Comment Letter I25

Hingtgen, Robert J

From: Donna Tisdale <tisdale.donna@gmail.com>
Sent: Saturday, March 01, 2014 11:06 PM
To: Hingtgen, Robert J
Subject: Soitec PEIR - Wind history comments
Attachments: Tisdale Soitec DPEIR wind history 3-1-4.pdf

FOR THE SOITEC SOLAR PEIR RECORD

Hello Robert,

Please include my attached comments and documentation for what I believe are PEIR underestimated wind events that will impact Soitec's days of operation, when winds exceed 35 mph, and will increase construction water use on 'wind days' over 15mph. I25-1

Living in the Tierra Del Sol area since the 1970's, and having friends who live in Campo, I can personally confirm that it is generally much windier here.

Donna Tisdale
619-766-4170

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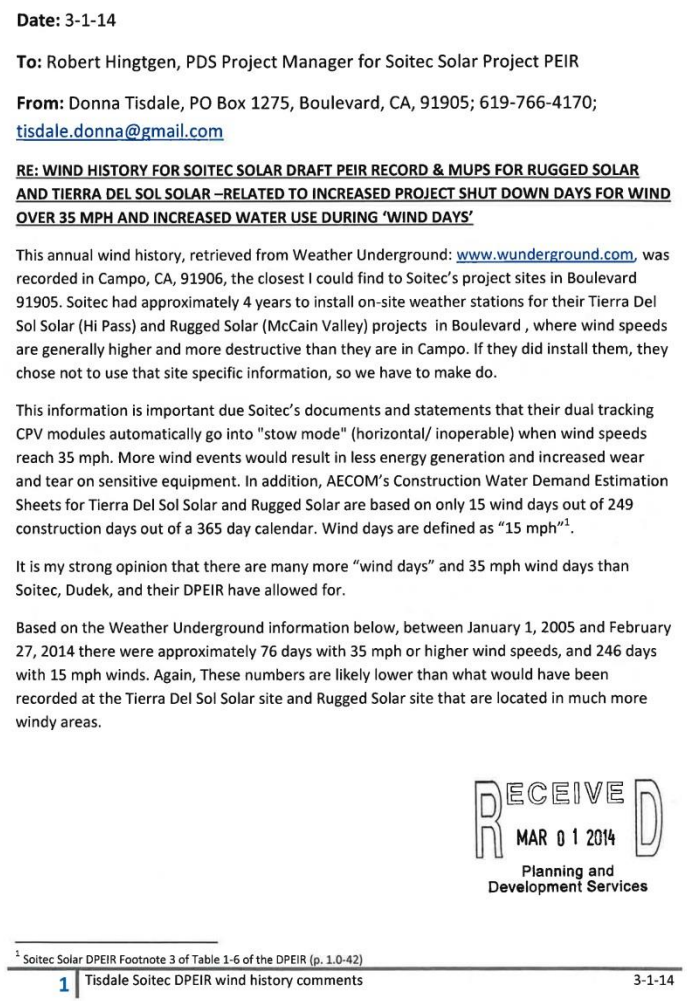
Response to Comment Letter I25

Donna Tisdale
March 1, 2014

I25-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The information in this comment letter will be in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.



Date: 3-1-14

To: Robert Hingtgen, PDS Project Manager for Soitec Solar Project PEIR

From: Donna Tisdale, PO Box 1275, Boulevard, CA, 91905; 619-766-4170; tisdale.donna@gmail.com

RE: WIND HISTORY FOR SOITEC SOLAR DRAFT PEIR RECORD & MUPS FOR RUGGED SOLAR AND TIERRA DEL SOL SOLAR –RELATED TO INCREASED PROJECT SHUT DOWN DAYS FOR WIND OVER 35 MPH AND INCREASED WATER USE DURING 'WIND DAYS'

This annual wind history, retrieved from Weather Underground: www.wunderground.com, was recorded in Campo, CA, 91906, the closest I could find to Soitec's project sites in Boulevard 91905. Soitec had approximately 4 years to install on-site weather stations for their Tierra Del Sol Solar (Hi Pass) and Rugged Solar (McCain Valley) projects in Boulevard , where wind speeds are generally higher and more destructive than they are in Campo. If they did install them, they chose not to use that site specific information, so we have to make do.

