Response to Comment Letter C1

Bonsall Sponsor Group
Margarette Morgan
February 5, 2014

Greetings,

This is the response from last night’s Bonsall Sponsor Group meeting regarding the proposed Soitec Solar projects in the County of San Diego.

Margarette Morgan, Chair
Bonsall Sponsor Group
The County of San Diego (County) acknowledges the commenter’s opposition to the Proposed Project. The information in this comment will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.

Potential impacts related to groundwater use were considered and addressed in the Draft Program Environmental Impact Report (DPEIR); see Sections 3.1.5.3.4, Groundwater Resources, and 3.1.9.3.1, Water. As stated in Sections 3.1.5.3.4 and 3.1.9.3.1, the County will place conditions on the Major Use Permit that will restrict the amount of water that is permitted to be withdrawn from the on-site wells in order to prevent interference with off-site wells. As such, the County does not anticipate that wells of neighboring residents will result in any significant impact with the implementation of the Proposed Project.

As stated in Section 1.1 of the DPEIR, one of the Proposed Project objectives is to invest a minimum of $100 million of economic development to support the local economy through the creation of high-wage, highly skilled construction and permanent jobs that pay prevailing and living wages. Additionally, the Tierra del Sol and Rugged solar farms both have been certified as Environmental Leadership Projects under the Jobs and Economic Improvement through Environmental Leadership Act (Assembly Bill (AB)
900), which requires that the applicants meet the prevailing and living wage requirements of California Public Resources Code Section 21183(b). The AB 900 Application for the Soitec Solar Energy Project is attached as Appendix 3.1.3-3 of the DPEIR. As discussed in Section 3.2.3 of the DPEIR, during construction, the Proposed Project would employ approximately 326 workers. During operation, the Proposed Project would employ approximately 33 full-time employees. No changes to the environmental document are required as a result of this comment.

The County concurs that the LanEast and LanWest projects could have potential significant impacts related to groundwater supply, traffic, glare, and visual character. With respect to potential impacts to groundwater supply and traffic, the DPEIR concluded that these impacts would be less than significant (DPEIR Sections 3.1.5.3.4, 3.1.8.3, 3.1.9.3.1.). The DPEIR concluded that the LanEast and LanWest projects would have significant and unavoidable impacts related to scenic views, visual character and quality, and glare (DPEIR Section 2.1.3.). These issues are discussed in Sections 2.1, 3.1.5, 3.1.8, and 3.1.9 of the DPEIR. In addition, both the LanEast and LanWest proposed projects have been evaluated at a program level. A project level analysis will be completed when the project design for each is determined and Major Use Permit applications are submitted.
This comment also addresses the possibility of glare impacts associated with misalignment of CPV modules. Please refer to response to comment O10-77 regarding the Boulevard Glare Study and consideration of certain operational scenarios including operations during high wind events and periods of malfunction.

The County agrees that the Proposed Project may result in potentially significant impacts to the visual character of the solar farm sites as a result of vegetation removal. This issue is discussed in Section 2.1.3.2 of the DPEIR. However, the County disagrees that the temperature of the solar panels will result in the “prolonged ‘baking’ of the landscape.” As stated in Section 1.2.1 of the DPEIR, although the concentrator photovoltaic panels would be hot to the touch as a result of solar energy absorption, they would not noticeably affect the temperature of the surrounding area and the temperature below the modules would be nearly the same as ambient temperatures in ordinary shade.

The County concurs that mitigation is feasible for some, but not all, of the significant impacts identified in the DPEIR. Should the decision makers wish to adopt the Proposed Project or any alternative with significant and unavoidable impacts, a Statement of Overriding Considerations will be prepared and included in the record.
The County acknowledges the commenter’s support for the No Project Alternative and preference for the implementation of rooftop solar installations. The decision makers have the approval authority for the Proposed Project and will consider all information in the FPEIR and related documents before making a decision. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.

References