

Response to Comment Letter I127

Various Individuals - Petition Signatures

- I127-1** The comment on the petition is the same statement as the petition statement in comment letter I112. Please refer to Responses to Comments I112-2 through 112-7.
- I127-2** The comment includes seven signatures. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-3** The comment states, “Petition to oppose the JVR (Jacumba Valley Ranch) Solar Project also known as the Jacumba Solar Park 90 megawatt solar generation and 20 megawatt storage facility.” In response, the County acknowledges the commenters’ (individuals signing the petition) opposition to the Proposed 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.
- I127-4** The comment states, “This project and others in the area are connected and not separate actions and cause cumulative impacts as noted in CEQA Article 20 Definitions. Section 15355. Cumulative Impacts.” In response, the Proposed Project is a separate project from the cumulative projects identified in the Draft EIR. Please refer to Table 1-4 in Chapter 1 of the EIR for a list of a cumulative projects. Section 15355 of CEQA states that “Cumulative impacts refers to two or more individual effects, which when considered together are considerable or which compound or increase other environmental impacts.” CEQA further states “The individual effects may be changes from a single project or a number of separate projects.” The cumulative projects listed in Table 1-4 are separate projects from the Proposed Project and from one another. Cumulative impacts are analyzed in accordance with CEQA in the Draft EIR.
- I127-5** The comment states “Petition Summary and Background” and also states, “This petition is directed at decision makers at the Jacumba Sponsor Group who some on Group may benefit financially, San Diego County, California Public Utilities Commission, and the general public who may think the Solar Project in close proximity to residents living in the community of Jacumba safe and beneficial to the community.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-6** The comment states “Action Petitioned For” and also states, “We, the undersigned, are concerned citizens who urge leaders to act now to deny the Jacumba Valley Ranch Solar Project based on significant, cumulative and disproportionate adverse impacts to:

Volume II – Individual Responses to Comments

public health and safety, sleep deprivation & stress-related illnesses; noise, low frequency noise, increased fire risk & insurance costs; loss of scenic landscapes & property values; light and electrical pollution; well water; wildlife; pets and livestock & habitat.” In response, the County acknowledges the commenters’ (individuals signing the petition) opposition to the Proposed Project. Regarding issues raised in this comment, please refer to discussion below.

With respect to public health and safety, Section 2.6 Hazards and Hazardous Materials of the Draft EIR did not identify any hazardous materials associated with the Proposed Project that would result in significant impacts to public health and safety. Section 2.2 Air Quality of the Draft EIR includes an analysis of potential impacts to air quality, including potential impacts to sensitive receptors. Specifically, please refer to Sections 2.2.1.3 and 2.2.3.2 of the EIR, which adequately discusses and analyzes Valley Fever, its incidence in the Project area (for the County and statewide averages), and the Proposed Project’s potential for causing exposure to Valley Fever for sensitive receptors. In particular, the Draft EIR discusses the Proposed Project’s compliance with SDAPCD Rule 55, which limits the amount of fugitive dust generated during construction through watering, using magnesium chloride for dust suppression on unpaved roads, and limiting speed on unpaved roads to 15 miles per hour. Workers on site would be protected through compliance with regulations pertaining to Valley Fever, which require: (1) the reporting of any serious injury or illness, or death, of an employee occurring in a place of employment or in connection with any employment to the nearest District Office of the Division of Occupational Safety and Health; (2) an Injury and Illness Prevention Program to identify and evaluate workplace hazards; (3) harmful exposures to be prevented by engineering and/or administrative controls whenever feasible; (4) when effective controls are not feasible, respirators shall be used and provided by the employer when such equipment is necessary to protect the health of the employee; and, (5) when necessary, the establishment and maintenance of a respiratory protection program. The Draft EIR concludes: “Based on the low incidence rate of Coccidioidomycosis in the Proposed Project region and in greater San Diego County, and the Proposed Project’s implementation of dust control strategies, it is not anticipated that earth-moving activities during Proposed Project construction and decommissioning would result in exposure of nearby sensitive receptors to Valley Fever.” The Proposed Project will also implement mitigation measure **M-AQ-2** to minimize fugitive dust from Project construction. The Proposed Project will also implement Project Design Feature **PDF-HYD-3** which requires vegetative cover under the solar panels during Project Operation. Please refer to section 2.7.6 of the Final EIR.

