

Comment Letter I6

COMMENTS ON DRAFT EIR: JACUMBA SOLAR MAJOR USE PERMIT, PDS 2014-MUP-14-041; PDSS2014-ER-22-001-By DANIELLE COOK (JACUMBA HOT SPRINGS) 619-766-9156

It is difficult to know where to start concerning comments to Jacumba Solar's EIR. This Industrial-scale Solar Installation is so terribly misplaced in our fragile desert environment.

Interestingly, **the Sierra Club**, a staunch supporter of solar and wind energy, **is concerned about massive solar farms' impact in desert regions**. Here is an excerpt concerning peer reviewed science taken from Sierra Club's own California/Nevada Desert Report September 2012.: In December, 2011, Jeff Lovich and Josh Ennen investigated the science behind solar industrial development in an article entitled *Wildlife Conservation and Solar Energy Development in the Desert Southwest*, published in *BioScience*, a peer-reviewed, heavily cited monthly journal. Here is what they said:

1. *...the implementation of large-scale solar energy development as an "environmentally friendly" alternative to conventional energy sources may actually increase environmental degradation on a local and on a regional scale.*
2. *...almost no information is available on the effects of [industrial] solar energy development on wildlife.*
3. *...little is known about the effects the construction and decommissioning of solar energy facilities will have impacts on wildlife, including rare and endangered species, and on their habitats in the desert. These activities involve significant ground disturbance and direct (e.g. mortality) and indirect (e.g. habitat loss, degradation, modification) impacts on wildlife and their habitat. Many of the areas being considered for the development of solar energy in the Mojave and Sonoran Deserts are, at present, relatively undisturbed.*
4. *...construction activities produce dust emissions Dust can have dramatic effects on ecological processes at all scales. The authors then explain these effects: alteration of fertility and water-retention capabilities of the soil, adverse influence on gas exchange, adverse influence on photosynthesis, changes in water usage of desert shrubs, root exposure, and damage to leaves and stems.*
5. *...there is a dearth of scientific research and literature on the effects of dust suppressants on wildlife.*
6. *We are not aware of any published studies documenting the direct effects of USSED [Utility -scale solar energy development] on the survival of wildlife.*

Even the **EPA recommends** OTHER LOCALES for industrial alternative energy development [taken from same article]: *The EPA assigns priority to locating industrial energy facilities on contaminated and underutilized sites, such as abandoned mines, parking lots, rooftops, and the like. These sites would then be more economically productive without sacrifice of virgin lands.*

Finally, as we are rushing to despoil our deserts with industrial-scale solar installations, European countries are actually having second thoughts about these massive so called 'green' energy projects. They are cutting back on subsidies to protect the aesthetics of the countryside and to protect their wildlife. [Source: *Solar Power in the U.S. Lessons Learned -Citizen's Alliance for Responsible Energy*]. For example, the UK is slashing subsidies for big solar farms as the government has established a preference for solar panels installed on tops of buildings instead of in fields.

Response to Comment Letter I6

Danielle Cook
May 31, 2015

I6-1

The County acknowledges receipt of Danielle Cook's input and appreciates her comments regarding the potential impacts associated with implementation of the project. The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.

I6-2

The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.

I6-1

I6-2

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The Jacumba Solar EIR as presented is riddled with carelessly assembled data, misleading statements and glaring omissions. Some of these are:

