

Comment Letter I60

Hingtgen, Robert J

From: Chris Noland <sdrockguy@hotmail.com>
Sent: Monday, March 03, 2014 8:45 PM
To: Hingtgen, Robert J
Cc: Donna Tisdale
Subject: SOITEC DPEIR comments

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Soitec Solar Development Program Impact Report, Log No. PDS2012-3910-120005 ER; 3800-12-010, GPA, Tierra Del Sol, 3300-12-010 MUP, 3600-12-005 REZ, 3921-77046-01, AP, Rugged Solar, 3300-12-00 MUP, SCH No. 201212108

Comments:

1. The project as presented completely industrializes the Boulevard area. Although presented as a "commercial" project, the scale of this project is excruciatingly large and will forever scar this rural area.
2. I would like to go on record and choose the "no project alternative". The document fails to identify any other alternatives that are outside of the Boulevard area. This represents a complete failure to identify areas in which SDG&E already use for such facilities such as the Imperial Valley.
3. For a project with this magnitude, the project proponents were allowed to perform groundwater studies using San Diego County's *Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego, 2007). Based on the reliance and significance of groundwater use in Boulevard, the County of San Diego had the latitude to require additional testing based on the size of these projects. Additional testing could have included isotope testing to determine age of groundwater withdrawn, tracer testing to assess groundwater flow patterns, packer testing to isolate different aquifer zones, slug testing, geophysical or acoustic borehole analysis, fracture analysis of wells to determine actual size and orientation of fractures, and additional observation wells that would allow for site specific drawdown analysis rather than relying on theoretical drawdown curves.
4. One basis for the reason that groundwater use for the Tierra del Sol site was considered a less than significant impact was based on the theoretical analysis of drawdown based on non-site specific values. A value of 19.9 feet was obtained as the maximum drawdown based on a well that was "approximately" 784 feet away. The value of 19.9 feet was deemed not significant. That value was based on assumptions and approximations; therefore, should be considered significant.
5. The volume of water anticipated to be needed at each site is based on a reference site that AECOM has identified as the model for each site. Based on the importance of groundwater for Boulevard and the obvious error encountered in water need by the same consultant (Dudek) for the Eco-substation project, the County of

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Response to Comment Letter I60

Chris Noland
March 3, 2014

I60-1

It has been determined that the Proposed Project would have aesthetic impacts, as analyzed in the DPEIR, Chapter 2.1, Aesthetics. See response to comment I17-5. In response to the commenters statement that the Proposed Project is a "commercial" project, please note that the Proposed Project is categorized by the County Zoning Ordinance as a "Civic Use Type" and, more specifically, as a "Major Impact Services and Utilities" land use.

I60-2

The County acknowledges the commenter's support for the No Project Alternative. The decision makers will consider all information in the 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.

In response to the commenter's statement that the DPEIR's range of alternative locations considered for the Proposed Project was too narrow or in violation of the California Environmental Quality Act (CEQA), see common response ALT1 and response to comment O10-7.

