

Comment Letter C1

Hingtgen, Robert J

From: Margarete Morgan <morgan7070@cox.net>
Sent: Wednesday, February 05, 2014 11:37 AM
To: Hingtgen, Robert J
Subject: Bonsall Sponsor Group response to Soitec Solar Projects
Attachments: Soitec Solar Boulevard.docx

Greetings,

This is the response from last night's Bonsall Sponsor Group meeting regarding the proposed Soitec Solar projects in the County of San Diego.

Margarete Morgan, Chair
Bonsall Sponsor Group

Response to Comment Letter C1

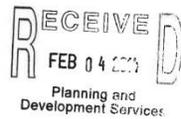
**Bonsall Sponsor Group
Margarete Morgan
February 5, 2014**

BONSALL COMMUNITY SPONSOR GROUP
Dedicated to enhancing and preserving a rural lifestyle



February 4, 2014

Mr. Robert Hingtgen, Planner
 Planning and Development Services
 5510 Overland Ave, Suite #10
 San Diego, CA 92123



Via email: Robert.hing(egen@sdcounty.ca.gov)
 RE: Soitec Solar PIER

Dear Mr. Hingtgen,

The Bonsall Sponsor Group strongly opposes all of the solar projects described in the Soitec Solar PIER. We oppose these projects because of the significant adverse impacts to the natural environment that includes sensitive biological and cultural resources. Also, to be considered is the impact the projects will have on adjacent residents' quality of life.

C1-1

Governor Brown has just declared that California is in a severe drought. These solar projects as proposed for the backcountry will have a deleterious impact on water supply, that includes well water, to the residents. The projects' construction will require the use of many millions of gallons of water which is clearly not available at this time. Any project that impacts water supply in anyway given current conditions is in no way justifiable.

C1-2

The projects will not provide any long term employment for the area. It was stated that only a small trained maintenance force to adjust tracking for the panels would be needed. The proponents thus cannot claim increased employment in the area as a substantial benefit for the projects.

C1-3

The impact of the Lan East and LanWest proposed projects are extreme and the existing residents and property owners have valid concerns regarding the impacts on their wells, roads, and the glare from the tracking equipment that is out of alignment. The size of the trackers which is stated to be 30 foot tall and 48 feet wide encompassing 280 acres of 1150 is an unreasonable visual blight on the residents of the area.

C1-4

All of the Soitec Solar Development projects require the removal (scraping) of all natural vegetation to bare earth. Temperatures produced by the huge solar trackers are projected to be about 180 degrees Fahrenheit which will promote long term **prolonged "baking" of the landscape**. This is not a resulting pleasant aesthetic sight to contemplate.

C1-4

C1-5



<http://www.bcsbg.org>



C1-1 The County of San Diego (County) acknowledges the commenter's opposition to 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.

C1-2 Potential impacts related to groundwater use were considered and addressed in the Draft Program Environmental Impact Report (DPEIR); see Sections 3.1.5.3.4, Groundwater Resources, and 3.1.9.3.1, Water. As stated in Sections 3.1.5.3.4 and 3.1.9.3.1, the County will place conditions on the Major Use Permit that will restrict the amount of water that is permitted to be withdrawn from the on-site wells in order to prevent interference with off-site wells. As such, the County does not anticipate that wells of neighboring residents will result in any significant impact with the implementation of the Proposed Project.

C1-3 As stated in Section 1.1 of the DPEIR, one of the Proposed Project objectives is to invest a minimum of \$100 million of economic development to support the local economy through the creation of high-wage, highly skilled construction and permanent jobs that pay prevailing and living wages. Additionally, the Tierra del Sol and Rugged solar farms both have been certified as Environmental Leadership Projects under the Jobs and Economic Improvement through Environmental Leadership Act (Assembly Bill (AB)

	<p>900), which requires that the applicants meet the prevailing and living wage requirements of California Public Resources Code Section 21183(b). The AB 900 Application for the Soitec Solar Energy Project is attached as Appendix 3.1.3-3 of the DPEIR. As discussed in Section 3.2.3 of the DPEIR, during construction, the Proposed Project would employ approximately 326 workers. During operation, the Proposed Project would employ approximately 33 full-time employees. No changes to the environmental document are required as a result of this comment</p> <p>C1-4 The County concurs that the LanEast and LanWest projects could have potential significant impacts related to groundwater supply, traffic, glare, and visual character. With respect to potential impacts to groundwater supply and traffic, the DPEIR concluded that these impacts would be less than significant (DPEIR Sections 3.1.5.3.4, 3.1.8.3, 3.1.9.3.1.). The DPEIR concluded that the LanEast and LanWest projects would have significant and unavoidable impacts related to scenic views, visual character and quality, and glare (DPEIR Section 2.1.3.). These issues are discussed in Sections 2.1, 3.1.5, 3.1.8, and 3.1.9 of the DPEIR. In addition, both the LanEast and LanWest proposed projects have been evaluated at a program level. A project level analysis will be completed when the project design for each is determined and Major Use Permit applications are submitted.</p>
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The proposed projects as stated in the 1400 plus page Solitec Draft Programmatic Environmental Impact Report concedes that it (all projects) can't be mitigated.

For all of the above reasons the Bonsall Sponsor Group supports the NO PROJECT alternative. We would recommend a solar project where solar panels are on the roof tops of existing buildings and easily accessible for connection to the existing electrical grid.

Sincerely,

Margarette Morgan, Chair
Bonsall Sponsor Group

C1-6

C1-5

This comment also addresses the possibility of glare impacts associated with misalignment of CPV modules. Please refer to response to comment O10-77 regarding the Boulevard Glare Study and consideration of certain operational scenarios including operations during high wind events and periods of malfunction.

The County agrees that the Proposed Project may result in potentially significant impacts to the visual character of the solar farm sites as a result of vegetation removal. This issue is discussed in Section 2.1.3.2 of the DPEIR. However, the County disagrees that the temperature of the solar panels will result in the “prolonged ‘baking’ of the landscape.” As stated in Section 1.2.1 of the DPEIR, although the concentrator photovoltaic panels would be hot to the touch as a result of solar energy absorption, they would not noticeably affect the temperature of the surrounding area and the temperature below the modules would be nearly the same as ambient temperatures in ordinary shade.

C1-6

The County concurs that mitigation is feasible for some, but not all, of the significant impacts identified in the DPEIR. Should the decision makers wish to adopt the Proposed Project or any alternative with significant and unavoidable impacts, a Statement of Overriding Considerations will be prepared and included in the record.



<http://www.besg.org>



The County acknowledges the commenter’s support for the No Project Alternative and preference for the implementation of rooftop solar installations. The decision makers have the approval authority for the Proposed Project and will consider all information in the FPEIR and related documents before making a decision. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.

References

California Public Resources Code, Sections 21178–21189.3.
Chapter 6.5, Jobs and Economic Improvement through Environmental Leadership Act of 2011.

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