



Comment Letter O16

Response to Comment Letter O16

Boulevard Residents Group

York Heimerdinger

March 4, 2014

O16-1

The County of San Diego (County) does not agree that the Draft Program Environmental Impact Report (DPEIR) does not comply with the California Environmental Quality Act (CEQA). 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. Per Section 15126.6 of the CEQA Guidelines (14 CCR 15000 et seq.), an EIR need not consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. As suggested by the commenter, a distributed-generation solar alternative was considered by the County, but was rejected as infeasible for the reasons stated in Section 4.2 of the DPEIR.

O16-2

The County acknowledges the commenter's support for the No Project Alternative. The decision makers will consider all information in the Final Program EIR (FPEIR) and related documents before making a decision on the project. The information in this comment will be provided in the FPEIR for review and consideration by the decision makers.

RECEIVED
MAR 04 2014
PDS DIRECTORS OFFICE - MARK WARDLAW
TO: COUNTY PLANNER DIRECTOR - ROBERT HINGSTEN
RE: PROPOSED SOTEC SOLAR "RUGGED" SECTION BOULEVARD

WE AS LOCAL BOULEVARD AREA RESIDENTS ALSO CONCLUDE THAT THE SOTEC DRAFT EIR DOES NOT COMPLY WITH CEQA. IT FAILS TO ANALYZE ALTERNATIVES SUCH AS PRODUCING THE SAME POWER AMOUNT USING ROOFTOP SOLAR. WE ASK THAT YOU DELAY THIS PROJECT UNTIL AN ADEQUATE EIR THAT COMPLIES WITH CEQA IS PREPARED.

WE AS LOCAL BOULEVARD AREA RESIDENTS AND REAL ESTATE OWNERS RECOMMEND THAT THE COUNTY OF SD SELECT THE "NO PROJECT" ALTERNATIVE FOR THE SOTEC PROPOSAL DUE TO NEGATIVE IMPACTS TO THE GROUNDWATER IN THE JACUNGA/BOULEVARD REGION AS WELL AS DOWNSTREAM.

WE AS LOCAL BOULEVARD AREA RESIDENTS OPPOSE THE "FAST TRACKING" OF THE ENERGY PROJECT ON PRIVATE AND PUBLIC LANDS.

- HOW MANY POUNDS OF STEEL WILL THIS PROJECT BE ALLOWED TO POUR INTO OUR SOIL/GROUND WATER SHED^{AS} VEHICLE METAL MASTS TO HOLD THESE PANELS?
- WHEN THE METAL MAST POLES CRUMBLE INTO THE MCCAIN VALLEY AQUIFER OVER TIME, HOW WILL THE FUTURE WATER QUALITY OF THIS PREVIOUS AQUIFER BE AFFECTED? STUDIES REQUESTED IN DETAIL
- HOW DOES SOTEC INTEND TO MITIGATE THE DEGRADATION OF LOCAL QUALITY OF WATER IN THE PROJECT^{AREA} ADJACENT RESIDENTS RESIDENTIAL WATER WELLS?
- WHY WOULD YOU ALLOW THE "FAST TRACKING" OF THE "RUGGED" PROJECT ON PRIVATE LANDS?

BOULEVARD RESIDENTS GROUP

	The Proposed Project is being processed pursuant to AB900 (PRC §21178 – 21189.3). This project is identified as a “Leadership Project” and streamlining is allowed if certain criteria are met (PRC §21183). The Proposed Project has been certified pursuant to AB900. Streamlining pursuant to AB900 does not reduce any environmental or planning requirements, and the Proposed Project is subject to all applicable laws and regulations. O16-3 Please refer to Table 1-1 of the DPEIR for the number of tracker masts proposed; the exact pounds of steel is a project detail that is beyond the scope of CEQA to provide. O16-4 Please refer to DPEIR Section 3.1.5.3.3, which provides an analysis of impacts to surface water and groundwater quality. Tracker masts are designed and maintained to be rust-free. Regardless, tracker masts—even if rusty—would not contribute to water quality problems, either in surface water or groundwater. As discussed in Chapter 1.0, all materials on site would be dismantled, removed, and disposed of at an authorized facility upon site decommissioning. O16-5 Please refer to DPEIR Section 3.1.5.3.3, which discusses the various best management practices used to minimize potential adverse effects on water quality.
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	O16-6 The County disagrees with the commenter’s assertion that it has allowed the “fast tracking” of the Proposed Project. The commenter is referred to the response to comment O16-2. References 14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended. 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. County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.
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