

From: [Hoang, Susan](#)
To: [Vidales, Rene A.](#)
Subject: Solar Farms PDP"s
Date: Tuesday, May 21, 2013 1:33:56 PM
Attachments: [MUP 11-029 No Hydromodification requirement for Solar Farm project.pdf](#)

-----Original Message-----

From: Sinsay, Edwin M

Sent: Wednesday, August 31, 2011 12:48 PM

To: Hoang, Susan; Peeva, Iliana; Perez, Diana; Vidales, Rene A.

Cc: Lantis, Richard; Carlton, Gregory A

Subject: FW: Solar Farms PDP's?

To all:

For the solar projects we are processing please see the comments below. For projects that have turned in major swmps--comments should be sent in the iteration checklists that these are not considered pdps and that a minor swmp can be submitted. Another comment needs to be added stating that BMPs to address potential erosion under the panels or other stormwater pollutants associated with solar projects need to be addressed in the swmp.

Thanks,

Ed

-----Original Message-----

From: Tesoro, Cid

Sent: Wednesday, August 31, 2011 12:31 PM

To: Lantis, Richard

Cc: Bankston, Troy; Agahi, Sara; Sinsay, Edwin M; Shick, Richard L.

Subject: RE: Solar Farms PDP's?

Rick,

Confirmed. Solar farms are not considered a PDP. Please consider modifying the Minor SWMP, if necessary, to address BMPs for solar farms.

Thanks...

-----Original Message-----

From: Lantis, Richard

Sent: Wednesday, August 31, 2011 12:22 PM

To: Bankston, Troy; Tesoro, Cid

Cc: Agahi, Sara; Sinsay, Edwin M; Shick, Richard L.

Subject: Solar Farms PDP's?

Cid,

Based on your e-mail and our subsequent phone conversation I understand that solar farms will not be considered a PDP, priority development project. These types of projects will be handled with a minor SWMP and BMP's implemented as deemed necessary for each project. Please confirm my understanding.

Thank you

-----Original Message-----

From: Tesoro, Cid

Sent: Wednesday, August 31, 2011 11:37 AM

To: Agahi, Sara; Sloan, Christine; Sinsay, Edwin M; Lantis, Richard

Cc: VanRhyn, Jon; Diaz, Richard; Snyder, Todd

Subject: RE: Solar Farms question

It would only seem logical that the Regional Board would view solar farms as low threats because you have to consider the overall green energy movement. It would be highly

impractical to consider these as high polluters when they are intended to reduce air pollution and leave a positive environmental footprint. We would be wide wise to follow the Regional Board's advice and not consider these as PDPs.

Thanks...

-----Original Message-----

From: Agahi, Sara
Sent: Wednesday, August 31, 2011 11:28 AM
To: Tesoro, Cid; Sloan, Christine; Sinsay, Edwin M; Lantis, Richard
Cc: VanRhyn, Jon; Diaz, Richard; Snyder, Todd
Subject: FW: Solar Farms question
Importance: High

Hi All,

Here is the Regional Board's reply to our questions about what is required for solar farm projects. I find it interesting that the San Diego Board doesn't think this type of project would necessarily require coverage under the Industrial General Permit, which the Central Coast Board has determined is required for similar projects.

It sounds like in her 2nd paragraph below Christina is leaving the door open to the County not requiring a Major SWMP (and, hence, a hydromod plan) for these potentially hundreds of acre projects, which is simply mind-boggling to me. Therefore, from the Regional Board perspective as implied in this email below, if the County PM determines that the project is using appropriate BMPs that prevent adverse downstream impacts, these types of projects could theoretically be approved with just a minor SWMP. However, this is a policy decision that County management will have to make. Clearly, if we do allow these projects to move forward with a Minor SWMP, the project's documentation and BMP selection will have to be impeccable.

Thanks,

Sara Agahi, PE, CFM
County of San Diego
Watershed Protection Program
(858) 694-2665

-----Original Message-----

From: Christina Arias [mailto:CArias@waterboards.ca.gov]
Sent: Wednesday, August 31, 2011 10:37 AM
To: Agahi, Sara
Subject: Re: Solar Farms question

Hi Sara,

Thanks for checking in. I discussed these issues with some others in the office, including Eric Becker, and here's my response:

1. Mandatory coverage under the Industrial General Permit is driven by SIC codes, which are assigned by municipalities. In any event, it would seem unlikely that permit coverage would be necessary because there is little to no waste generated at such a site that would necessitate a SWPPP and water quality sampling and the like. It would seem that a solar farm is a commercial development (what else would you call it?). However, I would expect it to be a lower priority for both the County and the San Diego Water Board because I can't see activity from a solar farm, as you describe below, being a high threat to downstream surface waters, compared to other commercial developments which are clear threats to downstream surface waters.

2. When deciding whether or not this project would trigger the need for PDP BMPs, I encourage the County to both look at municipal permit language and to think about the global intent of the permit. The intent is to require BMPs to mitigate for changes to the landscape that would result in significant changes to the existing hydrology (i.e. cause erosion downstream) or would produce pollutants to such a degree as to require treatment. If the County is convinced that the project proponent has proposed adequate BMPs for a particular development, and that adverse affects downstream would not occur as a result of this development, then there would not be a need to require anything further. I recommend keeping really good records to justify decisions and rationales made in case anything is called into question at a later date.

Let me know if you want to discuss further.

Christina Arias, P.E.
Water Resource Control Engineer
San Diego Regional Water Quality Control Board
(858) 627-3931
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CArias@waterboards.ca.gov

>>> "Agahi, Sara" <Sara.Agahi@sdcounty.ca.gov> 8/29/2011 3:57 PM >>>
Hi Christina,

Thanks for chatting with me this morning about the topic of whether or not solar farms would be considered Priority Development Projects. We expect to receive a large number of these types of projects in the near future and it would be very helpful to have Regional Board input.

As I mentioned to you, these types of projects tend to be large (50-500 acres or more); however, the solar panels are typically raised above the ground and the amounts of impervious surface are fairly small (hundredths of an acre). The impervious surfaces are typically small concrete pads (approx 0.01 acre) distributed throughout the site (one per every 5-10 acres of solar panels) and are used to support inverters and various equipment necessary to run the panels.

Your input would be appreciated on the following 2 questions:

1. Would a solar farm be considered a commercial development, an industrial development, or neither?

2. If a solar farm would be considered commercial or industrial, would this type of project (many acre project but very small amount impervious surface) be considered to trigger the threshold for PDP (for both of these categories it is 1 acre).

Please let me know if you would like to discuss.

Thanks so much for time and assistance,

Sara

