

Hingtgen, Robert J

From: Gungle, Ashley
Sent: Monday, April 22, 2013 1:14 PM
To: Hofreiter, Larry; Boparai, Poonam; Beddow, Donna; Pine, James; Bennett, Jim; Vidales, Rene A.
Cc: Sinsay, Edwin M; Ramaiya, Jarrett; Hingtgen, Robert J
Subject: Rugged Solar (PDS2012-3300-12-007)
Attachments: PDS2012-3300-12-007-PDS-PLN-Project Issue Checklist.pdf
Expires: Thursday, April 20, 2023 12:00 AM

A resubmittal was received for the Rugged Solar project (PDS2012-3300-12-007) and you have been assigned a task to review the project.

All of the technical studies (in pdf and word format) as well as the plot plans/grading plans can be found in the following folder: **S:\temp\Ashley Gungle\SOITEC SOLAR DEVELOPMENT\RUGGED SOLAR.** Also attached is a copy of the project issue checklist with the applicant's responses.

You should have received the following documents for review:

STUDY/ DOCUMENT	STAFF ASSIGNED
Visual	Larry Hofreiter
Air Quality	Poonam Boparai
Biology	Ashley Gungle
Climate Change	Poonam Boparai
Cultural	Donna Beddow
Cultural (Confidential Appendix)	Donna Beddow
Fire Protection Plan	James Pine
Groundwater Investigation	Jim Bennett
Well Test Plan	Jim Bennett
Land Development (Plot Plan)	Rene Vidales

All of the specialist tasks are due on 5/4/13 which is a Saturday, so please get your comments to me by Friday **5/3/13**. If you are not going to be able to meet this deadline or are going to need more than the allotted hours, please let me know.

Most of you are also assigned to the Tierra Del Sol project and Soitec's EIR for both of these projects. I will be sending out separate emails with similar instructions.

Please ensure that all time spent on your review of these technical studies is charged to the Rugged Solar account (**PDS2012-3300-12-007**). All review for Tierra Del Sol Solar and the Soitec EIR should be charged separately to those accounts.

Thanks in advance to all of you!

Ashley

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: RUGGED SOLAR				
Project Number(s): 3300 12-007 (MUP)				
DPLU (Department of Planning and Land Use) Planning and CEQA Comments				
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
1-1	Major Project Issue	Boulevard Community Plan Consistency: As noted in the Major Pre-application Letter dated October 25, 2011, the Boulevard Community Plan has several policies that prohibit the proposed project. These policies could be amended by the Board of Supervisors if the County's proposed Wind Ordinance regulations are adopted. However, at this time the proposed project does not comply with the following six Boulevard Community Plan issue statements and policies: Issue LU 1.1.1; Policy LU 1.1.1; Issue LU 1.3; Policy LU 1.3.1; Policy LU 1.3.2; Policy CM 8.6.2. Consistent with other renewable energy projects in the area, County staff will require the Rugged Solar project to underground its transmission lines, including the 125 foot 69 kV transmission line. Additionally, if the proposed project does not comply with the specific Boulevard Community Plan policies, the Department will recommend denial. The Department will allow you to continue processing the application until such time that the General Plan Amendment for the Wind Ordinance is decided by the Board. <u>8/23/2012: 2nd Request. No additional information was provided.</u>	The gen-tie for the project is a co-located facility with the Tule Wind Project MUP that was approved by the County of San Diego. The Rugged gen-tie will be constructed overhead north of I-8 and will be underground south of I-8 per the Board of Supervisor decision on the Tule MUP. The Draft Program EIR provides information regarding scale, bulk coverage and intensity in Sections 2.1, Aesthetics and Section 2.10, Land Use.	6/15/2012 8/28/2012
1-2	Major Project Issue	Major Use Permit Findings: Based on Staffs' initial review of your proposal, Major Use Permit findings, (particularly in regards to bulk, scale and coverage), appear extremely difficult to make. In the Project Issue Checklist, please provide additional, quantitative information that accurately describes the scale, bulk, coverage and intensity of the proposed CPV Panels in relation to existing uses in the area. If Major Use Permit findings cannot be made, the Department will recommend denial. The Department will allow you to continue processing the application until such time that the General Plan Amendment for the Wind Ordinance is decided by the Board. <u>8/23/2012: Additional information was provided, but the applicant should be aware that this will remain a Major Issue.</u>	Comment noted. The Draft Program EIR provides information regarding scale, bulk coverage and intensity in Sections 2.1, Aesthetics and Section 2.10, Land Use.	6/15/2012 8/28/2012
1-3	Major Project Issue	Cultural Resources Analysis: The report is missing many key elements that are necessary for County staff to identify project impacts such as site size, type, artifact counts, depth of artifacts for all sites in table form within the project area (see attached excel file). In addition, the historic homestead (P37-031680) was not evaluated for significance. These factors are necessary to adequately analyze project impacts and appropriate mitigation. Therefore, revisions to these comments may occur when this information is provided to County staff. County staff met with Micah Hale and James Daniels on June 14, 2012. Micah will email a draft copy of the report when available for staff review prior to another formal submittal. <u>8/28/12: Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Tables have been added to sites with subsurface material. Archival research for P-37-31680 has provided an expanded discussion of historical context and in-depth evaluation for significance. As the historical structure and related cultural material (bone and bottle stopper) will not be impacted directly by project activities, the collected bottle stopper was returned to the site. Reviewing the testing results has indicated that the bone is from a domesticated animal, as burned saw-cut bone was also found in the area. Additional clarification has been added to Section 6.0 regarding the rock shelters.	6/15/2012 8/28/2012

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1-4	Major Project Issue	Multiple Projects Utilizing Local Groundwater Resources: There are at least three major projects that each require groundwater resources from this localized area as follows: a) Tule Wind Farm (3300 09-019): Up to 58 acre-feet in nine months and ongoing water for an O&M Facility (2,400 gallons per day). b) Rough Acres Ranch Campground and Retreat Center (3992 11-002): Groundwater uses include a campground, potential mine, biological habitat creation, and other uses. The total amount of groundwater is not fully defined. c) Rugged Solar (this project): Up to 73 acre-feet in 40 working days for construction use and 5.2 acre-feet per year for ongoing panel washing, soil stabilization, and O&M building. The groundwater investigation must evaluate potential impacts to groundwater resources when taking all of these projects into account along with other existing groundwater uses, and groundwater use at maximum buildout of the General Plan. It is unknown whether all three projects can be supported by local groundwater resources. Additionally, the overall quality of groundwater and the projects potential to impact groundwater dependent habitat needs to be assessed. Finally, any impacts to off-site groundwater will also have to be analyzed. <u>8/28/12 Pending Groundwater Investigation.</u>	In order to address potential cumulative effects to groundwater resources Dudek prepared a Groundwater Resources Identification and Allocation Plan dated March, 2013. Section 6 of the memo (pgs. 30-31) summarizes the findings and conclusions, which indicate that there are sufficient local resources to supply peak demands calculated by month for the cumulative projects using local groundwater resources. Long term effects on groundwater in storage are addressed in the Rugged Groundwater Resources Investigation Report prepared by Dudek dated February, 2013. A 30-year water balance analysis was prepared which took into account groundwater use of the three projects referenced along with other existing groundwater uses and groundwater use at maximum buildout of the General Plan. See Section 3, as well as Exhibits 3-C and 3-F.	6/15/2012 8/23/2012	
2-2	Project Description	Section 1.3 Project Location. Please identify what offsite facilities would impact the listed APN's. Grading? Road improvements? Transmission lines? If you mean transmission lines please explain how many would be needed, how tall they need to be and what would they look like? Provide a figure to show the reader. <u>8/28/12 Information is still unclear. Please refer the reader to Figure 5A for another figure that is clear and accurately reference what roads will access what portions of the site including Vista Oaks Road, Roadrunner Lane, Rough Acres Ranch Road, and any other new access roads being proposed, including new road north of Rough Acres Ranch Road. Also, it is still unclear how many 34.5 KV overhead trunk line poles are proposed compared to how many 69KV Gen-Tie lines poles. It appears that 52 poles between 110 and 170' in height would be used to co-locate the 34.5 KV and 69KV lines. I think 34 of these 110 to 170' poles would be on-site (e.g. within MUP boundaries) and 20 would be offsite. Conversely, Page C-120 of Plot Plan shows (23) twenty-three 34.5KV Pole lines that would be approximately 75' tall; all of which would be within MUP boundaries - If I'm reading the information correctly? Please clarify this information in the written text.</u>	Per email received from County Staff on 3.27.13 the MUP Project Description is no longer a component of the project submittal. Please see Chapter 1 of the EIR.	6/15/2012 8/23/2012	
2-4	Project Description	Section 1.4 Project Description, first bullet. Please clarify the length of lines that will be placed underground as well as the length of lines that will be overhead. A simple graphic showing underground lines as orange and overhead lines as green would be helpful. Additionally, a schematic of the 50 - 75 foot tall overhead lines should be included on the graphic and be sure to specify how many overhead poles will be required. <u>8/28/12 Staff recommends producing a simple, colored graphic that shows the number and approximate locations of the 34.5KV overhead conductors that run approximately 16,380 feet. It should also show the number and approximate locations of the 69KV Gen-Tie line that runs 5,130 feet, both onsite and offsite. The graphic should show how the 34.5KV lines collect to the on-site substation, and how the onsite Substation then transmits the energy along the Gen-tie line and connects to the Boulevard substation south of I-8.</u>	Per email received from County Staff on 3.27.13 the MUP Project Description is no longer a component of the project submittal. Please see Chapter 1 of the EIR.	6/15/2012 8/23/2012	
2-6	Project Description	Section 1.4.2.2 Off-Site Private Transmission Facilities. Please specify the length (in miles), as well as the number of poles that would be necessary to transmit the energy from the onsite substation to the SDG&E Boulevard East Substation. <u>8/28/12 Not addressed. Please address this comment based on the Tule Wind Project decision.</u>	Per email received from County Staff on 3.27.13 the MUP Project Description is no longer a component of the project submittal. Please see Chapter 1 of the EIR.	6/15/2012 8/23/2012	

