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IMPERIAL COUNTY PLANNING & DEVELOPMENT SERVICES

Planning / Building & Safety / Parks & Recreation



Armando G. Villa, AICP
Department Director

June 4, 2013

Ashley Gungle
Project Manager, Suite 110
5510 Overland Avenue
San Diego, CA 92123

Subject: Response to Mitigated Negative Declaration by San Diego County for the Ocotillo Wells Solar Project/Major Use Permit Environmental Log No: PDS2012-3910-12-12-001

Dear Ms. Gungle:

The Planning & Development Services Department received your "Notice of Intent to Adopt a Mitigated Negative Declaration", dated April 25, 2013.

We appreciate the opportunity to comment on the above proposed project.

N1
The proposed project is a Major Use Permit for a 336-acre solar energy facility on an approximately 440-acre site. The two parcels on which the solar project is to be located is east of the Split Mountain Road and adjacent to the Imperial County in the Ocotillo Wells area on APN's 253-390-57 and 58, in the unincorporated area of San Diego County and in the Desert Community Plan.

The solar energy facility, IID substation and transmission lines are to be located approximately three (3) miles south of State Highway 78 and bordered by the Anza Borrego Desert State Park to the south.

N2
The California Environmental Quality Act (CEQA), Guidelines for California Environmental Quality Act, California Code of Regulations Title 14, Chapter 3, Article 6, Section 15071 (b), provides that the Negative Declaration shall include the "...location of the project, preferably shown on a map..."

Typically, the Imperial County CEQA package includes not only a map but also a copy of the application with support documents for the reviewing agency's information and staff perusal.

N2
Cont.

The analysis of the solar farm and your proposed Mitigated Negative Declaration and the project's exact location would have been easier to review if a hard copy of the map would have been provided to the County staff.

N3

The CEQA Initial Study prepared indicates that the project will generate "...an additional 10 ADT..." and payment of the TIF (Traffic Impact Fee) will mitigate potential cumulative traffic impacts to less than significant. The proposed 40 acre-feet of groundwater to be used will not impact any Imperial County project or groundwater wells near the solar project.

N4

N5

After a review of the Initial Study and its mitigation measures, the County of Imperial Planning and Development Services staff does not feel that there will be any significant, adverse environmental impacts from the proposed solar farm and its transmission lines. However, attached is the Imperial County Public Works Department Comment Letter dated June 3, 2013.

N6

Thank you for the opportunity to review and respond to the MND and look forward to working with San Diego County staff in the future on similar projects as they are submitted.

Sincerely,

ARMANDO G. VILLA, AICP
Director of Planning & Development Services

By:


Patricia Valenzuela
Planner III

Attachment: Imperial County Public Works Letter Dated June 3, 2013

cc: Armando G. Villa, Director of Planning & Development Services
Jim Minnick, Assistant Director of Planning & Development Services
John Gay, Imperial County Public Works
Files: 10.251, 10.101, 10.102, 10.107, 10.105

Responses to Comments on the Draft Mitigated Negative Declaration for Ocotillo Wells Solar, MUP12-004

Responses to Letter N, Imperial County Planning & Development Services

N1	The County concurs with this comment, which is introductory in nature and does not raise a significant environmental issue for which a response is required.
N2	The CEQA documents provided online for this project included the description of the project location within the Notice of Intent, the initial study and the technical studies. Aerial and vicinity maps were also provided along with the project plot plans. Hard copies of maps are not automatically mailed out due to the excessive cost associated with such an effort but are always provided upon request.
N3	The County concurs with this comment. Construction of the Project would generate an estimated 2.71 average daily trips (ADT); operation/maintenance activities would generate an estimated 10 ADT. Trucks used for construction would travel along portions of SR 78 as needed; however, the addition of Project-related traffic on the road, or along Split Mountain Road, would not result in a substantial increase in traffic congestion or create unsafe conditions with regard to circulation or access. The Project will require County of San Diego approval of a right-of-way encroachment permit for minor improvements at the private access easement from Split Mountain Road, and a Traffic Control Plan will be implemented to ensure that public safety is maintained. Neither construction nor operational traffic generated by the Project would cause the existing level of service (LOS) along these roadways to exceed the County of San Diego's thresholds of significance. Traffic impacts would be less than significant, and no mitigation measures are required.
N4	The County agrees with this comment.
N5	The County concurs with this comment. Please also refer to responses to comments O-1 and O-2 below.
N6	This concluding comment does not raise a significant environmental issue for which a response is required.