

Comment Letter I86

Hingtgen, Robert J

**From:** Don Bloom <donbloom42@gmail.com>  
**Sent:** Monday, March 03, 2014 11:48 AM  
**To:** Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Horn, Bill; Hingtgen, Robert J  
**Subject:** RE: Written Comments regarding Soitec's Solar Project - Tierra del Sol, Boulevard, CA  
**Attachments:** SBD&E report., pg 1.pdf; SDG&E report, pg. 2.pdf

Greg Cox, San Diego County Supervisor  
 Diane Jacob, San Diego County Supervisor  
 Dave Roberts, San Diego County Supervisor  
 Ron Roberts, San Diego County Supervisor  
 Bill Horn, San Diego County Supervisor  
 Robert Hingtgen, Planner, Planning and Development Services

Proposed SOITEC Solar Development

I'm sending this letter as an addendum to my earlier letter.

I attended the Boulevard Planning Meeting last month. From the comments and literature provided at the meeting, it is apparent that Soitec was not truthful or seriously underestimated in their reports the amount of water needed for this project.

One older gentleman provided a SDG&E substation project report reporting on the water usage at that substation. SDG&E has requested an increase in the total water usage. SDG&E originally stated they would need 30 million gallons of water.

SDG&E has since stated in this report (which I have attached) that water usage was increased to an estimated 90 million gallons. This is for a substation project on 100 acres. The water usage increased three times from what was originally stated.

The Soitec solar panel project is proposed for 1500 acres. The Soitec project has proposed using 300 million gallons of water. If you extrapolate the numbers, the estimated usage of water for the 1,500 acres for Soitec solar panels would be close to 1.5 billion gallons of water.

This area is high desert. We don't have adequate water for the residents as it is. Our well is only 6 gallons a minute. Geographically, the high desert is a very fragile environment. You cannot take this water out of the ground without a serious drop in the groundwater level.

Besides taking huge volumes of water out of our fragile ecosystem, the State of California is experiencing one of the most severe droughts in history.

This project should not go forward when California is experiencing this serious drought. We don't have the water. You can't just take water out of Jacumba or Pine Valley. It affects their well water and ground water supply too. Their water table has dropped resulting in dead 100 year old oak trees.

This entire project is a bad idea.

You should not put industrial utility panels across the road (50 feet) from our homes. What does that do to our property values? We don't be able to rent or sell these properties.

This project will negatively drop our water table and our wells will go dry. Without water, people cannot live in their homes.

California is in a severe drought. The fragile high desert environment doesn't have the water required for this project.

Put these solar panels in the cities, on top of buildings, on top of carports, where most of the energy is needed.

Don't dump these massive, industrial projects in East County in the rural areas of San Diego.

People choose to live in the open, rural country and shouldn't be burdened with power plants to provide energy for the cities.

Response to Comment Letter I86

Don Bloom and Katie Williams

March 3, 2014

I86-1

This comment asserts that the Proposed Project's water estimates are inaccurate. Please refer to common response WR1, as well as the response to comment I32-8.

This comment also discusses the current situation of water in California and locally. Water levels and hydrologic conditions within the geographic scope of potential impacts by the Proposed Project are considered and addressed in Section 3.1.5, Hydrology and Water Quality. Groundwater investigation reports were prepared for the Tierra del Sol Solar Farm, Rugged Solar Farm, Pine Valley Mutual Water Company and the Jacumba Community Services District (see Appendices 3.1.5-5 (Tierra del Sol), 3.1.5-6 (Rugged), 3.1.5-7 (Pine Valley), and 3.1.5-8 (Jacumba)).

I86-2

This comment raises concerns regarding property values. This topic was not evaluated in the Draft Program Environmental Impact Report, since it is not related to environmental impacts. (14 CCR § 15131.) The County acknowledges the commenters' opposition to the Proposed Project. The information in this comment will be in the Final Program Environmental Impact Report for review and consideration by the decision makers.

