

Comment Letter I8

Neufeld, Darin

From: Gungle, Ashley
Sent: Friday, May 29, 2015 7:24 AM
To: Neufeld, Darin
Subject: FW: Jacumba Solar Major Use Permit, PDS 2014-MUP-14-041; PDS 2014-ER-14-22-001

From: Cherry Diefenbach [mailto:csdiefenbach@sbcglobal.net]
Sent: Thursday, May 28, 2015 10:45 PM
To: Gungle, Ashley
Subject: Jacumba Solar Major Use Permit, PDS 2014-MUP-14-041; PDS 2014-ER-14-22-001

San Diego Planning & Development Services
 5500 Overland Ave., Ste. 310
 San Diego, CA 92122
 ATTN: PDS Project Manager: Ashley Gungle

May 28, 2015

RE: Comments on Draft EIR: Jacumba Solar Major Use Permit, PDS 2014-MUP-14-041; PDS 2014-ER-14-22-001

Dear Ms. Gungle,

As a Jacumba Hot Springs (JHS) property owner, I am concerned about potential adverse impacts that Nextera's proposed Jacumba Solar project will have on the community for several reasons.

One of my concerns lies with the project's plan to use some 100,000 gallons of water provided by the Jacumba Community Services District's (JCSD) Well #6 for site preparation (28 days) and grading (40 days) during the construction period. While it is true that Well #6 does not provide drinking water to community residents, the large scale extraction of this mineral water resource may negatively impact a nearby private well that is used to provide mineral water to the Jacumba Spa's three swimming pools. (The Spa is the town's largest employer and a major draw for visitors.) Water extraction from Well #6 may also negatively impact the availability of water that is sent to nearby Lake Jacumba, a five acre man-made lake. In addition to providing welcome habitat of the Tri-colored Blackbird, a California Species of Concern, the lake also attracts birders and hikers to JHS, a much needed economic benefit. A well monitoring plan for the nearby private well should be required as a condition prior to approval of this MUP. (I am also very curious as to why water-thirsty projects like this one are still going forward since California is currently in a severe, multi-year drought.)

I8-1

Another is the cumulative, negative impact of the project on the natural landscape. Sure the ECO Substation and associated transmission lines have already been built in the area, but the addition of 110 acres of fixed photovoltaic panels will significantly add visual blight and potentially impact wildlife habitat shared by Golden Eagles, Borrego Sheep and even the Pallid Bat.

I8-2

I also question why the Planning Department is allowing this project to go forward without requiring the applicant, Nextera to have obtained a power purchase agreement with SDG&E and an SDG&E easement for Nextera's proposed gen-tie corridor. County planners should not be in the business of approving projects such as this one with an "if we let them build it, the applicant will get the necessary agreements." Sometimes "the devil is in the details."

I8-3

My final concern is regarding the availability of local fire protection for a project that acknowledges the potential fire hazard posed by large energy storage containers adjacent to energized photovoltaic panels. Yes, Jacumba has a very small staff of firefighters on duty, but they are not sufficient in number nor do they have the necessary training to handle large electrical fires posed by either this project or its neighbor, the ECO Substation.

I8-4

I hope you will address these impacts before this project is approved. I look forward to hearing from you.

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Response to Comment Letter I8

Cherry S. Diefenbach
May 28, 2015

I8-1

The County acknowledges receipt of Cherry Diefenbach's input and appreciates her comments regarding the potential impacts associated with implementation of the Proposed Project. 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. See also, Responses to Comment C1-2 through 6, O3-2, and I4.

Sincerely,
Cherry S. Diefenbach

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- I8-2** The project’s cumulative impacts on aesthetics is discussed in DEIR section 2.1.4. Please see responses to comment O3-14 and O3-16 for a discussion of impacts on Bighorn Sheep and Golden Eagles, respectively. The Pallid Bat and other bat species were not evaluated in the EIR as no detections have been recorded in the project vicinity. 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, where no development is proposed, 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. The ECO Substation project included some work on a bridge to install the transmission line that was a known roost for certain bat species. The bridge is not affected by the Proposed Project. Please also see the discussion in response to O3-7 regarding potential impacts to avian and bat species.
- I8-3** The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.
- I8-4** See responses to comments C1-9 and 11.