The commenter does not provide and specific evidence that the Proposed Project, a solar energy generation and storage facility, would cause sleep deprivation and stress-

Volume II – Individual Responses to Comments

related illnesses. Regarding electromagnetic field and health concerns, please refer to Global Response GR-4 in the Final EIR.

Regarding impacts related to noise, Section 2.9 Noise of the Draft EIR analyzes the Proposed Project’s noise impacts during construction and operation. The Draft EIR identified potentially significant impacts associated with stationary equipment (**Impact NOI-1**) and PV panel washing (**Impact NOI-2**). Implementation of mitigation measures **M-NOI-1** and **M-NOI-2** would reduce these impacts to less than significant. Low frequency noise from inverter/transformer platforms would be less than significant and no mitigation is required. Construction noise (**Impact NOI-3**) was also identified as potentially significant but would be reduced to less than significant with implementation of mitigation measure **M-NOI-3**.

Fire risk is discussed in the Fire Protection Plan (Appendix N) and Section 2.12 Wildfire of the Draft EIR. With implementation of mitigation measures **M-WF-1** (Fire Protection Plan), **M-WF-2** (Construction Fire Protection Plan), and **M-WF-3** (Fire Protection and Mitigation Agreement), impacts associated with wildfire risk would be less than significant. Regarding insurance costs, CEQA analyzes physical changes to environment. Please refer to Global Response GR-1 in the Final EIR for a discussion of CEQA and socioeconomic impacts.

With respect to “loss of scenic landscapes,” Section 2.1 Aesthetics of the Draft EIR analyzes the Proposed Project’s visual impacts to community character, and panoramic or focal vistas. The Draft EIR identifies potentially significant impacts to existing visual character and/or quality (**Impact AE-1**) and valued visual character of the community (**Impact AE-2**). The Draft EIR also states that due to the wide distribution of solar panels within the solar facility, the Proposed Project would substantially reduce the quality of existing views toward the solar facility from I-8, Old Highway 80, Jacumba Community Park, Anza Borrego Desert State Park, and Bureau of Land Management lands (**Impacts AE-3 through AE-9**). Implementation of mitigation measures (**M-AE-1 through M-AE-6**) would reduce the Proposed Project’s visual impacts, but not to a level of less than significant. The impacts would remain significant and unavoidable. The California Environmental Quality Act (CEQA) requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits of a proposed project against its significant and unavoidable impacts when determining whether to approve the project. When a lead agency approves a project, the agency must state in writing the specific reasons to support its action; this statement is referred to a “Statement of Overriding Considerations.” Under CEQA, the County must make a Statement of Overriding Considerations” to approve the Proposed Project.

Volume II – Individual Responses to Comments

With respect to concerns about property values, CEQA requires analysis of physical changes to the environment as noted above. Please refer to Global Response GR-1 for a discussion of CEQA and socio-economic impacts.

Regarding concerns about light and electrical pollution, light pollution is discussed in Section 2.1 Aesthetics of the EIR, specifically in Section 2.1.3.5 Light and Glare. The Proposed Project would have minimal low-level lighting at access driveways and the entrance to the substation. The Proposed Project would be required to comply with the County's Light Pollution Code, and thus would have a less than significant impact regarding light pollution. With respect to electrical pollution, please refer to Global Response GR-4 in the Final EIR for a discussion of electromagnetic fields.