I86-1

I86-2

I86-3

I86-4

<p>Thank you,</p> <p>Katie Williams, 619-726-1532          Don Bloom, 619-247-9496          880 Tierra del Sol, Boulevard, CA          686 Tierra del Sol, Boulevard, CA</p> <p style="text-align: right;">↑ I86-4 Cont.</p> <p><b>Subject:</b> Written Comments regarding Soitec's Solar Project - Tierra del Sol, Boulevard, CA</p> <p>Greg Cox, San Diego County Supervisor          Diane Jacob, San Diego County Supervisor          Dave Roberts, San Diego County Supervisor          Ron Roberts, San Diego County Supervisor          Bill Horn, San Diego County Supervisor          Robert Hingtgen, Planner, Planning and Development Services</p> <p>Proposed SOITEC Solar Development</p> <p>February 4, 2014</p> <p>I am writing this letter to provide public comments on the proposed Soitec Solar Projects in Boulevard on Tierra del Sol Road.          We own two (2) beautiful homes directly across the street on Tierra del Sol Road from the proposed Tierra del Sol Solar Project.          These homes and the other homes are directly fifty (50) feet across the road from the Brown property and are located at (1) 880 Tierra del Sol and (2) 686 Tierra del Sol.</p> <p>This project will be both a public and private nuisance placing people, families and property at risk. These solar panels will interfere with the health, safety and property rights of my husband and I, the neighbors and the community.</p> <p>How can the County or any other agency approve this massive, industrial utility-type project directly across the street – fifty (50) feet from residential homes where people live?          Part of the land on Tierra del Sol is zoned "Agricultural." No one or company should receive a land re-zoning approval to allow big, industrial solar panels thirty (30) feet tall across from residential properties due to the risks involved.</p> <p>When building these huge panels, there will be excessive public and private nuisance involving blasting the land to remove the vegetation, excessive noise from the construction, and excessive sand blowing with all the trucks hauling in materials and building during the construction.</p> <p>What is the impact of our water table? This is an arid climate. The water table will be substantially lowered with the huge quantities of water needed for this project. Our wells could go dry and that is the needed primary life source to have water.          From the hydrology report attached, there are three runoff streams surrounding this area that flows directly into Mexico directly south of this project. This town will lose their water supply and from my reading of the reports, none of the Mexican officials have been notified of this huge proposed project that will affect their primary water source.</p> <p>The solar panels if installed will continue to be both a public and private nuisance to ourselves, our families and the community due to the massive height of the panels and the visible glare of the panels.</p> <p style="text-align: center;">2</p>	<p><b>I86-3</b> Refer to the response to comment I86-1.</p> <p><b>I86-4</b> The County acknowledges the commenters' preference for distributed-generation energy, including rooftop solar. See common response ALT2. The County acknowledges the commenters' opposition to the Proposed Project. The information in this comment will be in the Final Program Environmental Impact Report for review and consideration by the decision makers.</p> <p>The County acknowledges the commenter's attachments including a comment letter submitted on February 4, 2014 and a Minor Project Refinement request form prepared by SDG&amp;E for the ECO Substation Project. The commenters comment letter from February 2014 was received and issues raised were addressed (see responses to comment letter I6. The Minor Project Refinement request form is for a project other than the Proposed Project analyzed in the DPEIR See Chapters 3.1.5 and 3.1.9 of the DPEIR for information regarding construction and operational water demand and use associated with the Proposed Project. See also common response WR1 and WR2.</p>
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You can hardly screen this project from our existing views of the property across the street. We would lose the beautiful rural views of the hills, the chaparral, sage brush and the rocks. Instead we would be staring at massive, glaring, monster solar panels.

Also, the operating of these solar panels will continue to be both a public and private nuisance. They generate excessive heat. WE worry about the fire hazard with the excessive heat generated from these panels. And what is the effect of "global warming?" These panels generate 200+ degrees of heat. There is so much recent concern of the industrial impact causing global warming and this is a prime example of that.

No one knows what the electrical charges or currents are generated from these massive sources generating electricity. When my daughter was in 6<sup>th</sup> grade, her science fair project was to measure the electromagnetic forces (EMF's) emitted from electrical sources. My daughter and I checked out an instrument from SDG& E, that measured the electromagnetic forces from all electrical sources.

The dial of the instrument registered much higher whenever you put the instrument next to electrical poles, utility sub-stations, electrical wires on telephone wires, etc.

We don't want those massive electromagnetic forces next to our homes. No one knows what the health and safety hazards are. We don't want to hear in 20 years how dangerous these Electro-Magnetic forces are.

Another issue creating a public and private nuisance directly to our homes and the community, are the winds. We frequently have wind gusts in excess of 60 mph in Boulevard. Those panels could fly off in the wind and damage our homes or injure people in the area.

Lastly, which company will compensate the property owners like ourselves that would suffer real economic harm from the substantial loss of value of our two properties after a project like this is built literally across the street from us – 50 feet away?

Thank you for your consideration and please we ask that you do NOT approve these solar projects. The landowners in Boulevard do NOT want these massive industrial projects in their rural community. Projects like this would be best placed in the areas demanding the electricity – on rooftops, on parking garages, on buildings in the city demanding more electricity.

Don Bloom  
Katie Williams Bloom  
880 Tierra del Sol  
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Don't cell - 619-247-9496  
Katie's cell – 619-726-1532



