

Comment Letter I66

Hingtgen, Robert J

From: karajbush@gmail.com
Sent: Thursday, February 13, 2014 8:22 AM
To: Hingtgen, Robert J
Subject: COMMENTS: PDS2012-3910-120005, Soitec Solar Development Draft PEIR

To Whom It May Concern:

I am writing to you in opposition of the gigantic solar farm project proposed by Soitec Solar in Boulevard. My home is less than a quarter mile from the Tierra Del Sol site; however, I am opposed to the entire project (all sites), for many reasons.

- I do not trust the integrity of the environmental report. SD County representatives stated that the data they received for the EIR was provided by Soitec. Such data should always be studied and obtained by an unbiased, unrelated third party. This is a very basic standard in the business world.
- My home is within the range of homes whose wells will be effected. My well is 1,000 feet deep and draws only 1.5 gallons per minute, which is extremely low. I will have zero water. We are already in a serious drought, with NO measurable rain this season. Not only do we need water to survive, we need water available to firefighters this summer to defend our homes against the inevitable wildfires. This is aside from the fact that these solar panels could be the SOURCE of fire as well.
- Many wildlife will be displaced, and worse, injured or killed by the clearing of the proposed areas. There are many creatures living underground here, who are often forgotten. These include rabbits, squirrels, toads, frogs, lizards, horny toads, and other borroughing animals. This is in addition to the wildlife that IS visible – owls, vultures, hawks, songbirds, coyotes, bobcats, wolves, etc. They will be displaced and scared, running across roads with increased traffic, and will have no choice but to come closer to our homes.
- The application of herbicides is a major concern, not only for the wildlife (e.g.: frogs and toads “drink” through their skin by absorption and will die from contact with chemicals), but for our underground water quality.
- Boulevard is backcountry. People live here because of the rural way of life... small town, no traffic, no pollution, beautiful night skies, and nature. These solar farms will completely change the visual character and quality Boulevard. Solar panels belong on roofs, in the city, where electricity is in demand. Not out in whatever natural, virgin land is left.

Response to Comment Letter I66

Kara Bush
February 13, 2014

I66-1

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 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,

	<p>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.</p> <p>I66-2 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.</p> <p>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</p>
--	--

	<p>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>, 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.</p> <p>Related to the commenter's concern regarding the risk of wildfire, please refer to the responses to comments O10-82 and O10-83.</p> <p>I66-3 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.</p>
--	---

	<p>I66-4 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.</p> <p>I66-5 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.</p> <p>The County acknowledges the commenter's preference for solar panels to be located on urban</p>
--	---

<ul style="list-style-type: none"> • 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. <p>I66-6</p> <ul style="list-style-type: none"> • At the community meeting on February 6th, 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. <p>I66-7</p> <ul style="list-style-type: none"> • The proposed "solutions" to the significant and unavoidable impacts are simply unrealistic. <p>I66-8</p> <ul style="list-style-type: none"> • I support Alternative #9 – NO PROJECT. <p>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.</p> <p>Kara Bush 38211 Moon Valley Rd Boulevard, CA 91905</p>	<p>rooftops. Please refer to common response ALT2 regarding the County's consideration of a distributed generation alternative.</p> <p>I66-6</p> <p>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.</p> <p>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.</p> <p>I66-7</p> <p>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</p>
---	---

	<p>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.</p> <p>I66-8 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</p> <p>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.</p>
--	---