

Comment Letter X2

LATE

Hingtgen, Robert J

From: karajbush@gmail.com
Sent: Friday, March 21, 2014 10:08 AM
To: Hingtgen, Robert J
Subject: Re: COMMENTS: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

Also, we are in a flight path. Please see news story here about pilot being blinded by huge solar farm in San Bernardino County:
<http://dailycaller.com/2014/03/18/airplane-pilots-hit-by-nearly-blinding-glare-from-massive-calif-solar-facility/>

From: karajbush@gmail.com
Sent: Thursday, February 13, 2014 8:22 AM
To: robert.hingtgen@sdcounty.ca.gov
Subject: COMMENTS: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

To Whom It May Concern:

I am writing to you in opposition of the gigantic solar farm project proposed by Soitec Solar in Boulevard. My home is less than a quarter mile from the Tierra Del Sol site; however, I am opposed to the entire project (all sites), for many reasons.

- I do not trust the integrity of the environmental report. SD County representatives stated that the data they received for the EIR was provided by Soitec. Such data should always be studied and obtained by an unbiased, unrelated third party. This is a very basic standard in the business world.
- My home is within the range of homes whose wells will be effected. My well is 1,000 feet deep and draws only 1.5 gallons per minute, which is extremely low. I will have zero water. We are already in a serious drought, with NO measurable rain this season. Not only do we need water to survive, we need water available to firefighters this summer to defend our homes against the inevitable wildfires. This is aside from the fact that these solar panels could be the SOURCE of fire as well.
- Many wildlife will be displaced, and worse, injured or killed by the clearing of the proposed areas. There are many creatures living underground here, who are often forgotten. These include rabbits, squirrels, toads, frogs, lizards, horny toads, and other borroughing animals. This is in addition to the wildlife that IS visible – owls, vultures, hawks, songbirds, coyotes, bobcats, wolves, etc. They will be displaced and scared, running across roads with increased traffic, and will have no choice but to come closer to our homes.

Response to Comment Letter X2

**Kara Bush
 March 21, 2014**

X2-1 Airport and aircraft hazards are considered and addressed in the Draft Program Environmental Impact Report (DPEIR); see Section 3.1.4.3.2 of the DPEIR.

X2-2 Comment letter X2 forwards a copy of comment letter I66, also submitted by Kara Bush. Please refer to the response to comment letter I66.

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- The application of herbicides is a major concern, not only for the wildlife (e.g.: frogs and toads “drink” through their skin by absorption and will die from contact with chemicals), but for our underground water quality.
- Boulevard is backcountry. People live here because of the rural way of life... small town, no traffic, no pollution, beautiful night skies, and nature. These solar farms will completely change the visual character and quality Boulevard. Solar panels belong on roofs, in the city, where electricity is in demand. Not out in whatever natural, virgin land is left.
- Our roads were not made for the traffic and activity that this project would bring. We’ve got narrow, 2-lane roads that were designed for a rural way of life; not for tankers, trucks, and tractors. In an attempt to avoid the construction areas, residents will detour using unmaintained dirt roads like mine, Moon Valley Road, creating massive clouds of dust and traffic right in front of my home.
- At the community meeting on February 6th, it was brought to everyone’s attention that the EIR failed to address many issues and excluded several water usage needs, which leaves the water need grossly underestimated. The report needs to be discarded, and a new one obtained by an unbiased, unrelated third party. It is completely unacceptable that the County did not catch these serious omissions. The majority of the impacts listed in the County’s presentation were noted as “significant and unavoidable.” This just tells me that the County does not care about Boulevard or its residents.
- The proposed “solutions” to the significant and unavoidable impacts are simply unrealistic.
- I support Alternative #9 – NO PROJECT.

Please help us defend our land. This is a serious project, not merely a lemonade stand being put up on the corner. SD County needs to take it seriously and consider how it will effect the small town of Boulevard and its residents and inhabitants.

Kara Bush
38211 Moon Valley Rd
Boulevard, CA 91905

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Cont.

