

Hingtgen, Robert J

From: kevin=kkeane.com@sendgrid.info on behalf of Kevin Keane <kevin@kkeane.com>
Sent: Tuesday, February 11, 2014 12:41 PM
To: Hingtgen, Robert J
Subject: Soitec PEIR comments
Attachments: Soitec PEIR - comments.pdf

Dear Mr. Hingtgen,

Attached please find my comments regarding the Soitec PEIR. I hope that it is in acceptable form.

Sincerely,

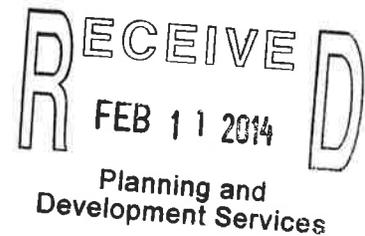
Kevin Keane

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FEBRUARY 11, 2014

Robert Hingtgen

County of San Diego
Department of Planning and Development Services
5510 Overland Avenue, Suite 110
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Public Review Comment for
SOITEC SOLAR DEVELOPMENT
PROGRAM ENVIRONMENTAL IMPACT REPORT

3800 12-010 (GPA); Tierra Del Sol; 3300 12-010 (MUP), 3600 12-005 (REZ), 3921 77-046-01 (AP); Rugged Solar,
3300 12-007 (MUP); Environmental Log No.: 3910 120005 (ER)

Dear Mr. Hingtgen,

I would like to make the following comments regarding the Soitec PEIR

NOISE AND OTHER ISSUES - WIND

The EIR does not include an analysis of the impact of strong winds/storms. The Boulevard area has some of the strongest winds in the state, with frequent sustained winds of 70 mph, and gusts up to 100 mph.

Will wind get caught in the trackers, making them act as a sail and possibly even get damaged? Will openings in the structure make noise similar to a whistle? Will any movable part of the structure be able to hit other structures and make them ring like a bell? Will all parts of the project withstand wind, and sand or rocks thrown by the wind, without damage? If parts of the project are already damaged, will they cause additional noise?

Wind storms generally carry loose debris with them, as well as loosen materials that are damaged or insufficiently attached. In the worst-case scenario, how far would a tracker panel be blown by a 100 mph wind gust, and how much noise and damage would it cause to neighboring properties?

NOISE – USE OF HELICOPTERS

The use of helicopters may be of serious concern for the area. Border Patrol already uses helicopters and drones in the area. These overflights are generally short (seconds) but very annoying. Considering that Boulevard is a very quiet

town, each overflight of these aircrafts is highly disruptive. Having helicopters hover for up to five minutes at very low altitude will be dramatically worse.

HEAT

The EIR does not include an analysis of the impact from heat dissipation from the concentrated photo voltaic elements. Currently, without the solar system, much of this heat is generally absorbed by the ground during the daytime, and slowly released during the night. The CPV elements require cooling to be immediate; the collected heat has to be radiated away from heat sinks during the daytime. Given the massive scale of the proposed projects, many megawatts of heat have to be disposed of – probably approximately 1.5 W for each 1 W of power generated.

Thus, in order to generate 60 MW (Tierra Del Sol) to 80 MW (Rugged), during the daytime, the facilities have to dissipate, conservatively estimated, 90 MW and 120 MW in heat, respectively.

Hot air rises. How does adding such a large amount of energy to a relatively small site affect local wind patterns or cause other changes to the microclimate? Will it cause additional evaporation, and will it contribute to, or reduce the amount of local rain fall?

Rising hot air in our area often causes dust devils; some neighbors have reported dramatic damage from them, such as torn-off barn roofs.

Will the wind caused by the rising air potentially fan any flames in case of a wild fire or fire in the facility?

TELECOMMUNICATION

The proposed projects will require phone and data connections for telemetrics, security, and other purposes. Boulevard is notoriously underserved in terms of telecommunications. Currently, landline phone service is the only form of telecommunication available to residents - and AT&T plans to discontinue landline phone service nationwide within the next six years.

What types of communication lines will Soitec have to install for the proposed projects? How many miles of fiberoptic cable (or other media) will be installed?

Will wireless communication be used, and if so, what will be impact of radiation from the wireless communication?

What will be the environmental impact from these lines during construction, and during operation?

As mitigation, will residents be able to benefit from any new telecom facilities?

Sincerely,

Kevin Keane

BOULEVARD HOME OWNER