

Planning and
Development Services

3.2.14

PG 1

TO: Co. of S.D. P.D.S.

ATTN: ROBERT HINGSTGEN

FROM: JEFFREY AND LAURA MCKERNAN

RE: DPIR SOITER SOLAR DEVELOPMENT PROJECT

WE FULLY SUPPORT THE NO PROJECT ALTERNATIVE,
(ALTERNATIVE 9). IN BASIN GENERATION MUST BE
ANALYZED AS AN ALTERNATIVE, BUT WAS NOT INCLUDED.
ROOFTOP SOLAR ON EXISTING STRUCTURES IS A VIABLE
AND PRODUCTIVE SOLUTION TO LARGE SCALE INDUSTRIAL
ENERGY PROJECTS.

THIS IS A VIOLATION OF CEQA GUIDELINE SECT. 15126.6 (b)
BECAUSE THIS IS A REASONABLE AND ENVIRONMENTALLY SUPER-
IOR ALTERNATIVE.

PG 5.0-2 FULL SITE LOCATIONS AND ACRES ARE NOT PROVIDED.

5.0-5 THERE IS NO GUARANTEE THAT RELIABILITY WILL BE
IMPROVED FOR THE S.D. REGION BECAUSE OF SDGE'S
COMMITMENT TO SELL RENEWABLE ENERGY TO THE GRID.

5.0-5 THE PRODUCTION OF 168.5 M.W. CANNOT BE GUARANTEED
BECAUSE OF THE INTERMITTENT PRODUCTION OF RENEWABLES,
WHICH GENERALLY OPERATE AT 40-60% OF RATED CAPACITY.

5.0-8 THE TULE WIND PROJECT WAS RECENTLY EXPANDED TO
INCLUDE AN ADDITIONAL 20 TURBINES ON THE CUYAMAKE
RESERVATION. THIS WILL HAVE SUBSTANTIAL CUMULATIVE
IMPACTS ON THESE PROJECTS THAT MUST BE ANALYZED.

- 1.0-7 THE NORMAL OPERATING TEMPERATURE FOR THE SOLAR
1.0-8 MODULES WILL BE 172° IN THE SUMMER, AND 104°
IN THE WINTER. THE UNDERGROUND COLLECTION SYSTEM
WILL ALSO GENERATE SURFACE HEAT, WHEN ALL THE
NATIVE VEGETATION IS REMOVED, THE SURFACE TEMPERATURE
WILL INCREASE. THIS WILL BE A SUBSTANTIAL INCREASE
IN SURFACE TEMPERATURE.

THE CPV MODULAR DENSITY ALONE, IS EQUAL
TO 48 WALMART SUPERCENTERS. THIS WOULD NEVER
BE ALLOWED ANYWHERE IN THE COUNTY, IN ONE
TOWN OR COMMUNITY.

THE POSSIBLE EFFECTS OF INCREASING SURFACE
TEMPERATURE BY THIS MUCH, IN SUCH A LARGE AREA
SHOULD BE ANALYZED. ~~THESE PROJECTS~~ THESE PROJECTS
NEED TO BE IN COMPLIANCE WITH POLICY COS-14.12
(HEAT ISLAND EFFECT).

- 1.0-30 IF, "IN A PERFECT SCENARIO", REFLECTIONS WOULD BOUNCE
BACK (DIRECTLY) TO THE SUN, WHAT PERCENTAGE OF
OPERATION IS CONSIDERED A "PERFECT SCENARIO", AND WHAT
ARE THE RESULTS OF AN IMPERFECT SCENARIO. THERE IS
DOCUMENTATION OF PROBLEMS AT SOLTEC'S NEW BERRY
SPRINGS 1.5 MW FACILITY. THE PROPOSED PROJECTS DWARF
THAT SITE.

BOULEVARD AND ITS RESIDENTS SHOULD NOT BE AN
EXPERIMENT.

- 1.0-42 (TABLE 1-6) DUST SUPPRESSION IS BASED ON 22
DAYS OF WINDS HIGHER THAN 15 MPH, AND IS BASED

ON DATA RECORDED FROM CAMPO STATION. THERE ARE 3 WEATHER STATIONS IN BOULEVARD, WHERE WINDS ARE GENERALLY HIGHER THAN IN CAMPO. THE DATA FROM THESE WEATHER STATIONS (BOULEVARD) MUST BE ANALYZED INSTEAD, TO ACCURATELY PROJECT WATER USAGE.

