

Hingtgen, Robert J

From: atomicoadranch@netzero.net
Sent: Tuesday, February 18, 2014 12:18 AM
To: Hingtgen, Robert J
Subject: Comments on EIR for Soitec Solar Project
Attachments: Soitec.pdf

Dear Mr. Hingtgen,

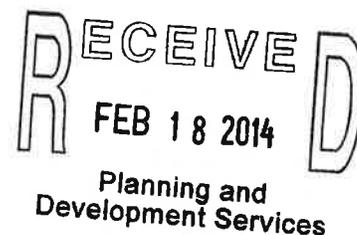
Please accept these comments on the proposed Soitec Solar project Draft EIR.

Thanks,

Kevin Emmerich
Basin and Range Watch



Basin and Range Watch



February 17, 2014

To: Robert Hingtgen, Planner III

Planning and Development Services of San Diego County
5510 Overland Avenue, Suite 310,
San Diego, CA 92123

Robert.Hingtgen@sdcounty.ca.gov

Subject: Comments on Soitec Solar Project Draft EIR

Basin and Range Watch is a group of volunteers who live in the deserts of Nevada and California, working to stop the destruction of our desert homeland. Industrial renewable energy companies are seeking to develop millions of acres of unspoiled habitat in our region. Our goal is to identify the problems of energy sprawl and find solutions that will preserve our natural ecosystems and open spaces.

The Soitec Solar Project would have long term impacts on biological, hydrologic, visual, air quality and socio-economic resources of surrounding communities and add to the cumulative impacts of nearby large-scale energy projects.

We have concerns about the following impacts:

Biological Resources:

The project would remove habitat for endangered Peninsular bighorn sheep, kit fox, burrowing owls and the Endangered Quino checkerspot butterfly.

Solar panels will create a polarized glare or "lake effect" which has been attracting, injuring and killing a host of avian species on other photovoltaic projects. Birds are deceived and often hit solar panels or can even dehydrate.

Below are examples of recent avian kills at solar projects:

On May 8th, 2013, a Federally Endangered Yuma clapper rail was found dead on the Desert Sunlight Solar Project, Riverside County, California

As it turns out, several water birds have been killed at both the Desert Sunlight Project as well as the Genesis Project.

Here is the official list compiled by Rewire : <http://www.kcet.org/news/rewire/solar/water-birds-turning-up-dead-at-solar-projects-in-desert.html>

Genesis, March 13, lesser goldfinch
Genesis, March 19, lesser goldfinch
Genesis, March 28, bufflehead
Desert Sunlight, April 3 eared grebe
Desert Sunlight, April 15 surf scoter
Genesis, April 17, black-throated grey warbler
Genesis, April 17, house wren
Genesis, April 17, orange-crowned warbler
Desert Sunlight, April 18 great-tailed grackle
Desert Sunlight, Week of April 21 red breasted merganser
Genesis, April 25, barn owl injured, taken to rehab
Genesis, May 1, pied-billed grebe
Genesis, May 1, eared grebe* injured, to rehab
Desert Sunlight, May 6 double crested cormorant
Desert Sunlight, May 8 Yuma clapper rail
Genesis, May 8, Wilson's warbler (poss. line strike)
Genesis, May 14, yellow-headed blackbird* injured, taken to rehab Genesis, May 15, hermit thrush (bulldozer)
Genesis, May 16, Wilson's warbler
Genesis, May 16, Townsends warbler
Genesis, May 16, unidentified bird
Genesis, May 22, western grebe injured, taken to rehab Genesis, May 22, yellow warbler
Genesis, May 23, warbler, species unknown
Genesis, May 24, unidentified sparrow
Genesis, May 30, American coot
Desert Sunlight, June 4, common loon
Desert Sunlight, June 5, eared grebe
Desert Sunlight, June 5, western grebe
Desert Sunlight, June 5, western grebe live, released after consultation.
Desert Sunlight, June 6, American coot
Desert Sunlight, June 6, double crested cormorant
Desert Sunlight, June 9, Common raven
Genesis, June 10, brown pelican- injured, sent to rehab
Desert Sunlight, June 19, hummingbird
Genesis, July 10, brown pelican Desert Sunlight, July 10, brown pelican
Desert Sunlight, July 11, brown pelican
Desert Sunlight, July 13, brown pelican
Desert Sunlight, July 15, black-crowned night heron

More bird kill lists can be found for the Ivanpah Solar Electric Generating System in San Bernardino County.

Hydrology: The project will use a very large amount of water for construction dust control and panel washing. This will threaten water resources in the region of Boulevard and Jacumba. This could impact the wells of local people and threaten wildlife that depends on water in the Carrizo Gorge and Anza Borrego watershed. Water use may be underestimated in the DEIR.

Air Quality: Large solar projects require an unreasonable amount of acreage, often spanning square miles. In arid regions, solar developers almost never adequately control the fugitive dust created by their massive construction footprint.

Construction activity will go on for 2 or more years.

The health impacts potentially caused by airborne particulates from construction dust could threaten the health of the local residents of the area. Coccidioidomycosis (Valley Fever) is a common issue that impacts desert communities when dust is stirred up.

Removal of stabilized soils and biological soil crust creates a destructive cycle of airborne particulates and erosion. As more stabilized soils are removed, blowing particulates from recently eroded areas act as abrasive catalysts that erode the remaining crusts thus resulting in more airborne particulates.

We are concerned that industrial construction in the region will compromise the air quality to the point where not only visual resources, but public health will be impacted.

We are also concerned that Soitec will have no choice but to use more water in an already over-drafted aquifer to control the large disturbance they intend to create.

Construction should not be permitted during days of high winds. Wind speeds of 10 MPH and higher should be determining factors that limit construction.

Visual Resources: Scenic visual resources would be impacted. The view from adjacent scenic areas and wilderness areas would be degraded. The glare from the project and the tangle of transmission lines will only hurt the scenery of the region and threaten any economic tourism benefits.

Socio-Economics: There would be a boom and bust of construction jobs, but solar projects like this only create 10 to 20 full time jobs on average. The long term benefits to employment and the local economy are minimal. Large industrial visual eyesores also degrade local property values. Any businesses that depend on tourism end up losing money due to the overall declining popularity cause by industrial projects.

Alternatives: The beauty of solar panels is that they don't need to kill endangered species to work. They can be easily retro-fitted to be placed in the built environment. There is no reason to threaten the hydrology, wildlife, economics and public health of the region for a boondoggle solar project like this.

Please select a No Project Alternative for this proposal.

Thank you,

Kevin Emmerich
Laura Cunningham
Basin and Range Watch
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Cima CA 92323
www.basinandrangewatch.org