

Comment Letter I2

Hingtgen, Robert J

From: THEMIGHTYQ <themightyq@inbox.com>
Sent: Tuesday, January 14, 2014 10:20 AM
To: Hingtgen, Robert J
Subject: RE: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

RE: Soitec Solar in Boulevard,CA

Please submit this and consider it as my objection to the industrial "solar" businesses planned in Boulevard, Ca 91905.

Aesthetically they are completely out of place. They should not be implanted anywhere near country home sites in the mountains. The counter cliche argument that beauty is in the eye of the beholder is a canard. Yes some people think that a crucifix in a jar of urine is art. However, 99.9 percent do not believe that or that miles of solar panels look good in the majestic mountains.

I2-1

Boulevard is in a fire hazardous area. This is fact proven by history. Solar heat collecting devices should not be placed in this area obviously. Heat can cause water pipes in such systems to burst, conducting electricity. We don't have a fully staffed or equipped fire department. It is improbable that the fire personnel are trained in the special hazards of solar panel electrical fires. There are 215 firefighters injured each year in the U.S. due to electric shock responding to calls. Has there been research done or training of the firefighters regarding the potential of electrocution by these projects? Should the solar panels burst or become inflamed in our fire prone area, we have the additional hazard of falling glass, slippery surfaces, potential explosions and the increased risk of toxic vapors. Firefighters and the local residents should be provided with special respirators. The insurance costs to the residents become escalated. Have the particular solar products been tested in these large quantities in this type of climate and terrain?

I2-2

Industrial solar power also has and will require construction of many miles of new high voltage power transmission lines in order to optimize the connections into existing Power Grids. This further increases the fire hazards.

Recent articles have brought to light bird deaths due to miles of solar panel reflections drawing these creatures into the intense heat of the glass. Other wildlife are upset due to complete disruption of the natural surroundings.

I2-3

In addition to obstructing views, creating fire hazards and destroying habitats, large solar power projects take a toll on the area's scarce water supply. Mirrors and solar panels have to be washed, and some solar projects incorporate steam turbines, which require even more water. In addition, solar projects call for grading the land and sometimes spraying it with chemicals to inhibit dust or plant growth that can reduce the efficiency of solar panels. Also, materials in the panels likely contain toxins that could leak into groundwater, which is the only source of water in this community. There could be a five or ten year latency period before the toxins show up in the aquifers but by then it is too late.

I2-4

Sites that require huge amounts of land, and water, to generate solar electricity, further restrict any other type of development or use, including any recreational component.

I2-5

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Response to Comment Letter I2

Barrance Zakar
January 14, 2014

I2-1

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.

The County agrees that the Proposed Project would result in a significant and unavoidable impact to visual character and quality. See Chapter 2.1 of the Draft Program Environmental Impact Report (DPEIR) for a discussion of aesthetic impacts.

I2-2

The County acknowledges the commenter's concern with fire risk in the Boulevard area and fire hazards associated with the Proposed Project. The type of tracker proposed for the Proposed Project does not heat water or other fluids to produce energy, so the comment regarding water pipes in solar facilities is not applicable. The DPEIR is based on extensive analysis conducted in coordination with the fire agencies, including the San Diego County Fire Authority (SDCFA), the California Department of Forestry and Fire Protection (CalFire), and the San Diego Rural Fire Protection District, and is consistent with industry standards and procedures. As stated in the DPEIR Section 3.1.4.3.3, an increase in the