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2-7		Project Description	Section 1.4.2.3.4 Internal and External Access Roads. Please revise this section to incorporate the County Fire Marshal's comments in the FPP. The County Fire Marshal has asked for additional east-west fire apparatus access roads that will be spaced no further than 600 feet apart. This section should also clarify how emergency personnel will be able to distinguish between fire apparatus access roads and the maintenance roads. <u>8/28/12</u> • Sec. 1.4.2.3.4 Access Roads: Access within the project is inadequate. Fire apparatus access roads are to be a minimum of <u>24 feet wide improved, all-weather and capable of supporting 50,000 lbs. Moreover, the majority of internal access roads are north-south—some approaching a half mile in length—with limited ability to travel east-west within the project. Provide additional east-west fire apparatus access roads spaced no further than 600 feet apart. Revise discussion in the Project Description.</u>	Per email received from County Staff on 3.27.13 the MUP Project Description is no longer a component of the project submittal. Please see Chapter 1 of the EIR.	6/15/2012 <u>8/23/2012</u>			
2-8		Project Description	Project Description, Page 51: The project is proposing to provide groundwater for water uses on the project through two wells. Please identify the location of the two wells. Please also provide any well logs for the wells which would be on file with the Department of Environmental Health, and any other information in regard to the wells (well depth, production characteristics, etc.). <u>8/28/2012: Two off-site sources, Jacumba Community Services District and Live Oak Springs Water Company have been identified as potential offsite uses. If the project cannot prove out adequate on-site groundwater, groundwater evaluation(s) of these offsite source(s) will be required.</u>	Refer to Section 2.7 (pgs. 2-17 and 2-18) and Appendix B of the Rugged Groundwater Resources Investigation Report (Dudek, February 2013) for well locations, logs and other well information. The wells proposed for use are Wells 6a/6b and Well 8. Off-site water resources (JCSD and LOSWC) are being evaluated by the water suppliers.	6/15/2012 <u>8/23/2012</u>			
2-9		Project Description	Project Description, Page 51: The project description indicates that water will be provided by two wells and from other sources if there is not enough water from the two wells. It is possible that the construction water required for this project of 73 acre-feet may not be possible to be produced from just two wells. Please have your hydrogeologist evaluate the total production needs during the construction phase and update your project description to identify all possible sources of water for this project. All sources of water are required to be identified now and evaluation of potential impacts to groundwater resources shall be conducted on these sources now. <u>8/28/12 Pending groundwater investigation.</u>	Refer to Section 2.4 (pgs. 2-9 to 2-14) of the Rugged Groundwater Resources Investigation Report (Dudek, February 2013) for construction water demands, including an estimate of the offsite import that would be required. Refer to Section 5 (pgs 23-29) of the Groundwater Resources Identification and Allocation Plan (Dudek, March 2013) for identification of potential offsite water sources and Section 6 (pgs 30-31) for an analysis of peak cumulative demands.	6/15/2012 <u>8/23/2012</u>			
2-12		Project Description	<u>Sec. 1.4.2.3.2 Fire Protection: Please remove that portions of the project fall within CSA 111, which has been dissolved.</u>	Per email received from County Staff on 3.27.13 the MUP Project Description is no longer a component of the project submittal. Please see Chapter 1 of the EIR.	<u>8/28/2012</u>			
3-2		General Plan Conformance	County staff has drafted a General Plan Amendment Report which indicates that the proposed project is consistent with Goals and Policies of the Regional Elements. <u>8/28/12 Ongoing comment.</u>	Comment noted. The Draft Program EIR provides information regarding scale, bulk coverage and intensity in Sections 2.1, Aesthetics and Section 2.10, Land Use.	6/15/2012 <u>8/28/2012</u>			
3-3		General Plan Conformance	County staff has drafted a General Plan Amendment Report which indicates that the proposed project is consistent with Mountain Empire Subregional Plan. <u>8/28/12 Ongoing comment.</u>	Comment noted. The Draft Program EIR provides information regarding scale, bulk coverage and intensity in Sections 2.1, Aesthetics and Section 2.10, Land Use.	6/15/2012 <u>8/28/2012</u>			
3-4		General Plan Conformance	County staff has drafted a General Plan Amendment Report which indicates that the proposed project IS NOT CONSISTENT with several policies and issue statements in the Boulevard Community Plan. Please note that if the project is not redesignated to comply with these policies, the Department will move the project forward for denial. <u>8/28/12 Ongoing comment.</u>	Comment noted. The Draft Program EIR provides information regarding scale, bulk coverage and intensity in Sections 2.1, Aesthetics and Section 2.10, Land Use.	6/15/2012 <u>8/28/2012</u>			

