

Response to Comment Letter I104

William Pelke

- I104-1** The commenter states his concerns with the Proposed Project is not against the need or want for clean renewable energy, it is with the fact that the project location/site will turn a rural community with history and God’s natural resources into an “epic mega-watt wasteland.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. Please refer to Global Response GR-1 Socioeconomics and Environmental Justice in the Final EIR, which discusses the relationship between CEQA and socio-economic considerations.
- I104-2** The commenter asks if the County’s officials have ever visited Jacumba and spoken to the residents. The commenter also asks if County officials knows the culture and history of this “heavenly enclave.” The commenter appeals to County officials to make time so that their feelings and judgment will be based on personal facts and firsthand knowledge rather than reading from industry experts, consultants and bureaucrats. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I104-3** The commenter states that his first specific comment or concern after having reviewed the Draft EIR in the Jacumba Library is that Old Highway 80 is soon to be constructed as a “County Scenic Highway” and this project should not be started until this designation has been awarded. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. Please also refer to Response to Comment O7-40.
- I104-4** The commenter states that his second specific concern is the Jacumba groundwater is essential to the town of Jacumba Hot Springs and the hotel and hot springs depends on this resource. The commenter states that he is not satisfied with the EPA review of the potential impact on this key element and expresses concern that construction will deplete 140-acre feet of local water and an additional 11-acre feet for washing panels four time per year during operation. The commenter states that this is a major concern. The Draft EIR analyzes potential impacts to groundwater resources in Chapter 2.7, Hydrology and Water Quality, and concludes the Proposed Project’s production of groundwater will result in a less than significant impact. Because the commenter does not provide any specific evidence concerning groundwater impacts, no further response can be provided.

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- I104-5** The commenter asks that County officials specifically respond to his concern that the EIR does not address the Mountain Empire Subregional Plan’s Community Character Goal: To encourage the development of land in a manner that reinforces the unique identity of the mountain empire subregion and its communities. The Proposed Project is consistent with this Goal as development would primarily be centered in the flatter terrain on the Project site, while the particularly vivid terrain including ridgelines and slopes would not be disturbed by the Proposed Project. With implementation of landscaping and tan slats/or screening on fencing, the solar facility components would be screened from public view of motorists on Old Highway 80, users of Jacumba Community Park, and residents in Jacumba Hot Springs to the extent practicable. From elevated vantage points, taller Proposed Project components associated with the collector substation and Switchyard Facilities would be visible but would be added to a viewshed that currently includes tall steel lattice towers and tubular steel poles of the Southwest Powerlink and Sunrise Powerlink. Lastly, the Proposed Project is proposed in the Jacumba area landscape that has been previously altered by the existing transmission lines. Further, subsequent to public review of the Draft EIR, the Proposed Project was revised to include increased setbacks from Jacumba Community Park and along both sides of Old Highway 80 (see Chapter 1 of the Final EIR).
- I104-6** The commenter states that the Proposed Project goes directly against the Mountain Empire Subregional Plan – Agricultural Goal by building this “solar panel prison complex (due to the chain-link fence with razor wire on top).” The commenter asks the County please be certain to address these two specific issues. In response, the Draft EIR analyzes the Proposed Project’s consistency with the Agricultural Goal of the Mountain Empire Subregional Plan in Table 3.1.4-5 of Chapter 3.1.4, Land Use and Planning. The Draft EIR finds the Proposed Project consistent with the goal because the Proposed Project does not conflict with a Williamson Act Contract or an agricultural preserve, there are no active agricultural operations in the Zone of Influence, the Proposed Project’s temporary/interim nature would not prevent the Project site from being utilized for agriculture in the future, and the Proposed Project would not introduce a land use to the site that would conflict with future agricultural uses.
- I104-7** The commenter states that he saw nothing to address the impact and displacement of the local wildlife and plants/flora. The commenter states that this is one of the most bedrock issues covered in more EIS documents, and litigation should be considered if this important aspect is not addressed. In response, please refer to Section 2.3, Biological Resources of the EIR which analyzes the Proposed Project’s potential impacts to vegetation communities, plants and wildlife. With implementation of mitigation measures, impacts to biological resources would be less than significant.

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- I104-8** The commenter states that another topic devoid of the report is the “heat island effect.” The commenter states that with 643 acres (300,000 solar cells) surrounding the area, winds can carry the heat, destroy vegetation, impact health, and cause discomfort to citizens as panels are usually 36 degrees warmer than then the ambient temperatures. Please refer to Global Response GR-2 Photovoltaic Heat Island Effects in the Final EIR.
- I104-9** The commenter asks what noise specifically will be generated by the Proposed Project (i.e. transformers humming 24 hours a day 7 days a week and panel noise, etc.). In response, Section 2.9, Noise, of the Draft EIR, analyzed the Proposed Project’s anticipated noise impacts during construction and operation. With implementation of mitigation measures, the Proposed Project’s noise impacts would be less than significant.
- I104-10** The commenter asks if the Proposed Project would prevent any future expansion of the Jacumba Airport facility. The commenter states that the solar complex would terminate the land-use of a potentially expanded transit resource. In response, please refer to Table 3.1.4-6 in Section 3.1.4, Land Use and Planning, which finds the Project consistent with the Jacumba Airport Land Use Compatibility Plan.
- I104-11** The commenter states that the Proposed Project would negatively impact the future international border crossing between Jacumba and Jacume, Mexico. The commenter states that this is a serious breach of future development in the need for additional crossing points. Please refer to Response to Comment O7-166.
- I104-12** The commenter states that the Draft EIR and MUP were very weak to non-existent on the specific pesticides and weed-killers that would be used on the Proposed Project. The commenter states that this is a double-edged sword as airborne fumes would be potentially harmful or lethal to residents, as well as wild and domestic animals. In response, please refer to Response to Comment I133-12.
- I104-13** The commenter states that with a complex that is so large, the fear of ground and water contamination is beyond serious especially if the Proposed Project were to last the 38 years that are planned. In response, Section 2.7 Hydrology and Water Quality of the Draft EIR analyzed the Proposed Project’s potential impacts to groundwater resources and determined the impacts would be less than significant.
- I104-14** The commenter states, “It is simple as this, if this project is allowed to proceed, the village of Jacumba will die.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1

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- Socioeconomics and Environmental Justice in the Final EIR, which discusses the relationship between socioeconomic considerations and CEQA.
- I104-15** The commenter states, “With the new owners of the Jacumba Hot Springs Hotel and Restaurant, there is more than just a spark of new life here, there is a huge resurgence, and plans to make Jacumba the preferred ‘destination spot’ that it was back in it’s hayday.” The commenter states “This industrial project would simply put a stake in the heart of this wonderful new energy. Please don’t allow this to happen!!!” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice in the Final EIR.
- I104-16** The commenter states “I am 100% in favor of clean, renewable energy. I say that from the bottom of my heart!!” However, the commenter believes that the placement of an industrial complex this large is just ill-suited for the tiny village of Jacumba Hot Springs. The commenter states there certainly are other alternate sites that are more remote that can be considered for such a project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Chapter 4, Project Alternatives, which discusses alternative sites for the Proposed Project. Please also refer to Global Response GR-6 Alternatives in the Final EIR.
- I104-17** The commenter states that he will be most appreciative to receive responses to the concerns raised at the County’s convenience as “there is literally an entire community’s future in your hands.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, in response please refer to Response to Comments I104-1 through I104-16. The responses to comments are made publicly available on the Planning & Development Services’ website when the draft FEIR is made public prior to any hearing on the Proposed Project.