

Comment Letter I13

GENERAL EIR ATT: PDS PROJECT MANAGER: ASHLEY, GUNGLE

5500 Overland Ave. Suite 310

San Diego, California 92122

(858) 495-5375

RE: COMMENTS ON DEIR: JACUMBA SOLAR MAJOR USE PERMIT, PDS 2014-MUP-14-041;
PDSS2014-ER-22-001 COMMENTS

Biology:

A concern is barrier effects to wildlife. Projects have been completed are the border fence, Sunrise Power Link, Eco-Substation, Energia Sierra Juarez Wind, and Ocotillo Wind. Another project in cue is Rugged Solar. These projects will create barriers to migrating wildlife and birds. Big Horn sheep, bobcats, mountain lions, deer, eagles, and bats have been seen in the proposed project area. The lake effect which is stated in the document would affect migratory birds. The cumulative impacts of all these projects must be evaluated before approving this project.

I13-1

Water:

Water is a concern as the surrounding communities are dependent on groundwater resources. This is a major concern as there is a limited amount of groundwater in the area. Another concern is the potential economic impact to Jacumba Spa as there hot water well is next to the water supply site. If the well dries up or the temperature drops this could cause the spa to close. The spa is the largest employer in town. We have been told under the current drought that we have approximately two years of groundwater available at current use. There needs to be monitoring of wells 1 mile out from the water source for this project. Previous estimates for past projects have underestimated the amount of water needed for the project. An example Eco-Substation estimated 30 million gallons of water for its projects use, but used over 90 million gallons water. The proposed water source in Jacumba is at the lowest point in the aquifer in comparison to the other groundwater dependent residents. This is a major concern for residents outside of the Jacumba Service District, which provides water to residents in the town of Jacumba. No one can predict how long this drought will last. The battery storage could also potentially contaminate the ground water in the event of fire or explosion. The soil binder is also of concern that would potentially contaminate ground water resources. The cumulative impacts of this project and previous projects need to be evaluated.

I13-2

Fire:

I13-3

Response to Comment Letter I13

Mark Ostrander

June 1, 2015

I13-1 The impacts to biological resources, including cumulative resources are addressed in the DEIR section 2.2. Please also refer to Responses to Comments F1-1, F1-5, F1-6 and O5-144.

I13-2 Groundwater impacts were analyzed in three locations in the DEIR, including Section 2.2.3 (Biological Resources), Section 3.1.4.3.4 (Groundwater Resources), and Section 3.1.8 (Utilities). The DEIR concluded that there were no significant impacts to groundwater resources for the Proposed Project (DEIR, pp. 3.1.4-26 to 3.1.5-33.). The Proposed Project would either use a mix of JCSD non-potable water and recycled water from PDMWD or rely entirely on recycled water from PDMWD. The JCSD non-potable groundwater supply well has an upper limit on the amount of water that can be supplied, in terms of maximum pump capacity as established by the JCSD. Beyond that limit, recycled water would be provided by PDMWD. Both water sources considered for the project construction activities would be non-potable sources. Use of the non-potable well water from JCSD or PDMWD would not affect abilities to achieve EO B-29-15 intended water conservation. Potential impacts to groundwater quality through

