

Response to Comment Letter I108

**Douglas Wayne Skains, Jr., and Heather Skains
March 3, 2014**

Comment Letter I108

2810 Ribbonwood Road
Boulevard, CA 91905
Ph# 619-766-4203

February 28, 2014

In regards to: Soitec Rugged Solar Project

Robert Hingtgen
San Diego County Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
M.S. O-650



Dear Mr. Hingtgen and County Officials:

We are writing this letter to you to address our concerns with the Soitec Rugged Solar Project. We are homeowner's presently residing at 2810 Ribbonwood Road, Boulevard, which is across the road from this project. We are worried about how this will affect the livelihood of our family.

In 2005, we built a beautiful home for our family in the Imperial Valley. In 2012, the County of Imperial approved a 3,000 acre solar project directly across from our home. We made the heart wrenching decision to move away and found this beautiful piece of property in Boulevard and closed escrow in January of 2013. Now we find out that we are dealing with the same issues again and cannot believe that another solar project is threatening our community and our way of life.

Now, to our astonishment, we are being told that our beautiful views will now be a sea of enormous solar panels. Not to mention the many other environmental changes/impacts that will come with this project. We have the following concerns that we will further elaborate on in this letter:

- Water
- Aesthetics
- Air Quality/Soil Erosion
- Noise
- Wildlife
- Traffic
- Property value
- Safety

Water: We are concerned that the quantity and quality of our groundwater from our wells will be affected. We rely on groundwater as our sole source of water and livelihood. In the Groundwater Monitoring and Mitigation Plan ("GMMP") for the Rugged Solar Farm Project dated November 2013 issued by Dudek, it states that significant impacts to our area may result due to groundwater extraction from Wells 6a and 6b over the short term. It also states the "short-term" period may be up to a 5 year period. Five years isn't short term for us or for anyone in our community. This "short term" period of time could destroy our wells, property and livestock.

We are concerned about the impact this may have on the existing pine trees, chaparral, scrub oaks, oak trees/woodlands and any other vegetation in the area. This is a beautiful area with plant life that depends on the groundwater for survival.

I108-1

I108-2

I108-1 The County of San Diego (County) acknowledges this comment and addresses the specific comments on the Proposed Project below.

I108-2 As discussed in Draft Program Environmental Impact Report (DPEIR) Section 3.1.5.3.4, the groundwater mitigation and monitoring plan will be implemented in accordance with Mitigation Measure M-BI-PP-14 (Note: in the Final Environmental Impact Report (FEIR), M-BI-PP-14 is renumbered to M-BI-PP-15). As indicated in the groundwater mitigation and monitoring plan referenced by the commenters, if groundwater level monitoring shows evidence that pumping from on-site supply wells is causing groundwater thresholds to be exceeded, the applicants will be required to cease or curtail pumping.

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We understand the County of San Diego is willing to monitor our wells. We would like to know how the County of San Diego is going to mitigate this problem, should it occur. We would expect the County of San Diego or Soitec Solar to redrill or repair our wells if they run dry or are compromised in any way.

Aesthetics - This will have a huge impact on our scenic views of the area. Some of the community residents have a beautiful view of meadows and wetlands that would be destroyed. Imagine going from beautiful views of vegetation and mountain ranges to this: 30 foot solar panels bordered by an eight foot chain link fence topped with barbed wire for as far as the eye can see.

In the Environmental Impact Report ("EIR") the community of Boulevard is grossly misrepresented by the content and pictures presented. Pictures of run down vacant homes, industrial properties, Kumeyaay Wind Farms, the Sunrise Power Link and Golden Acorn Casino are not a reflection of our beautiful community. We are real families with real homes. We have beautiful homes with beautiful landscapes and beautiful views.

Air Quality/Soil Erosion - Soil erosion will occur as a result of grading this land and removing the vegetation. We quite often have very high winds in our area. The system of leaves and roots in grass plants allow them to trap millions of tons of dust and dirt from the air annually. Up to 90% of the weight of a grass plant is in the root system. This makes grass very efficient at preventing erosion. Without this, we will have an extreme amount of blowing dust.