- The attempted positioning of Jacumba Hot Springs as a town in decline [therefore, of no significance] with a fading tourist economy- this attempt includes underreporting Jacumba Hot Spring's population by at least 30% when more current census data is available
- Stating that no improvements are planned for the airport [3.1.5-18-Land Use and Planning] when in fact the County has current plans to pave the run ways which will encourage use by private planes
- Using Average Daily Traffic Data [table 3.1.7-1] for Old Highway 80 from Ribbonwood Rd to McCain Valley Road which is 6 miles away in the wrong direction and NOT relevant for determining Jacumba Hot Spring's traffic patterns
- Leaving out the (species of concern) Pallid Bat (*Antrozous pallidus*) and Mexican free-tailed bat and tri-color blackbird here in Jacumba in the section on impacts to wildlife
- Leaving out the potential safety impacts to our children and elderly of big water trucks continually traveling through downtown Jacumba for 6-8 months
- Stating that the project would be using an environmentally safe soil stabilizer when there are NO STUDIES available that show the long-term effect of these liquid stabilizers on humans, plants, birds amphibians etc.
- Misleading the public that Jacumba Solar will deliver energy to SDG&E Eco substation [Project Description 1-3] when in fact, there is no Purchase Agreement between the two companies and no guarantees that they will get one
- Misleading the public that they will create local jobs when in reality, Jacumba Solar by their own admission will be handing off the project to another company headquartered in Phoenix who will most likely bring in their own union crew
- Misleading the public by promising increased property tax revenue when it is a fact that large-scale energy projects depress property values for those living under or close to massive power lines and substations
- Misleading the public that the fire danger will be safely rendered 'not of significant impact' by the proximity of four fire stations and other mitigation methods
- Misleading the public that the Jacumba Solar project would have minimal impact to air quality air when they admit the dust generation is a potentially serious issue and that the nearest monitoring station is in Alpine [Ambient Air Monitoring Stations]
- Misleading public on water usage issues impacts by using historical precipitation records from July 1982 through June 2012 to estimate recharge within our (water) basin instead of worst case scenario using drought year records
- Misleading the public that the proposed project area is not within a specific groundwater problem area (such as over drafted basin) when we simply do not know, as the data they used was from a County of San Diego 2007 report before the drought took hold. [Note: EIR states that there are few studies on fractured granite aquifers-too much is unknown!]

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I6-3

The FEIR has been updated to include the most recent Census data, from 2010 to note an increase in total population from approximately 400 to 561 (p. S-5).

I6-4

The FEIR (p. 3.1.5-2) has been updated to include reference to the County Supervisors approval of a resolution to support a state grant for improvements to the runway at the Jacumba Airport.

I6-5

The DEIR (Section 3.1.7, Id pp. 3.1.7-12) identifies that a traffic analysis is not necessary as a result of the low numbers of trips generated by the Proposed Project. The traffic data used is the closest available and does provide a representative value of the levels of traffic along Old Highway 80 for the purposes of demonstrating the existing demand relative to the roadway capacity (compare tables 3.1.7-1 and 3.1.7-4).

I6-6

Please see responses to comment O3-7 and I3-3. Bats are described in Appendix 2.2-1 as likely to forage on site. Regarding pallid bat, this species are described in detail Appendix F of Appendix 2.2-1 as having moderate potential to roost during the day in the rocks on the portion of the project area located north of Old Highway 80 but no potential for maternity roosts due to lack of suitable habitat. Mexican free-tailed bat (*Tadarida brasiliensis*) is not considered a special-status species by the County of San Diego, CDFW, or USFWS and, therefore, is not described in the DEIR.