The Proposed Project's impacts to groundwater are analyzed in Section 2.7 Hydrology and Water Quality of the Draft EIR, specifically Section 2.7.3.4 Groundwater Resources. As described in this section, the source of groundwater for the Proposed Project would be on-site wells. Drawdown calculations were performed to assess the effect of Project pumping on off-site domestic and public pumping wells. The analysis in the Draft EIR determined that the impacts to off-site wells would be less than significant. Also, the reduction in groundwater storage from extraction by the Project would not exceed the County's threshold and the impacts would be less than significant. A Groundwater Monitoring and Mitigation Plan (GMMP) is required as a Project Design Feature (**PDF-HYD-2**) to ensure that pumping for the Project does not significantly impact existing well users.

With respect to wildlife, Section 2.3 Biological Resources of the EIR analyzes the Proposed Project's potential impacts to wildlife, including impacts to wildlife habitat. Potentially significant impacts to wildlife would be less than significant with implementation of mitigation measures, as described in the Final EIR.

With respect to pets, livestock and habitat, it is unclear what the commenters' specific concern is. This comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

I127-7 The comment states "Solar panels and inverter, collector substations, and substations are planned far too close to homes and roads." In response, for clarification the Proposed Project includes one collector substation, which would be located off of Carrizo Gorge Road adjacent to the proposed Switchyard Facilities and the existing SDG&E 138 kV transmission line.

I127-8 The comment states the mail or email copies of the petition to Diane Jacob, County of San Diego. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

Volume II – Individual Responses to Comments

- I127-9** The comment includes one signature to the petition and states “no more boondoggles.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-10** The comment includes two signatures to the petition and states “no more.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-11** The comment includes one signature to the petition and states “Unhealthy - No.” Please refer to Response to Comment I127-6 for a discussion of health issues.
- I127-12** The comment includes four signatures to the petition. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-13** The comment includes one signature to the petition and states “fire concerns, health issues.” Please refer Response to Comment I127-6 regarding fire risks and health issues.
- I127-14** The comment includes two signatures to the petition. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-15** The comment includes one signature to the petition and states “other properties away from towns.” In response, Chapter 4 Alternatives in the Draft EIR includes a discussion of alternative locations considered and rejected. Please also refer to Global Response GR-6 regarding alternatives to the Proposed 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.
- I127-16** The comment includes one signature to the petition and states “health issues and draining water reservoirs.” Please refer to Response to Comment I127-6 regarding health issues and groundwater.
- I127-17** The comment includes one signature to the petition and states “wildlife issues.” Please refer to Response to Comment I127-6 regarding wildlife.
- I127-18** The comment includes one signature to the petition and states “negative impacts on the town.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-19** The comment includes one signature to the petition and states “health issues and fire issues.” Please refer to Response to Comment I127-6 regarding health issues and fire risks.

Volume II – Individual Responses to Comments

- I127-20** The comment includes one signature to the petition and states “kills property values and too close to houses.” Please refer to Response to Comment I127-6 regarding property values. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-21** The comment includes one signature to the petition and states “too big.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-22** The comment includes one signature to the petition and states “health issues.” Please refer to Response to Comment I127-6 regarding health issues.
- I127-23** The comment includes one signature to the petition and states “disabled vet from 1968.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-24** The comment includes one signature to the petition and states “limits potential of town growth.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-25** The comment includes one signature to the petition and states “the project prevents future growth.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-26** The comment includes the same petition statement as page 2 of this comment letter. Please refer to Responses to Comments I127-3 through I127-6.
- I127-27** The comment includes one signature to the petition. The commenter also states she is concerned about fire issues, chaparral removal for wildlife, health issues, air and dust. In response, please refer to Response to Comment I127-6 regarding fire issues, wildlife, and health issues. In regard to chaparral removal, for clarification the Project site features the following vegetation communities: fallow agriculture; Sonoran mixed woody scrub; Sonoran mixed woody scrub succulent scrub; big sagebrush scrub; desert saltbrush scrub; tamarisk scrub; mesquite bosque; and disturbed freshwater marsh. The Proposed Project’s impacts to these vegetation communities are analyzed in Section 2.3 Biological Resources of the EIR. With implementation of mitigation measure **M-BI-3** (Habitat Preservation) and **M-BI-4** (Resource Management Plan), the impacts to sensitive vegetation communities would be less than significant. Regarding air and dust, please refer to Section 2.2 Air Quality of the EIR. With implementation of mitigation measures, impacts to air quality would be less than significant.