<p>The document states that the area is in a Very High Hazard Severity Zone and that there is a very low occurrence of fire history in the area of the project. The reason for this is historically there were no infrastructure, roads, and low numbers of people in the area. Current infrastructure in the area is Sunrise Power Link and Eco substation. These being new infrastructure in the area will increase the probability of fire occurrence with the addition of this project will also add to the probability of fire. They stated that fire could occur every 5 to 6 years based on past fire history. It further stated occurrences could be shorter based on weather. San Diego weather history shows that we generally get Santa Anna winds every year further San Diego County has year-round fire season. A good example of fire occurrence in the area is when the BLM shooting range was open there were fires started from people shooting in the area. When BLM closed the shooting area the occurrence of fire reduced. Another concern is this will add more to the existing fire service in our area. Currently, Jacumba is served by paid fire staff. Boulevard is staffed with volunteers with many days being dark. Boulevard has a new fire station, which will house CAL Fire White Star personnel and when available volunteers. There exist a potential of one engine less due to lack of volunteer staffing. It also shows US Forest Service, which are seasonally staffed. A concern will be when a fire starts what revised tactics will firefighters need to employ to fight the fire. The changed tactics could have the potential of a small fire becoming a large fire. The document states that the fires would potentially be small due to the sparseness of vegetation. In a Santa Anna event fire would in fact spread very rapidly making its way to heavier fuel beds. This could potentially lead to an event that was witnessed in the years 2003 and 2007. Another concern is the battery storage which typically uses lithium ion batteries. These batteries are prone to heating when charging especially when there are loose connections between the batteries and make them prone to explode and catch fire. Since this would be high voltage that would cause firefighting tactics to stand back and this would also create a HazMat incident. There is no local HazMat team in the area they would have to be requested from San Diego Fire with an extended response time. The cumulative impacts of this project and previous projects need to be evaluated.</p> <p>Traffic:</p> <p>The amount of water truck traffic through the town of Jacumba will increase the risk of accidents. The water site is located across from the elementary school in Jacumba. Also of concern will be the condition of Old Highway 80, after the amount of traffic stated in the document. The cumulative impacts of this project and previous projects need to be evaluated.</p> <p>Soils:</p> <p>Removal of the vegetation and grading impacts will alter drainages and possible silting of seasonal streams which would impact water quality and potentially the recharge of aquifers in the area. This could also impact the surrounding vegetation growth and health. Removal of the</p>	<p>implementation of the project are outlined in Section 3.1.4.3.3 and analyzed to be less than significant based on the County’s Groundwater Guidelines. DEIR section 2.4-27 and the Fire Protection Plan describe the measures that will be implemented to protect against the risk of battery fires and explosions.</p> <p>I13-3 See Response to Comment C1-9, C1-11, O3-22.</p> <p>I13-4 Traffic hazards associated with implementation of the Proposed Project are outlined in Table 3.1.7.3.4 of the DEIR. As outlined in this section, a traffic control plan would be required to follow County requirements during construction to ensure large trucks would not create any potential safety hazard. Implementation of a traffic control plan would ensure the safe and efficient traffic flow in the area and would contain measures for construction noticing, signage, and policy guidelines to ensure no direct or potential cumulative safety hazards.</p> <p>I13-5 Potential impacts associated with geology and soils through implementation of the Proposed Project are outlined in detail within Section 3.1.2 of the DEIR. Section 3.1.4 of the DEIR outlines potential impacts associated with implementation of the Proposed Project to hydrology and water quality. Cumulative impacts to both resource areas are outlined in detail within their respective sections. DEIR pages 3.1.3-11 to 12 includes a discussion of carbon sequestration and concludes that evidence does</p>
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<p>vegetation will also take away the carbon sequestration they provide. The cumulative impacts of this project and previous projects need to be evaluated.</p> <p>The description of Jacumba in the document would lead one to believe that the community is in decline and blighted. I strongly believe these statements are misleading. Further, I believe they put the statements in place to lead one that the area is inconsequential and would not be an impact to the community. The community's economy is based on tourism. Many tourist come to the area to hike the trails visit The Desert View Tower and explore the history of the area. Projects that have been completed in the area have taken its toll and with addition of this project would create a further decline in tourism. The community has done quite a bit of work revitalizing the area with the addition of artwork, trails with interpretive signage, information boards, the lake area with its tricolored blackbird, and festivals held throughout the year. The document under aesthetics states that this project will alter the view shed and that it can be viewed from Interstate 8. Interstate 8 house portions that are considered scenic corridors. The project lies within an area considered a scenic corridor. This project would not help increase jobs for San Diego County residents as these companies historically come from out of state and, once completed; have no personnel working at these sites as they are monitored remotely. The project owners are based out of state and this will not do anything for long term employment opportunities within San Diego County. The cumulative impacts of this project and previous projects need to be evaluated.</p> <p>That County must evaluate the cumulative impacts, from this project, past projects, and future proposed projects. Currently impacts from these projects have impacted wildlife, economics, property values, and quality of life for residents in the area. The County must do due diligence when evaluating and approving these projects.</p> <p>In conclusion, these are just some of the items I found of concern in the document for the time I had to review the document. One final comment renewable energy projects need to be placed at point of need to be efficient. Distributive power is more secure, more efficient, and less costly than transmission technology. The US is currently concerned about the reliability of the grid and is encouraging distributive power over transmission power. The studies that have been done about the security and reliability of the grid in the US need to be looked at, especially with the current threats of terrorism and natural phenomena that could cause power disruption.</p> <p>Cumulative impacts as stated in PRC Division 13 Environmental Quality Article 20 15355 Cumulative Impacts</p>	<p>↑ I13-5 Cont.</p> <p>I13-6</p> <p>I13-7</p> <p>I13-8</p> <p>I13-6 Most of these comments restate facts set forth in the DEIR or describe the status of the community and therefore do not require a response under CEQA. The County believes that a substantial portion of the labor force supporting the project will come from the local community. Property tax revenue generated by the project will also support the region. Cumulative impacts are outlined in detail in each topic within Chapters 2 and 3 of the DEIR. The methodology for each resource area is defined in detail within the respective sections of the DEIR, as well as in Section 1.7 of the DEIR.</p> <p>I13-7 Please refer to the response to comment I13-6 above.</p> <p>I13-8 Please refer to the response to comment I13-6 above. The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.</p>
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"Cumulative Impacts" refer to two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

We hope you take these comments and concerns and address them to the full extent possible. If you have questions or need further clarification feel free to contact me. Thank you for your time and allowing me to participate in this process.

I13-8
Cont.

Regards,

Mark Ostrander /s/

(Retired Cal Fire Battalion Chief and Environmental Coordinator)

Jacumba Resident

43577 Old Hwy 80

Jacumba, Ca. 91934

clasictraclayer@att.net

(619) 302-0470