

Comment Letter O4

Hingtgen, Robert J

From: Paige Rogowski <paige@theabf.org>
Sent: Friday, February 14, 2014 5:26 PM
To: Hingtgen, Robert J
Cc: Jimmy Smith
Subject: Comments on proposed SOITEC Development Draft EIR
Attachments: SOITEC OPPOSITION LET 2014.pdf

Dear Mr. Hingtgen,

Please accept the attached letter with comments on the proposed SOITEC Development draft EIR. Anza-Borrego Foundation stands opposed to this project because of the impact it stands to have on Anza-Borrego Desert State Park.

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Response to Comment Letter O4

Anza-Borrego Foundation
Paige Rogowski
February 14, 2014



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February 13, 2014

COMMENTS ON PROPOSED SOITEC DEVELOPMENT DRAFT EIR
 LOG# PDS2012-3910-12005
 Proposed Projects: Tierra del Sol, Rugged Solar, Lan West, Lan East

Mr. Hingtgen:

The Anza-Borrego Foundation (ABF), the non-profit cooperating association of Anza-Borrego Desert State Park, would like to provide comments regarding the Draft EIR for the proposed Soitec Development project adjacent to the southern boundary of the state park.

The ABF was established in 1967 and has successfully acquired more than 50,000 acres of private lands from willing sellers to be added to Anza-Borrego Desert State Park including recent acquisitions in the Jacumba area. ABF provides support to protect the park from threats, provides services for education and research, and assists the park with interpreting the desert environment to people from all over the world.

The Anza-Borrego Foundation is opposed to the expansion of solar and wind projects adjacent to Anza-Borrego Desert State Park, including those proposed in the Soitic 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. 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 desert bighorn sheep lambing area, and has forever blighted the scenic qualities of the entire southern sector of the state park.

O4-1

O4-2

PARTNERS WITH THE PARK
theabf.org

O4-1 This comment is introductory in nature and does not raise an environmental issue for which a response is required.

O4-2 The County of San Diego (County) acknowledges the commenter's opposition to the Proposed Project and preference for the No Project Alternative. Comments related to the Ocotillo Wind project do not raise an environmental issue related to the Proposed Project and do not require further response. The information in this comment will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.

<p>ABF recommends the County of San Diego select the “No Project” alternative for the Soitec proposal for the following reasons:</p> <ol style="list-style-type: none"> 1) 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 and its tributaries 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 originally told us they would be using 30 million gallons of water for the project, yet they recently submitted a change in the usage to 90 million gallons. Soitec estimates in the DEIR can be expected 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. 2) 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. 3) Wildlife which are key to the local habitat include the Peninsular bighorn sheep (listed as an Endangered Population by the US Fish & Wildlife Service), the golden eagle, which nest in this area, the federally Endangered Quino Checkerspot butterfly, the peregrine falcon and scores of other sensitive animal and plant species. 4) Construction of yet another group of solar projects will further impede the free movement of wildlife by reducing habitat connectivity and ruining wildlife corridors. 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. 5) ABF opposes the concept of “Fast Tracking” energy projects on private or public lands. “Fast Tracking” is a euphemism for avoiding laws put in place to address environmental impacts, the very essence of why the United States enacted NEPA and the California Legislature created CEQA. 6) Rooftop solar installation in the San Diego metro area will provide sufficient power and it is unnecessary to disturb the San Diego backcountry. <p>The Board of the Anza-Borrego Foundation thanks you for allowing us the opportunity to make comments on the proposed Soitec Development and asks 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 style="text-align: right;">Sincerely,  Paige Rogowski Executive Director</p>	<p style="text-align: center;">↑</p> <p style="text-align: center;">O4-2</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-3</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-4</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-5</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-6</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-7</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-8</p> <p style="text-align: center;"> </p> <p style="text-align: center;">O4-9</p> <p>O4-3 The County acknowledges the commenter’s concern about water use. Please refer to common response WR1. Given the depth of the on-site supply wells, the short-term nature of high water demand, and with implementation of M-BI-PP-15, the Proposed Project is not anticipated to result in appreciable impacts on surface waters in the Carrizo Gorge and Anza-Borrego Desert State Park. The commenter is also referred to the response to comment O10-23. Water use by any other project in the region has no bearing on the water demand for the Proposed Project. Please refer to the response to comment O4-7 related to the assertion that the Project is being “fast-tracked” such that the environmental analysis has been compromised.</p> <p>O4-4 See response to comment O4-3.</p> <p>O4-5 Potential impacts to each of the species listed by the commenter, as well as all other sensitive species in the Project area or likely to occur in the Project area were addressed in the DPEIR Section 2.3.3.</p> <p>O4-6 Issues raised in this comment regarding wildlife movement and corridors were considered and addressed in the DPEIR (see Section 2.3.3.4).</p> <p>O4-7 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.</p>
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	<p>O4-8 The County appreciates this information and will take it into consideration. This information, however, would not affect the analysis in the DPEIR. See common response ALT2 for more information regarding the DPEIR's consideration of a distributed-generation energy alternative.</p> <p>O4-9 The County acknowledges the commenter's support for the No Project Alternative. The DPEIR found that the Proposed Project would have no significant impacts on those resources that the commenter seeks to safeguard - biological resources, cultural resources, or water resources. The decision makers 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 provided in the FPEIR for review and consideration by the decision makers.</p>
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