

Comment Letter I59

Hingtgen, Robert J

From: Chris Noland <sdrockguy@hotmail.com>
Sent: Monday, March 03, 2014 9:16 PM
To: Hingtgen, Robert J
Subject: SOITEC DPEIR - additional comment

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Soitec Solar Development Program Impact Report, Log No. PDS2012-3910-120005 ER; 3800-12-010, GPA, Tierra Del Sol, 3300-12-010 MUP, 3600-12-005 REZ, 3921-77046-01, AP, Rugged Solar, 3300-12-00 MUP, SCH No. 201212108

Comments:

1. There are no uncertainty analyses in either of the groundwater reports produced as a part of this DPEIR. Uncertainty analyses should be included in each report to address the fact that non-site specific values were used to model groundwater characteristics and how that could affect certain decisions made in the CEQA process, not limited to the finding of no significant impact.

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Response to Comment Letter I59

Chris Noland
March 3, 2014

I59-1

Although the groundwater resource investigation reports completed for the Proposed Project do not include an explicit or quantitative uncertainty analysis, they acknowledge that the conclusions are based on limited production well testing (DPEIR Appendices 5.1.3-5 and 5.1.3-6). It is for this reason, and because impacts to groundwater-dependent habitat were found to be potentially significant, that groundwater mitigation and monitoring plans were recommended as a mitigation measure to be applied to the Proposed Project. This mitigation measure is included as M-BI-PP-15 (DPEIR, Section 2.3.6.2, Riparian Habitat or Sensitive Natural Community) and the actual groundwater mitigation and monitoring plans are part of the administrative record for the Proposed Project. Additional information that may be of interest to the commenter is included in common responses WR1 and WR2.

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