**EAST COUNTY SUBSTATION PROJECT  
MINOR PROJECT REFINEMENT  
REQUEST FORM**

<b>Date Submitted:</b>	09-20-13 (Originally Submitted) 10-01-13 (Resubmitted)	<b>Request #:</b>	8
<b>Date Approval Required:</b>	10-01-13	<b>Landowner:</b>	Not Applicable (N/A)
<b>APN:</b>	N/A		
<b>Refinement from (check all that apply):</b>			
<input type="checkbox"/> Mitigation Measure	<input type="checkbox"/> APM	<input checked="" type="checkbox"/> Project Description	<input type="checkbox"/> Drawing <input type="checkbox"/> Other
<b>Identify source (mitigation measure, project description, etc.):</b>			
Pages B-3 and B-37 of Section B Project Description of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and the Construction Water Supply Plan, which was approved by the California Public Utilities Commission on January 31, 2013, for the East County (ECO) Substation Project (Project) describe the water usage required during construction of the Project. The information in this Minor Project Refinement (MPR) request describes a change in the amount of construction water consumption that was previously estimated in the Final EIR/EIS and the Construction Water Supply Plan. A description of and justification for the requested refinement are provided on pages 1 and 2 of this MPR request.			
<b>Attachments (check all that apply):</b>			
<input checked="" type="checkbox"/> Refinement Screening Form (provided as Attachment A: Minor Project Refinement Request Screening Form)			
Under Order 3 of the Decision Granting SDG&E Permit to Construct the East County Substation Project (D.12-04-022), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 3 of the Decision, respond "yes" or "no" to the following questions (a) through (d).			
<b>(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?</b> No. The proposed refinement requests a change to the Project description than what was presented in the Final EIR/EIS, which provided an estimated volume of water to be used during construction, and will not result in any change in geographic location.			
<b>(b) Will the proposed refinement result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS?</b> No. No change in impacts to any resource area evaluated in the Final EIR/EIS is anticipated to result from the requested refinement. The following resource areas apply to the Project's construction water usage and are discussed in detail in Attachment A: Minor Project Refinement Request Screening Form: air quality, climate change, water resources, public services and utilities, and transportation and traffic.			
<b>(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?</b> No.			
<b>(d) Does the proposed refinement trigger an additional permit requirement?</b> No. Construction water usage was contemplated in Section B, Project Description of the Final EIR/EIS. No additional permits will be required.			
<b>Describe refinement being requested (attach drawings and photos as needed):</b>			
SDG&E is requesting an increase in the total water usage that will be needed throughout construction of the Project. This MPR request proposes that the total construction water usage be increased to an estimated 90 million gallons. While the Final EIR/EIS included an estimate of 30 million gallons for total construction water use, SDG&E increased this estimate to 50 million gallons prior to the start of construction as part of its January 2013 Construction			



Water Supply Plan. This increase was found to be consistent with the language in the Final EIR/EIS in light of the selection of the ECO Partial Underground 138 kV Transmission Route Alternative (UG Alternative).

**Provide need for refinement (attach drawings and photos as needed):**

This MPR request has been prepared as a result of the necessity to increase the Project's overall construction water usage in order to continue to meet soil compaction standards and dust control requirements associated with the Project's Mitigation Monitoring, Compliance, and Reporting Program. The conditions at the ECO Substation site, which is currently under construction, have differed from what was originally anticipated, resulting in a higher Project demand for construction water. Based on the geotechnical report, the contractor estimated that remedial removal and recompaction of alluvial soil at the ECO Substation site was expected to reach a maximum depth of 10 feet. However, during mass-grading of the ECO Substation site, remedial removal and recompaction of alluvium in excess of 20 feet in depth across most of the site was necessary to reach the formational, hard pan soils under the 230/138 kilovolt (kV) and 500 kV pad areas. The deeper than expected alluvial removal also triggered the need to construct a buttress slope outside of the grading limits on the south side of 500 kV pad to accommodate proper compaction of the soils within the grading limits.

In addition, the moisture content of the in-situ soils were lower than anticipated, resulting in higher water usage for recompaction and dust control. The anticipated amount of water to provide the optimum moisture content for compaction prior to the start of construction was estimated at 30 gallons per cubic yard, based on a typical project at this elevation with similar soils and climate, but the actual water required to achieve the optimum moisture content for compaction has been approximately 45 gallons per cubic yard. In total, SDG&E's construction contractor now estimates handling approximately 50 percent more material than was originally planned in order to complete grading at the ECO Substation site. These differing site conditions will result in the use of approximately 50 to 55 million gallons of water during mass grading of the ECO Substation site alone.

Accordingly, an increase in the water needed to complete construction of the ECO Substation along with the other Project components is necessary. SDG&E's construction contractor estimates that approximately 40 to 45 million additional gallons of water will be needed to complete construction of the ECO Substation following mass grading and for construction activities at the Boulevard Substation, the underground and overhead portions of the transmission line, the SWPL Loop-in, and the other associated Project components, such as the construction yards. At the end of August 2013, the Project had used approximately 42 million gallons of water. Therefore, approximately 40 million gallons of water, in addition to the 50 million gallons already approved through the January 2013 Construction Water Supply Plan, will be needed to complete construction of the Project.

**Date refinement is expected to be implemented:** 10-02-13

**SDG&E Approvals**

Title	Name	Approval Initials	Date	Conditions (see attached)	
Environmental Project Manager	Don Houston	DH	09/19/13	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Environmental Compliance Lead	Kirstie Reynolds	KR	09/19/13	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Substation Project Manager	Matt Huber	MH	09/19/13	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Environmental Field Supervisor	Jeffrey Coward	JC	09/19/13	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Landowner Approval (if required)**

Landowner Name	Signature or Other Consent
No landowner approvals are required as a result of the requested refinement.	

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