

Comment Letter O6



The Desert Protective Council, Inc.
 P.O. Box 3635, San Diego, California 92163-1635
 protectdeserts.org

June 1 2015

Ashley Gungle, PDS Project Manager
 Department of Planning and Development Services
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Via Email:

RE: Comments on the Draft Environmental Impact Report Prepared for the Jacumba Solar Development Project: PDS 2014-MUP-14-041; PDS2014-ER-14-22-001

Dear Ms. Gungle,

Thank you for the opportunity to submit brief comments on the proposed Jacumba Solar Energy Project on behalf of the Desert Protective Council.

The Desert Protective Council (DPC) is a 501(c) (3) non-profit membership organization founded in 1954 with members throughout the southwest and nationwide. *The DPC's mission is to safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual, or recreational value, and to educate children and adults to a better understanding of the deserts.* Members of the Desert Protective Council have for decades, enjoyed camping, hiking, bird watching, botanizing and auto-touring in and around the Jacumba area.

The DPC finds this Draft EIR lacking in discussion of *cumulative impacts* from this project in conjunction with the impacts from the several major energy projects and related infrastructure in the Jacumba/ Ocotillo/Boulevard/Campo areas. *Mitigation measures* should take into account the full range of *individual and cumulative impacts* to migratory birds and nesting birds, especially to Golden Eagles and other raptors, to the aesthetics and visual resources, impacts on recreation, to sensitive and endangered plants and animals, including the endangered Peninsular Bighorn Sheep and cumulative impacts to wildlife connectivity corridors. The EIR must analyze the cumulative impacts to groundwater resources and hydrology, cumulative impacts to biotic components of soils, impacts to Native American cultural resources and to paleontological resources as well as impacts on community character and environmental justice.

The mission of the Desert Protective Council is to safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual, and recreational value, and to educate both children and adults to a better understanding of the deserts.

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O6-2

Response to Comment Letter O6

The Desert Protective Council, Inc.
 Terry Weiner
 June 1, 2015

O6-1 The County acknowledges receipt of The Desert Protective Council's input and appreciates their comments regarding the potential impacts associated with implementation of the project.

O6-2 Section 1.7 of the DEIR outlines the method of cumulative analysis utilized for this project. As outlined in this section, the cumulative analysis includes both the list method of analyzing past, present, and probable future projects, as well as the general plan projection method which accounts for regional and area planning contributing to cumulative impacts. As outlined in Table 1-7, 13 separate projects were analyzed for cumulative impacts with respect to implementation of the Proposed Project. Included in this list are several major energy projects and related infrastructure from the surrounding area, including Jacumba, Ocotillo, Boulevard, and Campo.

Cumulative analysis is outlined for each resource area within Chapters 2 and 3 of the DEIR. Section 2.2.4 of the DEIR includes cumulative analysis with respect to biological resources. Section 2.2.6 outlines the mitigation measures required through both individual

The Interstate 8 highway corridor from East of El Cajon in San Diego County to Ocotillo in Imperial County is a designated scenic corridor. The view shed along this 60-mile or so stretch of highway had been, until recently, one of the very few remaining wild scenic vistas uncluttered by human infrastructure in southern California. Then appeared the Campo wind turbine development, the Sunrise Powerlink, the 112 wind turbines in Ocotillo on the base of the east side of the Jacumba Mountains, the wind turbines in the Sierra Juarez mountains on the Mexican border, the ECO Substation adjacent to the south side of interstate 8 across from Table Mountain ACEC, the McCain Valley wind project and the Soitec Solar Project. The cumulative impacts from all of these projects must be analyzed before finalizing a plan to fragment another 300 acres of habitat and further industrialize this beleaguered biological ecosystem and local human community.

O6-3

Thank you very much for adding the comments of the Desert Protective Council to the public record for this project.

Best Regards,

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project impacts and cumulative impacts associated with the project. Cumulative impacts to aesthetics and visual resources is outlined in 2.1.4. Section 3.1.4 outlines potential cumulative impacts to groundwater resources and hydrology. Section 2.3.3, and potential cumulative impacts to paleontological resources are outlined in Section 2.6.3. Land use and community character is analyzed within section 3.1.5.4 of the DEIR.

Section 3.2 has been revised to clarify that no cumulative impacts to recreation would occur through implementation of the project.

O6-3

Cumulative impacts with respect to scenic vistas are outlined in detail within Section 2.1.4.1 of the DEIR, and include the Rugged Solar Project, Chapman Ranch Solar Project, ECO Substation Project, Energia Sierra Juarez U.S. Transmission MUP. These are the projects included within the cumulative study area, which is defined as the viewshed of I-8 from SR-79 (Pine Valley) to the Imperial County line, as outlined in detail within Section 2.1.4. Extending the cumulative study area further to the west is not warranted as the landscape becomes increasingly developed west of SR-79 and into the community of Alpine.