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Airplane pilots hit by 'nearly blinding' glare from massive Calif. solar facility

Posted By [Michael Bastasch](#) On 7:23 PM 03/18/2014 In | [No Comments](#)

Airplane pilots cruising over southern California have been complaining about a "nearly blinding" glare emanating from a massive government-funded solar thermal facility.

The Ivanpah solar energy plant in San Bernardino County is the world's largest solar thermal plant and has 173,500 large mirrors that reflect sunlight onto boilers in three 459-foot towers. A feat of modern engineering — to green energy advocates, but a flying hazard to pilots.

The Federal Aviation Administration's Aviation Safety Reporting System (ASRS) got two anonymous complaints in August that mentioned a "blinding glare" coming from the Ivanpah solar facility. One complaint came from a Los Angeles air traffic controller and the other from a small transport plane pilot that took off from an airport in Boulder City, Nevada.

"The FAA is aware of potential glare from solar plants and is exploring how to best alert pilots to the issue," an FAA spokesman told The Daily Caller News Foundation.

Dozens of flights per day fly over or near the Ivanpah solar facility on routes between the Las Vegas area and Southern California. On its initial climb leaving Boulder City airport, the pilot of the small transport plane "experienced a very bright, intense light from three solar complexes which interfered with their ability to scan for traffic," according to the ASRS filing.

"[T]he Co-pilot and I were distracted and momentarily blinded by the sun reflecting off of mirrors at the solar power plant facility located near the CA-NV border near the town of Primm," [the pilot wrote to ASRS](#). "This solar power plant which I believe is still under construction consists of three massive circular arrays of thousands of mirrors oriented inward toward a central tower."

"From the pilot's seat of my aircraft the brightness was like looking into the sun and it filled about 1/3 of the co-pilots front windshield," the pilot added. "In my opinion the reflection from these mirrors was a hazard to flight because for a brief time I could not scan the sky in that direction to look for other aircraft."

"Daily, during the late morning and early afternoon hours we get complaints from pilots of aircraft flying from the northeast to the southwest about the brightness of this solar farm," [wrote the Los Angeles air traffic controller in August](#).

"On this particular morning, an air carrier complained about the brightness and reiterated that it was 'nearly blinding,'" the controller continued. "I have no idea what can be done about this situation, but being a passenger on an aircraft that flew through this airspace and saw it for myself, I would say that something needs to be done. It is extremely bright and distracting."

In August, the Ivanpah solar facility was still being built. During the time of the complaints, the facility's developer BrightSource Energy "was testing and calibrating the mirror assemblies, called heliostats, but it is unknown if that had anything to do with the reflection," [reports the Press-Enterprise](#). The Ivanpah facility was brought online last December.

Ivanpah's co-owner and operator, NRG Energy, was notified of the "blinding" complaints this week and said it would respond within 10 days. The FAA received the complaints last November and the Clark County Department of Aviation was notified of them at the end of January.

<http://dailycaller.com/2014/03/18/airplane-pilots-hit-by-nearly-blinding-glare-from-massiv...> 3/21/2014

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The article cited by the commenter addresses a different type of solar energy generation technology than that used by the Proposed Project. The solar technology used by the Ivanpah project described in the article cited by the commenter uses mirrors to focus sunlight on energy generating towers. In contrast, the CPV trackers used by the Proposed Project are designed not to reflect sunlight, and will have reflectivity characteristics comparable to asphalt. (DPEIR, Appendix 2.1-3, Figure 12.).

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BrightSource's environmental impact study for Ivanpah included mitigation measures for glare issues related to the site's reflective mirrors. The aviation community actually raised such worries during the environmental review process.

Ivanpah's environmental impact study found that the solar thermal plant could cause temporary blindness to pilots flying within 3,300 feet of the heliostats, which compromises safety. BrightSource had to develop a heliostat position plan to mitigate the potential harm from Ivanpah's glare.

"At the right angle, you will get the intensity, which is similar to looking at a car headlight at night. If you were to look away you'd still have that shape in your vision," Chad Davies, president of Riverside Air Service, told the Press-Enterprise.

"If you see a reflection, you turn your head, you don't look at it," said Phil Shallenberger, who regularly flies over the project to refuel his plane. "It's not going to stay there long. When you move, it goes away."

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