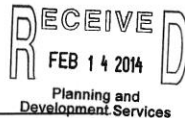


02/14/2014 08:37 FAX

Comment Letter I71

001

PINNEY, CALDWELL & PACE, A.P.C.
A PROFESSIONAL CORPORATION
444 South 8th Street, Ste A – P.O. Box 710
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Tel: (760) 352-7800 Fax: (760) 352-7809



Facsimile Transmittal Cover Sheet

Date: February 14, 2014 **-3- PAGES INCLUDING COVER SHEET**

To: Robert Hingtgen
County of San Diego
Department of Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

FAX: (858) 694-2485


From: Elva Weakley, Trustee of the Walapai Trust / Walapai Properties Retirement Plan Trust

Subject: Written Comment Form for Soltec Solar Development Program Environmental Impact Report

Attached is the Written Comment Form (objections) to the Soltec Solar Development Program Environmental Impact Report as made on behalf of Elva Weakley, Trustee who owns the real properties located at 2782 Ribbonwood Road (80 acres) and Ribbonwood Road and Opalocka Road (10 acres), in Boulevard, CA.

If you have any questions in regards to this, please call Clifford C. Caldwell at (760) 352-7800.

Thank you.


Clifford C. Caldwell, attorney for Elva Weakley, Trustee

The transmission of information and any documents accompanying it may contain confidential information and is intended only for the designated recipient(s). If you have received this information in error, any review, dissemination, distribution or copying of this information is strictly prohibited. Please notify us immediately by telephone if this has been received in error. Thank you.

I71-1

Response to Comment Letter I71

Elva Weakley, Trustee of Walapai Trust
February 14, 2014

I71-1

This comment is introductory in nature and does not raise an environmental issue for which a response is required.

02/14/2014 06:37 FAX

002

**SOITEC SOLAR DEVELOPMENT
PROGRAM ENVIRONMENTAL IMPACT REPORT**

3800 12-010 (GPA); Tierra Del Sol, 3300 12-010 (MUP), 3600 12-005 (REZ),
3921 77-046-01 (AP); Rugged Solar, 3300 12-007 (MUP);
ENVIRONMENTAL LOG NO.: 3910 120005 (ER)

PUBLIC REVIEW PERIOD
January 2, 2014 through February 17, 2014

PUBLIC REVIEW COMMENT SHEET

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 110
SAN DIEGO, CA 92123

WRITTEN COMMENT FORM

Elva Weakley, Trustee of the Walapai Trust / Walapai Properties Retirement
Plan Trust, strongly objects to the Soltec Solar Development Project(s)
that are directly to the west of her properties located at 2782 Ribbonwood
Road (80 acres) and located at Ribbonwood and Opalocka Road (10 acres) in
Boulevard, CA. Her properties directly face the proposed Rugged Solar Project.
Elva Weakley is concerned about the aesthetics, air quality, water quality,
water use and the negative effect of said projects on her property. The

property has a natural spring on the southern portion of said property that
has supported the local wildlife over the years. (*continued on next page)
(Attach additional pages as needed)

Clifford C. Caldwell, Attorney
For Elva Weakley 02/14/2014
Signature Date
Elva Weakley, Trustee by Clifford
C. Caldwell, her attorney
Print Name

MAIL, FAX or E-MAIL FORMS TO:

Robert Hingtgen
County of San Diego
Department of Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123
FAX #: (619) 684-2485
e-mail: robert.hingtgen@sdcounty.ca.gov

c/o P. O. Box 710
Address
El Centro, CA 92244
City State Zip Code
(760) 352-7800
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, FEBRUARY 17, 2014

I71-2

The County of San Diego (County) acknowledges the commenter's opposition to the Proposed Project. The information in this comment will be in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.

This comment raises concerns related to aesthetics, air quality, water quality, water use, and wildlife. These issues are considered and discussed in Sections 2.1, Aesthetics, 2.2, Air Quality, 3.1.5.3, Surface Water and Groundwater Quality, 3.1.5.3, Groundwater Resources, 3.1.9.3, Water, and 2.3.3, Biological Resources of the Draft Program Environmental Impact Report (DPEIR). Please also refer to common response WR1 related to water use. The County has found that the Proposed Project would have a less than significant impact on groundwater resources and quality. The County acknowledges that the Proposed Project would have certain significant and unavoidable impacts related to aesthetics and air quality. The County has proposed all feasible mitigation in an effort to mitigate these impacts to below a level of significance.

<p>02/14/2014 08:37 FAX</p> <p style="text-align: right;">003</p> <p><u>*ATTACHMENT TO WRITTEN COMMENT FORM FOR SOLETEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT (PAGE 2 -CONTINUED...)</u> <u>[Elva Weakley, Trustee, Owner of the real properties located at 2782 (80 acres) and Ribbonwood and Opalocka Road (10 acres) in Boulevard, CA.]</u></p> <p><u>Elva Weakley is extremely concerned about the large quantities of water being used and the reduction of the local aquifers that support the fragile environment in the area. Elva Weakley believes that her properties will be severely impacted by the aesthetics and visual impacts of the projects, including possible reflections from the Concentrated Photovoltaic (CPV) trackers. The Rugged Solar Project alone, involves over one square mile of CPV trackers near her properties to the north of the freeway.</u></p> <p><u>Elva Weakley also objects to each of the related projects (Tierra del Sol Solar Farm, Rugged Solar Farm, LanEast Solar Farm, LanWest Solar Farm and their supporting infrastructure projects) and the similar adverse effects that they will have over the rest of the Boulevard area. One of the most adverse effects is the direct negative impact on the "value" of her adjacent properties.</u></p> <p><u>Elva Weakley supports and endorses the well-documented opposition and objections to the Soltec Solar Development Projects as stated by and/or filed by the Boulevard Planning Group, Backcountry Against Dumps, and/or The Protect Our Communities Foundation.</u></p>	<p>I71-3 See the response to comment I71-2. Related to specific concerns regarding local aquifers, the County will place conditions on the Major Use Permit that will restrict the amount of water that is permitted to be withdrawn from on-site wells, which would ensure that the Project will not interfere with neighboring wells or local aquifer levels, in general. The Project would also have a less than significant impact on biological resources with the implementation of proposed mitigation. To mitigate potential impacts to groundwater dependent habitat and vegetation, mitigation measure M-BI-PP-15 will require the implementation of groundwater monitoring. Related to the commenter's concern about possible reflections from the Rugged project, a glare study was conducted for this proposed solar farm (see DPEIR Appendix 2.1-3).</p> <p>As stated in Section 3.1, Identify Potential Glare Issues, the glare study identified residences within one-mile of each of the proposed Project's solar equipment as having potential to receive glare. Five residential locations located directly west of the Rugged Solar LLC Project were identified as having potential to receive glare. Residences located west of McCain Valley Road (the residence at 2782 Ribbonwood Road is located west of McCain Valley Road) were not identified as having potential to receive glare (see Appendix 2.1-3, Boulevard Glare Study). In addition, residences located adjacent to the intersection of Ribbonwood Road and Opalocka Road were not</p>
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	<p>identified in the Glare Study as having potential to receive glare. The glare study did determine that an approximate 0.5-mile segment of McCain Valley Road south of Opalocka Road would be exposed to glare throughout the year with daily duration not to exceed forty minutes (see Appendix 2.13).</p> <p>I71-4 This comment raises concerns regarding property values. This topic was not evaluated in the DPEIR since it is not related to environmental impacts (see 14 CCR 15131). However, this information will be in the FPEIR for review and consideration by the decision makers.</p> <p>The County acknowledges the commenter's opposition to the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.</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>
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