	<p>I60-3 The comment is acknowledged and will be included in the FPEIR for review and consideration by the decision makers.</p> <p>The <i>Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources</i> (County of San Diego 2007), were developed by a technical panel and the County Geologist. In addition, as described in the DPEIR, the County's Groundwater Ordinance (Ordinance No. 9826) establishes standards that discretionary projects must meet to be permitted. These rules and guidelines were developed not in spite of but <i>because</i> of the groundwater-dependent nature of so many parts of San Diego County.</p> <p>For example, as written in the County guidelines:</p> <p>“Since 1991, with the adoption of the Groundwater Ordinance and associated DPLU policy ‘County Standards for Site Specific Hydrogeologic Investigations,’ projects in fractured rock basins have been required to meet this 50% criterion. The 50% criterion was established to address the unique characteristics of the County fractured rock aquifers which are characterized by limited storage capacity and very limited groundwater recharge during droughts and excess recharge during wet periods.”</p>
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	<p>The types of studies suggested are not necessary to adequately evaluate the groundwater impacts of the Proposed Project against the County's significance thresholds. Aquifer tests performed at the Rugged and Tierra Del Sol sites included nearby wells that were monitored during testing which provided site-specific information for aquifer testing. See also common responses WR1 and WR2 and response to comment I38-48. The DPEIR includes summarized technical data pursuant to Section 15147 of the CEQA Guidelines, and provides sufficient material "to permit full assessment of significant environmental impacts by reviewing agencies and members of the public." Any reports associated with technical analysis were made available for public review.</p> <p>I60-4 The County acknowledges that the basis of the drawdown calculation of 19.9 feet of drawdown at the nearest residential well in the DPEIR, Section 3.1.5, was unclear. Therefore, the DPEIR has been edited to include the following language:</p> <p>"One of the conditions of the Major Use Permit for the Tierra del Sol Solar Farm to be required by the County is that the on-site well (Well B) will not be permitted to produce more than 18 acre-feet of water over the year-long construction period, with an additional limit of no more than 7 acre-feet over the first 90 days of construction. The well interference analysis results in a</p>
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	<p>projected drawdown of nearly 20 feet at residential wells RM-1 and RM-2 because the groundwater cap was imposed to avoid exceedance of County thresholds, per calculation of projected well interference using the Cooper-Jacob approximation of the Theis non-equilibrium flow equation. The analysis model for well interference used is reasonably conservative for several reasons: 1) it assumes no recharge, 2) it assumes a storage co-efficient of 0.001 (1×10^{-3}) and 3) it assumes that the shallow aquifer accessed by the nearest residential well is connected to the deep aquifer accessed by Well B (i.e., that the drawdown in the fractured rock aquifer results in equal drawdown in the alluvial aquifer).”</p> <p>These revisions to the DPEIR are presented in strikeout/<u>underline</u> format. The changes 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.</p> <p>The impact is considered less than significant for reasons further explained in the DPEIR, Section 3.1.5. As part of the Proposed Project, the applicant will implement a Groundwater Monitoring and Mitigation Plan (GMMP) in accordance with M-BI-PP-15. Implementation of the GMMP is a condition of the MUP.</p>
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<p>San Diego should have required the project proponent to attain site specific soil values for each site to refine actual water need for each site.</p> <p>6. The DPEIR is underestimates water demand. For both Rugged and Tierra del Sol, the construction water estimate fails to account for any water demand for many phases of Project construction, including constructing (1) substations, (2) operation and maintenance ("O&M") buildings, (3) the Tierra del Sol gen-tie, (4) the rock crushing facility, (5) undergrounded electrical equipment, (6) culverts, (7) draining, (8) fencing, and (9) foundations for anything besides CPV trackers such as invertors, transformers or poles.</p> <p>7. Based on the failure to use site specific values and analyses at all sites for water use estimation, it is in the best interest of the community and native flora and fauna of Boulevard to have all project water be imported.</p> <p>8. As a professional geologist licensed to practice in the State of California, I support the comments made by Dr. Victor Ponce in his white paper entitled IMPACTS OF SOITEC SOLAR PROJECTS ON BOULEVARD AND SURROUNDING COMMUNITIES, SAN DIEGO COUNTY, CALIFORNIA date November 15, 2013.</p> <p>9. The DPEIR fails to document cumulative effects of solar trackers in stowed or horizontal position and the amount of heat that can be dispersed to neighboring properties with differing wind speeds.</p> <p>10. Clearing and grubbing almost 1500 acres of land will effectively reduce amount of land available to both terrestrial and avian predators and will effectively chase rodents and other species onto neighboring properties that could have deleterious effects on their properties.</p> <p>11. As a member of the Boulevard Planning Group – I support the comments and responses made by that elected body for the DPEIR.</p> <p>12. Based on the deficiency of the DPEIR, I suggest re-issuance of a new DPEIR to address these and comments made by others.</p>	<p>I60-5 Please refer to common response WR1.</p> <p>I60-6 Please refer to common response WR1.</p> <p>I60-7 The comment is acknowledged and will be included in the FPEIR for review and consideration by the decision makers.</p> <p>I60-8 Please refer to common response WR2 and response to comment I10-1 and Appendix 9.0-2 of the DPEIR.</p> <p>I60-9 The County disagrees that the CPV trackers would disperse heat to neighboring properties. Although the CPV trackers would be hot to the touch as a result of solar energy absorption, the trackers are designed to absorb light energy inwards toward the panel to produce electricity. As opposed to mirrors, which redirect the sun, trackers use Fresnel lenses to concentrate sunlight inside the tracker to produce electricity; therefore, they would not noticeably affect the temperature of the surrounding area. Temperatures below the trackers would be nearly the same as ambient temperatures in ordinary shade. Ultimately, although the trackers do create heat due to dissipation of the heat in the solar modules, the trackers also create shade. The heat generated from the trackers is natural; without the presence of the trackers the heat would still be present, but less localized, and all the solar irradiance would be dissipated into heat in the environment. Therefore,</p>
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	<p>the trackers are not anticipated to cause a rise in temperatures at the site above what would otherwise occur without the Proposed Project, nor would wind disperse heat to neighboring properties. Also see response to comments I91-5 and I95-18.</p> <p>I60-10 Potential impacts related to the removal of vegetation as part of the Proposed Project were considered and addressed in Section 2.3, Biological Resources, of the DPEIR. Based on the environmental evaluation, it has been determined that the Proposed Project would have a less than significant impact to biological resources, including wildlife and vegetative communities, with the implementation of mitigation.</p> <p>I60-11 The County acknowledges the commenter's support of the comments made by the Boulevard Planning Group. In response to the commenters statement that the DPEIR is inadequate and/or deficient, the Proposed Project is in conformance with CEQA. The DPEIR evaluated the whole of the action and analyzed each environmental subject area with regard to potential adverse effects, as well as a reasonable range of alternatives. In addition, the DPEIR is consistent with the County's EIR Format and General Content Requirements, dated September 26, 2006.</p>
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	<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. 2006. <i>County of San Diego Environmental Impact Report Format and General Content Requirements</i>. County of San Diego Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. September 26, 2006.</p> <p>County of San Diego. 2007. <i>Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources</i>. County of San Diego, Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. March 19, 2007. http://www.sdcounty.ca.gov/pds/docs/Fire-Guidelines.pdf.</p> <p>County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.</p>
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