The "EIR" also states that residences located east and south of the Rugged site would be afforded long-term, permanent view of the solar facility and that viewer awareness of the Rugged solar farm would be high.

Noise - We are concerned with the noise levels of the inverters, machinery and trucks. As you know, living in the country has many advantages, one being the sounds of nature and not much else. Landscaping and/or vegetation, including grass, help to muffle objectionable noises. With the removal of all grass and vegetation, we are concerned the noise levels of the inverters will very be noticeable.

What are the hours of construction? Will the construction crews be working through the night or just during normal business hours?

Wildlife - How will this project impact the wildlife in the area? We have coyotes, turkeys, deer, bobcats, golden eagles, hawks, mountain lions and many other animals that make their home on or near our properties. A project of this size could have a significant impact on the existence of these animals, causing hundreds of them to be displaced from their homes.

Traffic - There will be a significant increase in traffic due to construction crews and vehicles. This will not only create more greenhouse emissions, but will do further damage to already damaged country roads. Many of our country roads in this area are already in need of major repair. Is the County of San Diego going to create a plan to repair the roads during and after the construction process is complete?

Property value - The value of our property and neighboring properties will be affected. The placement of a solar project near our homes could reduce our property value by 20 to 30%. In today's real estate market, we need to be increasing property values, not dragging them down even further.

Safety - What type of hazard will the solar panels pose to us? At such high temperatures, the solar panels can overheat and catch fire. The panels can also catch fire from faulty wiring. If too much power is pumped through inadequate wiring, the insulation can melt away and expose the wire, which can cause a fire. Is the San Diego County Fire Department equipped to handle wildfires such as these? If the panels catch fire, will toxic fumes affect us? What about the thousands of lightning strikes we get each year?

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The commenters' opposition to the Proposed Project is noted and will be included in the administrative record for review and consideration by the decision makers. Impacts to existing views and aesthetic resources of the Proposed Project area are discussed in Chapter 2.1, Aesthetics, of the DPEIR. Figures 1-4 and 1-5 have been revised in response to comment letter I116. Please refer to revised Figures 1-4 and 1-5 of the FEIR, which contain images of land uses and natural and built features that contribute to the existing environmental setting of the Proposed Project area. These changes and additions to the DPEIR provide new information that clarify or amplify information already found in the DPEIR, and do not raise new issues about significant effects on the environment. Accordingly, such changes are insignificant as the term is used in 14 CCR § 15088.5(b).

I108-4

Fugitive dust impacts are analyzed in Section 2.2.3.2 of the DPEIR. Particulate matter (PM₁₀ and PM_{2.5}) emissions were estimated for the Proposed Project and project design features have been identified to reduce impacts related to fugitive dust emissions. See also the response to comment I27-2.

In addition, and in compliance with state law, a stormwater pollution prevention plan (SWPPP) would be developed for the Proposed Project. Further details can be found in DPEIR Section 3.1.5.3.1 (which identifies the potential for water erosion and sedimentation).

