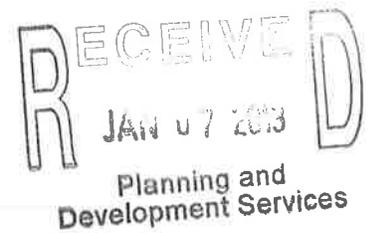


January 2, 2013

Ashley Gungle , Jarrett Ramalya  
County of San Diego/ Department of Planning and Development  
5510 Overland Ave., St 310  
San Diego, CA 92123



**Re: Notice of Preparation for a Programmatic Environmental Impact Report for the Soitec Solar Projects**

We would like to thank the County of San Diego employees that brought the December 18<sup>th</sup>, 2012 public scoping meeting on this project to the Boulevard fire station to solicit comments from some of the local residents. Jarred and Mark's comments and kindness were greatly appreciated and we appreciate the individuals that took their evenings to bring this meeting to the public in Boulevard CA.

The intent of our letter, is to provide comments on this proposed project to you, the EIR lead agency that help make environmentally sound decisions for the County of San Diego. This project has the ability to dramatically change the local area in many ways. Some subjects of concern are included as subject areas to be analyzed in the EIR. But, as local land owners, our perspective (if we can be so bold) includes critical areas of concern that may not be found directly in the subjects to be evaluated. Therefore, the following is intended to give you, the lead agency at The County of San Diego, a true menu of concerns from local property owners' viewpoints.

Below are our comments on specific subjects listed to be analyzed on the NOP (specifically the areas of the proposed Rugged project)....

**Aesthetics (Visual Resources)**

We are concerned with the proposed project's potential effects on visual resources in the Boulevard community; because the proposed project area is highly visible from the Interstate 8 freeway in east bound and west bound directions. Any passerby or resident will look down on a metaphorical "sea" panels that blanket the ground. The existing wind turbines that are the Kumeyaay Windfarm (and the newly proposed Tule Wind Project) already obstruct the views, and damage the aesthetics. The adverse environmental affects that the Rugged Solar Project will have to visual resources include visual character; how a viewer observes the visual environment as a whole; visual quality, the environment's

brilliance, distinction, and/or excellence seen by the observer; viewers response from the highway the composite view is from the right-of-way; the viewing distance is vast and extensive, the number of viewers will be high due to the extensive use of Interstate 8. The Sunrise Powerlink attempted to blend into their environment by coloring the towers. Will the poles of the CPV panels used in the Rugged project be painted, or colored, to fit in with the surroundings?

#### Air Quality (Dust Control)

In the Boulevard area, blowing winds are continuing occurrences; gusts frequently blow up to 70 miles per hour or more. Concerns arise not only during construction of the Rugged Acres Solar project, but also for the life of the project. Barren lands will include but not limited to, of area underneath the CPV panels, new and existing roadways, fire barriers, and access roads. These large exposed areas in combination with the unfailing wind, and dry conditions (annual precipitation of 15.84"), create a continuous particulate in the air affecting the surrounding area.

#### Biological Resources

The proposed project area contains natural habitats with the potential for use by sensitive and/or protected species. This project creates the potential for substantial adverse effects through habitat modifications, including the invasive species. In the proposed area, any disrupted land is quickly taken and the native flora is pushed out; additionally any moisture in the soil is monopolized due to the adaptation of invasive species.

#### Boundaries

We feel there is dire necessity for the County to increase the proposed required set back distances from Rugged project fences and CPV panels/masts near adjacent neighbors water wells and property boundaries. This distance should be lengthened substantially when adjacent to a residential (R1) zoned parcel. Without additional space from project fencing to an adjacent residential property boundary the tall masts and CPV panels will appear to "loom" intrusively over our boundaries. The Rugged project, the Kumeyaay Windfarm, Tule Wind projects, and the Sunrise Powerlink all encroach onto populated areas, our homes and Ranches. These projects have left us in the area feeling as though we are being "stepped on." Are we as local individuals, property owners, residents, and future residents obsolete and irrelevant?

### Dark Skies and Glare

A concern arises with the reflective light from the CPV panel surfaces. Most of the proposed grids of high density panels on the Rugged project are situated in a highly visual valley. As these CPV panels follow the path of the sun, through the sky, the reflective light from the panels will be reflected on the southern and western horizons. Residential homes, ranches, yards, freeway traffic (potentially dangerous effects to travelers along HWY I-8 from the reflected light also could occur,) individuals, including children at local school bus stops, are all within view of these horizons, and will be negatively impacted from the reflected light of these CPV panels lenses. The Laguna Observatory, as well as local star observers, have a clear direct view of the project area; will rising heat from the panels adversely affect their work?

### Ground Water

We would like to express our concerns for the water wells in the immediate area (specifically the well located at APN #611-091-02-00) and any compromised integrity during and after the construction phase of the project. The ground vibration created from drilling, pounding and installation methods for the CPV masts can have a detrimental effect on the integrity of the adjacent water wells. Another concern is the leaching of ground water on and around the CPV 28" diameter metal poles into our water table and affecting the water quality in the existing well. What are the specifications of the metal masts that are inserted into the ground? Are the poles galvanized or coated to prevent oxidation over time into the soil and water table?

### Land Mitigation

The EIR should thoroughly address how the proposed project will mitigate impacts to biological resources. Impacts to sensitive habitat should be mitigated through conservation of a habitat, as specified by the County. Any land used for mitigation should be protected for conservation, and a grant should be in place so that the mitigated land can be managed for all time.

### Storm Water Management (Run-off)

What measures will be taken to control water runoff from thunderstorm, rain, and snow melt?

### Traffic

Can the existing and proposed roads (Ribbonwood Road and the proposed dirt road that will be used for ingress and regress) support the amount of traffic flow, construction traffic, and weight of the vehicles traveling these corridors? As residents in the area, we are especially concerned with condition of the existing asphalt of Ribbonwood Rd after the project is concluded. Off Ribbonwood Rd there is a dirt easement road to be used as access to the Rugged project, how will this dirt road and surrounding land will be affected during and after the use of this proposed dirt access road?

### Wildlife Movement

There is an abundance of life in the proposed Rugged project area, with an array of animal species living in or using the area for movement. Concerns arise with the seven foot high, barbed wire fences that will incase the entire area, limiting the valley's use as a wildlife habitat and a wildlife corridor.

### Zoning

Please consider the proposed zoning change and how it may effect residential homes that are located adjacent the projects boundaries. We residents in the area are still feeling the impact of the County 2020 Plan. Allowing this rezoning requested within the Rugged project appears to go directly against the 2020 Plan. A zoning change to property once zoned R1 for this application should not be allowed it is now directly adjacent the proposed enormous power project's boundaries. In our opinion this project is "industrial" by nature and most other definitions and should be well separated from an owner's residential property. Referring specifically to APN #611-091-02-00, this residentially zoned parcel will be severely impacted by the proposals of the Rugged project.

January 2, 2013

Thank you for the opportunity to comment on the NOP for the proposed project. Any questions regarding this letter can be directed to Andrew Heimerdinger and/or York Heimerdinger at [ANDREW.HEIMERDINGER@LIVE.COM](mailto:ANDREW.HEIMERDINGER@LIVE.COM) and [YORKH@LIVE.COM](mailto:YORKH@LIVE.COM) respectively.

Sincerely

A handwritten signature in black ink, appearing to read "York L. Heimerdinger". The signature is fluid and cursive, with a large, sweeping flourish at the end.

York Heimerdinger

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Pine Valley, CA 91962