	<p>I6-7 Traffic hazards associated with implementation of the Proposed Project are outlined in Section 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 potential safety hazards to area children and elderly.</p> <p>I6-8 The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required. Soil stabilizers would be utilized on-site for fugitive dust control, as approved by the California Air Resources Board.</p> <p>I6-9 The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.</p> <p>I6-10 The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required. One of the main project objectives, as outlined in Section 1.1 of the DEIR, is “Develop a utility-scale solar facility within San Diego County supporting the economy by investing in the local community, creating local construction jobs, and increasing property tax</p>
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	<p>revenue.” While the commenter is correct that no commitment to definitively using local workers is provided, the Proposed Project would result in opportunities for local and regional labor and local businesses consistent with project objective 8.</p> <p>I6-11 The Proposed Project would result in increased property tax revenue by making improvements to vacant parcels, consistent with the project objective 8. The Proposed Project would also not result in the construction of new off-site power lines or substations that might affect occupied properties. The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.</p> <p>I6-12 As outlined in Section 2.4.3.3. of the DEIR, potential direct, indirect, and cumulative impacts associated with implementation of the Proposed Project are based on the County’s <i>Guidelines for Determining Significance and Report Format and Content Requirements – Wildland Fire and Fire Protection</i>. Based on these detailed thresholds used to analyze the potential hazards within development in the County of San Diego, the Proposed Project would not have a potentially significant impact with proposed mitigation.</p> <p>I6-13 As outlined in Section 3.1.1.3.1, potential direct, indirect, and cumulative impacts associated with implementation are based on the Appendix G of the</p>
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	<p>CEQA Guidelines (14 CCR 15000 et seq.) and the County’s <i>Guidelines for Determining Significance: Air Quality</i> (County of San Diego 2007). Based on these detailed thresholds used to analyze the potential impacts to air quality through development in the County of San Diego, the Proposed Project would not have a potentially significant impact with proposed mitigation.</p> <p>I6-14 Discussion of historical precipitation is found in Section 3.1.4, Hydrology and Water Quality of the DEIR. The County disagrees with the commenter’s suggestion that the DEIR is misleading the public by using long-term historical precipitation data instead of worst case drought year records. Drought, by definition, is a prolonged period of abnormally low rainfall, not a permanent condition. To characterize existing and historical trends in rainfall by only discussing worst case scenario drought years would be misleading by not providing the public with historical averages. Additionally, it should be noted that the historical rainfall data provided in Section 3.1.4 of the DEIR is averaged per year from 1963 to 2011, which includes multiple drought years throughout history.</p> <p>I6-15 Groundwater resources impacts are analyzed in detail within Section 3.1.4 of the DEIR.</p>
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- Misleading the public that the impact on plants would be less than significant due to 'set aside' mitigation actions when no rare plant surveys have been conducted for the project site! [Biological Resources 2.2-50] Some species simply do not take well to transplant.
- Misleading the County that the actual project can be completed in six months as this does not adequately account for almost certain delays due to postponing or halting construction because of nesting birds or bats or wind conditions of over 30 MPH (winds of over 30 mph are determination point for halting construction as per EIR). The ECO substation construction was shut down for months due to nesting bats.
- Failing to disclose who will 'monitor the monitors'. The project will be constructed by a sub-contractor. Who at Nextera will monitor the hundreds of mitigation reports and other actions that will be supposedly monitored? Who at the County level will review this work?

In the interest of brevity and because so many others have covered the water concerns for Jacumba and its surrounds in depth, I will focus my main comments on:

- 1) Jacumba's current and future success as a tourism destination
- 2) Soil Stabilizer safety and control of dust
- 3) Safety concerns around water trucks on main street Old Highway 80
- 4) Fire Danger and lack of proper mitigation resources

Jacumba Hot Springs

Jacumba Hot Springs is a CURRENT tourism destination for San Diego County. While our history does show a period of decline when the Interstate diverted traffic from Old Highway 80, our residents have rallied and worked hard over the past few years to revitalize the town and it is working! We have: attracted a new buyer for the hot springs spa who invested over a \$100,000 in renovations; we raised money and installed public art in our park and around town; developed a 'Walking Tour of Jacumba' tourism map and brochure; celebrated our Centennial last year with four major events that drew crowds from all over the state, fixed up our lake to re-attract the Tri-color Blackbird (A California Species of concern); partnered with Imperial Valley Desert Museum on marketing initiatives to build more I-8 traffic to our community; installed a billboard on I-8 touting our recreational attributes; launched a TV advertising campaign in Imperial Valley and Yuma. On many weekends, our lake is visited by scores of birders, our spa is enjoyed by San Diegan's and others 'taking the waters' and motorcycle and car clubs ride through town and eat at our restaurants. Our current economy is heavily dependent on tourism. Tourists come here to enjoy our scenic views, breathe our clean air, revel in the quiet of nature, recharge in our hot springs and enjoy our 'dark' skies. Industrial scale projects such as Jacumba Solar threaten our visitor satisfaction levels and have the potential to destroy our tourism economy and jobs.