	<p>risk of wildland fire would occur on the site during construction and decommissioning where there is the largest amount of fuel on the site combined with increased activity and ignition sources. However, with implementation of a site-specific Construction Fire Prevention Plan that will be approved by the SDCFA and CalFire as described in the project design feature (PDF) PDF-HZ-2, as well as with implementation of PDF-TR-1 that would ensure safe access in the area during construction for emergency responders, impacts are anticipated to be less than significant during construction and decommissioning. Additionally, it should be noted that the Proposed Project would contribute funding toward local fire and emergency response capabilities to ensure that the increased demand for fire protection services from the Proposed Project will not result in a significant impact (see PDF-PS-1 in Section 3.1.7.3.1 of the DPEIR).</p> <p>Wildfires may occur in the area, but based on the available research and scientific principles applied to the risk evaluation presented in the DPEIR, would not be considered to have the ability to ignite the trackers, which would be set back from off-site, higher BTU producing wildland fuels. In addition, fuel modification would be provided throughout the facilities. Because of the low probability of a CPV tracker fire and for wildland fire would cause a CPV tracker to ignite, the potential generation of toxic</p>
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	<p>vapors is low. Further, in the unforeseen event that occurs, it would be limited in extent due to the non-combustibility of the CPV trackers, the spacing provided between adjacent CPV trackers, and the ability of on-site personnel and responding fire fighters to minimize fire spread through application of firefighting practices for energized facilities.</p> <p>The County generally agrees that the Proposed Project would introduce possible ignition sources. To reduce the risk of fire on the site and improve the effectiveness of an emergency response should a fire occur on site, site-specific Fire Protection Plans (FPPs) for the Tierra del Sol solar farm (Appendix 3.1.4-5 of the DPEIR) and the Rugged solar farm (Appendix 3.1.4-6 of the DPEIR) have been prepared, will be approved, and will be implemented. The FPPs were prepared by a County-approved California Environmental Quality Act (CEQA) consultant in accordance with the County's <i>Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection</i> (2010). As specified in the FPPs, adequate access will be provided to the solar sites and emergency personnel will be trained. As per PDF-HZ-3, similar site-specific FPPs would be prepared and approved by the SDCFA for the LanEast and LanWest solar farms prior to approval of a Major Use Permit. It should be reiterated however that permits are not currently being sought for the LanEast and LanWest solar farms.</p>
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	<p>With regard to electrical fires, please refer to the response to comment O10-82. With regard to response to fires associated with transmission lines, please refer to the response to comment I1-5.</p> <p>I2-3 The County acknowledges this comment. Potential impacts to avian species and other biological resources were considered and addressed in the DPEIR. As indicated in Chapter 2.3 of the DPEIR, glare and pseudo-lake effect from the trackers were deemed to be a low risk to avian movement and migration due to a number of factors, including array design, tracker design, and site location. In addition, mitigation measures such as M-BI-PP-10 and M-BI-PP-13 have been included to reduce impacts to avian species. Refer to Chapter 2.3 of the DPEIR for further details.</p> <p>I2-4 Steam turbines are not part of the tracker technology being proposed; therefore, water will not be required for wet-cooling. The commenter is referred to DPEIR Section 1.2.1.1 and Table 1-7 for a description of the sources and amount of water needed for operation of the Proposed Project, as well as Common Response WR1. The DPEIR has determined that the Proposed Project would have a less than significant impact on groundwater supply and groundwater quality (DPEIR Sections 3.1.5.3.3, 3.1.5.3.4). In response to the concern related to the possibility of toxicity associated with soil binding agents, it should be noted</p>
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	<p>that the proposed soil binding agent is a water-soluble, vinyl acetate/acrylic copolymer—an environmentally safe, non-hazardous material.</p> <p>As stated in Chapter 1.0, Project Description, in-place tracker washing would occur every 6 to 8 weeks during evening hours. The application of water to tracker panel surfaces (a closed system) as part of regular operations and maintenance would not degrade panel materials such that panel components would leach potentially hazardous materials such as soluble toxins that could affect or otherwise degrade groundwater resources.</p> <p>I2-5 The County acknowledges this comment however; the comment does not raise an environmental issue. It should be noted that the Proposed Project is consistent with the land use designation and zoning of the sites, provided a Major Use Permit and associated findings are approved for the Proposed Project. To the extent the commenter is concerned about the availability of recreational development and other land uses for the Proposed Project, the County found in DPEIR Section 3.2.1 that the Proposed Project would have a less than significant impact on park and recreational services. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.</p>