This information is important due Soitec's documents and statements that their dual tracking CPV modules automatically go into "stow mode" (horizontal/ inoperable) when wind speeds reach 35 mph. More wind events would result in less energy generation and increased wear and tear on sensitive equipment. In addition, AECOM's Construction Water Demand Estimation Sheets for Tierra Del Sol Solar and Rugged Solar are based on only 15 wind days out of 249 construction days out of a 365 day calendar. Wind days are defined as "15 mph"[1].

It is my strong opinion that there are many more "wind days" and 35 mph wind days than Soitec, Dudek, and their DPEIR have allowed for.

Based on the Weather Underground information below, between January 1, 2005 and February 27, 2014 there were approximately 76 days with 35 mph or higher wind speeds, and 246 days with 15 mph winds. Again, These numbers are likely lower than what would have been recorded at the Tierra Del Sol Solar site and Rugged Solar site that are located in much more windy areas.

I25-2

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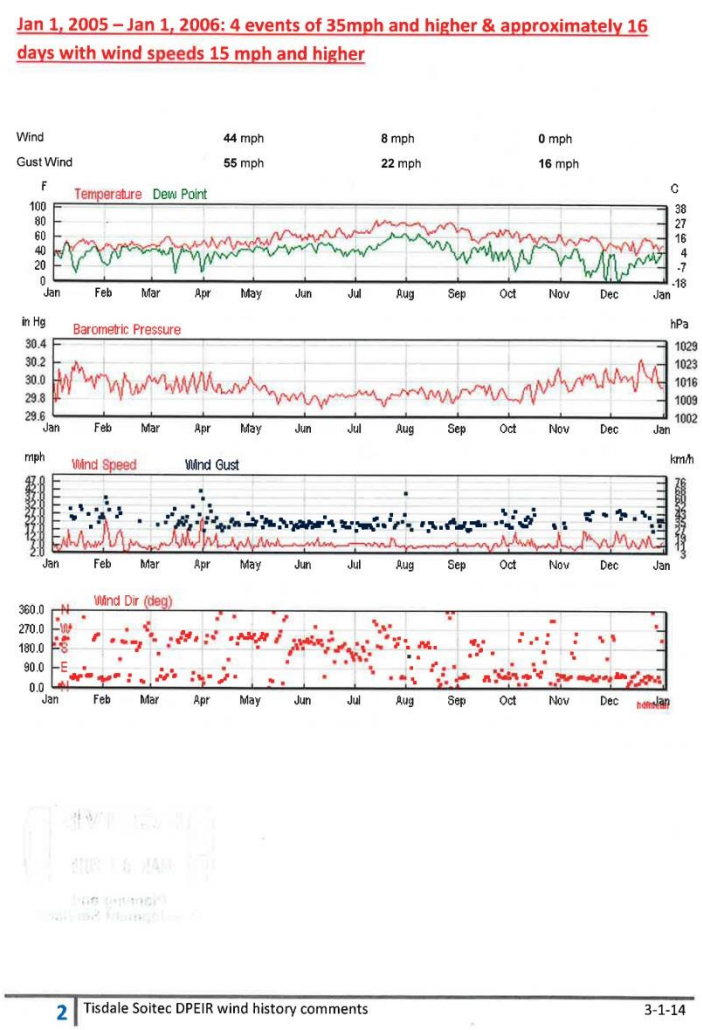
[1] Soitec Solar DPEIR Footnote 3 of Table 1-6 of the DPEIR (p. 1.0-42)

