Response to Comment Letter I1

Ted Tibbetts
January 9, 2014

I1-1 The comment does not adequately provide details related to the environmental document. The County of San Diego (County) believes that the comment is generally related to the health and safety risk of locating the Proposed Project in the vicinity of the commenter’s residence. The County disagrees that the Proposed Project poses a health and safety risk because adequate setbacks are provided. The commenter specifically refers to the Tierra del Sol solar farm.

As shown on Figure 1-6 of the DPEIR, Tierra Del Sol Site Plan, on the west side of the Tierra del Sol site north of the secondary access point solar panels would be setback approximately 80 feet from the project boundary. South of the secondary access point (see Figure 1-6), solar panels would be setback approximately 125 feet from the property boundary. A similar setback would be provided along the eastern boundary of the site. Along the northern property boundary, solar panels would be setback approximately 25 feet from the property boundary however, with implementation of M-AE-PP-1, the setback would be increased to 100 feet (see Chapter 2.1 Aesthetics and Appendix 2.1.4, Landscape...
Screening Design). Furthermore, with implementation of M-AE-PP-1, a 50-foot wide landscape area consisting of climate-appropriate, drought-tolerant shrubs and trees would be installed and maintained through the operational life of the project. A 50-foot wide landscape area and 50-foot wide cleared fire buffer area would be installed along the northern and western project boundary where the site parallels Tierra Del Sol Road. With implementation of M-AE-PP-1, solar panels located north of the secondary access point and along the western property boundary would be setback more than 300 feet from the property boundary and a 50-foot wide landscape buffer would be located between solar panels and the property boundary. Furthermore, with implementation of M-AE-PP-1, the home located on APN 658-081-0400 would be located approximately 375 feet west of the nearest solar panel and the home on APN 658-081-0300 would be located greater than 400 feet west of the nearest solar panel.

Please see also response to comments C2-109 through C2-111, I57-5, and I94-3 for concerns regarding health risks.

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 Section 2.5-1, Section
2.5.3.2 and Table 2.5-2 in Chapter 2.5, Land Use and Planning. 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.

The solar modules are lightweight and surrounded by airflow both inside and outside the module. As a result, heat dissipates quickly from the solar panels. As described in Chapter 1.0, Project Description, of the Draft Program Environmental Impact Report (DPEIR), the normal operating temperature for solar modules is 20 degrees Celsius (°C; 68 degrees Fahrenheit (°F)) above ambient temperature; therefore, on a typical summer day at 40°C (104°F), the panel temperature would be approximately 60°C (140°F). When accounting for irradiance (a measure of solar radiation energy received on a given surface area in a given time), wind, and module type, it is expected that the peak module temperatures in the summer would be between 65°C and 70°C (149°F and 158°F), and the peak module temperatures in the winter would be between 35°C and 40°C (95°F and 104°F).

Although the solar panels would be hot to the touch as a result of solar energy absorption, solar panels
are designed to absorb light energy inwards towards the panel to produce electricity. As opposed to mirrors, which redirect the sun, solar modules use Fresnel lenses to concentrate sunlight inside the module to produce electricity; therefore, they would not noticeably affect the temperature of the surrounding area. Temperatures below the modules would be nearly the same as ambient temperatures in ordinary shade. Therefore, the solar panels would not pose an ignition risk.

Social and economic effects, such as impacts to property values are not an environmental issue and as such, the no changes to the environmental document are required as a result of this comment. See California Environmental Quality Act (CEQA) Guidelines Section 15064(e).

The County acknowledges the commenter’s concern related to groundwater supply. It has been determined that the Proposed Project would have a less than significant effect on groundwater supply. These issues were discussed in Section 3.1.9.3, Water, of the DPEIR. See also common response WR1.

The County acknowledges the commenter’s concern related to blasting and explosions. Blasting is not proposed or anticipated for the installation of solar panels. Posts to support the tracking arrays would be installed using a drill to bore a pilot hole, followed
by a vibratory driver. These shallow activities would not result in the collapse of wells in the region. Blasting may be used in limited instances for the installation of support poles for the Tierra del Sol gen-tie line. However, blasting would be prohibited within 1,700 feet of any existing structures and would require blasting permit issued by the County Sheriff’s Department. Noticing and structural assessment of structures in proximity of the proposed blast location would be required as part of the blasting permit processes.

I1-4 See the response to comment I1-1. The County disagrees that the panels would produce excessive heat that could pose a health risk to neighboring residents.

I1-5 This comment raises the issue that the Proposed Project may impede aerial firefighting. The DPEIR’s determination that the Proposed Project will not have a significant impact on aerial firefighting is substantiated by the analysis conducted in the DPEIR as well as confirmation by local fire agencies charged with providing aerial firefighting response. Wildfire response in San Diego County typically includes aerial attack with fixed-wing and/or rotary-wing aircraft that drop fire retardant in front of an encroaching fire. The presence of transmission lines, wind turbines, microwave and cell towers, and other vertical structures on the landscape has been previously
evaluated for impacts on aerial firefighting in recently certified environmental documents in the Proposed Project area. The presence of tall, vertical structures on the landscape was shown to have little overall effect on aerial firefighting. New features are subject to Federal Aviation Administration requirements and their locations are included in mapping used by the aerial fire attack aircraft. Typical fire operations include drops from 50 to 150 feet above ground surface from helicopters and from 150 to 500 feet above ground surface from fixed-wing aircraft, so the features proposed for the Proposed Project would not interfere or pose a threat of collision because they would be below this height. Therefore, the existence of the gen-tie transmission lines associated with the Proposed Project sites will not have an impact on aerial firefighting operations. Please refer to the response to comment I2-2.

Additionally, the comment raises concerns regarding future attainment of fire insurance. Social and economic effects of the Proposed Project are not an environmental issue, and as such, no changes to the environmental document are required as a result of this comment.

This comment raises concerns related to criminal activity and drug smuggling as a potential effect of reduced property values. This topic was not evaluated in the DPEIR since it is not related to environmental
impacts (see 14 CCR 15131). However, this comment letter is incorporated into the Final Program EIR and will be presented to the decision makers for their consideration during the hearing process for the Proposed Project.

References

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