Soil Stabilizer Safety & Dust Control

Desert ecosystems are rich and diverse biological resources. Rare plant communities exist on many of these sites. Although Jacumba Solar has not completed any rare plant surveys on the Jacumba site, they admit that the environment and conditions are conducive to such plants [Jacumba milk-vetch, Pygmy

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Please see responses to comment S2-2 and O3-15.

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Although the project schedule may shift and be updated due to details within the construction process, the schedule outlined within the EIR is an accurate representation of the timeline anticipated to complete construction activities. The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.

I6-18

Although the comment does not specifically identify a mitigation measure, mitigation measures outlined throughout Chapter 2 of the DEIR, such as M-BI-1 note that documentation of the monitoring reports would be submitted to PDS for review.

I6-19

Traffic hazards associated with implementation of the Proposed Project are outlined in Section 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 potential safety hazards. Dust control is outlined in Section 3.1.1 of the DEIR. Potential fire hazards are outlined in detail within Section 2.4 of the DEIR.

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lotus' Parry's tetracoccus, Southern jewel-flower, Fremont barberry, etc) Soil crusts, called Cryptobiontic (composed of cyanobacteria, mosses, lichen and fungi) are critical to the desert ecosystem. They help soil stability and plant-water retention. Chaparral, an established native plant, provides one of the most restricted and fragile native scrubland habitats in the West. Any disturbance to the environment can result in long lasting damage as it can take decades to renew. This area is also home to a wide variety of small mammals, lizards, foraging and nesting birds. Although there are no U.S. Geographical Survey-mapped creek channels within the Jacumba Valley that connect directly to the northerly draining Carrizo Gorge, it is presumed that the valley is hydrologically connected to the northerly draining Carrizo Wash [Hydrology and Water Quality 3.1.4-]. This means that anything sprayed or spread on the land can travel to undisturbed areas.

The Jacumba Solar Project will actively 'grub' 108 acres of this delicate land in preparation for the installation of the solar modules, inverters, lithium battery containers and other equipment necessary for the project completion. Dirt roads would be established and trucks and heavy equipment will be working the land seven days a week for up to 12 hours/day.

Particulate Matter is of special concern. Especially the tiny inhalable particulates that is contained in dust. These can cause or aggravate many respiratory problems such as asthma and bronchitis and reduce the body's ability to fight infection. [Air Quality 3.1.1]. The Jacumba Solar Project will supposedly have a 'less than significant impact' on potential dust and toxic air contaminants by employing the following mitigation activities:

- Spraying water on the site up to 3X daily-This will be ineffective as the typical high summer temperatures and low humidity of the area will evaporate the water before it can do its job. (All it takes is one trip to the Imperial Valley to experience the awful 'Grapes of Wrath' style dust clouds that envelope your car as you travel by the solar installation project)
- Applying a supposedly non-toxic synthetic liquid soil stabilizer such as Envirotac II or Rhinosnot frequently during construction and at least once a year thereafter (min 5 years). These soil stabilizers are traditionally used by the military (helicopter pads, runways), road builders and as dust control in disturbed lots. Envirotac II has been on the market for around 20 years.

In doing research on these chemical liquid stabilizers, I was astonished to learn that other than some biological lab assays, and one study using fathead minnows, NO DATA exists on the long-term safety effects of this on birds, insects, lizards or humans. The material safety data sheet that I found on-line, stated that thermal decomposition of Envirotac II may yield acrylic monomers [known carcinogen to small mammals and potential carcinogen to humans]. One of the vinyl acetates is a trade secret so it cannot be evaluated. [The ingredients listed on its label are: Vinyl acetate, Acetaldehyde, Acrylic Monomers and water].

Here is what the U.S. Army Corps of Engineers said about the Envirotac II [Source: Environmental Evaluation of Dust Stabilizer Products, Steevens et al] . . . Little is known regarding the fate and potential human and environmental effects associated with the

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I6-20 The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.

I6-21 Please see responses to comments S2-4 and O3-15.

