

Response to Comment Letter I101

Daniel Renard
February 28, 2014

- I101-1** Potential health risks, including those related to exposure to stray voltage, are considered and addressed in Section 3.1.4.5, Other Field-Related Public Concerns or Hazards, of the Draft Program Environmental Impact Report (DPEIR). Furthermore, in response to this comment and other comments regarding high voltage concerns, a memorandum was prepared by Asher R. Sheppard, PhD to support the information provided in the DPEIR and provide more detail; see Appendix 9.0-1 of the DPEIR.
- I101-2** Potential impacts related to groundwater supply and water use associated with the Proposed Project are considered and addressed in Section 3.1.5.3.3, Surface Water and Groundwater Quality, Section 3.1.5.3.4, Groundwater Resources, and 3.1.9.3.1, Water, of the DPEIR. Please also refer to common response WR1. The DPEIR found that the Proposed Project would have a less than significant impact on groundwater supply and quality.

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Comment Letter I101

February 27, 2014

To: County of San Diego
Planning and Development Services
Project Processing Counter
5510 Overland Ave, suite 110
San Diego, CA 92123

Re: COMMENTS ON
SOITEC SOLAR DEVELOPMENT PROJECT
Draft Program Environmental Impact Report (PIER)

SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, LOG NO.PDS2012-3910-120005 (ER); 3800-12-010 (GPA); TIERRA DEL SOL, 3300-12-010 (MUP); 3600-12-005 (REZ); 3921-77-046-01 (AP); RUGGED SOLAR, 3300-12-007 (MUP); SCH NO.2012121018

ADDENDUM to previous comments of Feb. 17, 2014

From: Daniel Renard
41148 Old Highway 80
Boulevard, Ca, 91905

Dear Director and Staff;

We are concerned for the safety, health and wellbeing of our home, family and pets with imminent risks of the long term exposure to being surrounded by a high voltage solar farm witch deprives us of the quality of life we had a right to expect when we bought our home in Boulevard.

It came with an adequate supply of pure safe drinking water from a legally protected aquifer witch this solar program intends to drain beyond its fair share and further put at risk by pollution through the site preparation,

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construction, maintenance, and cleaning these incompatible solar power projects. We currently share this aquifer with the residents of our next door neighbors, which Soitec denies exist. Despite the proponents claim to the contrary there is an existing occupied residence established in 1997 on the proposed site of LanEast. They are not related to our family but seem to be nice people.

12. A document entitled "Notice of Manufactured Home (Mobilehome) or Commercial Coach, Installation on a Foundation System" recorded JUNE 23, 1997 as Instrument No. 1997-0291411 of Official Records.

We had the protection of the general plan for San Diego County to indicate that that our magnificent view would not be totally obscured in every direction with a 30 foot tall unsightly and blinding obstruction. It is easy to determine that at or near sunrise and sunset these glaring panels will blind drivers coming around the curve with the sun behind them and its reflection in front of them on scenic Historic Old Highway 80 in front of our home. This same glare will also create a nuisance for our family and pets. It certainly reduces the value of our property as a residence.

Though it is no longer a store, the view from the highway, "Old Hiway 80" out front is still available and substantially the same as it was when California became a State in 1850 when this spot included an army mail stop and stage coach station. The scenic view and location is nostalgic and culturally and historically significant. It is well worth preserving.

We maintain an adequate supply of water to protect our property from fire. Such a source of high voltage electricity surrounding us would create an unacceptable life threatening hazard to use water to fight a fire. That same risk of electrocution should be assumed to exist any time you stand in a puddle surrounded by high voltage electricity, even in the rain.

The plans for these projects do not seem to include much designated parking or any parking that mitigates the increased risk of operating or storing gasoline powered equipment near the 180 degree plus operating temperature of these solar panels. Access roads are not for employee or visitor parking.

It is apparent and obvious that the water storage water tanks proposed to fight fire on a high voltage electrical project is essentially subterfuge to provide large quantities of our life sustaining potable water for maintaining

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The County does not agree that the project applicant (through the DPEIR) deny the existence of residences on the LanEast site. Figure 2.5-6, LanEast Solar Sensitive Land Uses Within 1,000 Feet, and Figure 2.5-7, LanWest Solar Sensitive Land Uses Within 1,000 Feet, both identify existing residential structures on the LanEast project site. As shown on the figures, these residences are considered to be "sensitive land uses". In addition, both residence are included in the glare behavioral analysis for the LanEast project site (see Appendix 2.1-3, Boulevard Glare Study).

In response to this comment, the County has made revisions and clarifications to the DPEIR. These revisions to the EIR are presented in ~~strikeout~~ underline format; refer to Figure 2.6-4 in Section 2.6, Noise. The figure has been revised to consider existing residential structures located on the LanEast project site.

To the extent these changes and additions to the EIR provide new information that may clarify or amplify information already found in the DPEIR, and do not raise important new issues about significant effects on the environment, such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines.

