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April 29, 2019

County of San Bernardino, Land Use Services Department
Tom Nieves, Contract Planner
385 N. Arrowhead Avenue, First Floor
San Bernardino, CA 92415 Tom.Nieves@lus.sbcounty.gov
RE: Daggett Solar Power Facility, Draft EIR (SCH No. 2018041007)

Dear Mr. Nieves,

I'd like to take this opportunity to comment on the Daggett Solar Power Facility Draft EIR - specifically Section 3.1 - Aesthetics and Visual Resources.

Most of the DEIR Section 3.1 conclusions are based on photographs from so-called "key observation points" (KOPs) selected by the project applicant. The applicant has overlaid their own photographs with their own "simulated" (likely photoshopped) images of views they claim represent the actual views seen by motorists, residents and tourists of their proposed 20-foot tall solar panels. I've observed that many of the KOP views contained in the DEIR are extremely false and misleading. It is unclear whether this falsification has been intentionally done by the applicant or whether the falsification has been done accidentally by the applicant. In either case, the photo-falsification leads the applicant to claim (falsely) that building the project would not significantly impact either community aesthetics or visual resources.

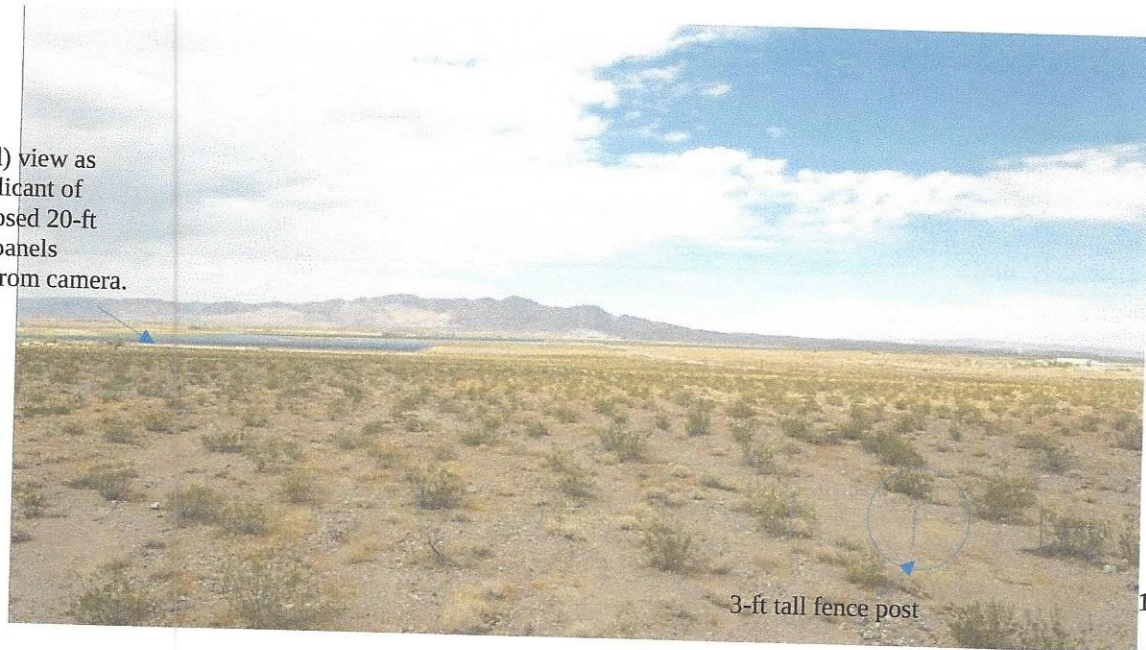
One glaring example of the applicant's photo-falsification is their KOP 2 picture (Exhibit 3.1-6b KOP 2 Visual Simulation). This DEIR photo supposedly shows a "simulated" view of the proposed solar panels from Interstate 40 (I-40) which is traveled by 14,400 motorists each day. In fact, as the DEIR admits, KOP 2 is actually a view not from I-40 but from the westbound "ONRAMP" to I-40. Based on this photo, the DEIR claims that "the project would result in a moderately low change to views from I-40". Two points put the lie to this DEIR claim.

