEIVED
FEB 21 2019

February 6, 2019

Supervisor Quintero
Fresno County Board of Supervisors
2281 Tulare Street, Room 301
Fresno, CA 93721

CLERK. BOARD OF SUPERVISORS

RE: Fresno Chamber of Commerce- Comments on Little Bear Solar Project

Dear Supervisor Quintero,

Sal,

On behalf of the Fresno Chamber of Commerce and its 1,200 members, representing 78,000 jobs in our region I am writing to you in support of Little Bear Solar's proposed project in Fresno County. First Solar is a leading global provider of comprehensive solar energy solutions that are moving the energy industry forward.

It is our understanding that the Little Bear Solar project in Mendota will generate enough clean solar energy to supply approximately 54,000 homes per year. This will result in the displacement of approximately 102,000 metric tons of carbon dioxide—roughly the same amount as 20,000 cars being taken off the road.

The Fresno Chamber of Commerce focuses on promoting a strong local economy. This project is estimated to create 500 construction jobs and First Solar is committed to providing employment for our residents that meet qualifications once construction is complete. The economic and environmental benefits to this project align with the needs of our ever-growing County.

We would be proud to support a project that is able to deliver the significant economic benefits offered by the Little Bear Solar project.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nathan Able", is written over a horizontal line.

Nathan Able
President & CEO
Fresno Chamber of Commerce


To promote and support the success of the regional business community through effective advocacy, education and relationship building.



February 6, 2019

Supervisor Magsig
Fresno County Board of Supervisors
2281 Tulare Street, Room 301
Fresno, CA 93721

RE: Fresno Chamber of Commerce- Comments on Little Bear Solar Project

Dear Supervisor Magsig, 

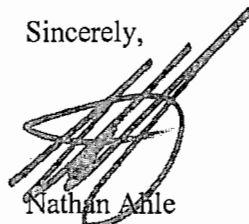
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Sincerely,



Nathan Ahle
President & CEO
Fresno Chamber of Commerce

To promote and support the success of the regional business community through effective advocacy, education and relationship building.



February 6, 2019

Supervisor Mendes
Fresno County Board of Supervisors
2281 Tulare Street, Room 301
Fresno, CA 93721

RE: Fresno Chamber of Commerce- Comments on Little Bear Solar Project

Dear Supervisor Mendes,

Buddy,

On behalf of the Fresno Chamber of Commerce and its 1,200 members, representing 78,000 jobs in our region I am writing to you in support of Little Bear Solar's proposed project in Fresno County. First Solar is a leading global provider of comprehensive solar energy solutions that are moving the energy industry forward.

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Nathan Ahle
President & CEO
Fresno Chamber of Commerce

To promote and support the success of the regional business community through effective advocacy, education and relationship building.



February 6, 2019

Supervisor Pacheco
Fresno County Board of Supervisors
2281 Tulare Street, Room 301
Fresno, CA 93721

RE: Fresno Chamber of Commerce- Comments on Little Bear Solar Project

Dear Supervisor Pacheco, *Brian,*

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Nathan Ahle
President & CEO
Fresno Chamber of Commerce

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Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (559) 224-1523, FAX (559) 241-6277

February 20, 2019

County Board of Supervisors
Attention: Bernice Seidel, Clerk of the Board
2281 Tulare Street, Room 301
Fresno, CA 93721

RECEIVED
FEB 21 2019

CLERK. BOARD OF SUPERVISORS

Re: First Solar's Appeal of the Planning Commission's Decision to Deny a Conditional Use Permit for the Little Bear Solar Project

Dear Honorable Supervisors,

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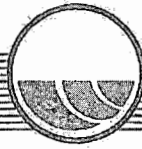
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I plan to attend the meeting on February 26, 2019 and will make myself available to answer any additional questions the Supervisors may have. I may also be contacted at 559-241-6241.

Sincerely,

Russ Freeman
Deputy General Manager - Resources



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Russ Freeman
Deputy General Manager - Resources

To: Nathan Magsig
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Fresno, CA 93721-2198

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Submitted via email to: Clerk/BOS@co.fresno.ca.us

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<https://www.scienceforconservation.org/products/integrating-land-conservation-and-renewable-energy-goals>

² <https://www.law.berkeley.edu/wp-content/uploads/2016/05/A-PATH-FORWARD-May-2016.pdf>

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Joaquin Valley. We are going to need to look for opportunities for solar PV development that minimizes natural resource, land use, economic and community impacts

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Thank you,

Sincerely,



Jay Zeigler
Director of External Affairs and Policy
The Nature Conservancy in California

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CC:

Christina Monfette,
Department of Public Works and Planning
Development Services and Capital Projects Division
2220 Tulare St. Suite A, Fresno, CA 93721
Main Office: (559) 600-4230 Direct: (559) 600-4245
cmonfette@fresnocountyca.gov

John "Jack" Garamendi
Professional Evaluation Group, Inc.
jgaramendi@proegroup.com
209-675-8050