Response to Comment Letter I64

Barrance Zakar
February 13, 2014

I64-1

The commenter’s opposition to the Proposed Project is noted and will be included in the administrative record for review and consideration by the decision makers.

The commenter expresses concern regarding impacts to scenic vistas and prominent ridgelines resulting from operation of the Tierra del Sol solar farm. Potential impacts to scenic vistas are discussed in Section 2.1.3.1 of the Draft Program Environmental Impact Report (DPEIR). Section 2.1.3.1 states that while there are no designated or known valued focal points on Tierra Del Sol Road within the solar farm viewshed, relatively wide, expansive, and continuous views of the Proposed Project area are available from the roadway (such as from Key Views 1, 4, and 5). However, from these public viewing locations, trackers would display largely horizontal forms and lines, and the introduction of these features would not substantially obstruct, interrupt, or detract from existing available views. In addition, there are no recreational areas or designated scenic vistas or highways (including area roadways in the County of San Diego (County) Scenic Highway System) located within the viewshed of the Tierra del Sol solar farm. For the reasons discussed above and in Section
2.1.3.1 of the DPEIR, impacts to scenic vistas resulting from construction and operation of the Tierra del Sol solar farm were determined to be less than significant.

Views of the Tierra del Sol solar farm from Tierra Real Road will be substantially reduced due to intervening topography and/or vegetation. As shown on Figure 5 of Appendix 2.1-1 in the DPEIR, there are areas along Tierra Real Road where views of the solar farm would be present; however, the viewshed analysis does not consider the screening effects attributed to intervening vegetation. According to Section 2.3 of the DPEIR, chaparral communities in the Proposed Project area, including those referenced by the commenter as occurring between Tierra Real Road and the Tierra del Sol solar farm site, consist of shrubs that range from approximately 3- to 10-feet tall. While Tierra Real Road is located at a greater elevation than the Tierra del Sol solar farm site, the presence of intervening 3- to 10-foot-tall chaparral vegetation will reduce available views to the solar farm site from the road. Also, as stated in Section 2.1.1.2 of the DPEIR, while views from private residences are not required to be analyzed under the California Environmental Quality Act (CEQA), local residents experience views of the Tierra del Sol site from public viewpoints close to their homes from the transition from private driveways to Tierra Del Sol.
Road (a public street); therefore, residences were considered in the DPEIR aesthetics analysis.

The commenter states that natural features should be incorporated into the Proposed Project and that the only way this could be done is to relocate the Proposed Project to where no one lives. The County worked extensively with the Proposed Project applicants and fire agencies to develop measures for implementing landscaping and natural features on the solar farm sites that are sensitive to fire protection requirements while recognizing the need for screening. As indicated in the DPEIR Section 2.1 and Appendix 2.1-4, the proposed landscape screens (M-AE-PP-1) would break up the mass and scale of trackers, block views of trackers and other components from critical mobile and stationary viewpoints, and create visual interest to divert attention away from trackers. While the installation and maintenance of screening elements along the solar farm boundaries would partially screen views of trackers from passing motorists and local residents, the complete screening of views from public viewpoints to the proposed solar farms is not possible; therefore, the impact to visual character and quality of the community is significant and unmitigable. Chapter 4.0 of the DPEIR analyzes reduced project alternatives that further reduce impacts to visual character and quality; however, the impact is still found to be significant and unmitigable. Should the decision makers wish to adopt
the Proposed Project, a Statement of Overriding Considerations will be included in the record.

Related to the commenter’s concern regarding sufficient groundwater for the Proposed Project at its proposed location, the analysis determined that the Proposed Project would have a less than significant impact on groundwater supplies; see DPEIR Sections 3.1.5.3.4 (Groundwater) and 3.1.9.3.1 (Water). In addition, please refer to common response WR1 and WR2.

Locating a commercial solar farm within the boundary of a state park would conflict with the mission of the California Department of Parks and Recreation (DPR). The DPR aims to provide for the health, inspiration, and education of Californians by preserving the state’s extraordinary biological diversity, protecting valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. The National Park Service is managed according to a similar mission. Further, commercial solar projects are not permitted land uses within state or national parks.

The comment regarding devaluation of property due to the presence of the solar farm is noted and will be included in the administrative record for review and consideration by the County decision makers. This comment does not raise an environmental issue and as such, is not evaluated in the DPEIR.
This comment raises concerns related to vandalism and illegal trespassing. The Proposed Project sites would be fenced according to National Electrical Safety Code requirements for protective arrangements in electric supply stations and would include remote-monitored infrared cameras and alarm systems and motion-sensor perimeter and safety lighting. These security measures are anticipated to deter trespassing on the sites. The potential for other hazards are considered and discussed in Section 3.1.4 of the DPEIR. In addition, the County analyzed the potential effects of the Proposed Project on groundwater quality and found that there would be a less than significant impact (DPEIR Section 3.1.5.3.3).

With regard to the potential for toxic vapors, see the response to comment O10-83. Also see response to comment I57-5 for details of the analysis related to herbicides.

As described in Section 1.2.1.1 of the DPEIR and further clarified in the response to comment I1-1, heat from the solar panels dissipates quickly and would not affect ambient air temperatures. Based on the analysis, it has been determined that the panels would not produce excessive heat that could pose a health risk to neighboring residents, vegetation, or wildlife around the Proposed Project sites. Please also refer to the response to comment C3-4 regarding the DPEIR’s analysis of risks associated with fire.
The commenter’s reference to Soitec’s solvency and financial stability does not raise an environmental issue for which a response is required. The project would be conditioned to post a surety to ensure the decommissioning of the site upon the project’s conclusion (DPEIR Section 1.2.1.1 Removal Surety).

References

County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.
pollution more then we could take some additional action here; otherwise it would be a
singular vain attempt to solve a global problem.

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?

Thank you for considering these matters.

Very truly yours,
Barbara Q. Zavitz
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