



MORRO COAST
AUDUBON
SOCIETY

Solar Generated Energy Policy

May 10, 2010

The Mission of Morro Coast Audubon Society (MCAS) is to promote the appreciation, conservation, and restoration of ecosystems, focusing on the biological diversity of birds, other wildlife, and their habitats, particularly in San Luis Obispo County, California.

In keeping with this mission, we recognize and fully support the compelling need for the county to develop and implement an aggressive and comprehensive total energy conservation and renewable energy production program, and we encourage its full implementation. We fully support the concept that both “distributed” and “centralized” solar power production are key elements of this program.

Mission Statement of MCAS Solar Generated Energy Policy: to make solar-generated power a strong part of a more comprehensive San Luis Obispo County conservation program, where energy conservation and energy efficiency are the first priorities, while preserving and protecting habitat for birds and other wildlife.

This document is designed as a guideline for MCAS use in evaluating, advising, supporting or opposing various solar-related policies and/or projects which may be proposed or implemented in SLO County or on a broader scale.

1. ALL SOLAR GENERATION PROJECTS: MCAS urges that **all solar generated energy projects** include the following:

- A. Clearly defined goals which include aggressive energy saving.
- B. Strong publicity and educational components.
- C. Minimal use of hazardous materials.
- D. Use of “best available technology” to reduce environmental impacts of materials used.
- E. Creation of sustainable employment opportunities.

2. DISTRIBUTED SOLAR GENERATION: MCAS encourages **distributed solar generated energy projects** and urges that they include the following:

- A. Both residential and business properties.
- B. Both new and retrofit applications.
- C. Energy assessment.
- D. Inclusion of county property owners of all socio-economic backgrounds to participate as soon as possible by providing:

- (1) Low upfront costs;
- (2) Competitive interest;
- (3) No prepayment penalties.

3. CENTRALIZED SOLAR GENERATION PROJECTS

A. Locations: MCAS has developed the following list of considerations in siting centralized solar projects. These criteria are fairly broad. They are intended to minimize resource conflicts and thereby help California meet its ambitious renewable solar goals. The criteria are not intended to serve as a substitute for project specific review.

(1) Areas of High Conflict in Siting:

- a. Locations that support sensitive biological resources, including: federally designated and proposed critical habitat; populations of federal or state threatened and endangered species; populations of sensitive, rare and special status species; and federal or state agency species of concern; rare or unique plant communities; and Audubon-designated Important Bird Areas.
- b. Lands purchased for conservation of biological resources including those conveyed to any county, state or federal agency.
- c. Designated landscape-level biological linkage areas, including wildlife corridors, (consult CA DFG's California Essential Habitat Connectivity Project) required for the continued functioning of biological and ecological processes.
- d. Proposed or designated Wilderness Areas or proposed or designated National Monuments (i.e. Carrizo Plain National Monument).
- e. Wetlands (including vernal pools) and riparian areas, including the upland habitat and groundwater resources required to protect the integrity of seeps, springs, streams or wetlands.
- f. Locations directly adjacent to National or State Park units (adjacent: lying contiguous, adjoining or within 2 miles of the unit boundaries).

(2) Other Potential Site Specific Impacts to be Avoided or Minimized:

- a. Aerial obstacles for birds and bats.
- b. Fencing that can inhibit wildlife movements.
- c. Grading existing lands during construction.
- d. Use of non-native grasses during revegetation of areas graded or disturbed during construction (we recommend use of native species specific to project area).
- e. Noise that could have a negative impact on wildlife resources.
- f. Night lighting on solar arrays and associated facilities.
- g. Use of rodenticides in or adjacent to project area.

(3) Areas of Lower Environmental Conflict in Siting:

- a. Use of disturbed sites, as opposed to extant high quality habitat, such as brownfields, underutilized industrial sites, or lands that have been “type-converted” from native vegetation through plowing, bulldozing or other mechanical impact often in support of agriculture or other activities (mining, clearance for development, heavy off-road vehicle use, etc.).
- b. Locations adjacent to federally designated corridors with existing major transmission lines.
- c. Proximity to urbanized areas (thus providing jobs for local residents and minimizing workforce commuting and associated greenhouse gas emissions).
- d. Proximity to sources of municipal wastewater for use in construction and cleaning solar panels.
- e. Minimal need to build new roads and other infrastructure.

B. Impact Assessment: MCAS encourages using the following criteria to assess impacts of a specific project proposal:

- (1) Environmental impacts using science-based habitat assessment. Protect high quality habitat including habitat designations (“Important Bird Areas”) and conservation lands.
- (2) Cumulative impacts throughout the region for sensitive species (i.e. kit fox populations within Carrizo Plain and Panoche Valley) and that avoidance, minimization, and mitigation be appropriate for such impacts.
- (3) Visual and sense of wildness impact, especially on the quality of the protected lands. Consider distance to protected lands.
- (4) Impact on both deep and surface water resources in terms of on site water usage during construction and operation and water disposal (to include identifying locations of key water resources).
- (5) Effects on wildlife corridors within project and between project and protected lands.

C. Mitigation: Once a project is sited and the environmental impacts assessed, if mitigation is required, MCAS encourages the following in San Luis Obispo County:

- (1) For projects proposed on the Carrizo Plain: acquisition of Carrizo Plain National Monument (CPNM) in-fill properties or outlying properties with high quality wildlife corridors or with the most development pressures.
- (2) Acquisition of existing native habitat over lands that can or have been restored.
- (3) Development of a mitigation fund (in-lieu fee) for future acquisitions of desirable lands that come up for sale or (if and when AB811 or similar legislation is passed), for funding to contribute to distributed solar generated projects in San Luis Obispo County.