



# Alameda Creek Alliance

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Alameda County Board of Supervisors  
County Administration Building  
1221 Oak Street, Fifth Floor  
Oakland, CA 94612

## **Re: Solar Development in Alameda County**

Thank you for the opportunity to provide our views on proposed industrial solar energy facilities in eastern Alameda County.

The Alameda Creek Alliance is a community watershed group with more than 1,900 members, dedicated to the protection and restoration of the natural ecosystems of the Alameda Creek watershed. Many of the areas in eastern Alameda County being considered for industrial solar development are within the Alameda Creek watershed.

We have concerns about the impacts of industrial energy facilities on habitat for endangered, threatened and rare species in eastern Alameda County, the cumulative effects of large-scale solar development combined with ongoing severe impacts to raptors from wind turbines at Altamont Pass Wind Resource Area. We urge a proper level of environmental review for proposed large-scale solar facilities. We are concerned about conflicts with the East County Area Plan and Measure D.

We appreciate the County's efforts to define county policies for the appropriate development of solar energy facilities. As a conservation group, we strongly support the development of non-petroleum energy sources, as long as they are sensibly and appropriately sited. However, we are adamantly opposed to any energy development, solar or otherwise, that results in the unnecessary loss of open space and wildlife habitat.

Alameda County should focus on distributive rather than industrial-scale solar energy developments. Alameda County has not done enough to encourage rooftop solar. Development and zoning laws should be amended to require solar arrays on all new buildings. The county should pass policies and provide incentives that cover every roof-top in the county with solar panels. Then, if large-scale solar farms are still needed to meet renewable energy goals, they should be sited exclusively on disturbed lands, not on agricultural lands or areas with habitat value for wildlife.

**We encourage the county to adopt policies and amend the county general plan to prevent siting of any industrial solar energy facilities within suitable habitat for federally or state protected endangered or threatened species, breeding or foraging habitat for sensitive raptor species, or adjacent to the Altamont Pass Wind Resource Area, for the reasons outlined below.**

The photograph below is of a recent rooftop solar installation at Crescent Park in Richmond, California, in adjacent Contra Costa County. This solar array is the largest affordable housing solar installation in the country and provides 900 kW of power, meeting approximately 20% of the City of Richmond's renewable energy goals.



This is an example of how to sustainably create green jobs and green energy on existing infrastructure, without destroying or degrading wildlife habitat and agricultural lands. Alameda County should promote and explore solar developments similar to Crescent Park before allowing or encouraging industrial energy facilities on rural land. Why would Alameda County promote the loss of open space and wildlife habitat for solar energy when there are so many rooftops and parking lots available for solar?

The areas within eastern Alameda County being considered for industrial solar development contain essential habitat for numerous endangered and threatened species, such as the California red-legged frog, California tiger salamander, San Joaquin kit fox and Alameda whipsnake. In addition, grasslands in eastern Alameda County provide important breeding and foraging habitat for many raptor species of concern, such as golden eagles, western burrowing owls, Swainson's hawks, red-tailed hawks and American kestrels. There is no reason to sacrifice habitat for our wildlife when more than enough other areas with no habitat value for native wildlife are available, such as rooftops and parking lots.

Furthermore, we question whether Alameda County has learned any lessons from the ongoing

bird kill fiasco at the Altamont Pass Wind Resource Area, where thousands of raptors continue to be killed each year because of the County's failure to consider impacts to wildlife when approving and permitting the industrial wind farms, and failure to require energy companies to take adequate measures to reduce the massive bird kills, or even to enforce the minimal measures the County has required of energy companies. Siting industrial solar facilities adjacent to Altamont Pass could compound the bird kill problems by displacing and dispersing breeding and foraging birds from grasslands and agricultural lands, driving even more birds into the wind turbines.

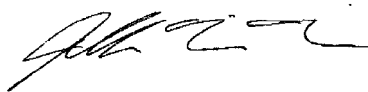
Any increase in avian mortality will make it even more difficult for the County to reach its mortality reduction goals for the Wind Resource Area, which are already not being met. Any county solar policy must consider the impacts on rare and endangered species, cumulative effects and potential for increased raptor deaths, and the integrity of wildlife migratory corridors.

We note that Alameda County has issued a notice of intent to adopt a Mitigated Negative Declaration for the 140-acre Cool Earth Solar facility (CUP PLN 2011-00009) in eastern Alameda County. Use of a Mitigated Negative Declaration for this project is completely inappropriate, and an Environmental Impact Report must be prepared and the cumulative impacts of multiple industrial solar facilities must be evaluated for any project approval to comply with the California Environmental Quality Act. Furthermore, it is inappropriate for Alameda County to approve industrial-sized solar facilities without first defining and adopting a County policy on solar energy development, amending the County Plan and zoning ordinances to reflect this policy, and preparing a programmatic Environmental Impact Report for all of the County lands being considered for industrial energy development, solar or otherwise.

Finally, we have concerns that the proposed policies and findings by the Alameda County Planning Department are incompatible with the East County Area Plan, specifically protection of biological resources and valuable agricultural lands. The Planning Department's proposed policies would also violate Measure D - it was not the intent of Measure D to allow industrial facilities.

We urge the Board of Supervisors to pursue a sensible solar energy development policy that prioritizes rooftop and parking lot solar in urban areas over rural industrial development.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Miller', written in a cursive style.

Jeff Miller  
Executive Director