

From: [Mark Ostrander](#)
To: [Hingtgen, Robert J](#); [Jacob, Dianne](#)
Subject: NOP Soitec Solar Development Comments
Date: Wednesday, January 02, 2013 1:21:21 PM
Attachments: [Comments Boulevard Solar ER.docx](#)

Happy New Year and Good Day,

Find attached my comments for the NOP Soitec Solar Development PEIR. If you questions or need any clarification feel free to contact me.

Regards,
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To: Robert Hingtgen

County of San Diego/Planning & Development Services

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The following are comments and concerns I have in regards to the Solar Projects EIR (Tierra Del Sol, Rugged, LanEast, and LanWest) Log No.: 3910-120005 (ER).

Aesthetics:

Large concentrated photo voltaic arrays will diminish view shed quality and are in view along Historic Old Highway 80. This could diminish property values that were purchased and appraised for their views. In addition, this could diminish recreation and tourism to the area.

Air Quality:

Dust could be an issue due to winds. Dust control abatements need to be available 24/7 as once the ground is disturbed dust will be an issue as experienced on other projects, example when construction workers are off no one is available to mitigate the problem of dust during off hours.

Biological:

Removal of vegetation in the area could diminish fragile and endangered plant species and could lead to erosion in the project area. The project area is home to Peninsular Big Horn sheep, Quino Checker Spot butterfly, Golden Eagle, Red Tail Hawk, Harris Hawk, Tri Colored Black Bird, Mountain Lions (cougars), and Turkey Vultures. Recently, a Black Panther (Puma or Cougar) was spotted in the area of the project, and was seen by many local residents. Black Panthers are native to California and Mexico. This particular Black Panther was probably disturbed from its habitat due to the construction of Sunrise Power Link Project. The project area could create Barrier effects to these species and could diminish foraging and hunting areas. The projects abut Wilderness and Nature Conservancy lands. The projects are also within the Sonoran Desert region which is a diverse and fragile ecosystem. The region incorporates southern Arizona North to the Mogollon Rim, the southeastern corner of California drawing a line south From Needles to Palm Springs to San Diego, the state of Sonora, Mexico, the Baja California Peninsula of Mexico, and the Gulf of California. The projects need to be studied for cumulative impacts as there are

many projects that have completed or are in construction and planning stages. The cumulative effects need to be evaluated from Imperial County and San Diego County.

Cultural Resources:

The project areas are rich in prehistoric resources from pottery shards, conical mortars, flakes, cores, house pits, pictographs, and burial sites which are well-documented and recorded. McCain Valley is rich in flakes and cores which consist of quartz and obsidian used for tool making. The Kumeyaay today still go to these areas to gather resources and some still have ceremonies in the area. The area was a large gathering spot of the Tipai and Quechan people. While employed by Cal Fire I was trained to identify and protect cultural resources and conducted surveys in the area and found 8 more sites in an area previously surveyed by Archaeologists. This is not to question the previous surveys as features appear after rains, fires, and other disturbances, this is the reason Cal Fire trains personnel to do surveys. I can personally attest that the proposed project locations and surrounding lands are highly sensitive with many more sites not recorded. The many archaeological sites that have been disturbed by previous projects need to be studied for the cumulative impacts, and the region needs to be studied as a whole and not individually before this history is lost or destroyed forever.

Geology and Soils:

The Boulevard Jacumba area consists of granite, quartz, Julian schist, decomposed granite, volcanic rock, and sand. The soils support a fragile vegetative community which helps reduce erosion and supplies habitat for indigenous wildlife. The disturbance of the soils and geology could impact wildlife and lead to erosion. This should be studied for cumulative impacts to the area.

Greenhouse Gas Emissions:

Construction phase will contribute to short term contribution of greenhouse gases from equipment working on the project. Long-term contribution is likely from loss of vegetation which is valuable in carbon sequestration during its lifecycle. The cumulative impacts need to be studied for this area.

