Comment Letter I35

WELL DONE PUMP SERVICE & SUPPLY, INC.
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February 6, 2014

via FAX to 858/694-2485

RECEIVED
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Planning and Development Services

Robert Hingtgen
COUNTY OF SAN DIEGO
Department of Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Soitec Solar Development Program

Dear Mr. Hingtgen:

I sell, install, service and maintain well water pump systems in East County, from Alpine to Jacumba and north to Julian and Laguna. I also serve numerous customers in Imperial Valley. Be advised that I submit this letter in opposition to the Soitec Solar Development Program.

My 25 plus years of experience in all of the East County area has given me firsthand knowledge of the water tables and the impact of increased water use, not only from population growth, but also from new and growing business and industrial activity. For instance, just in the Boulevard area over the last twenty years, the water systems I service have shown proof of dropping levels from 10 feet in some areas to as much as 60 feet in other locations. Of particular interest were the year round creeks that can no longer be seen above ground. Calexico Lodge had a year round creek flowing through their development and, even though use levels have remained constant, have had to drill another well for lack of supply. I35-1

Some of the local water companies have been, and are, selling water to San Diego Gas & Electric and/or the power link project with little regard for how that will effect their existing residential customers. I have heard the excuse that the water being sold is not potable. However, past history has proven that adjacent water sources to potable water source also play a part in the change of water tables.

Water was being sold by the Live Oaks Water company at a time when residential customers were experiencing inconsistency in water supply. To this day, one of their customers has continuing delays in supply. In addition, you cannot disregard the effect that new Border Patrol and Sheriff sub-stations, as well as the three (3) casinos, have had on the water supply in the East County. To the ultimate harm of local residents, these facts have obviously been disregarded by those claiming their projects will have no effect on water supply.

Response to Comment Letter I35

Marty Kennell
February 10, 2014

I35-1 This comment identifies that the increased use of water from population growth, new and growing businesses, and industrial activity has caused problems with groundwater levels, surface water features, and the native oak tree population in the East County area. The County acknowledges the commenter's opposition to the project. The information in this comment letter will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.

The County generally agrees with the commenter that intensive use of water can result in impacts on water levels, volume of water in storage, and groundwater-dependent habitat. Assessing and mitigating for these potential impacts is the purpose of the County's CEQA guidelines for groundwater resources, as discussed in greater detail in common response WR1 and WR2.

The commenter provides anecdotal evidence that groundwater levels have dropped within East County area, but does not address any of the information or analysis presented in the Draft Program Environmental Impact Report (DPEIR) or indicate how or why any of

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My personal observations in all of East County leaves me greatly concerned about the impact the Soitec Solar Development Program will have on water usage and potability. Presently, the greatest number of trouble calls I make result in the installation of pump savers, booster pumps, and large water storage tanks, all due to water shortage or water depth.

In addition to the foregoing effect on humanity, there is also damage to local plants and trees. The lack of water for the greenery of this County, due to our ongoing drought, presents an even greater hazard for the fires often experienced in this area. Furthermore, the vegetation's use of carbon dioxide has a positive effect on greenhouse gases. One cannot ignore how the drought has curtailed the natural defense our native oak trees have to the beetle imported to this area that has now killed over 80,000 trees. There is something very wrong in selling water for industrial use, considering projects requiring millions of gallons of water usage, and promising allocations of future water supplies at a time when we are witnessing such destruction from the LACK of water. I35-1 Cont.

I have been given an overview of the information being provided you by the "experts" for Soitec and readily admit I cannot compete with the titles of many whose opinions support the proposed solar panel project. However, my "hands-on" experience and personal observations over almost three decades should be sufficient to "hold water" in that which the County considers for their ultimate approval or disapproval of the Soitec Program. Too much of what Soitec alleges will not affect the residents is just the opposite of what I have found to be fact.

My personal history in water well systems in the eastern areas of San Diego County leaves me with the opinion that the project presented by Soitec Solar will have a detrimental effect on water supply, usage and potability.

Yours truly,

Marty Kennell

MK:es

Cc: Diane Jacobs, County Supervisor via email (dianne.jacob@sdcounty.ca.gov)
Adam Wilson, Senior Land Use and Policy Advisor via email (adam.wilson@sdcounty.ca.gov)
San Diego Regional Water Quality Control Board via FAX to (619)516-1994
Colorado River Basin Regional Water Quality Control Board via email to (jangel@waterboards.ca.gov)
Douglas Liden, EPA Border Liaison Office via email (iden.douglas@epa.gov)
David Albright, EPA, Region 9 Groundwater/Underground Injection Control Manager via email (albright.david@epa.gov)

the information is deficient or inaccurate. The commenter is referred to Chapter 3.1.5 of the DPEIR, and Appendices 3.1.5-5 and 3.1.5-6, which together conclude that there will be impacts on well interference and groundwater in storage, but that such impacts would be less than significant. The commenter is also referred to Chapter 2.3 of the DPEIR, which finds that impacts of groundwater-dependent habitat would be potentially significant and describes the Groundwater Mitigation and Monitoring Program (see M-BI-PP-15) that will be implemented to ensure that impacts remain below significant levels.