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<p>By and large local residents strongly oppose these project for health, safety, environmental, aesthetic, ethical and other reasons. The inhabitants should have the freedom to control the area in which they live and not have industrial blight dictated to them by outsiders, especially when the community plan has always called for an open natural country atmosphere. That's why we moved here. The negative impacts on property values will be in a direct ratio to the proximity to such totally out of place industrial businesses.</p> <p>There are serious doubts about whether solar is a sustainable industry rather than an unaffordable, infeasible initiative, dependent on subsidies and for the real purpose of promoting crony capitalism. The beneficiary "industrialists" and absentee land owners, i.e. the bag men then funnel a chunk of the money back to the politicians that approve such projects. If we had honest U.S. and California district attorneys, they would seriously investigate the corruption of this cabal that is obvious to the victims.</p> <p>Boulevard is not a wasteland but rather a beautiful mountainous rural scenic countryside with a night sky that you won't find in the city or near the industrialization that is planned by intruders.</p> <p>These projects if built should rather be placed in completely uninhabited areas. There are such places, as in only 5.2 percent of continental U.S. land is considered to be developed. Alternatively, they could be located next to the populations that would use most of the output, ideally in an already industrialized location. That would be a fair and reasonable way to handle it. Either bother nobody with it or molest only those that want industrial solar electric. Also, roof top point of use solar is a reasonable voluntary method (except for the forced co-payment by taxpayer subsidizers).</p> <p>To the the extent that the proposed disruptions to Boulevard are to solve the "global warming crisis," the battle is a complete nugatory mythological bugaboo. An elementary education reveals ice age cycles and melting of them prior to mankind. Cloud cover on any day can cause a temperature change of 5 degrees in minutes. Boulevard can have a 40 degree change in temperature within one day. An alleged projected change of 2 degrees in 100 years is speculative and irrelevant. To the extent that one location would allegedly suffer from such a change, another location would benefit. There is a reason why most of our Canadian neighbors live on their southern border. When Peking, Mexico City and Baja California, just across the border from Boulevard come close to solving their air pollution mess then we could take some additional action here; otherwise it would be a singular vain attempt to solve a global phenomena.</p> <p>The persons deciding on the proposed industrial projects should determine whether it would be appropriate to place them next to their own families homes. If the answer is no, then they should not abuse their power to the detriment of their neighbor's family. Have you read the bible or do you have fundamental ethics?</p> <p>Thank you for considering these matters.</p> <p>Very truly yours, Barrance Q Zakar Alpine & Boulevard, Ca.</p> <p>Inbox.com News Contact Us Privacy Policy Terms of Use Browser Requirements</p> <p>2</p>	<p>I2-6 The County acknowledges the commenter's opposition to the Proposed Project. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers. The comment does not raise an environmental issue. However, it should be noted that the Proposed Project is consistent with the land use designation and zoning of the sites, as well as the Boulevard Subregional Plan Area Community Plan (DPEIR Section 2.5.3.2).</p> <p>I2-7 The comment is acknowledged and will be included in the FPEIR for review and consideration by the decision makers. The comment does not raise an environmental issue.</p> <p>I2-8 The County acknowledges the commenter's preference for an alternate location for the Proposed Project in either completely uninhabited areas or near population centers that would purportedly use most of the Proposed Project's electrical output. The applicants have set forth in their development applications the proposed solar farm sites as the Proposed Project to be considered by the County and analyzed in the DPEIR. The County has an obligation under CEQA to analyze a range of reasonable alternatives to the Proposed Project or to the location of the Proposed Project that would both attain most of the objectives of the Proposed Project and avoid or substantially lessen any of the significant impacts of</p>
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	<p>the Proposed Project (14 CCR 15126.6(a)). An environmental impact report is only required to set forth a range of alternatives necessary to permit a reasoned choice (14 CCR 15126.6(f)). The County has met this standard by analyzing eight different alternatives to the Proposed Project, including different locations and the No Project Alternative (DPEIR, pp. 4.0-9 to 4.0-55). The applicants reviewed a number of different locations throughout the County and screened these locations for their ability to meet the Proposed Project objectives (DPEIR, p. 4.0-8). Siting the Proposed Project elsewhere in the continental United States, as the commenter suggests, would not meet most of the Proposed Project objectives, including creating solar energy in the San Diego basin to provide a source of local generation and improve reliability, siting solar facilities in areas within the County that have excellent solar attributes, and supporting the local economy through the creation of high-wage jobs (DPEIR, p. 1.0-1).</p> <p>The commenter points to rooftop solar as a reasonable voluntary method. The County's consideration of distributed generation as an alternative to the Proposed Project is found in Section 4.2 of the DPEIR. Please refer to common response ALT2 and the responses to comments O10-102 to O10-113 regarding the County's elimination of the distributed-generation alternative as infeasible.</p>
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	<p>I2-9 The DPEIR Section 3.1.3 analyzes the potential impacts from the Proposed Project’s greenhouse gas emissions in accordance with CEQA and the County’s Guidelines for Determining Significance and Report Format and Content Requirements - Climate Change. Related to the commenter’s statements regarding global warming, the comment is acknowledged and will be included in the FPEIR for review and consideration by the decision makers.</p> <p>I2-10 The comment is acknowledged and will be included in the FPEIR for review and consideration by the decision makers. The comment does not raise an environmental issue.</p> <p>References</p> <p>14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.</p> <p>County of San Diego. 2010. <i>Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection</i>. County of San Diego, Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. March 19, 2007; last updated August 31, 2010. http://www.sdcounty.ca.gov/pds/docs/Fire-Guidelines.pdf.</p>
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