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5 - 2		Plot Plan	Please submit written confirmation from SDG&E that the proposed project and associated improvements are compatible with their existing easements/transmission corridor. Please note that Vehicle access shall be provided at all times (24 hours a day) to SDG&E existing facilities, and SDG&E service locks shall be required on all gates adjacent to the power line easement. Finally, please have SDG&E confirm that the proposed project has been designed in accordance with their Transmission Encroachment Guidelines. <u>8/28/2012. Comment not addressed with this submittal. Please provide confirmation from SDG&E</u>	The project has been designed pursuant to the SDG&E guidelines. The redflag hold will stay on the property until such time when a final grading plan is provided to SDG&E.	6/15/2012 <u>8/28/2012</u>			
5 - 3		Plot Plan	<u>Per Noise Report submitted on 7/24/12, please identify and bubble all non-enclosed inverters along property lines #2 and #5 as reference on Figure 6, within the Noise Report. Include a plan details that specifically states the following: These specified non-enclosed inverter's shall (a) be relocated 300 feet or greater from the property lines #2 and #5 as referenced on Figure 6, within the Noise Report. OR (b) enclose the specified inverters located along the property lines #2 and #5 as referenced on Figure 6, within the Noise Report.</u>	The MUP will be conditioned per the mitigation identified in the Noise Impact Analysis. The note has not been included as requested as the MUP conditions of approval is the appropriate location for this specification.	<u>8/28/2012</u>			
10 - 4		Air Quality	Executive Summary - Please include a summary of all project impacts including consistency with the RAQS and cumulative impacts in this section. <u>8/28/12. A discussion of cumulative impacts during construction has not been provided in the Executive Summary.</u>	A discussion of cumulative impacts during construction has been added to the Executive Summary.	6/22/2012 <u>8/28/2012</u>			
10 - 8		Air Quality	Section 1.2.2.1 - The section states that "Less water-intensive methods of dust suppression are under review..." When will a decision be made on incorporation of such measures? Is it anticipated that alternate measures will be identified in the next iteration of project review? <u>8/28/12 The response to this comment states that the cited text was removed from the Study. However, the text is still included in the version of the Study provided.</u>	The text has now been removed as previously indicated.	6/22/2012 <u>8/28/2012</u>			
10 - 11		Air Quality	Section 2.2.1 - Please provide a source and citation for the regional temperature and precipitation data. This section also must include a summary of prevailing wind patterns in the area, consistent with County guidance. <u>8/28/12 The comment was addressed for the microclimate discussion, but not for the regional climate discussion.</u>	The regional climate discussion has been updated and appropriate citations have been included.	6/22/2012 <u>8/28/2012</u>			
10 - 34		Air Quality	Section 4.2.2.3 - Please include the frequency of soil binding agent application in the design consideration. <u>8/28/12 The response to this comments states that the soil binding agent will be applied on a bi-annual basis. This frequency also needs to be stated in the text so that the project can be conditioned as such.</u>	The frequency of soil binding has been included in that section.	6/22/2012 <u>8/28/2012</u>			
10 - 36		Air Quality	Section 4.3.1.2 - This section identifies other projects in the area and concludes that cumulative impacts would be less than significant due to the "sequential nature" of construction schedules. No evidence is provided to support this conclusion. Were environmental documents or permit applications for these projects reviewed to determine that their construction would not overlap with proposed project construction? Additional supporting data needs to be provided to conclude that there would be no simultaneous construction activities. Additionally, distance of the cumulative projects from the proposed project needs to be disclosed to assess localized impacts. The section also alludes to "similar projects in the area". It should be noted that cumulative impacts must be assessed from all projects in the area and must not be limited to projects of similar nature. <u>8/28/12 Additional analysis was added to the section based on the comment. The section identifies the "southeastern corner of the SDAB" as the geographic extent for cumulative projects. Please explain why the extent is limited to this area. Construction activities would generate precursors to ozone which is a regional pollutant. Therefore, it is unclear why only a certain portion of the air basin is used for the analysis. Additionally, please clarify if the same construction contractor and equipment is proposed to be used for the LanEast, LanWest, and the proposed project.</u>	The cumulative section has been revised to indicate that San Diego County is the geographic extent of the cumulative analysis. However, even "regional pollutants" have more localized effects within that region. Based on climate and meteorology of the area, including wind direction and speed, the primary area of impact would most likely be southeastern San Diego County. Therefore, the discussion of specific and known projects focuses on that area.	6/22/2012 <u>8/28/2012</u>			
				The same construction equipment would be used for LanEast, LanWest, and Rugged. The text currently states that "Construction of LanEast and LanWest would use the same equipment as the Rugged Solar Project; therefore, construction schedules would not overlap."				

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10 - 38		Air Quality	Section 4.4.2.1 - The discussion of health risk impacts from construction-related diesel PM does not demonstrate that the project would not exceed the County's threshold of 1 in 1 million for incremental cancer risk without application of T-BACT. While exposure durations related to construction are limited, it is possible for sensitive receptors to be exposed to risks in excess of this threshold during periods of intense construction activity, especially since the nearest receptor is directly adjacent to the project site. It is recommended that a screening-level health risk assessment be conducted to determine if application of T-BACT is required for the project, consistent with other projects of similar nature and magnitude. <u>8/28/12 Cancer risk is estimated based on annual average concentrations while SCREEN3 estimates 1-hour concentrations. Please revise the analysis based on annual average concentrations. This can be done by post-processing the SCREEN3 output.</u>	The analysis currently includes postprocessing of SCREEN3 results using EPA methodology. The most conservative factors were used to develop the cancer risk based on average annual estimates. Additional text has been added to clarify that the estimates are based on average annual concentrations.	6/22/2012 <u>8/28/2012</u>		
11 - 2		Biological Resources	Species specific mitigation is required for group A and B species. Please revise discussion to include mitigation measures under Section 3.4 and 8 to reduce significant species impacts below significant. Ratios for A and B species range from 1:1 for B and 2:1 or 3:1 for A species depending on their sensitivity. <u>8/28/12 While the report was updated to include a condition for species specific mitigation, the mitigation measure does not specify the number of individuals that must be included as mitigation but instead states that the numbers will be determined by future surveys of the project site and mitigation site. Please include specific plant mitigation numbers based on the current data available to date. This information should be updated as additional surveys are completed on the project site and mitigation site. This information must be provided prior to a decision on the project as the permit must be conditioned appropriately.</u>	As seen in Section 8.0, preservation of 440 acres of habitat in off-site open space would provide adequate mitigation under CEQA. A memorandum has been prepared that includes the habitat function and value of the proposed biological open space.	6/15/2012 <u>8/28/2012</u>		
11 - 3		Biological Resources	Cumulative impacts have not been addressed. Additional comments and potential design changes may be forthcoming once cumulative analysis is provided. <u>8/28/12 Cumulative impacts have not been addressed and will be evaluated in the EIR prepared for the proposed project. Additional comments and potential design changes may be forthcoming once cumulative analysis is provided.</u>	Comment noted. No further work required by Rugged Solar Farm LLC. Please see First Screencheck EIR.	6/15/2012 <u>8/28/2012</u>		
11 - 5		Biological Resources	Golden Eagle analysis and impacts to foraging habitat are not addressed. The report states an additional report will be submitted. Additional comments will be provided once the report is submitted. <u>8/28/12 Additional information was not included in this submittal.</u>	WRI has completed the separate report as stated in the County comment. The WRI report is provided as Attachment to the Biological Technical Report. It should be noted the report is confidential and will be redacted from the public review version of the Biological Resources Technical Report.	6/15/2012 <u>8/28/2012</u>		
11 - 7		Biological Resources	According to Figure 8 the wildlife movement from the northwest to southeast will be severely impacted by the project design due to fencing surrounding the block of solar development. Unless a wildlife study can substantiate the claim that wildlife are not using the jurisdictional wetlands (Tule Creek) that bisects the north and south portions of the western side of the project, this area will need to be opened up to allow movement. Please submit a fencing plan to show how movement will be allowed through this portion of the site, or provide additional evidence detailing how wildlife will move throughout this area with this project and adjacent projects. <u>8/28/12 While additional information has been included in the report regarding wildlife movement in the area, it is still unclear how wildlife will move through Tule Creek as sheet C-102 of the plot plan submitted 7/24/2012 shows security fencing along Rough Acres Ranch Road. Please clarify whether fencing will be proposed along this road and whether the road and/or the fencing will impact wildlife movement.</u>	The post entitlement conditions on Figure 8 show new wildlife movement paths around project site. There is no fencing along Rough Acres Road; only fencing around building blocks.	6/15/2012 <u>8/28/2012</u>		