1 | Tisdale Soitec DPEIR wind history comments 3-1-14

I25-2 Wind data used to estimate water use for the Proposed Project was based on weather data from the Campo station (the closest station with available data for the Proposed Project site) for the year 2012. During 2012, 22 days were recorded with average wind speeds exceeding 15 miles per hour. The assumed wind days are not for an entire year, as the commenter suggests. The number of wind days was prorated for the actual number of construction days anticipated for Tierra del Sol and Rugged solar farms (249 days and 300 days, respectively), which resulted in an estimated 15 wind days for the construction period for Tierra del Sol and 18 wind days for the construction period for Rugged. In response to this comment and others regarding wind data, site-specific wind data has since been obtained from a proprietary source onsite. Compared to the data from the Campo station, a slight increase in the number of days with average wind speeds exceeding 15 miles per hour was identified in the site-specific data and as a result, the number of wind days during the construction period was increased by one, for a total of 16 wind days for Tierra del Sol and 19 wind days for Rugged. This has been reflected in revisions to the DPEIR; see Common Response WR1, Table 1 for further details. These changes and additions to the EIR provide new information that clarifies and amplifies information already found in the DPEIR, and do not raise important new issues



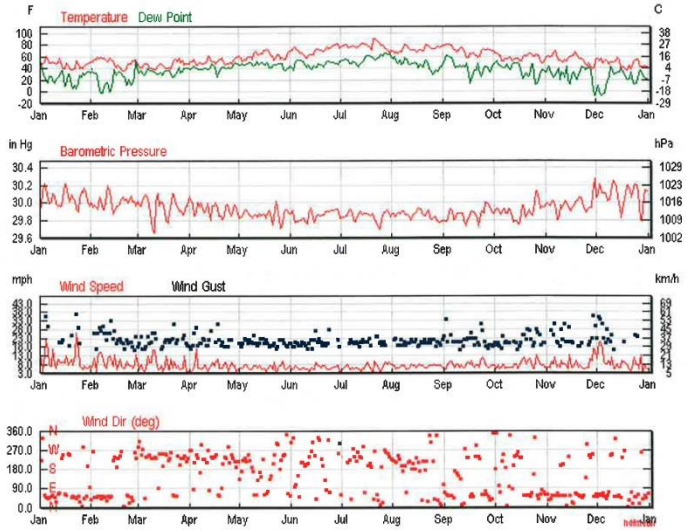
I25-3

about significant effects on the environment; therefore, such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines.

I25-3 The County appreciates the information provided by the commenter from Weather Underground. This information will be provided in the FPEIR for review and consideration by the decision makers.

Jan 2, 2006--Jan 1, 2007: 4 events of 35mph and higher & approximately 13 days with wind speeds 15mph and higher

Wind			
Wind	**46** mph	**8** mph	**0** mph
Gust Wind	**54** mph	**22** mph	**16** mph

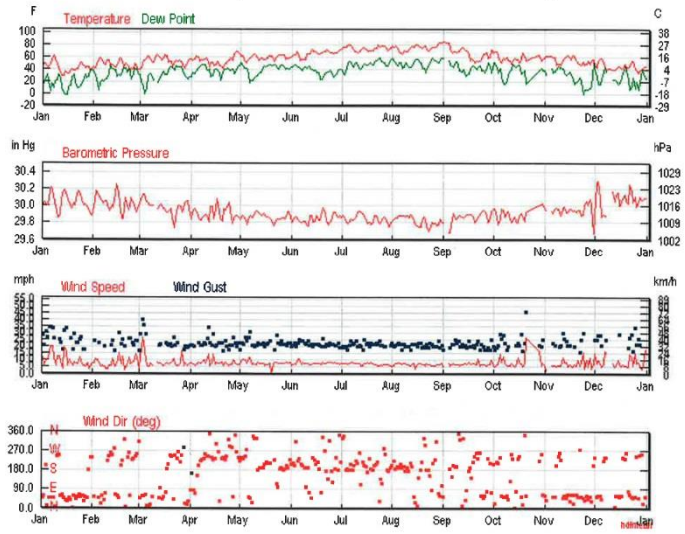


I25-3 Cont.