I6-22 The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.

I6-23 The use of water and soil binding agents for dust suppression under APCD Rule 55 is spelled out as effective dust abatement measures by the SDAPCD, specifically relevant measures 24, 26, and 40 identified in the SDAPCD Measures to Reduce Particulate Matter in San Diego County (December 2005 available at: <http://www.sdapcd.org/planning/PM-Measures.pdf>). Additionally, the South Coast Air Quality Management District (SCAQMD) Rule 403 – Fugitive Dust, recommends watering and soil binding agents as effective control measures for fugitive dust abatement including “apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes” and “for large sites, pre-water with sprinklers or water trucks and allow time for penetration” as delineated in Control Measures 05-1, 05-2, 07-1, 07-2, 08-1, 08-2, 08-3 (SCAQMD 2005). While a specific soil binder has not been selected at this time, the EPA has evaluated the potential contamination effects of a number of dust suppressants including soil binding agents and found that

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application and use of this product . . . there is a need to determine the toxicity of these products to other species such as plants, soil invertebrates, and reptiles that can reasonably contact these products in the field. . .

We are not building a helicopter pad here. The risk is too great to use this product in our fragile desert environment until some long-term toxicity studies have been completed. (FYI, Rhinosnot was used in Ocotillo wind project and it has not worked-it has however created an icky foam that blows around the land when moisture is present).

Safety Concerns around Water trucks

According to the Jacumba Solar EIR, they will use an approximate average of forty-seven 6,000-gallon water trucks per day for water import. Up to 100,000 gallons/day would come from the Jacumba Community Services District (JCSD). This will be either from the well directly across from our school or in our Community Park. Based on past history, the 6,000-gallon water trucks will probably be used for the Padre-Dam water and smaller 2,800 to 4,000 gallon trucks for Jacumba water. This means between 25 and 35 truckloads/day [50-70 roundtrips] will be driving down our main street (Old Highway 80). The trips will be potentially seven days per week from 7AM -7PM. This poses a significant impact on the safety of our children and elderly plus on the wear and tear on our road.

Jacumba does not have any stoplights, has few cross walks and very limited sidewalks. As a result, our children and wheel chair users tend to use the roadways. We lost a senior in a wheelchair last year as she was crossing the middle of the street at dusk [where there wasn't a crosswalk] and was hit by a van. Constant dirty/noisy truck traffic down main street will negatively impact our tourist business.

Fire Danger and Lack of Mitigation Resources

According to the Jacumba Solar EIR the proposed project is located in an area classified as Very High Fire Severity Zone by the California Department of Forestry and Fire Protection (Cal Fire) [appendix 2.4-2]. They also state that the fire environment in southeastern San Diego County is considered one of several areas that are classified as 'wildfire corridors'. And, they state that based upon the region's fuels, fire history and expected fire behavior, a high intensity fire can be expected to occur in the Project area at some point in the future whether started by man-made or natural causes [Hazards and Hazardous Materials 2.4-6]. This is where we want to install 81,000 solar panels, 10 container size Lithium Battery units, inverters and other potential ignition sources?? Are we SERIOUS??!

Oh, but the Jacumba Solar folks claim that the fire mitigation measures they will put in place will render the impact 'less than significant'. One of these is the fore mentioned spraying of water. Another is the fact that they claim four fire station resources [White Star, Boulevard, Jacumba and Campo/Lake Morena] within reasonable distance. This is simply smoke and mirrors. First, only Jacumba (9 minutes away) and Boulevard (about 20 minutes) away are within the County mandated response time of 20 minutes. White Star is closing (merging with Boulevard) and Campo/Lake Morena and all the others are too far a distance to do any good. Second, few if any of the firefighters are trained to handle electrical

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they did not result in contamination (EPA 2008: Testing of Dust Suppressants for Water Quality Impacts [[available at: <http://www.epa.gov/region9/air/dust/DustSuppressants-sept2008.pdf>]]). The referenced instance was the result of a rain event occurring immediately after the application of the Rhinosnot soil stabilizer, which was not included in the 2008 EPA study. Applying the stabilizer strictly to the manufacturer's directions for application and cognizant of the weather forecast to avoid application immediately before a rain event will avoid any unintended conditions such as the foam layer described by the commenter.