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11 - 8		Biological Resources	Please ensure analysis for the majority of Section 6.2 (6.2.2, 6.2.3, and 6.2.5) is correct, currently it states that the project would allow wildlife movement by way of Tule creek. According to plot plan C-102 (northwest) the entire area is fenced and will not allow movement. Movement is also narrowed to approximately 120ft at the southeastern end of Tule creek. Please provide analysis for an adequate opening with a revised fencing plan. This area may need to be redesigned and widened. <u>8/28/12 Sheet C-102 of the plot plan submitted 7/24/2012 still shows security fencing along Rough Acres Ranch Road and across Tule Creek although the applicants response stated that there is 1,000 feet in Tule Creek between fenced areas. Please clarify.</u>	See response above. There is no fencing along Rough Acres Road; only fencing around building blocks. Wildlife movement will still be possible through the project site.	6/15/2012 <u>8/28/2012</u>			
11 - 9		Biological Resources	Please provide a figure showing the tentative design for the adjacent projects in order to understand the wildlife movement possibilities that will be created with the development of these projects. A wildlife movement study may be required once additional information is provided. This study will help accurately identify current wildlife movement and what movement paths will remain after this Valley is developed. <u>8/28/12 Cumulative impacts will be addressed in the EIR for this project and must address wildlife movement. Additional comments and potential design changes may be forthcoming once cumulative analysis is provided.</u>	See response above. In addition see Section 2.4 of the EIR for a comprehensive biological cumulative analysis.	6/15/2012 <u>8/28/2012</u>			
11 - 11		Biological Resources	Analysis in Section 7.2.3 regarding the determination that no impacts will occur to sensitive habitat lands. The site has a significant population of sensitive plants and species and potential impacts and cumulative impacts to wildlife movement. Additional analysis needs to be discussed to justify why the site is not sensitive habitat lands. <u>8/28/12 Cumulative impacts will be addressed in the EIR for this project and must address wildlife movement. Additional comments and potential design changes may be forthcoming once cumulative analysis is provided.</u>	Comment noted. See Section 2.4 of the EIR for a comprehensive biological cumulative analysis.	6/15/2012 <u>8/28/2012</u>			
11 - 13		Biological Resources	The proposed location of the on-site or off-site mitigation was not provided in the Biological Resources Report. If the off-site mitigation will be through the purchase and preservation of other off-site land, please provide sufficient information for staff to evaluate the off-site resources and the means to preserve the resources in perpetuity. <u>8/28/12 The proposed mitigation location must provide directly benefit the group 1 species impacted by this project.</u>	This has been added into the TDS and Rugged bio reports: The applicant is currently assessing 2,619 acres of open space located just west of the Project Area to mitigate for the loss of sensitive vegetation communities and habitat that will be impacted as a result of the proposed project. A description of the mitigation site, including a list of vegetation communities and the potential for sensitive plant and wildlife species to occur, is included in Appendix J.	6/15/2012 <u>8/28/2012</u>			
12 - 8		Community Character & Land Use Consistency Analysis	Section 1.3 Physical Setting. Please quantify how many 200 ft Met Towers are in the study area boundary, and show where they are located on Figure 6. <u>8/28/12 # of Met Towers are not listed in the text. According to Figure 6, it appears there are three? Please address this comment.</u>	The number of MET towers and 500 KV steel lattice structures has been included in Section 1.3 Physical Setting (see page 12). The approximate location of MET towers and steel lattice structures associated with the 500 KV Sunrise Powerlink are shown on Figure 6.	6/15/2012 <u>8/28/12</u>			
12 - 21		Community Character & Land Use Consistency Analysis	Section 3.1.4 Visual Impacts. Please include a discussion that differentiates between visual impacts associated with overhead utility lines, and visual impacts associated with the proposed solar panels. The discussion should clarify how many overhead lines will be on the project site (numeric # and distance), as well as how much of the utility line will be undergrounded (distance). Please be sure to include the off-site 69KV line in your discussion. <u>8/28/12 Please replace "eastern" with "western". Sentence should read "With the exception of the western side of the project site, existing residences are not immediately adjacent to the affected properties". Also, please include the width of the proposed fire buffer and/or any avoidance areas or screening that will help reduce the visual impact on nearby residences.</u>	The requested editorial correction has been made on page 15 of the report. In addition, an expanded discussion has been provided to identify measures being implemented to reduce visual effects for nearby residences.	6/15/2012 <u>8/28/12</u>			

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12 - 23	Community Character & Land Use Consistency Analysis	Section 3.1.4 Visual Impacts. In addition to referencing the Visual Resources Report, please summarize what the proposed mitigation for visual impacts would be. <u>8/28/12 Please include additional detail regarding the height of the proposed landscaping and/or width and distance of buffer areas.</u>	6/15/2012 <u>8/28/12</u>		The height of landscaping and buffers will be determined at a future date when implementing the mitigation measures as defined in the Visual Resources Technical Report.		
13 - 12	Cultural Resources	Staff has reviewed the cultural resources report titled, "Preliminary Draft Archaeological Evaluation for the Rugged Solar Project", dated May 2012, prepared by Jerry Schaefer of ASM Affiliates, Inc. The cultural report submitted concurrently which was authored by Brian Glenn was not thoroughly reviewed per the applicant's request and no comments are provided on the Glenn report. The report provides the results of a cultural resource survey to determine the presence of cultural resources and test program to determine the significance of 49 sites located within the project area and 42 were evaluated since they are located within the project footprint. According to the report, testing of the 42 sites determined that the sites are not important resources. The report requires revisions as detailed in the following comments. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed. The report has been revised accordingly throughout.		
13 - 13	Cultural Resources	Please provide all changes in strikeout-underline format and submit electronically as a Microsoft Word document. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed.		
13 - 14	Cultural Resources	The County feels that because of the large number of archaeological sites on the project site and surrounding area, that a cultural landscape evaluation must be analyzed and included in the cultural report. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed. The track changes comments have been responded to. The Tule Wind project cultural evaluation included a cultural landscape analysis for the resources within the Rugged Solar project area.		
13 - 15	Cultural Resources	The NAD-B form includes 44 trinomials and 2 primary numbers, however, page ix states that there are 49 identified sites and 32 isolates within the current study area. Include all trinomials and primary numbers (including isolates) on the NAD-B form. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed. The NAD-B information has been corrected.		
13 - 16	Cultural Resources	Page ix, it appears that the number of sites and isolates is inconsistent (48 sites identified in Glenn's survey and 25 isolates and 49 in ASM survey with 32 isolates). It also states that there were 38 sites tested and then further states 42 of the sites were evaluated during the current investigation. Please review these numbers to ensure that they are correct and consistent throughout the document and clarify the numbers since the report as written is confusing. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed. The evaluation and survey numbers have been clarified and used consistently throughout.		
13 - 17	Cultural Resources	The sites are either eligible or not eligible but the report does not use definitive language. For example within the first paragraph of page x the report states "the archaeological sites appear to meet the criteria to be considered eligible to the CRHR..." and page 34 states "it appears that this area has been adequately evaluated". Please revise this language accordingly. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	6/15/2012 <u>8/28/2012</u>		Comment addressed. The language regarding eligibility has been made more definitive throughout, and the example has been corrected.		