Volume II – Individual Responses to Comments

- I127-28** The comment includes one signature to the petition and states “No. Please don’t kill our valley.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-29** The comment includes one signature to the petition and states “Concerned about trackers, wildlife, dust, valley fever, and firefighters.” In response, please refer to Response to Comment I127-6 regarding concerns about wildlife and Valley Fever. With implementation of mitigation measures, the Proposed Project’s impacts to air quality, including dust, would be less than significant. Fire hazards are analyzed in Section 2.12 Wildfire. With implementation of mitigation measures **M-WF-1** (Fire Protection Plan), **M-WF-2** (Construction Fire Protection Plan) and **M-WF-3** (Fire Protection and Mitigation Agreement), impacts would be less than significant.
- I127-30** The comment includes two signatures to the petition. The commenters state concerns about dust and lung fungus. In response, with implementation of mitigation measures, the Proposed Project’s impacts to air quality, including dust, would be less than significant. Please refer to Section 2.2 Air Quality of the Draft EIR. Regarding, lung fungus concerns, the Proposed Project would implement dust control measures to reduce the potential impact of exposure from fungus found in soil.
- I127-31** The comment includes one signature to the petition. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-32** The comment includes one signature to the petition and states concerns about dust, air, and wildfire. In response, with implementation of mitigation measures, the Proposed Project’s impacts to air quality, including dust, would be less than significant. Please refer to Section 2.2 Air Quality of the Draft EIR. Please also refer to Response to Comment I127-6 regarding wildfire concerns.
- I127-33** The comment includes one signature to the petition and states concerns fire, air, COPD, and animals. Please refer to Response to Comment I127-6 regarding fire and animal concerns. Regarding air and health concerns, the Proposed Project’s impacts to air quality, including dust, would be less than significant with implementation of mitigation measures. Please refer to Section 2.2 Air Quality of the Draft EIR.
- I127-34** The comment includes five signatures to the petition and states concerns about health issues. Please refer to Response to Comment I127-6 regarding health issues.
- I127-35** The comment includes one signature to the petition and states “no herbicides.” In response, Section 1.2.1.1 of Chapter 1, Project Description, specifies that “the estimated annual operational water demand for irrigation of the landscape screening is

Volume II – Individual Responses to Comments

- approximately 8.4 [acre-feet per year].” In response, the Proposed Project will include irrigation for the landscaping installed as part of the Proposed Project. (See also Section 2.7.3.3. in 2.7, Hydrology and Water Quality, [“Landscaping would include native and drought-resistance plants, irrigated by an automated drip irrigation system to limit excess water use.”].) Mitigation measure **M-BI-8** regulates the use of herbicides at the Project site. Further, **M-BI-8** in the Final EIR has been revised to confirm that no pesticides will be used by the Proposed Project.
- I127-36** The comment includes one signature to the petition and states “health worries.” Please refer to Response to Comment I127-6 regarding health issues.
- I127-37** The comment includes four signatures to the petition. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-38** The comment includes one signature to the petition and states “not good for community.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I127-39** The comment includes one signature to the petition and states “health risk; no benefit to community; not recyclable.” In response, please refer to Response to Comment I127-6 regarding health risks. Regarding recycling, please refer to Chapter 1 of the Draft EIR, (Section 1.2.1.3) for a discussion of recycling of the solar facility components as part of decommissioning.
- I127-40** The comment includes one signature to the petition and states “health risk; no benefit to community; not recyclable.” In response, please refer to Response to Comment I127-6 regarding health risks. Regarding recycling, please refer to Chapter 1 Project Description of the Draft EIR, (Section 1.2.1.3) for a discussion of recycling of the solar facility components as part of decommissioning.
- I127-41** The comment includes one signature to the petition and states “no financial benefit.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.