3 | Tisdale Soitec DPEIR wind history comments 3-1-14

Jan 1, 2007 to Jan 1, 2008:12 events of 35 mph and higher & approximately 26 days with wind speeds 15 mph and higher

Wind			
Wind	**46** mph	**8** mph	**0** mph
Gust Wind	**66** mph	**23** mph	**16** mph



4 | Tisdale Soitec DPEIR wind history comments 3-1-14

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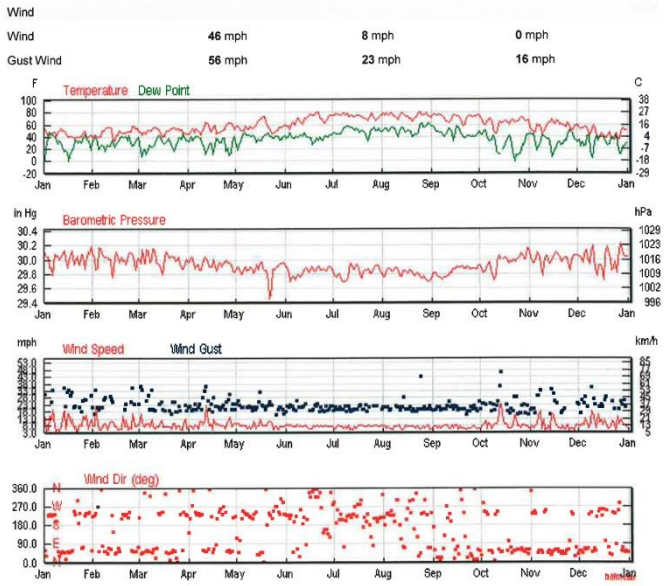
Jan 1, 2008 to Jan 1, 2009: 9 events of 35mph and higher & approximately 35 days with wind speeds 15 mph and higher



5 | Tisdale Soitec DPEIR wind history comments 3-1-14

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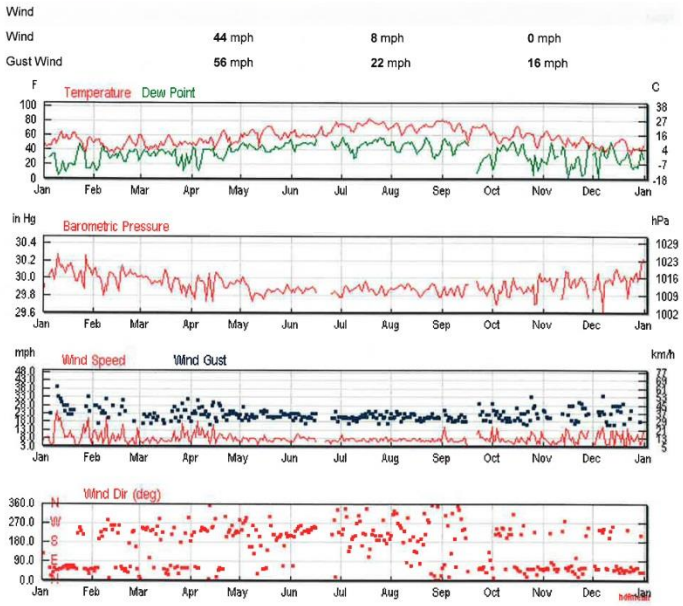
Jan 1, 2009 to Jan 1, 2010: 5 events of 35 mph and higher& approximately 11 days with wind speeds 15 mph and higher