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved		
13 - 18	Cultural Resources	Due to the large number of sites in the project area and high likelihood of subsurface deposits, grading monitoring should occur in all areas of development and not just within 50 feet of the archaeological site boundaries as identified on page x of the report. Please revise in the Executive Summary, table 9.0 and anywhere else this is referenced. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. Language regarding grading monitoring has been revised to include initial disturbances in all areas of development.	6/15/2012 <u>8/28/2012</u>			
13 - 19	Cultural Resources	Although isolated resources are not considered CEQA significant, they still must be discussed in the cultural report. Page x of the report and the analysis of project effects starting of Page 23 must include a brief description of the isolated resources found such as their isolate numbers and descriptions as well as whether they will be impacted by the project or not. Also indicate whether the artifacts were collected or not and whether they will be curated. Some of this information is provided in the Brian Glenn report. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. Section 4.2 includes additional details, including a summary table with collection information.	6/15/2012 <u>8/28/2012</u>			
13 - 10	Cultural Resources	Per County guidelines, all sites are important but through recordation, curation of artifacts, and grading monitoring (for example) their impacts are reduced to less than significant. Please revise the report to include this analysis. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The report now includes the appropriate language, see Section 7 for example.	6/15/2012 <u>8/28/2012</u>			
13 - 11	Cultural Resources	The report must include a historic overview of the project area since there is a historic homestead onsite. Historic aerials and archival research should be conducted in accordance with County guidelines. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. Archival research was conducted and historic aerials have been investigated. Confidential Appendix C includes a sketch map for P-37-31,680 with 1928 aerial imagery background.	6/15/2012 <u>8/28/2012</u>			
13 - 12	Cultural Resources	The County contacted the tribes listed in the NAHC file sent by Micah Hale on June 15, 2012 (see attached). Any comments received will be sent to the archaeologist on the project to include in the revised report. Also include the County's tribal list in the report. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The requested NAHC tribal Contact List has been added to Appendix F.	6/15/2012 <u>8/28/2012</u>			
13 - 13	Cultural Resources	Page 26 under 4.1.4 Curation, the report states "all DPR forms and updates created by Gallegos and Associates." I think that this is boilerplate language left over from a different report and should be Brian Glenn. Please correct accordingly. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The language has been corrected.	6/15/2012 <u>8/28/2012</u>			
13 - 14	Cultural Resources	Only 45 of the sites are discussed in the Field Results section 4.2, however, there are 49 sites within the subject property. All sites and isolates within the APE must be discussed in this section. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. All sites within the current APE are now discussed within Section 4.2.	6/15/2012 <u>8/28/2012</u>			
13 - 15	Cultural Resources	Page 36, site CA-SDI-10,359 does not include a discussion or site summary like the other sites. Please include. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The summary for CA-10,359/20,059 has been revised to include this information.	6/15/2012 <u>8/28/2012</u>			
13 - 16	Cultural Resources	The report must include further explanation for why all 42 of the sites evaluated for this project are not eligible for significance on the CRHR or RPO listing. The current analysis does not justify or substantiate this claim. This should also include that the County considers all sites as important but that through recordation, testing, curation and grading monitoring the impacts are reduced to less than significant. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The eligibility recommendations have been clarified. Comments have been responded to in track changes. Additional detail has been added to Section 6.1.	6/15/2012 <u>8/28/2012</u>			

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	13 - 17	Cultural Resources	Refer to page 15 of the County report guidelines which state that there should be a section of the report for Record search results. The current report does not include this information. In addition, a table identifying the site number, site type, dimensions and report references must be included for sites within 1 mile per the requirements of this section. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The records search results have been added in table form to Section 1.2.3. Records search summary information has been added to Appendix F.	6/15/2012 8/28/2012				
	13 - 18	Cultural Resources	Page 82 of the report references the Star Ranch project. This is presumably boilerplate language and is meant to state Rugged Solar. Please refer to track changes. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staffs' field visit scheduled in early September 2012.</u>	Comment addressed. The language has been corrected.	6/15/2012 8/28/2012				
	13 - 19	Cultural Resources	Use the full trinomial CA-SDI-.... or SDI-.... to describe the sites. Please be consistent and don't use both.	Comment addressed. State Prefix "CA" has been left in the "Sites;" section of the NAD-B sheet to support standardization across the National dataset. The remaining site names within the report body have had the State prefix removed to streamline reading, to correspond with figures and tables, and to address County comments.	8/23/2012				
	13 - 20	Cultural Resources	Please accept or clarify the information provided in track changes to the word document.	Comment addressed. Information provided in track changes has been addressed throughout the report.	8/23/2012				
	15 - 15	Fire	Section 4.2 Access Roads and Gates, 5.1 Enhancements: Access within the project is inadequate. Fire apparatus access roads are to be a minimum of 24 feet wide improved, all-weather and capable of supporting 50,000 lbs. Moreover, the majority of internal access roads are north-south—some approaching a half mile in length—with limited ability to travel east-west within the project. Provide additional east-west fire apparatus access roads spaced no further than 600 feet apart. Also: How are emergency personnel going to be able to distinguish between fire apparatus access roads and the maintenance roads that are not designed to support fire apparatus? Please provide discussion. Revise discussion in the FPP and show, with road sections, on the plot plans, <u>8/28/12 • Sec. 4.2 Access Roads and Gates, 5.1 Enhancements: Access within the project is inadequate. Fire apparatus access roads are to be a minimum of 24 feet wide improved, all-weather and capable of supporting 50,000 lbs. Moreover, the majority of internal access roads are north-south—some approaching a half mile in length—with limited ability to travel east-west within the project. Provide additional east-west fire apparatus access roads spaced no further than 600 feet apart. Revise discussion in the FPP and show, with road sections, on the plot plans.</u>	The FPP has been updated to include an access road layout per discussions with SDCFA to date.	6/15/2012 8/28/2012				

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17 -1	Groundwater Resources	The groundwater investigation must evaluate potential impacts to groundwater resources when taking into account the Tule Wind Farm, Rough Acres Ranch and Rugged Solar projects into account along with other existing groundwater uses, and groundwater use at maximum buildout of the General Plan. The report must determine whether all three projects can be supported by local groundwater resources. If they can't, please identify where/how other water resources will be utilized. <u>Update 8/28/2012: The groundwater investigation was waived for XIS1, but will be required to be submitted with XIS2. Pursuant to the scoping letter requirements for the groundwater investigation, a meeting is required to be setup between the applicant's hydrogeologist(s) and County Groundwater Geologist to discuss the wells to be drilled/tested for the groundwater investigation. Please setup this meeting as soon as possible so testing can be conducted and included in the groundwater investigation with the next iteration submittal.</u>	In order to address potential cumulative effects to groundwater resources Dudek prepared a Groundwater Resources Identification and Allocation Plan dated March, 2013. Section 6 of the memo (pgs. 30-31) summarizes the findings and conclusions, which indicate that there are sufficient local resources to supply peak demands calculated by month for the cumulative projects using local groundwater resources. Long term effects on groundwater in storage are addressed in the Rugged Groundwater Resources Investigation Report prepared by Dudek dated February, 2013. A 30-year water balance analysis was prepared which took into account groundwater use of the three projects referenced along with other existing groundwater uses and groundwater use at maximum buildout of the General Plan. See Section 3, as well as Exhibits 3-C and 3-F.	6/15/2012 8/28/2012			
17 -2	Groundwater Resources	Please determine if any ground-water-dependent-vegetation will result in potential groundwater impacts from proposed groundwater extraction. Please note that this could result in a severe curtailing of potential groundwater use from any wells near groundwater dependent habitat. This also may result in the requirement of identifying wells within other areas of the project site for adequate groundwater resources. <u>8/28/12 Pending groundwater Investigation.</u>	Analysis to ground-water-dependent-vegetation is included in Section 3.2.1.2 of the Rugged Groundwater Resources Investigation Report (Dudek, February 2013). No impacts were identified.	6/15/2012 8/28/2012			
17 -3	Groundwater Resources	If it is found that on-site groundwater resources cannot serve this project, additional water will be required from off-site source(s). Pursuant to CEQA, impacts to groundwater resources from using any of these sources must be evaluated now as part of this project. Therefore, please identify any off-site sources of groundwater in which this project is considering. <u>Update 8/23/2012: Two off-site sources, Jacumba Community Services District and Live Oak Springs Water Company have been identified as potential offsite uses. If the project cannot prove out adequate on-site groundwater, groundwater evaluation(s) of these offsite source(s) will be required.</u>	Off-site water resources are being evaluated by the water purveyors to determine their respective water availability and source capacity.	6/15/2012 8/28/2012			
17 -4	Groundwater Resources	Since elevated radionuclide concentrations above the Maximum Contaminant Level (MCL) could pose a threat to human health, water quality sampling will be required to ensure that there is a safe and potable water supply for any new wells to be used for the project. Please address how wells with constituents that exceed MCL's will be addressed. For wells with constituents found to exceed any primary MCL, a water treatment system could be implemented to reduce detectable concentrations to below the MCL. <u>8/28/12 Pending groundwater Investigation.</u>	Analysis is provided in Section 4 of the Rugged Groundwater Resources Investigation Report (Dudek, February 2013). One well (Well 8) on the Rugged site indicated concentrations of radionuclides above the MCL. Well 8 will not be used for potable supply so no impacts were identified.	6/15/2012 8/28/2012			

