

Comment Letter I64

Hingtgen, Robert J

**From:** THEMIGHTYQ <themightyq@inbox.com>  
**Sent:** Thursday, February 13, 2014 9:37 PM  
**To:** Hingtgen, Robert J  
**Subject:** Additional issues RE: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

Please allow this to serve as an amendment to my prior Soitec/ Boulevard opposition letter attached:

Please stipulate that essentially 100 percent of the community at a recent meeting are opposed to these projects. Hopefully that would carry great weight with anyone deciding the issue.

The County General Plan calls for protection of scenic vistas, prominent ridge lines and scenic vistas. The environmental study says that there are minor impacts. This is not true. Looking straight out from the front of my property on Tierra Real Road I can see the mountains of Mexico and beautiful chaparral in between. Instead if the Soitec Tierra Del Sol project is done, I would have to look across thousands of acres of three story high solar panels.

The developer is supposed to develop natural features into the project. The only way that this could be done effectively is to relocate the project to where no one lives. This is doable by moving to Imperial County where they want such projects in their vast desert areas. There they have access to water from the Colorado River. We do not have sufficient water, as we rely on ground water only.

Alternatively the project should be placed in a national or state park so that the population would bear the brunt equally, instead of placing it next to someone's house and trying to claim with a straight face that it has minor scenic impact.

The developer is supposed to use appropriate scale, materials and design to compliment the area. In this regard the developer gets zero points. There is nothing like this project anywhere near this area. The materials are foreign, except for the developer abusing the precious ground water. The design of thousands of three story solar panels next to each other over thousands of acres is completely out of place. There are no three story houses in the area at all to my knowledge. There are no houses next to each other, such as housing developments. This is completely a rural area.

Presumably the proposed massive industrial complex would be surrounded by chain link fence with barbed wire and prominent high voltage signs. All of the above would lead to lower property values in the community.

The array of such a landscape of solar panels may be an attraction to rural children to enter and explore or throw rocks from the outside at the glass. This danger has not been addressed appropriately. Such projects should be away from all populations.

The hazard to the health of people of the materials being used in the project has not been adequately addressed. We should know the dangers. This includes the vapors and how the ground water may be affected in the event of fire. There likely are thousands of materials in the solar panel glass, inverters, electrical circuits, wires, connectors, terminal boxes, fuses, circuit breakers, fans, etc. Ground management may include herbicides.

All of the electrical equipment pose additional fire danger to an area already very fire prone. There was a thousand acre fire about a year ago about a mile from the Tierra Del Sol proposed project. There has been inadequate analysis of the temperature of the panels. To the extent this could be discovered on the internet, it seems that each panel can be about 77 degrees Fahrenheit hotter than the surrounding area. That would mean on

Response to Comment Letter I64

Barrance Zakar  
 February 13, 2014

I64-1

The commenter's opposition to the Proposed Project is noted and will be included in the administrative record for review and consideration by the decision makers.

The commenter expresses concern regarding impacts to scenic vistas and prominent ridgelines resulting from operation of the Tierra del Sol solar farm. Potential impacts to scenic vistas are discussed in Section 2.1.3.1 of the Draft Program Environmental Impact Report (DPEIR). Section 2.1.3.1 states that while there are no designated or known valued focal points on Tierra Del Sol Road within the solar farm viewshed, relatively wide, expansive, and continuous views of the Proposed Project area are available from the roadway (such as from Key Views 1, 4, and 5). However, from these public viewing locations, trackers would display largely horizontal forms and lines, and the introduction of these features would not substantially obstruct, interrupt, or detract from existing available views. In addition, there are no recreational areas or designated scenic vistas or highways (including area roadways in the County of San Diego (County) Scenic Highway System) located within the viewshed of the Tierra del Sol solar farm. For the reasons discussed above and in Section

I64-1

I64-2

I64-3

	<p>2.1.3.1 of the DPEIR, impacts to scenic vistas resulting from construction and operation of the Tierra del Sol solar farm were determined to be less than significant.</p> <p>Views of the Tierra del Sol solar farm from Tierra Real Road will be substantially reduced due to intervening topography and/or vegetation. As shown on Figure 5 of Appendix 2.1-1 in the DPEIR , there are areas along Tierra Real Road where views of the solar farm would be present; however, the viewshed analysis does not consider the screening effects attributed to intervening vegetation. According to Section 2.3 of the DPEIR, chaparral communities in the Proposed Project area, including those referenced by the commenter as occurring between Tierra Real Road and the Tierra del Sol solar farm site, consist of shrubs that range from approximately 3- to 10-foot tall. While Tierra Real Road is located at a greater elevation than the Tierra del Sol solar farm site, the presence of intervening 3- to 10-foot-tall chaparral vegetation will reduce available views to the solar farm site from the road. Also, as stated in Section 2.1.1.2 of the DPEIR, while views from private residences are not required to be analyzed under the California Environmental Quality Act (CEQA), local residents experience views of the Tierra del Sol site from public viewpoints close to their homes from the transition from private driveways to Tierra Del Sol</p>
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	<p>Road (a public street); therefore, residences were considered in the DPEIR aesthetics analysis.</p> <p>The commenter states that natural features should be incorporated into the Proposed Project and that the only way this could be done is to relocate the Proposed Project to where no one lives. The County worked extensively with the Proposed Project applicants and fire agencies to develop measures for implementing landscaping and natural features on the solar farm sites that are sensitive to fire protection requirements while recognizing the need for screening. As indicated in the DPEIR Section 2.1 and Appendix 2.1-4, the proposed landscape screens (M-AE-PP-1) would break up the mass and scale of trackers, block views of trackers and other components from critical mobile and stationary viewpoints, and create visual interest to divert attention away from trackers. While the installation and maintenance of screening elements along the solar farm boundaries would partially screen views of trackers from passing motorists and local residents, the complete screening of views from public viewpoints to the proposed solar farms is not possible; therefore, the impact to visual character and quality of the community is significant and unmitigable. Chapter 4.0 of the DPEIR analyzes reduced project alternatives that further reduce impacts to visual character and quality; however, the impact is still found to be significant and unmitigable. Should the decision makers wish to adopt</p>
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the Proposed Project, a Statement of Overriding Considerations will be included in the record.