	<p>I108-5 The comment is an excerpt from Chapter 2.1, Aesthetics, of the DPEIR. Because the comment does not address the adequacy of the DPEIR or raise a specific issue, no further response is provided.</p> <p>I108-6 Potential impacts related to noise are considered and addressed in Section 2.6, Noise, of the DPEIR.</p> <p>Construction activities would occur between the hours of 7 a.m. and 7 p.m., Monday through Saturday, in accordance with the County Noise Ordinance (see DPEIR Sections 1.2.1.1, Common Project Components and Activities, 1.2.1.2, Solar Farm Specific Components and Activities, and 1.2.1.3, Project Design Features). Operational activities would occur between sunrise and sunset.</p> <p>I108-7 Potential impacts to wildlife are considered and discussed in Section 2.3, Biological Resources, of the DPEIR. As described in Chapter 2.3, the Proposed Project would remove vegetation that serves as habitat for wildlife in the Proposed Project area. Therefore, mitigation is provided, including the preservation of an area equal to or greater than the area to be disturbed by the Proposed Project.</p> <p>I108-8 Please refer to common response TRAF1, which addresses maintenance of roads in the Proposed Project area. Furthermore, the Proposed Project will offset all greenhouse gas emissions.</p>
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	<p>I108-9 This comment raises concerns regarding property values. This topic was not evaluated in the DPEIR since it is not related to environmental impacts (see 14 CCR § 15131; see also response to comment I76-2). However, this type of information will be presented to decision makers for their consideration during the hearing process for the Proposed Project.</p> <p>I108-10 Issues raised in this comment are considered and addressed in the DPEIR. See Section 3.1.4.3.3, Wildfire Hazards.</p> <p>As described in Section 1.2.1.1 of the DPEIR and further clarified in the response to comment I1-1, heat from the solar panels dissipates quickly and would not affect ambient air temperatures. Therefore, the County disagrees that the panels would produce excessive heat that could pose a health risk to neighboring residents or wildlife, or ignite vegetation and start a wildfire, around the Proposed Project sites. Regarding the availability of fire services in the Proposed Project area, please see the responses to comments O10-80 and O10-84.</p> <p>With regard to toxic fumes, a significant fire and equipment malfunction would be required before the potential for toxic fumes was possible. A tracker would need to be combusting with very high temperatures to melt aluminum, glass, and other parts. However, fire within a tracker is considered to be a rare event.</p>
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From 2007 through 2011, there were a total of 30 photovoltaic (PV) solar-panel-related fires in California. This is an average of six fires per year over the 5-year period, primarily involving rooftop solar panels. Data obtained from the California Energy Commission indicates there are 78 photovoltaic plants (and a large number of other solar panels in private use) in operation in California. Solar statistics indicate that between 2007 and 2010, 47,335 solar panels (17,213 per year) were installed in California (<http://www.californiasolarstatistics.ca.gov/reports/9-08-2010/AdminStats.html>). Assuming that this rate continued during 2011 and 2012, there would be a total of over 86,000 Soitec Solar Portfolio Project panels since 2007. There are likely many more panels that were installed prior to 2007. Therefore, if there are six fires per year in 78 plants and some conservatively estimated 65,000 solar panels, that equals 0.077 fires per farm per year if all fires were associated with solar farms, or 0.00009 fires per year, when known solar panels installed during 2007 to 2011 are considered (this does not include older panels, which may be more prone to fires). Based on these statistics, solar farms would be expected to experience, at most, some type of fire about every 13 years and the 65,000 solar panels installed between 2007 and 2011 would be expected to experience, at most, some type of fire about every 11,000 years.

Wildfires may occur in the area, but based on the available research and scientific principles applied to the risk evaluation, they would not be considered to have the ability to ignite the trackers, which would be set back from off-site, higher British thermal unit-producing wildland fuels and would be provided fuel modification throughout the facilities.

With the low occurrence of solar facility fires and the low probability that wildland fire would cause a tracker to ignite, the potential for generation of toxic vapors is low. Further, in the unforeseen event that a tracker fire occurred, it would be limited in extent due to the non-combustibility of the trackers, the spacing provided between adjacent trackers, and the ability of on-site personnel and responding firefighters to minimize fire spread through application of firefighting practices for energized facilities.

The solar farms would be fitted with lightning protection that transfers lightning strikes to the ground. Lightning would not be expected to cause tracker fires.

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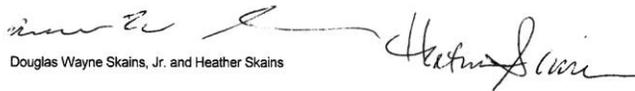
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Our family is not against solar energy, but we do feel that it should not be placed near families that will be forced to live with them everyday.

We ask you to please take our concerns into consideration. Thank you in advance for taking the time to address all of these pertinent issues.

I108-11

Sincerely,



Douglas Wayne Skains, Jr. and Heather Skains

I108-11 The County acknowledges the commenters' opposition to the Proposed Project. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.

References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

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