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17 - 5	Groundwater Resources	Potential Groundwater-Dependent Habitat: Any supply well for this project that is located within the center of McCain Valley is within an area regionally mapped as containing vegetation that could be groundwater dependent (alkali seep) and RPO Wetland. Guideline 4.2.C from the Biological Guidelines for Determining Significance have the following threshold for determining a significant impact to riparian habitat or a sensitive natural community: "The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels." The requested biology report will be required to evaluate whether the vegetation community is groundwater dependent as well as other vegetation communities throughout the project site. Any vegetation found to be groundwater dependent will be required to be evaluated for potential groundwater impacts from proposed groundwater extraction. This could result in a severe curtailing of potential groundwater use from any wells near groundwater dependent habitat. This also may result in the requirement of identifying wells within other areas of the project site for adequate groundwater resources.	Analysis to ground-water-dependent-vegetation is included in Section 3.2.1.2 of the Rugged Groundwater Resources Investigation Report (Dudek, February 2013). No impacts were identified.	6/15/2012 8/28/2012			
17 - 6	Groundwater Resources	Any Offsite Groundwater Sources Must Be Evaluated: If it is found that on-site groundwater resources cannot serve this project, additional water will be required from off-site source(s). The project description indicates that the project may pursue water from the following sources if there is not adequate on-site groundwater for this project: Jacumba Service District, Live Oak Springs Water Company, any County permitted Groundwater Extraction operations located within the Mountain Empire, the contiguous Rough Acres Ranch public, non-community water system. Pursuant to CEQA, impacts to groundwater resources from using any of these sources must be evaluated now as part of this project. Therefore, please indicate any off-site source(s) of groundwater in which this project is considering. An appropriate evaluation of potential impacts to groundwater resources will be determined by DPLU based on the source(s) identified by the applicant. <u>8/28/12 Pending groundwater investigation.</u>	See response to 17-1	6/15/2012 8/28/2012			
17 - 7	Groundwater Resources	Groundwater Quality: There is a potential risk for naturally-occurring radionuclides to be present at levels above drinking water standards in wells used for domestic supply in areas underlain by fractured crystalline bedrock in the backcountry of our County. Since elevated radionuclide concentrations above the Maximum Contaminant Level (MCL) could pose a threat to human health, water quality sampling will be required to ensure that there is a safe and potable water supply for any new wells to be used for the project. For wells with constituents found to exceed any primary MCL, a water treatment system could be implemented to reduce detectable concentrations to below the MCL. The treatment of radionuclides is expensive and may prove to be economically infeasible. It is therefore recommended that for any new wells to be included for this project and used for potable water, that water quality testing portion of your project proceed as soon as possible to evaluate potential impacts. <u>8/28/12 Pending groundwater investigation.</u>	See response to 17-4	6/15/2012 8/28/2012			
20 - 1	RPO Protection Study (Sensitive Habitat & Wetlands)	Section 3.2.2 under unique vegetation communities, Please justify why this site is not an outstanding example of the veg. community type in the region. Please add additional details to substantiate this claim. <u>8/28/12 While additional information has been added to the RPO Study, a determination of whether the site supports sensitive habitat lands. Staff and the applicant should meet to discuss this issue further.</u>	Per e-mail from County on 4.2.13, a stand-alone RPO Study is not required. The EIR includes an evaluation of the project's consistency with the RPO.	6/15/2012 8/28/12			

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20 - 2	RPO Protection Study (Sensitive Habitat & Wetlands)	71% impacts to milkvetch and sticky geranium, and 44% impacts to desert beauty onsite is significant. Please provide additional information about the populations offsite of these species to substantiate why this is not an RPO sensitive site. This seems to be large population of sensitive species proposed to be impacted. Please prove how this significant impact will not substantially deplete the population as a result of this project. <u>8/28/12 While additional information has been added to the RPO Study, a determination of whether the site supports sensitive habitat lands. Staff and the applicant should meet to discuss this issue further.</u>	Per e-mail from County on 4.2.13, a stand-alone RPO Study is not required. The EIR includes an evaluation of the project's consistency with the RPO.	6/15/2012 <u>8/28/12</u>			
20 - 3	Resource Protection Study (Prehistoric and Historic Sites)	The RPO Study is missing pertinent information that is needed to determine the significance of various cultural sites throughout the project boundaries. Please review Cultural revisions required for the ASM Survey and Report and then update and revise this section accordingly. <u>8/28/12 Information pertaining to Cultural Resources will be provided following Staff's field visit scheduled in early September 2012.</u>	Per e-mail from County on 4.2.13, a stand-alone RPO Study is not required. The EIR includes an evaluation of the project's consistency with the RPO.	6/15/2012 <u>8/28/12</u>			
21 - 1	Visual Resources	Executive Summary: Please confirm that the trackers would be located on 455-acres of the project site and the remaining 337-acres would be open space. <u>8/28/12 Please put back in information that states 455-acres would include the trackers and associated equipment and 337-acres would be for open space. Staff asked you to confirm these figures, not remove them!</u>	The requested sentence has been included in the revised report.	6/20/2012 <u>8/28/2012</u>			
21 - 17	Visual Resources	Section 3.3 2nd Paragraph: Please identify the boundaries of the McCain Valley Conservation area on Figure 3 - Project viewshed analysis. <u>8/28/12 Comment not addressed. Second Request.</u>	Figure 4 has been revised to include the McCain Valley Conservation as requested.	6/20/2012 <u>8/28/2012</u>			
21 - 35	Visual Resources	Executive Summary Page V. Please revised 3rd Paragraph last sentence to read "....and depict proposed effects accurately by illustrating the typical visual experience..."	Requested edit has been made in the Executive Summary (see page 5).	8/28/2012			
21 - 36	Visual Resources	Key Issues Page 1. 3rd bullet point. Please remove the first set of parenthesis from the first sentence.	Requested edit has been made in Section 1.2 Key Issues (see page 7).	8/28/2012			
21 - 37	Visual Resources	3.3 Landscape Units 1st Paragraph Page 33. The last sentence reads "Four individual LCUs have been identified....", but it appears you have consolidated the LCU's into two distinct units (e.g. Mountain LCU and McCain Valley LCU). Please revise to reflect two LCU's, or make sure the reader can identify what the four LCU's are.	The text in Section 3.3 Landscape Units has been revised to reflect two LCUs: the Mountains LCU and the McCain Valley LCU.	8/28/2012			
21 - 38	Visual Resources	Page 34. Please keep the McCain Valley LCU as a title, if this is the second LCU.	McCain Valley LCU has been retained as this is the title of the second LCU (see Section 3.3).	8/28/2012			
21 - 39	Visual Resources	Please delete "Similar to the Mountain LCU" as a title on page 35.	Requested title has been removed on Page 35. Text has been revised to clarify the prominence of the Interstate 8 corridor in both the Mountain LCU and the McCain Valley LCU.	8/28/2012			
21 - 40	Visual Resources	Section 5.5 Determination of Significance pages 73 to 75. Under Mitigation Measures for Guidelines 1, 2, and 3, explain how the mitigation measure reduces the significance. For Guideline 1, identify the relevant Mitigation Measures that would reduce features that would detract or contrast with the visual character. For Guideline 2, what mitigation measures help contribute to the overall valued visual character. For Guideline 3, how do the specific mitigation measures reduce impacts to panoramic vista's along a scenic highway and public roads?	See revised discussion in Section 5.5.	8/28/2012			