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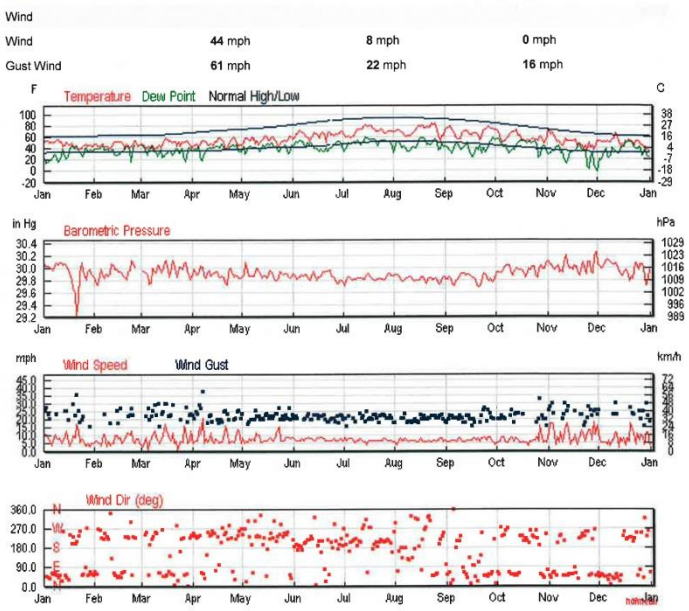
Jan 1, 2010 to Jan 1, 2011: 7 events of 35 mph and higher & approximately 37 days with wind speeds 15mph and higher



7 | Tisdale Soitec DPEIR wind history comments 3-1-14

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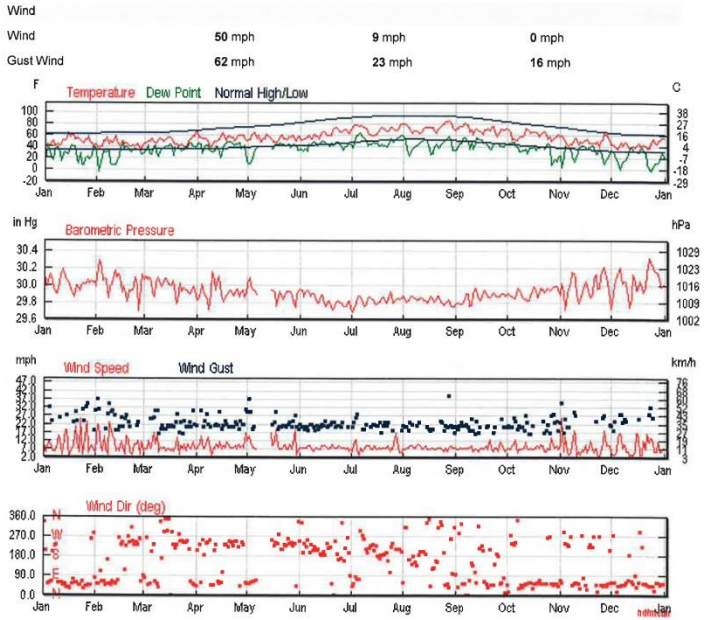
Jan 1, 2011 to Jan 1, 2012: 4 events of 35 mph and higher & approximately 44 days with wind speeds 15mph and higher



8 | Tisdale Soitec DPEIR wind history comments 3-1-14

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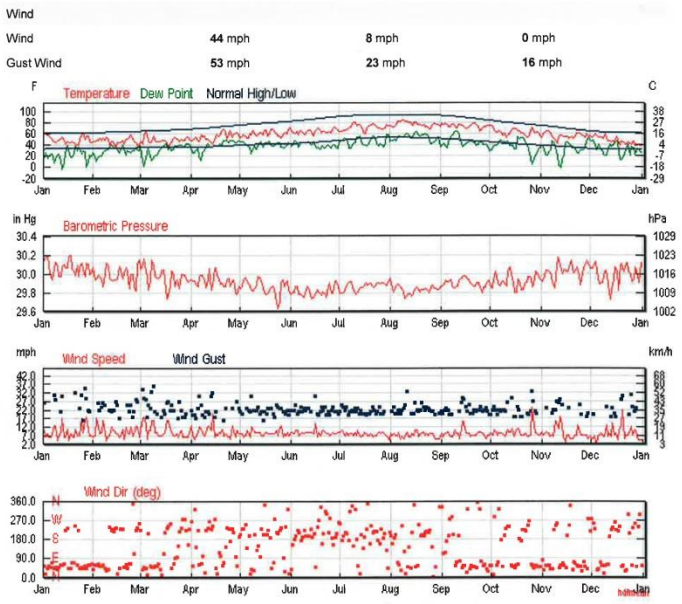
Jan 1, 2012 to Jan 1, 2013: 9 events of 35 mph and higher & approximately 17 days with wind speeds 15 mph and higher



