

Comment Letter I72

Hingtgen, Robert J

From: Mark Jorgensen <mjorgensen1951@gmail.com>
Sent: Saturday, February 15, 2014 12:06 PM
To: Hingtgen, Robert J
Cc: Jacob, Dianne; Horn, Bill; howwcook@yahoo.com; Donna Tisdale; Paige Rogowski; Kathy Dice; Dan Falat; Jimmy Smith
Subject: Comments on Soitec Solar Development Project
Attachments: SolarComments-Soitec2014.docx

Mr. Hingtgen:

Please find attached my comments, as a private citizen and retired Superintendent of Anza-Borrego Desert State Park regarding the Draft EIR for the four proposed solar projects adjacent to the south end of Anza-Borrego. It is my opinion that the consumption of ground water from the already stressed aquifer around Jacumba and Boulevard will have negative impacts downstream, in Carrizo Gorge, within the state park.

Thank you for the opportunity to make comments on this large scale project. I recommend the County Board of Supervisors vote for the "No Project" alternative and do all the Board can to encourage citizens and businesses to install rooftop solar in the cities where the need exists, not in our wild backcountry.

Sincerely,
 Mark C. Jorgensen
 Borrego Springs, CA

I72-1

Response to Comment Letter I72

Mark Jorgensen
 February 15, 2014

I72-1

The County of San Diego (County) acknowledges these comments. Impacts to groundwater are considered and addressed in the Draft Program Environmental Impact Report (DPEIR; see Section 3.1.5, Hydrology and Water Quality). Please refer to the response to comment O4-3 related to concerns regarding groundwater and Carrizo Gorge.

The County acknowledges the commenter's support for the No Project Alternative. The decision makers have the approval authority for the Proposed Project and will consider all information in the Final Program Environmental Impact Report (FPEIR) and related documents before making a decision on the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.

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Robert J. Hingtgen
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February 15, 2014

MY COMMENTS ON PROPOSED SOITEC DEVELOPMENT DRAFT EIR

Proposed Projects: Tierra del Sol, Lan West, Lan East, Rugged Solar
LOG# PDS2012-3910-12005

Mr. Hingtgen:

As a private citizen and retired Superintendent of Anza-Borrego Desert State Park, I am providing comments on the Draft EIR for the proposed Soitec Development project adjacent to the southern boundary of California's largest state park, in the region of Jacumba and Boulevard.

I worked 33 years of my 36 ½ year state park career at Anza-Borrego. I began by studying the now endangered Peninsular bighorn sheep of the park, worked as the Park Naturalist, a State Park Resource Ecologist, and the last nine years of my career as the Park Superintendent.

I stand opposed to the expansion of solar and wind projects adjacent to Anza-Borrego Desert State Park, including those proposed in the Soitec Development Draft EIR. The recently constructed Ocotillo Wind project was built on 12,500 acres of BLM land along five miles of common boundary with Anza-Borrego DSP. This project is an atrocity. Ocotillo Wind has had a profound negative impact upon the park's natural and cultural resources, has created a barrier to wildlife, has encroached upon a documented bighorn sheep lambing area, and has forever blighted the scenic qualities of the entire southern sector of the state park.

I recommend the San Diego County Board of Supervisors vote for the "No Project" alternative for the Soitec proposal for the following reasons:

- 1) This is yet another excellent example of why the County, State and Federal governments should encourage by all means that citizens of San Diego County install rooftop solar panels on their residences, and that all commercial buildings, hospitals, schools and parking structures be covered with solar panels to generate the electrical needs of our county. Spoiling our wonderful backcountry resources and shipping



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I72-2

The County acknowledges the commenter's opposition to the Proposed Project. Impacts associated with the Ocotillo wind project are not representative of any potential impacts of the Proposed Project on natural or cultural resources, which have been thoroughly evaluated by the County in the DPEIR. Ultimately, the decision makers must determine whether to approve the Proposed Project or any alternatives. The information in this letter will be in the FPEIR for review and consideration by the decision makers.

I72-3

The County acknowledges the commenter's support for the No Project Alternative. 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 on the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.

The County acknowledges the commenter's preference for distributed-generation energy projects over the Proposed Project. Please refer to common response ALT2 regarding the County's evaluation of a distributed energy generation alternative to the Project.

