

## Hingtgen, Robert J

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**From:** Billie Jo Jannen <jannen@inbox.com>  
**Sent:** Friday, January 30, 2015 1:13 PM  
**To:** Gungle, Ashley; Horn, Bill; Cox, Greg; Jacob, Dianne; Roberts, Dave; Ron-Roberts; Hingtgen, Robert J  
**Cc:** LUEG, CommunityGroups; Fitzpatrick, Lisa; Glassman, Marilu; McPherson, Sheri  
**Subject:** CLMPG comment on Soitec programmatic EIR  
**Attachments:** Soitec letter CLMPG to BOS.pdf

Please include the attached letter in materials provided to the Board of Supervisors with the February 4 agenda item entitled "SOITEC SOLAR DEVELOPMENT; MOUNTAIN EMPIRE SUBREGIONAL PLAN AREA (DISTRICT: 2)

Thanks

Billie Jo Jannen, Chairman, CLMPG

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**Memorandum**

From: Billie Jo Jannen, Chairman  
Campo Lake Morena Community Planning Group

To: San Diego County Board of Supervisors

January 30, 2015

**RE: SOITEC SOLAR DEVELOPMENT PROJECT OPPOSITION COMMENTS  
FOR FEBRUARY 4 BOARD HEARING**

Dear Chairman Horn and Members of the Board:

At our regular meeting held on January 26, 2015, the Campo Lake Morena Community Planning Group voted unanimously to support the Boulevard Planning Group's letter of opposition, dated January 9, 2015, for the Soitec Solar Final EIR and controversial CPV projects.

We do not believe that the post-circulation addition of 160 large, experimental battery arrays -- a profound impact on all elements of the environment and very high fire risk -- could possibly be legal. We believe that your approval of high-impact elements added after the draft EIR was circulated would be a violation of state and federal laws requiring public comment on substantial elements of the proposed projects.

In addition, Soitec Solar appears to be unreliable, financially unstable, and unable to meet repeated contract milestones as disclosed by SDG&E's December 22 filing with the CPUC<sup>1</sup> and recent media coverage regarding their terminated Power Purchase Agreements, loss of 100 or more jobs at their Ranch Bernardo facility, and the January 16 vote by Soitec's Board of Directors to exit the solar energy business<sup>2</sup>.

The inadequate and flawed EIR must be revised and re-recirculated based on significant new information related to changed circumstances with Soitec, project design changes, late introduction of an unprecedented 160 cargo containers of highly flammable battery storage, inadequate groundwater/construction water estimates, mitigation and more.

We strongly urge and request that you:

1. Reject the pre-determined staff report and planning commission recommendations.
2. Reject environmental findings (staff report) and DO NOT certify the EIR, as neither is substantially supported by the record nor are they CEQA compliant.

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<sup>1</sup> <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=143931998>

<sup>2</sup> [http://www.soitec.com/pdf/soitec\\_q3\\_14-15\\_sales.pdf](http://www.soitec.com/pdf/soitec_q3_14-15_sales.pdf)

3. Reject the ordinance changing the zoning classification of certain property in the Boulevard Subregional Plan Area; Ref PDS2012-3600-12- 005 (REZ)
4. Reject the resolution disestablishing a portion of the Maupin Agricultural Preserve No. 96.
5. Reject Soitec Solar's Tierra Del Sol project Major Use Permit PDS2012-3300-12-010 and conditions set forth in the Form of Decision.
6. Reject Soitec Solar's Rugged Solar project Major Use Permit PDS2012-3300-12-007 and conditions set forth in the Form of Decision.

Finally, the EIR, as written, **fails to quantify the carbon emissions impact of either the individual projects or the "program" as a whole.** Without a clear analysis of the true Net Energy Exchange, the change of zoning from agriculture/open space to intense industrial energy generation is unjustifiable. Doing so because you THINK it might be beneficial to carbon emissions is not an adequate reason to pursue such drastic changes, nor to impose this undue share of impacts on the residents and property owners you are forcing to accept them.

According to 2006 research by Global Change Research Group, Department of Biology, San Diego State University, "*...the old-growth chaparral shrub ecosystem can be a significant sink of carbon under normal weather conditions and, therefore, be an important component of the global carbon budget.*"<sup>3</sup>

Failure to quantify the long-term carbon emission effects of permanently removing all vegetation on hundreds of acres of land is irresponsible and unconscionable, especially when stripping the land is being done for the stated goal of saving carbon emissions. If the long-term effects are not truly as claimed, this would make such claims fraudulent and the approval of these projects negligent. The claimed benefits should be scientifically supported, rather than simply assumed.

Sincerely



Billie Jo Jannen  
(619) 415-6298

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<sup>3</sup> H. Luo, et al, "Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide" *Global Change Biology* (2007)13, 386–396, doi: 10.1111/j.1365-2486.2006.01299.x