9 | Tisdale Soitec DPEIR wind history comments 3-1-14

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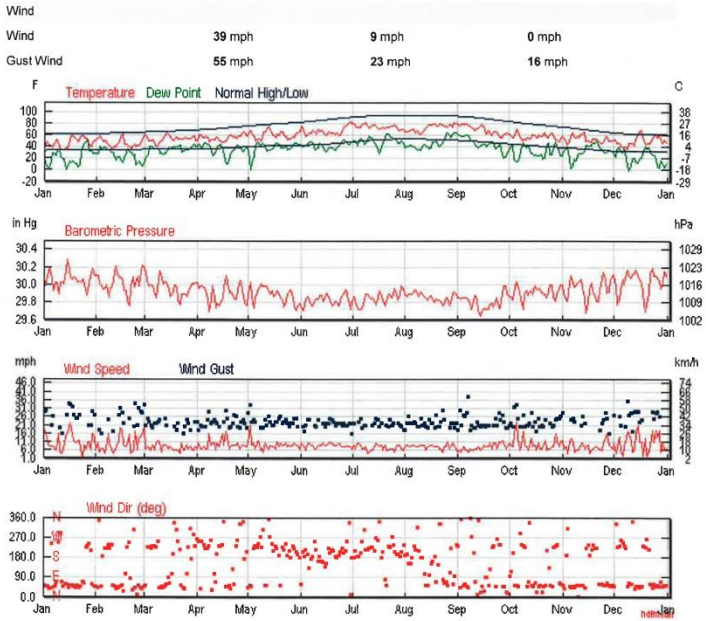
Jan 1, 2013 to Jan 1, 2014: 20 events of 35 mph and higher & approximately 37 days with wind speeds 15mph and higher



10 | Tisdale Soitec DPEIR wind history comments 3-1-14

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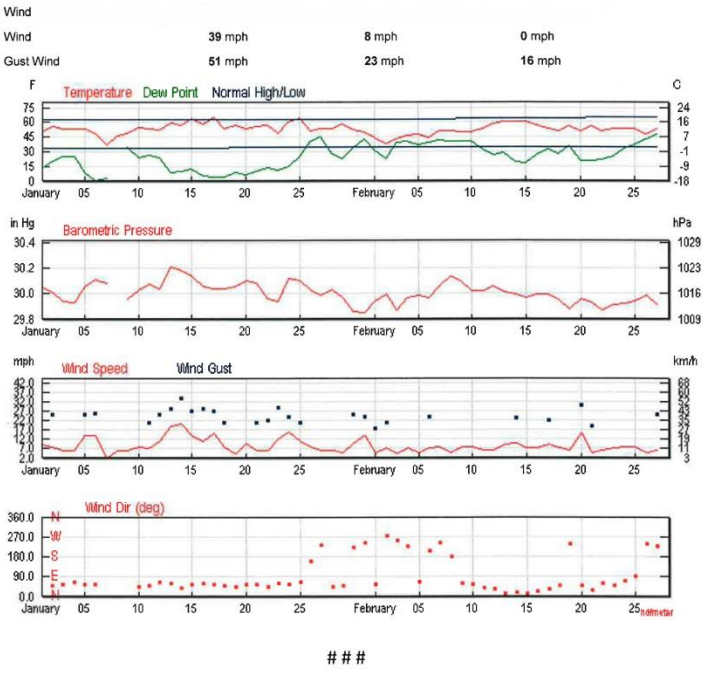
Jan 1, 2014 to Feb 27, 2014: 2 events of approximately 32 mph & approximately 10 days with wind speeds of 15 mph and higher



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