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 disagrees with assertions made by the commenter that the DPEIR is biased and lacks integrity. As noted in responses to more specific comments, the County has conducted an independent review of the DPEIR and related technical studies and has found them to be thorough and accurate, and completed in an objective manner.

The County is the lead agency for the project under the California Environmental Quality Act (CEQA), and as such is responsible for all content and technical analysis in the DPEIR. Accordingly, the County’s process for receiving and considering technical information provided by the applicants and their consultants includes a rigorous review by County staff, and certification by the applicants and consultants that the technical studies and the DPEIR utilize accurate and verifiable field techniques and professional work performance standards. Moreover,
the County requires certification that the DPEIR and technical studies are in conformance with all applicable CEQA requirements and all applicable County, state, and federal rules, regulations, and laws, and are prepared pursuant to direction from the County and in response to all comments by the County.

**166-2**

Issues raised in this comment were considered and addressed in the DPEIR. See Section 3.1.5 for a discussion of potential impacts to groundwater. Please also refer to common response WR1. Based on the environmental analysis, it has been determined that the Proposed Project would have a less than significant impact on groundwater supply. Private wells in the vicinity of the Proposed Project will not be significantly affected since the Proposed Project’s groundwater usage will be capped within County thresholds under the Major Use Permit to prevent potential drawdown of adjacent wells. As such, it is not anticipated that there will be significant impacts to wells of neighboring residents as a result of the Proposed Project.

The County generally agrees that the Proposed Project would introduce possible ignition sources. Additionally, the equipment on the sites presents a potential challenge to firefighters due to accessibility issues around the solar equipment and a lack of training and experience in firefighting where such equipment exists. 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 Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection, dated August 31, 2010. As per project design feature PDF-HZ-3, similar site-specific FPPs will be prepared and approved by the San Diego County Fire Authority for the LanEast and LanWest solar farms prior to approval of a Major Use Permit.

Related to the commenter’s concern regarding the risk of wildfire, please refer to the responses to comments O10-82 and O10-83.

Issues raised in this comment were considered and addressed in the DPEIR. See Section 2.3 for a discussion of potential impacts to wildlife. The DPEIR determined that the Proposed Project would have a less than significant impact on biological resources, including direct and indirect impacts to wildlife, with the implementation of proposed mitigation.
Issues raised in this comment are not inconsistent with the existing content of the DPEIR. Potential indirect impacts to biological resources resulting from the application of herbicides are addressed in Section 2.3.3. The County has found that the Proposed Project would have a less than significant impact on biological resources with the implementation of mitigation. As discussed in Section 3.1.5.3, any potential threat to groundwater quality as a result of construction, operation, and maintenance of the Proposed Project sites would be addressed with a stormwater pollution prevention plan during construction and a stormwater management plan during the operating life of the Proposed Project. As such, the Proposed Project would have a less than significant impact on groundwater quality. Also see response to comment I57-5.

The County acknowledges the commenter’s concern regarding the visual character and quality of Boulevard. The DPEIR found that the Project would have significant and unavoidable impacts on visual character and quality (DPEIR Section 2.1.7). All feasible mitigation identified in the DPEIR will be implemented in an effort to mitigate this impact to below a level of significance (see response to comment I17-5). The decision makers will consider all information in the FPEIR and related documents before making a decision on the Project.

The County acknowledges the commenter’s preference for solar panels to be located on urban
Our roads were not made for the traffic and activity that this project would bring. We’ve got narrow, 2-lane roads that were designed for a rural way of life, not for tankers, trucks, and tractors. In an attempt to avoid the construction areas, residents will detour using unmaintained dirt roads like mine, Moon Valley Road, creating massive clouds of dust and traffic right in front of my home.

At the community meeting on February 9th, it was brought to everyone’s attention that the EIR failed to address many issues and excluded several water usage needs, which leaves the water need grossly underestimated. The report needs to be discarded, and a new one obtained by an unbiased, unrelated third party. It is completely unacceptable that the County did not catch these serious omissions. The majority of the impacts listed in the County’s presentation were noted as “significant and unavoidable.” This just tells me that the County does not care about Boulevard or its residents.

The proposed “solutions” to the significant and unavoidable impacts are simply unrealistic.

I support Alternative #9 – NO PROJECT.

Please help us defend our land. This is a serious project, not merely a lemonade stand being put up on the corner. SD County needs to take it seriously and consider how it will effect the small town of Boulevard and its residents and inhabitants.

Kara Bush
38211 Moon Valley Rd
Boulevard, CA 91905

Issues raised in this comment were considered and addressed in the DPEIR. See Chapter 3.1.8, Transportation and Traffic. The County disagrees that the local roads that would be utilized for the Proposed Project were not designed for the operation of construction vehicles. Potential traffic hazards during construction were analyzed in DPEIR Section 3.1.8.3. The County found that the Proposed Project would have a less than significant impact related to traffic, including traffic hazards. Project design features, such as a traffic control plan and notification of residents would ensure that the Proposed Project would not create local driving hazards (see PDF-TR-1). Whether residents would choose to detour through unmaintained dirt roads is speculative.

Impacts related to dust resulting from construction vehicles were considered and addressed in Section 2.2 of the DPEIR and PDF-AQ-1, which incorporates measures to minimize fugitive dust.

County has reviewed the estimates for construction and operational water demands and has made revisions and clarifications which has resulted in an increase in construction water demand. See common response WR1. As discussed in common response WR1, the changes made to the Proposed Project’s water demand

rooftops. Please refer to common response ALT2 regarding the County’s consideration of a distributed generation alternative.
are an insignificant modification that do not raise important new issues about significant effects on the environment (14 CCR 15088.5(b)). The DPEIR has found the Proposed Project would have a less than significant impact on groundwater resources. A number of significant, unavoidable impacts (i.e., certain aesthetic, air quality, and land use impacts) were identified in the DPEIR. All feasible mitigation measures were identified and have been incorporated, yet impacts may still remain significant and unavoidable. Should the decision makers wish to adopt the Proposed Project, a Statement of Overriding Considerations will be included in the record.

With regards to significant and unavoidable impacts, all feasible mitigation identified in the DPEIR will be implemented to reduce such impacts to less than significant. Nevertheless, some impacts will remain significant and unavoidable.

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.