Point 1. The "onramp" increases in elevation from the access roadway up to I-40 itself. The DEIR photo is from an onramp vantage point that is substantially lower than the actual view from I-40 itself. Look at the height of the 3-foot tall barb wire fence post (circled in blue). It's clear the camera vantage point is only a few feet higher than the top of the 3-foot tall fence post(s), and is not a view from I-40 itself. By choosing a lower vantage point than I-40 itself, distant objects such as the proposed solar panels, appear much smaller in the distance. Also, the wide-angle onramp "simulated" view in no way represents the actual view of the proposed project panels as seen from the I-40 roadway by passing motorists and tourists.

Point 2. The DEIR photo is taken with a wide-angle camera lens. Wide angle lens distort visual perspective and, as in Point 1 above, this perspective distortion makes foreground objects and distances look much larger while making background objects appear much smaller. This perspective distortion (and solar panel size distortion) is easily noticed by looking at the three actual distances from the camera position shown by the distance scale in the right-hand margin of the photograph. If the photo's distance scale was truly linear, then Rt. 66 (National Trails Highway), visible in the distance as a thin white line should be 80 feet away from the camera. In actuality, Rt. 66 is 4/10 of a mile (about 2200

feet) away (per Google Earth) from the camera. It's clear how distances are distorted by the wide-angle lens. Further, in the photo, the near edge of the Calico Mountains appears to be just beyond Rt. 66. In actual fact, the near edge of the Calico Mountain is over 4 1/2 miles beyond Rt. 66. The photographic distance and size distortions mean that the simulated solar panel sizes appear much smaller in the KOP 2 photograph compared to their appearance in actual reality. In fact, only about 10% of the proposed panels are even shown in this KOP 2 false simulation. The other 90% of the proposed solar panels have disappeared. Apparently they have shrunk down so much as to be completely invisible in this (Exhibit 3.1-6b) KOP 2 distorted-perspective photo simulation.

Partial (simulated) view as submitted by applicant of some of the proposed 20-ft tall solar project panels located 1/2 mile from camera.



5 miles
4 1/2 mile
16 feet

ACTUAL
Distances from
Camera Position

The DEIR conclusions are therefore almost completely invalid. This Exhibit 3.1 - 6b (KOP 2) DEIR photo and a number of other DEIR photo(s) use the same wide-angle distance and size minimization technique to give the false impression that the solar project's impact on the viewshed is almost negligible. This impression is a lie. The viewshed degradation is in fact very considerable and is unacceptable to tourists as well as to the surrounding community.

Additional examples of this same wide-angle **photo-lying** include:

Exhibit 3.1-5b KOP 1 (Visual Simulation)

Exhibit 3.1-7b KOP 3 (Visual Simulation)

Exhibit 3.1-8b KOP 4 (Visual Simulation)

Exhibit 3.1-11b KOP 6 (Visual Simulation)

In addition to Section 3.1 - 6b, many other Daggett Solar Power Project DEIR conclusions are demonstrably, substantially and irreparably false for the same reason, including:

1. **Scenic Vista - Impact 3.1-1** The project **WOULD HAVE** an adverse effect on a scenic vista. A substantial **NEGATIVE** impact **WOULD** occur.
2. **Scenic Highway - Impact 3.1-2** The project **WOULD** substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. These impacts **WOULD** be **SIGNIFICANT**.
3. **Visual Character - Impact 3.1-3** The project **WOULD** substantially degrade the existing visual character or quality of the site and its surroundings. These impacts **WOULD** be **SIGNIFICANT**.
4. **Cumulative Impacts - Impact 3.3-5** The project **WOULD** result in cumulative, negative aesthetic impacts. These impacts **WOULD** be **SIGNIFICANT**.

Irrespective of the many other significant negative impacts of the proposed project, the negative impacts of the proposed project on the Mojave Valley's aesthetics and visual resources are, in my opinion, significantly negative to warrant cancellation of the entire project.

Thank-you very much for this opportunity to comment on the DEIR.

Respectfully,

Jack Unger