I6-24

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 potential safety hazards to area children and elderly.

I6-25

The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required. Please refer to DEIR Section 2.4.3, the Fire Protection Plan included as Appendix 2.4-2 of the DEIR, and RTC C1-9 through 11 for further

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fires. What good will it do to call on them? Third, there is currently no specialized truck that can handle this type of fire (the only foam truck in the area is not in working order). Because we have no clinic or hospital in our back country, we rely heavily on our fire fighters as EMT's. There is a real danger that they may be on an emergency call when a fire breaks out. This is a recipe for disaster, potentially putting us in harm's way AND increasing our already high fire insurance policies.

SUMMARY

- This is a project that does NOT belong in our fragile desert ecosystem
- This is a project that has the potential (dust, toxins, water truck traffic down main street) to harm our health and our efforts to expand our tourism economy
- This is a project that that could generate dangerous chemical fires that when spread, could cause property damage as well as loss of life. [As quoted in the EIR 3.1.3-2: The California Resource Board states that "some of the potential impacts in California of global warming may include loss in snow pack (this will affect groundwater), sea level rising, MORE EXTREME HEAT DAYS PER YEAR, more high O3 days, MORE LARGE FOREST FIRES, and MORE DROUGHT years". The implications are staggering for our fire prone back country (much less our groundwater)
- There is no purchase agreement in place so why grant them the green light?
- This is a project that I would argue, in spite of Jacumba Solar's claims, appears to be in violation of the County Land Use Policy: LU 2.8 (Mitigation of Development Impacts); LU 6.1 (Environmental Sustainability); LU-6.1 (Protection From Hazards)

The project should be rejected

If the project is not rejected outright, I would request that Jacumba Solar re-write the EIR to include:

1. Impacts and mitigation methods for the Pallid and Mexican bats
2. Impacts and mitigation methods of the water truck activity on Jacumba downtown
3. Completion of a rare plants study on the proposed site and a promise to share the information with concerned citizens
4. A more detailed fire mitigation plan that includes how much money will be committed (and where these funds will go) to guarantee sufficient money for the ongoing training of fire personnel and the purchase of proper equipment
5. Funds for an air quality station to be set up in Jacumba
7. Funds for a study on the toxicity of the chosen soil stabilizers on small mammals and lizards
8. Information on who exactly will 'monitor' the monitors on this project and how the concerned public can access these reports

Surely the Planning Department and County Supervisors can see that the small benefits (only 20MGW of electricity and additional tax revenues at a steep price) far outweigh the great harm this project brings to human health, the environment and long-term economic viability of Jacumba Hot Springs? Please do the right thing and reject this project.

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discussion of the measures being implemented with the project to avoid significant fire hazards.

See Response to Comment C1-9 for information regarding fire response times. As discussed on DEIR pages 2.4-24 through 26, the Mitigation Measure M-HZ-1 will require preparation of a fire protection plan that provides for customized training for local fire personnel. The Applicant intends to produce a video that provides specific information about the project, including electrical hazards, that can be viewed by firefighters as they rotate through the local fire stations (See pp. 42 and 59 of the FPP (EIR Appendix 2.4-2)). Pursuant to Mitigation Measure M-HZ-2, the project will also provide fair share funding to equip local fire stations with fire-fighting and paramedic equipment and staff. It is expected that funds will be used to purchase additional paramedic equipment and to support salary for additional paramedic personnel. See the discussion at DEIR pages 2.4-29 through 31 for further information about emergency services.

I6-27

Please refer to responses to comments I6-3 through I3-26. The project's consistency with the County of San Diego's General Plan Land Use policies are outlined in Section 3.1.5, specifically Table 3.1.5-3.

I6-28

The County acknowledges this comment summarizing the comments responded to above.

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