

Comment Letter C3

Hingtgen, Robert J

**From:** Billie Jo Jannen <jannen@inbox.com>  
**Sent:** Wednesday, February 12, 2014 9:50 AM  
**To:** Hingtgen, Robert J  
**Cc:** Glassman, Marilu  
**Subject:** Programmatic EIR for proposed SOITEC projects  
**Attachments:** SOITEC PEIR comment.pdf

Attached is the formal comment of the Campo Lake Morena Community Planning Group on the proposed programmatic EIR requested by SOITEC. Please add it to the public record.

Thanks  
Billie Jo, Chairman

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C3-1

## Response to Comment Letter C3

Campo Lake Morena Community Planning Group

Billie Jo Jannen

February 12, 2014

C3-1

The County of San Diego (County) acknowledges receipt of the Campo Lake Morena Community Planning Group comment letter. All comment letters received during public review will be included in the administrative record.

**Billie Jo Jannen, Chairman, Campo Lake Morena Planning Group  
28736 Highway 94, Unit 1, Campo, California, 91906 (619) 415-6298**

To: Robert Hingtgen  
Planning & Development Services (PDS),  
Project Processing Counter,  
5510 Overland Avenue, Suite 110  
San Diego, California 92123

February 2, 2014

Re; Programmatic EIR for proposed SOITEC projects; SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, LOG NO. PDS2012-3910-120005(ER); 380-12-010 (GPA); TIERRA DEL SOL, 3300-12-010 (MUP); 3600-12-005 (REZ); 3921-77-046-01 (AP); RUGGED SOLAR, 3300-12-007 (MUP); SCH NO. 2012121018

Dear Mr. Hingtgen:

At the request of the Boulevard Community Planning Group, the Campo Lake Morena Community Planning Group voted unanimously on January 27, 2014, to formally support BPG's actions and comments about SOITEC's proposed LanWest, Tierra Del Sol and Rugged Solar industrial-scale solar projects. Specific actions supported are:

1. Action taken by BPG on June 14, 2012, opposing Soitec's Rugged Solar: *Oppose/deny Rugged Solar for non-compliance with General Plan, Community Plan, MUP Required Findings (bulk, scale, harmony, density, coverage, fire services, utilities, traffic, suitability of site for type and intensity of use) and CEQA. Please uphold the voice of the overwhelming majority of registered voters who elected planning group members to help protect Boulevard's rural community character from being destroyed from over-development and large-scale industrial projects.*
2. Action taken by BPG on August 2, 2012, opposing Soitec Tierra Del Sol project: *Send comment letter denying Tierra Del Sol Solar LLC using same reasons stated for opposition to Rugged Solar LLC and LanWest Solar LLC; add Homeland Security and military air traffic and other issues /impacts.*
3. Action taken by BPG on May 3, 2012, opposing Soitec's LanWest project: *Oppose LanWest Solar based on the fact it is a large-scale industrial solar project in close proximity to adjacent homes; non-compliance with community character, general plan and community plan that was approved and adopted by the Board of Supervisors in August 2011; public health and safety concerns, cumulative impacts.*

The Campo Lake Morena Planning Group strongly shares the concerns cited by the BPG, and is highly concerned that groundwater usage will be much higher than what is stated in its environmental documents, as has occurred at the Ecosubstation in Jacumba. Where is the water coming from and how can we be sure this is a valid estimate of usage?

Fire danger is also an area of great concern for us. The equipment and chemicals used at these generation facilities are associated with fires, and the difficulties of shutting down equipment

C3-2

C3-3

C3-4

**C3-2**

The County acknowledges the commenter's opposition to the Proposed Project and support of the Boulevard Community Planning Group's actions and comments regarding the Proposed Project. The information in this comment will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers. See responses to comments for the Boulevard Community Planning Group (C2).

**C3-3**

The County refers the commenter to Draft Program Environmental Impact Report (DPEIR) Sections 3.1.5.3.4 and 3.1.9.3.2, which discuss the sources of water—both on site and off site—that will be utilized by the Proposed Project for construction, operation and maintenance, and decommissioning. Comments received during public review of the project resulted in re-evaluation of project water demand. This resulted in an increase in the amount of estimated water needed for the project. With the increased water demand, the revised DPEIR still finds that the Proposed Project would have a less than significant impact on groundwater. The commenter is also referred to common response WR1.

**C3-4**

The County acknowledges the commenter's concern with fire risk in the Boulevard area and fire hazards associated with the Proposed Project.

The DPEIR is based on extensive analysis conducted in coordination with the fire agencies, including San

were amply illustrated in the January 20 structure fire in El Cajon, where it took an hour for SDG&E to turn off a transformer. During that time, firefighters were not able to put water on the fire, allowing it to spread into a nearby building. How much longer than that will it take when the equipment is located in a remote community like Boulevard?

The backcountry has already been threatened by two wind turbine fires/explosions. The addition of multiple solar facilities will further multiply this risk, with the result that local residents are being forced to take on a catastrophic risk that is many times that of the people who will be using the power generated by these facilities.

Sincerely,



Billie Jo Jannen

cc;  
Dianne Jacob, Supervisor, District 2  
San Diego County Board of Supervisors  
1600 Pacific Highway  
San Diego, CA, 92101

Duncan Hunter, U.S. Representative, District 50  
1611 N. Magnolia Ave. Suite 310  
El Cajon, CA 92020  
Fax: (619) 449-2251

Juan Vargas, U.S. Representative, District 51  
333 F Street, Suite A  
Chula Vista, CA 91910  
Fax: (619) 422-7290

C3-4  
Cont.

Diego County Fire Authority (SDCFA), California Department of Forestry and Fire Protection (CalFire), and San Diego Rural Fire Protection District, and is consistent with industry standards and procedures. As stated in the DPEIR Section 3.1.4.3.3, an increase in the risk of wildland fire would occur on the site during construction and decommissioning where there is the largest amount of fuel on the site combined with increased activity and ignition sources. However, with implementation of a site-specific Construction Fire Prevention Plan that will be approved by SDCFA and CalFire as described in PDF-HZ-2, as well as with implementation of PDF-TR-1, which would ensure safe access in the area during construction for emergency responders, impacts would be less than significant during construction and decommissioning. Additionally, it should be noted that the Proposed Project would contribute fair-share funding toward local emergency response capabilities (PDF-PS-1).

The County generally agrees that the Proposed Project would introduce possible ignition sources. To reduce the risk of fire on the site and improve the effectiveness of an emergency response should a fire occur on site, there will be adequate access to all equipment and emergency personnel will be provided with adequate training. Furthermore, site-specific Fire Protection Plans (FPPs) for the Tierra del Sol solar farm (Appendix 3.1.4-5 of the DPEIR) and the Rugged

solar farm (Appendix 3.1.4-6 of the DPEIR) have been prepared and will be approved and implemented. The FPPs were prepared by a County-approved California Environmental Quality Act consultant and in accordance with the County's *Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (2010). As per PDF-HZ-3, similar site-specific FPPs will be prepared and approved by the SDCFA for the LanEast and LanWest solar farms prior to approval of a Major Use Permit.

With regard to electrical fires, please refer to the response to comment O10-82.

**References**

County of San Diego. 2010. *Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection*. March 19, 2007; last updated August 31, 2010. County of San Diego, Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. <http://www.sdcounty.ca.gov/pds/docs/Fire-Guidelines.pdf>.