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21 - 41	Visual Resources	Page 75 Guideline 4. Under Impact Analysis, please revise to add the word "help". The middle sentence should read "Doing so would <i>help</i> protect existing views, blend development..." Table 4 Summary of Visual Quality Ratings on Page 89. Add in 4th column under each key view that is titled "After Mitigation". This column should add the "with project" column with "change" column to produce a new total.	Requested edit has been made within the Guideline 4 impact analysis.	8/28/2012			
21 - 42	Visual Resources	6.0 Visual Mitigation and Design Alternatives. More details are needed to better understand and assess the various mitigation measures. For VIS-2, how many acres of "Leave Islands" are proposed? For VIS-3, VIS-4, etc. how tall will vegetative screening be? What will be the depth of the proposed buffering? Will the project include a conceptual landscape plan? For VIS-13, what will be the effect of limiting the tracker mast to 16 in height? Will the overall structure still be 35 feet tall. Please provide additional details on each proposed mitigation measure.	Table 4 has been revised as requested.	8/28/2012			
21 - 43	Visual Resources		See Section 2.1 of the Program EIR.	8/28/2012			

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DPW (Department of Public Works) Comments				Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
Item No.	Subject Area	Issue, Revision or Information Required				
22 - 1	Plot Plan	Per the project description, show the 69 kV distribution line from the project to the SDG&E Boulevard substation.		The gen-tie for the project is a co-located facility with the Tule Wind Project MUP that was approved by the County of San Diego. The Rugged gen-tie will be constructed overhead north of I-8 and will be underground south of I-8 per the Board of Supervisor decision on the Tule MUP.	11/20/11	6/15/12
22 - 2	Plot Plan	2nd Request: Show the lines of inundation to the limits of the 100-year flood along the watercourse which flows through the property, labeled "Subject To Inundation By The 100-Year Flood".		Change has been incorporated. See Sheets C-102- through C-106.	11/20/11 6/15/12 8/20/12	
22 - 6	Plot Plan	2nd Request: Sheet C-400 C-101, Plan View: Add Assessor Parcel Numbers that are adjacent to this project		Page C-110 addresses this by including all adjacent parcels; it was thought adding them in the drawings C-100 and C-101 would be unclear and messy	6/15/12 8/20/12	
22 - 7	Plot Plan	2nd Request: Sheet C-400 C-101, Plan View: Revise the boundary of APN 611-091-07 to include an additional 40 acres to the west.		Page C-110, we have also added a label "west half of parcels, not part of project, it was thought doing so on C-100 and C-101 would not increase clarity, but rather distract from the point of said drawings	6/15/12 8/20/12	
22 - 8	Plot Plan	Sheet C-400 C-101: Plan View: • Label Ribbonwood Road as "(Public)": Addressed • Label McCain Valley Road as "(Public)": Addressed • Label Rough Acres Ranch Road as "(Private)": 2nd Request • Label Road Runner Lane as "(Private)": Addressed • Label Vista Oaks Road as "(Private)": No longer applicable • Label private access for APN 611-110-01 off of McCain Valley Road and label as "(Private)". 2nd Request		This has been labeled as such on C-101, C-102, C-104, C-105, C-106 and C-111. Roadrunner lane has been removed from the Plot Plans	6/15/12 8/20/12	
22 - 10	Plot Plan	Sheet C-101: Revise the location for Access Point 5 on APN 611-110-01 based on Sight Distance Letter & Exhibit dated July 6, 2012.		Driveway relocated south to incorporate adequate site distance per county standards.	8/23/12	
22 - 11	Plot Plan	Sheet C-106: Revise the location for Access Point 5 on APN 611-110-01 based on Sight Distance Letter & Exhibit dated July 6, 2012.		Access point was revised in the previous submittal	8/23/12	
22 - 10	Plot Plan	Add additional sheets to show the underground Gen-Tie line along McCain Valley Road and Old Highway 80 between the project site and the Boulevard Substation as described in the Project Description (Section 1.3, Project Location, Offsite Facilities). Include a Typical section for both roads.		The gen-tie for the project is a co-located facility with the Tule Wind Project MUP that was approved by the County of San Diego. The Rugged gen-tie will be constructed overhead north of I-8 and will be underground south of I-8 per the Board of Supervisor decision on the Tule MUP.	8/20/12	
23 - 1.1	Preliminary Grading Plan	Per the project description, show the 69 kV distribution line from the project to the SDG&E Boulevard substation.		The gen-tie for the project is a co-located facility with the Tule Wind Project MUP that was approved by the County of San Diego. The Rugged gen-tie will be constructed overhead north of I-8 and will be underground south of I-8 per the Board of Supervisor decision on the Tule MUP.	11/20/11	6/15/12 8/20/12
23 - 2	Preliminary Grading Plan	3rd Request: Show the lines of inundation to the limits of the 100-year flood along the watercourse which flows through the property, labeled "Subject To Inundation By The 100-Year Flood".		Lines of inundations to the limits of the 100-year storm event were captured on preliminary grading plans dated 9/24/2012	11/20/11 6/15/12 8/20/12	
23 - 7	Preliminary Grading Plan	2nd Request: Sheets C-202 to C-205 and C-302 to C-304, Plan View: Add Assessor Parcel Numbers that are part of this project and add Assessor Parcel Numbers that are adjacent to this project		Updated APNs for adjacent parcels were captured on preliminary grading and drainage plans, under the property owner information, dated 9/24/2012	6/15/12 8/20/12	
23 - 10	Preliminary Grading Plan	2nd Request: Sheet C-204: Plan View: • Label Rough Acres Ranch Road and label as "(Private)"		Drawing C-204, plotted on 9/24/2012, included a leader and label indicating Rough Acres Ranch Road as "Private"	6/15/12 8/20/12	
23 - 12	Preliminary Grading Plan	Sheet C-201, Grading Note 19: Verify Grading Quantities, since they do not match the quantities shown in Technical Memorandum from AECOM dated July 17, 2011.		Grading quantities shown on C-200 (C-201 was used as a key plan for the grading drawings) reflect the current cut and fill quantities for the conceptual design of this project	8/20/12	
23 - 13	Preliminary Grading Plan	Add another sheet (C-200?) in order to show the entire site that is proposed to be graded, with an index similar to Sheet C-101		Drawing C-201 was revised to be shown as a key plan to index all of the grading plans. C-200 was added to function as the preliminary grading notes	8/20/12	
23 - 14	Preliminary Grading Plan	Sheet C-205: Revise the location for Access Point 5 on APN 611-110-01 based on Sight Distance Letter & Exhibit dated July 6, 2012.		Revised driveway was shown C-205 plotted 9/24/2012	8/23/12	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