The County disagrees that the Proposed Project will spoil backcountry resources such as natural and cultural resources. The County found that the Proposed Project

<p>power into the cities is a waste of electricity lost in the lines (6%+) and a waste of our natural and cultural resources.</p> <p>2) Negative impacts to the groundwater in the Jacumba/Boulevard region. Consumption of huge amounts of groundwater from the headwaters of the Carrizo Creek Watershed will have negative impacts on the amount and quality of surface waters available to desert wildlife within Carrizo Gorge within Anza-Borrego Desert State Park. As evidenced by the recent construction activities by SDG&E on the ECO Substation, initial water use estimates made in the EIR were grossly underestimated. SDG&E told us they would be using 30 million gallons of water for the project, yet they now estimate usage at 90 million gallons. I expect the Soitec estimates in the DEIR to be underestimated by at least the same factor, given the “fast track” broad-brushed analysis given to the proposal, and the same company and crew doing the estimates.</p> <p>3) Downstream impacts on water availability can be expected in Carrizo Creek, Boundary Creek, Tule Creek, and Walker Creek, all of which feed into Carrizo Gorge and Carrizo Canyon. Current restoration work to remove non-native tamarisk trees in Carrizo Gorge and Carrizo Canyon will not be nearly as successful if massive amounts of water are drawn from the upstream aquifer for construction and cleaning of four new solar projects.</p> <p>4) Wildlife which are key to the local habitat include the endangered Peninsular bighorn sheep, the golden eagle, which nests in this area, the endangered Quino checkerspot butterfly, the peregrine falcon and many other sensitive animal and plant species.</p> <p>5) Construction of yet another group of solar projects will further impede the free movement of wildlife by reducing habitat connectivity and ruining wildlife corridors.</p> <p>6) Anza-Borrego Desert State Park and the Anza-Borrego Foundation own lands adjacent to the proposed project in the area of Jacumba. Park lands are on both sides of Interstate 8 and currently about one mile north of the border with Mexico.</p> <p>7) I oppose the concept of “Fast Tracking” energy projects on private or public lands. “Fast Tracking” is a euphemism for circumventing laws put in place to address environmental impacts, the very essence of why the United States enacted NEPA and the California Legislature created CEQA.</p> <p>I thank you for allowing County citizens the opportunity to make comments on the proposed Soitec Development and ask that the San Diego County Board of Supervisors vote for “No Project” in order to safeguard the wild lands, natural and cultural resources, and the waters of our east county.</p> <p>Sincerely,</p> <p>Mark C. Jorgensen State Park Superintendent, Retired Anza-Borrego Desert State Park</p>	<p style="text-align: right;">172-3 Cont.</p> <p style="text-align: right;">172-4</p> <p style="text-align: right;">I72-4</p> <p style="text-align: right;">172-5</p> <p style="text-align: right;">172-6</p> <p style="text-align: right;">172-7</p> <p style="text-align: right;">172-8</p> <p>would have less than significant impacts on biological and cultural resources with the implementation of mitigation (see DPEIR Sections 2.3.3, 2.4.3). The County acknowledges that the Project would have certain significant and unavoidable impacts related only to aesthetics, air quality, and land use (see DPEIR Table S-2). This comment lacks sufficient detail for the County to provide further response.</p> <p>Potential impacts to groundwater were considered and addressed in the DPEIR (see Section 3.1.5, Hydrology and Water Quality). The County does not agree that estimates for water use in the Proposed Project’s DPEIR were grossly underestimated. See common response WR1. Related to potential impacts to the Carrizo Gorge within Anza-Borrego Desert State Park, please refer to response O4-3.</p> <p>The County disagrees with the characterization of the DPEIR as a “‘fast-track’ broad-brush analysis”. The application for the Proposed Project has been processed by the County according to the County Zoning Ordinance and related regulations. The DPEIR provides a project-specific analysis of those projects for which the applicant is currently seeking project-specific approval, the Rugged and Tierra del Sol solar farms. The other projects are appropriately analyzed on a programmatic level. CEQA provides for programmatic analysis where a series of actions can be</p>
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	<p>characterized as one large project and are related. (14 CCR 15168(a); see also 14 CCR 15165.) LanEast and LanWest are related to the Rugged and Tierra del Sol projects by geography, as logical parts in a chain of contemplated actions by the applicant, and because they would have generally similar environmental effects which can be mitigated in similar ways. (<i>Ibid.</i>)</p> <p>I72-5 Issues raised in this comment related to sensitive wildlife and plant species and habitat connectivity and wildlife corridors were considered and addressed in the DPEIR (see Section 2.3.3.1, Candidate, Sensitive, or Special-Status Species, Section 2.3.3.4, Wildlife Movement and Nursery Sites). The County found that the Proposed Project would have a less than significant impact on all biological resources with the implementation of mitigation, including sensitive species and wildlife movement.</p> <p>I72-6 The County concurs with this comment, which does not raise an environmental issue related to the Proposed Project.</p> <p>I72-7 The County disagrees with the commenter’s assertion that it has allowed the “fast tracking” of the Proposed Project. The application for the Proposed Project has been processed by the County according to the County Zoning Ordinance and related regulations, as well as the California Environmental Quality Act. Please refer to the response to comment O16-2.</p>
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	<p>I72-8 The County acknowledges the commenter’s support for the No Project Alternative. The Board of Supervisors has approval authority for the Proposed Project and will consider all information in the FPEIR and related documents before making a decision on the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.</p>
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