Related to the commenter's concern regarding sufficient groundwater for the Proposed Project at its proposed location, the analysis determined that the Proposed Project would have a less than significant impact on groundwater supplies; see DPEIR Sections 3.1.5.3.4 (Groundwater) and 3.1.9.3.1 (Water). In addition, please refer to common response WR1 and WR2.

Locating a commercial solar farm within the boundary of a state park would conflict with the mission of the California Department of Parks and Recreation (DPR). The DPR aims to provide for the health, inspiration, and education of Californians by preserving the state's extraordinary biological diversity, protecting valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. The National Park Service is managed according to a similar mission. Further, commercial solar projects are not permitted land uses within state or national parks.

The comment regarding devaluation of property due to the presence of the solar farm is noted and will be included in the administrative record for review and consideration by the County decision makers. This comment does not raise an environmental issue and as such, is not evaluated in the DPEIR.

	<p><b>I64-2</b> This comment raises concerns related to vandalism and illegal trespassing. The Proposed Project sites would be fenced according to National Electrical Safety Code requirements for protective arrangements in electric supply stations and would include remote-monitored infrared cameras and alarm systems and motion-sensor perimeter and safety lighting. These security measures are anticipated to deter trespassing on the sites. The potential for other hazards are considered and discussed in Section 3.1.4 of the DPEIR. In addition, the County analyzed the potential effects of the Proposed Project on groundwater quality and found that there would be a less than significant impact (DPEIR Section 3.1.5.3.3).</p> <p>With regard to the potential for toxic vapors, see the response to comment O10-83. Also see response to comment I57-5 for details of the analysis related to herbicides.</p> <p><b>I64-3</b> 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. Based on the analysis, it has been determined that the panels would not produce excessive heat that could pose a health risk to neighboring residents, vegetation, or wildlife around the Proposed Project sites. Please also refer to the response to comment C3-4 regarding the DPEIR’s analysis of risks associated with fire.</p>
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a 100 degree day, which is not unusual in the summer, the panels would be 177 degrees. There may also be a collective effect from such heat. This is a high wind area also. Combustible dust, leaves and branches would undoubtedly blow on to these baking solar panels and may burst into flames. The proposed project and the ecology in Boulevard are a bad and unnecessary combination. On the contrary, the Imperial Valley projects mostly have dust made of sand and not combustible.

The solvency of Soitec has not been adequately addressed. It is relevant to the environmental study. Even if the project were environmentally sound, it would have dire consequences if the developer could not meet their financial obligations and have to shut down partially completed. It is not unusual for solar companies to go bankrupt. Financial experts should study the facts. A "solyndra" type ending will not got over well with the public.

↑  
I64-3  
Cont.  
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I64-4  
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-----Original Message-----

**From:** themightyq@inbox.com  
**Sent:** Tue, 14 Jan 2014 10:19:48 -0800  
**To:** robert.hingtgen@sdcountry.ca.gov  
**Subject:** RE: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

**RE: Soitec Solar in Boulevard,CA**

Please submit this and consider it as my objection to the industrial "solar" businesses planned in Boulevard, Ca 91905.

Aesthetically they are completely out of place. They should not be implanted anywhere near country home sites in the mountains. The counter cliché argument that beauty is in the eye of the beholder is a canard. Yes some people think that a crucifix in a jar of urine is art. However, 99.9 percent do not believe that or that miles of solar panels look good in the majestic mountains.

Boulevard is in a fire hazardous area. This is fact proven by history. Solar heat collecting devices should not be placed in this area obviously. Heat can cause water pipes in such systems to burst, conducting electricity. We don't have a fully staffed or equipped fire department. It is improbable that the fire personnel are trained in the special hazards of solar panel electrical fires. There are 215 firefighters injured each year in the U.S. due to electric shock responding to calls. Has there been research done or training of the firefighters regarding the potential of electrocution by these projects? Should the solar panels burst or become inflamed in our fire prone area, we have the additional hazard of falling glass, slippery surfaces, potential explosions and the increased risk of toxic vapors. Firefighters and the local residents should be provided with special respirators. The insurance costs to the residents become escalated. Have the particular solar products been tested in these large quantities in this type of climate and terrain?

Industrial solar power also has and will require construction of many miles of new high

**I64-4**

The commenter's reference to Soitec's solvency and financial stability does not raise an environmental issue for which a response is required. The project would be conditioned to post a surety to ensure the decommissioning of the site upon the project's conclusion (DPEIR Section 1.2.1.1 Removal Surety).

**References**

County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.

pollution mess then we could take some additional action here; otherwise it would be a singular vain attempt to solve a global phenomena.

The persons deciding on the proposed industrial projects should determine whether it would be appropriate to place them next to their own families homes. If the answer is no, then they should not abuse their power to the detriment of their neighbor's family. Have you read the bible or do you have fundamental ethics?

Thank you for considering these matters.

Very truly yours,  
Barrance Q Zakar  
Alpine & Boulevard, Ca.

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