DPW (Department of Public Works) Comments			Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
Item No.	Subject Area					
23 - 15	Preliminary Grading Plan		Add additional sheets to show the underground Gen-Tie line along McCain Valley Road and Old Highway 80 between the project site and the Boulevard Substation as described in the Project Description (Section 1.3, Project Location, Offsite Facilities). Include a Typical section for both roads.	The gen-tie for the project is a co-located facility with the Tule Wind Project MUP that was approved by the County of San Diego. The Rugged gen-tie will be constructed overhead north of I-8 and will be underground south of I-8 per the Board of Supervisor decision on the Tule MUP.	8/20/12	
25 - 3	Drainage Study		The Report should be signed and stamped by a Registered Engineer.	AECOM addressed all comments from Staff and received a letter on October 3, 2012 that the Drainage Study was accepted by the County.	6/15/12 8/20/12	
25 - 4	Drainage Study		The Drainage Report was not reviewed due to the number of comments listed below. Even though the Preliminary Grading Plan sheets (Sheets C-201 to C-208 and C-301 to C-304) are included in the back of the report, this should not constitute a substitute for a Master Hydrology Exhibit for existing and proposed conditions, as well as Local Drainage Exhibits for proposed conditions	See response 25-3.	6/15/12 8/20/12	
25 - 5	Drainage Study		Exhibits: The report should include a master hydrology exhibit, with proper scaled topography, showing all drainage basins (on-site/off-site tributary areas) for existing and proposed conditions at the same node points for comparison. The exhibit should show property boundaries and layout of proposed facilities on post-development drainage exhibits. Show nodes locations and flows with proper legend on the exhibits to match printed calculations.	See response 25-3.	6/15/12 8/20/12	
25 - 6	Drainage Study		Exhibits: Show 100-year flood lines of inundation boundary and flood surface elevation for basin areas larger than 25 acres.	See response 25-3.	6/15/12 8/20/12	
25 - 7	Drainage Study		Exhibits: Address all flow paths (on-site and off-site) and identify flood hazards.	See response 25-3.	6/15/12 8/20/12	
25 - 8	Drainage Study		Exhibits: Revise vicinity map to per comments on the Preliminary Grading Plan, i.e. the project is not adjacent to Ribbonwood Road.	See response 25-3.	6/15/12 8/20/12	
25 - 9	Drainage Study		Report text: Include a summary data table for pre-development versus post-development drainage Q100 showing all points of concentration nodes (on-site, at property boundary and off-site).	See response 25-3.	6/15/12 8/20/12	
25 - 10	Drainage Study		Report text: Include a narrative on the adequacy of all drainage facilities impacted directly by the proposed development. Demonstrate any adverse impact due to increase peak flow rate and velocity.	See response 25-3.	6/15/12 8/20/12	
25 - 11	Drainage Study		Additional comments will be provided once the report incorporates the above comments.	See response 25-3.	6/15/12 8/20/12	
29 - 7	Sight Distance		Access Point 4: Private Access Road off of McCain Valley Road: This access point will serve APN 611-100-07 in case Rough Acres Ranch Road (Private) does not get built, and Sight Distance verification needs to be provided.	The entrance shown serving APN 611-100-07 intersects with an existing private driveway. The existing driveway leads to McCain Valley Road from a private residence. Such an entrance off of an existing driveway would not be subject to County's requirements for a sight distance study.	8/20/12	
31 - 3	Fire Protection Plan		Figure 6a: Update Project Plot Plan to: • Remove Vista Oaks Road since it is no longer part of the application. • Show and label the new location for the access road for APN 611-110-01 • Label the alternate access Road for APN 611-100-07.	The FPP has been updated to reflect the latest site plan.	8/20/12	
31 - 4	Fire Protection Plan		Figure 6b: Remove Vista Oaks Road since it is no longer part of the application.	The FPP has been updated to reflect the latest site plan.	8/20/12	
31 - 5	Fire Protection Plan		Figure 6f: Show and label the new location for the access road for APN 611-110-01.	The FPP has been updated to reflect the latest site plan.	8/20/12	
32 - 3	Project Description		Figure 4a: Update Project Plot Plan to: • Remove Vista Oaks Road since it is no longer part of the application. • Show and label the new location for the access road for APN 611-110-01 • Label the alternate access Road for APN 611-100-07.	Per email received on 4.2.13 the Project Description associated with the MUP has been superseded by the Project Description in the EIR. The project description has been updated to reflect the latest site plan provided with the re-submittal.	8/20/12	
32 - 4	Project Description		Figure 5b: Remove Vista Oaks Road since it is no longer part of the application.	See response 32-3.	8/20/12	
32 - 5	Project Description		Figure 4d: Rename to Figure 5d, and show/label the Optional Primary Access for APN 611-100-07.	See response 32-3.	8/20/12	
32 - 6	Project Description		Figure 5f: Show and label the new location for the access road for APN 611-110-01.	See response 32-3.	8/20/12	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

DPW (Department of Public Works) Comments							
Item No.	Subject Area	Issue, Revision or Information Required			Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
32 - 7	Project Description	Add another figure to show the project's Gen-Tie along McCain Valley Road and Old Highway 80.			See response 32-3.	8/20/12	
32 - 8	Project Description	Section 1.3, Project Location, Offsite Facilities: Please clarify that the Gen-Tie line along McCain Valley Road and Old Highway 80 between the project site and the Boulevard Substation will be underground. The Tule Wind project was approved by the Board of Supervisors on August 8, 2012 with an underground Gen-Tie line along McCain Valley Road to the Boulevard Substation within public right-of-way.			See response 32-3.	8/20/12	
32 - 9	Project Description	Figure 11a: • Show and label Access Easement for APN 611-091-07 (off Ribbonwood Rd.) • Show and label Access Easement for APN 611-100-07 (off McCain Valley Rd.)			See response 32-3.	8/20/12	
32 - 10	Project Description	Add another figure (11d) to show and label Access Easement for APN 611-091-07 (off Ribbonwood Rd.).			See response 32-3.	8/20/12	
32 - 11	Project Description	Add another figure (11e) to show and label Access Easement for APN 611-100-07 (off McCain Valley Rd.).			See response 32-3.	8/20/12	

ATTACHMENT A **PROJECT ISSUE CHECKLIST**

PROJECT NAME: RUGGED SOLAR					
DEH (Department of Environmental Health) Comments					
Project Number(s): 3300 12-007 (MUP)					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
33 - 1	Plot Plan	Department of Environmental Health (DEH) staff has reviewed the proposed Major Use Permit, dated 5-15-12. The project proposes the construction of a solar farm with 3,422 photovoltaic trackers, an operations/maintenance building, substation, and control house. Various other supporting structures are outdoor equipment cabinets. The Department of Environmental Health, Land & Water Quality Division, cannot recommend approval of the proposed project at this time, the following items must be addressed. <u>8/28/2012 Department of Environmental Health (DEH) staff has reviewed the proposed Major Use Permit, dated 7-24-12.</u> <u>The project proposes the construction of a solar farm with 3,422 photovoltaic trackers, an operations/maintenance building, substation, and control house. Various other supporting structures are outdoor equipment cabinets. The Department of Environmental Health, Land & Water Quality Division, has no objection to the approval of the proposed project at this time, with the following conditions of approval:</u>	<u>Information Only. No follow-up required.</u>	6/15/12	<u>8/28/12</u>
33 - 2	Plot Plan	All wells to be destroyed will require a well destruction permit from DEH. <u>8/28/12 1. All wells to be destroyed will require a well destruction permit from DEH. All work must be completed by a licensed CA Well Driller.</u>	<u>Resolved.</u> This will be a condition of approval.	6/15/12	<u>8/28/12</u>
33 - 3	Plot Plan	Wells to be retained for potable use will be required to be sampled and tested by DEH staff prior to issuance of a septic permit. <u>8/28/12 2. Wells to be retained for potable use will be required to be sampled and tested by DEH staff prior to issuance of a septic permit.</u>	<u>Resolved.</u> This will be a condition of approval.	6/15/12	<u>8/28/12</u>
33 - 4	Plot Plan	Given the proposed 25-30 full time employees, the project will be required to obtain a permit and operate as a Non-Transient Non-Community Water System (NTNCWS). For details related to this, please contact Peter Neubauer at 858-694-3113. <u>8/28/12 Given the proposed 25-30 full time employees, the project will be required to obtain a permit and operate as a Non-Transient Non-Community Water Svstem (NTNCWS). For details related to this, please contact Peter Neubauer at 858-694-3113.</u>	<u>Resolved.</u> This will be a condition of approval.	6/15/12	<u>8/28/12</u>

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: RUGGED SOLAR				
DEH (Department of Environmental Health) Comments				
Project Number(s): 3300 12-007 (MUP)				
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
33 - 5	Plot Plan	A layout must be submitted to DEH for review and approval for all structures that generate wastewater. The proposed onsite wastewater treatment system(s) must be shown on the plot plan along with the required reserve area(s). <u>8/28/12 A layout must be submitted to DEH for review and approval for all structures that generate wastewater. The proposed onsite wastewater treatment system(s) must be shown on the plot plan along with the required reserve area(s).</u>	<u>Resolved.</u> This will be a condition of approval.	6/15/12
				<u>8/28/12</u>