FIG. 2.3-12 THE RUGGED SOLAR MAP SHOWS A TOTALLY DIFFERENT
2.3-20 USFWS CRITICAL HABITAT FOR PENINSULAR BIG HORN SHEEP THAN THE LANCAST MAP. THE RUGGED MAP HAS A $\frac{1}{2}$ MILE BUFFER WHILE LANCAST HAS A 5 MILE BUFFER.

THESE MAPS SHOW A SERIOUS CONFLICT AND INACCURACY. ONE MAP CANNOT JUST BE CHOSEN WITHOUT A BIG HORN SHEEP CRITICAL HABITAT AREA STUDY BEING COMPLETED.

3.1.9-22 (TABLE 3.1.9-1) TOTAL CONSTRUCTION DEMAND SHOULD READ GALLONS (MILLIONS) NOT (THOUSANDS).

2.1-27 NIGHTTIME GLARE WAS NOT ANALYZED DURING MOONLIT NIGHTS WHEN PANELS ARE IN STOW POSITIONS. THIS COULD POTENTIALLY BE SEEN FROM MANY AREAS.

2.1-50 RESIDENTS SHOULD NOT BE SUBJECTED TO THE "JUMBLED ARRANGEMENT OF VISIBLE GEN-TIE STRUCTURES AND MULTIPLE CRISSCROSSING AND SAGGING TRANSMISSION LINES THAT WOULD PRODUCE SLIGHT VISUAL CHAOS..." VISUAL CHAOS.

2.1-54 TRACKER ROWS AND PASSING CARS WOULD NOT BE AKIN TO DRIVING ALONGSIDE ORCHARDS OR ROWCROPS BUT WOULD BE MORE AKIN TO DRIVING ALONG SIDE ROWS OF

BOXCARS (TRAIN), OR SEMI-TRUCK TRAILORS.
TRACKERS ARE MAN MADE AND ^{IN}NO WAY RESEMBLE
AGRICULTURE.

- 2.1-70 RENEWABLE ENERGY DEVELOPMENT IN THE STUDY AREA
WOULD RESULT IN THE "INTRODUCTION OF NUMEROUS
AND PROMINENT INDUSTRIAL ELEMENTS..."
- 2.1-71 "THE SHEER VOLUME OF WIND TURBINES, TRACKERS,
GEN TIE LINES, ANCILLARY FACILITIES, REFLECTIVE SURFACES,
AND MECHANICAL MOVING COMPONENTS WOULD OBSTRUCT,
INTERRUPT AND DETRACT..."
- 2.1-72 "ONCE CONSTRUCTED THESE PROJECTS WOULD ALTER
THE EXISTING RURAL CHARACTER AND WOULD INCREASE
THE PROMINENCE OF INDUSTRIAL COMPONENTS..."
"...AS VIEW SHED BECOMES INCREASINGLY INDUSTRIAL
AND DECREASINGLY RURAL..."

THIS DPEIR IS NOT IN COMPLIANCE WITH THE
S.D. CO. GENERAL PLAN POLICIES:

- | | |
|-----------|-------------|
| ① LU-5.3 | ⑩ LU-11.2 |
| ② LU-6.1 | ⑪ LU-11.11 |
| ③ LU-6.6 | ⑫ COS-11.1 |
| ④ LU-6.9 | ⑬ COS-11.3 |
| ⑤ LU-6.10 | ⑭ COS-11.7 |
| ⑥ LU-6.11 | ⑮ COS-12.2 |
| ⑦ LU-10.2 | ⑯ COS-14.12 |
| ⑧ LU-10.4 | ⑰ COS-19.1 |
| ⑨ LU-8.3 | ⑱ S-11.2 |

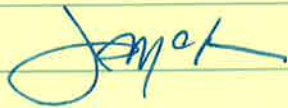
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PG 5

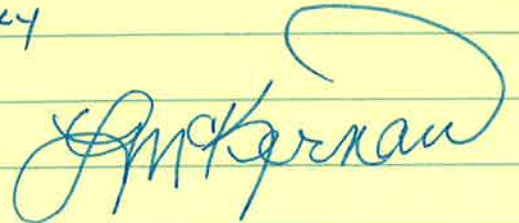
THESE PROJECTS DO NOT BELONG IN BOULEVARD,
AND HAVE FAR TOO MANY NEGATIVE, SIGNIFICANT,
UNAVOIDABLE, AND UNMITIGABLE IMPACTS TO JUSTIFY
EVEN THE "GREATER GOOD".

THE ONLY VIABLE ALTERNATIVE IS THE
NO PROJECT ALTERNATIVE.

THANK YOU,
SINCERELY



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