Hazards and Hazardous Materials:

Introducing electrical lines and other infrastructure (CPV arrays and Wind Turbines) would increase potential for wildfires. Studies for the area usually, state there is a low fire activity in the area; however, they do not take into account that these areas have little or no improvements or infrastructure and

limited public access. The introduction of electrical lines, infrastructure, and people would increase the probability of a fire starts within this area. Overhead power lines and infrastructure would reduce the effectiveness of aerial firefighting resources, causing fire commanders to alter strategy and tactics. Fires could potentially become larger. The project area is within a Wick area which during a Santa Anna event could be catastrophic and devastating to San Diego as experienced in 2003 and 2007 conflagrations. Concentrated photo voltaics also pose a hazard to firefighters as the CPV arrays cannot be shut down only the inverters are shut down. The CPV array, array wiring, combiners, and home runs to inverters are fully energized at high voltages. Even at night when work lights and even moonlight can generate enough energy that could potentially be dangerous or lethal to firefighters. Another concern is lighting strike and attraction that the infrastructure may impose to the area and another potential ignition source for wildland fire. Water which is the fire suppression standard on engines could not be used in the array footprint as it creates hazards to firefighters, it would require special engines and chemical systems for suppression. Airports have dedicated fire stations with special trained dedicated personnel at the facility as it is a specialized job. This needs to be explored so that our firefighters are not put at greater risks than they already face. The cumulative impacts need to be studied for the area.

Hydrology and Water Quality:

The projects could substantially alter the existing drainage pattern of the site or area through alteration of the course, in a manner which will result in substantial on or off-site erosion or siltation and could substantially increase the rate or amount of surface runoff in a manner which would result in off-site flooding which could degrade water quality to Wells and Springs within the area. Furthermore, this could result in inundation by mudflows from the project areas. The community of Boulevard is totally dependent on wells and springs for their water needs. The cumulative effect of the projects has to be studied thoroughly as water is the lifeblood of the community.

Noise:

Noise would be an issue during construction, as has been experienced by residents during the border fence construction, which proceeded 24/7 during construction and currently experience during the ongoing construction of Sun Rise Power Link. SDG&E requested and received waivers for hours and days of work increasing residents to more noise. Inverters and appliances could also introduce noise into the area that was not present in the rural setting. This could potentially raise the ambient nighttime noise levels.

Public Service:

The area is currently served by two volunteer fire stations, which are Jacumba and Boulevard. Currently, the Jacumba station is staffed by Mount Laguna volunteers as San Diego Rural does not have sufficient staffing to cover the station. This has been an issue for several years. Boulevard is currently staffed with

San Diego County Fire Authority volunteers. Statistically volunteer fire station staffing goes up and down. The stations could potentially be uncovered when there is a lack of sufficient and trained volunteer force and has been dark several times in 2012. There is not a paid year-round fire station in the area, the closest Paid Staff Station is CAL Fire White Star station, which is contracted in the winter months by the County. Boulevard and Jacumba stations have a large call volume already due to I 8 traversing its response area. The projects have the potential of adding more responses to the stations call volume. The projects and as well as other projects in the area, need to be studied for the cumulative impacts to the area.

Recreation:

The projects would impact recreation as people come to the area for the view, dark skies, quiet, wildlife, and hiking. The views will be tarnished by the big CPV arrays and hiking areas could be decreased due to the large amount of land used for these projects. Access routes for local and regional recreation areas will be highly impacted due to conversion of the area from scenic rural lands into concentrated industrial energy production and transmission zones. The cumulative impacts of all the projects in the area will have a significant impact on recreation and tourism to the area. These cumulative impacts need to be studied extensively.

Transportation:

Construction traffic will have an impact on local roads residents and wildlife. This is currently being experienced with Sun Rise Power Link. There have been 50 or more trucks a day continuously traveling Highway 80, tractor-trailers hauling heavy equipment, water trucks, and pickup trucks. The vehicles many of them speeding and using cell phones while driving. There has been a large number of wildlife killed along the roads from construction traffic. Old Highway 80 is showing signs of disrepair because of this traffic as well as other residential roads. The roads in the project areas were not designed for this traffic use. This needs to be studied for the cumulative impacts on these roads.

EMF and Radio Frequency Emissions:

This area needs to be studied and the effects of EMF and RFE on residents and wildlife. The level of exposure needs to be addressed and not taken as a single project but as a whole of all projects proposed in the area. This would show an accurate exposure level to the residents and wildlife. This needs to be studied for the cumulative impacts.

Cumulative impacts as stated in PRC Division 13 Environmental Quality Article 20

15355 Cumulative Impacts

"Cumulative Impacts" refer to two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

We hope you take these comments and concerns and address them to the full extent possible. If you have questions or need further clarification feel free to contact me. Thank you for your time and allowing me to participate in this process.

Regards,

Mark Ostrander

(Retired Cal Fire Battalion Chief and Environmental Coordinator)

Jacumba Resident

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