I101-4

The comment regarding the aesthetic impacts of the proposed LanEast and LanWest solar farms is noted. Impacts to scenic vistas, existing visual character and

	quality, and existing views due to substantial new sources of light and glare are discussed in Section 2.1, Aesthetics, of the DPEIR. While the anticipated visual effects of the LanEast and LanWest solar farms as experienced at 41148 Old Highway 80 were not described in the DPEIR (the DPEIR considered public views as opposed to views from private residences), the visual effects of the proposed solar farms as experienced by passing motorists on Old Highway 80 were described in the DPEIR. While project-level information has not yet been fully developed, the DPEIR utilized a worst-case scenario in which the entirety of the LanEast and LanWest sites would be developed with trackers and ancillary facilities and concluded that impacts to scenic vistas, existing visual character and quality, and daytime views due to glare would be significant. However, the Glare Study did not show that any glare would be experienced by motorists between milemarker 1.0 and 2.0 on Old Highway 80, near the commenter's residence at 41148 Old Highway 80 (DPEIR Appendix 2.1-3, Section 4.3). Impacts to cultural and historical resources associated with development of the LanEast and LanWest solar farms are discussed in Section 2.4, Cultural Resources, of the DPEIR. A cultural resources records search and an intensive pedestrian survey reconnaissance survey were conducted for both the LanEast and the LanWest sites; these sites were analyzed at a program level however and the evaluation and classification of
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	cultural resources for LanEast and LanWest have not yet been completed and a final determination of the significance of potential impacts to cultural resources will be provided when project-specific environmental review is conducted in the future for these sites. At that time, the County will determine whether the army mail stop and stage coach station identified by the commenter are cultural or historic resources which could be adversely impacted by the projects. I101-5 The County acknowledges the commenter's concern associated with high voltage electricity and the risk of fire. Please refer to the response to comment O10-82 related to risks associated with fighting electrical fires and the mitigation of this risk for the Proposed Project. Shock issues associated with electricity and water streams is also addressed in Appendix 3.1.7-1 of the DPEIR. I101-6 The County of San Diego (County) does not agree that sufficient parking is not available. Parking for construction vehicles and trucks would be on site in temporary construction staging areas. Long-term parking is provided at the operations and maintenance building on each Proposed Project site. The increased temperature of the trackers is localized and does not radiate such that it could cause a risk to nearby gasoline-powered equipment; see the response to comment O10-82 regarding electrical fires and the response to C3-4 regarding the mitigation of risk
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and cleaning solar panels. To truly assess the environmental impact of these projects on a program level concealing such information is not an innocent oversight it is a fatal flaw.

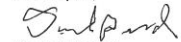
This also raises the question of what chemicals are appropriate to combat high voltage electrical fires and how do we keep them out of our ground water once they have been deployed? The first step to fight an electrical fire is normally to shut off the power source, but you cannot make a solar panel exposed to the sun stop producing watts. The first priority of fire fighters is always to protect lives first so let's not use water to put theirs in peril.

If large quantities of groundwater are for maintenance and cleaning, do not accept any lame excuse to mask the **true intent of their use of our most precious resource** and the plan for its drainage or recovery and reclamation and the resulting erosion and contamination that will result. If the intent of these water tanks is for firefighting on the neighboring agricultural and rural residential properties why lock it up behind a 10 foot fence?

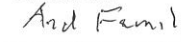
We are very worried that the proposed construction will damage the structure of our residential/commercial building, well and water storage system and electrical systems. Pile driving and blasting over eleven hundred, 28 inch diameter posts, 20 feet into the earth on immediately adjacent or even nearby property can certainly be predicted to disturb existing foundations, structures, mechanical and electric systems, aquifers and the human occupants not to mention the habitat of all god's creatures and their nests scheduled to be obliterated by it.

We agree with the PEIR the consequences of our fears are significant but not unavoidable with the resounding effect of **not approving** this or any program with such missuses of any agricultural and residential rural property in Boulevard or scenic highways or corridors in San Diego County.

Thank you;



Daniel Renard



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associated with the increased risk of fire during construction of the Project with the presence of additional ignition sources.

The County does not agree with the commenter's assertion that the true purpose of the water storage tanks is concealed. As stated in Chapter 1.0 of the DPEIR, there would be dedicated water tanks for fire protection with fire department connections. In addition, other water tanks would provide storage for operational uses such as potable water for employees or solar module washing.

I101-8

This comment raises concerns regarding fighting electrical fires with water; please refer to the response to comment O10-82. Firefighters would be able to de-energize the CPV systems to ensure a fire response can proceed in a safe manner.

I101-9

See the response to comment I101-7. This comment does not raise a significant environmental issue for which a response is required.

I101-10

The County acknowledges the commenter's concerns regarding construction noise blasting and pile driving operations. Blasting and pile-driving is not proposed or anticipated for the installation of the posts (pylons) to support the trackers. Pilot holes would be drilled for the posts, and then the posts would be installed using a vibratory driver which causes much less noise

	or vibration than a pile driver. Limited blasting may occur for the installation of some of the support poles for the Tierra del Sol gen-tie line. However, as detailed in Mitigation Measure M-N-TDS-4 (see Section 2.6.6.2 of the DPEIR) blasting during construction will be prohibited within 1,700 feet of any structure. I101-11 The County disagrees that approval of the Project would be a misuse of agricultural and residential rural property or scenic highways and corridors within the County. Each of these impacts is considered and addressed in the DPEIR; the commenter does not raise specific issues related to the adequacy of the DPEIR or the Project such that additional response can be provided. However, the County acknowledges the commenter's opposition to the Proposed Project. The decision makers have approval authority for the Proposed Project and will consider all information in the Final Program Environmental Impact Report (FPEIR) and related documents before making a decision on the Proposed Project. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.
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