Gungle, Ashley

From: York Heimerdinger <york@bluewestsolutions.com>
Sent: Sunday, January 11, 2015 6:35 PM
To: Gungle, Ashley
Cc: 'Donna Tisdale'; andrew@bluewestsolutions.com; york@bluewestsolutions.com
Subject: Additional Comments - County of San Diego Final PEIR for Soitec Solar's Boulevard Projects
Attachments: Rugged Project EIR Review.docx

Ashley Gungle
County of San Diego/ Department of Planning and Development
5510 Overland Ave., St 310
San Diego, CA 92123

Thank you for attending the meeting in Boulevard on Thursday January 8th. in Boulevard.

During this meeting as Jim Bennett concluded his presentation at the planning group, we raised a related concern that was initially expressed in writing to the County of San Diego during open comment period that was not addressed within the EIR or presented at the final meeting in Boulevard. Upon verbal inquiry as to why it was not addressed in the written or the final EIR presented, Jim Bennett suggested I go on record with a written inquiry once again to your County staff. Please see the original letter to County of SD attached above.

The proposed project analysis begs for an additional hydrologic concern not addressed to date.

We request that the County of San Diego communicate to the public the method the County of San Diego used to evaluate the water quality potential degradation of ground water resources that will occur during the "life" of the project from the oxidation(rusting and decomposition) and leaching of metal ions from the estimated separate 5,700 steel poles/pylons that hold the tracker assemblies that are to be driven deeply into the ground within the proposed projects footprint. It is understood per Soitec's proposal that over 5,700 separate massive 28" - 30 " diameter "steel" poles are to be pounded in the ground to support CPV tracker panels. Proposed it that many of these pillars if not all will be driven(pounded by force)into the ground exposed to soils at a significant depth in the ground where oxidation will occur over time. Please resource the metallurgic content of these thousands of "steel" support poles so we may evaluate the long term geologic action of decomposition over the metal of the lifespan of the proposed project. The analysis should extrapolate and use the Rugged and the Terra Del Sol proposed projects subterranean metal to soil contact area. In effort toward fairness, ultimately is the diligence of the science directed employee as employed as part of the County's team. Please provide the public with the actual proposed units of measure incorporated in analysis to calculate contact surface area in square feet for the 5,700 units of steel that directly contact soil and will decompose over 25 years of project life. The square footage of the oxidation suffice area is "very significant". Also significant to this calculation is the electrical current released daily as "grounding" of the surplus current of each CPV panel as an electric adder to this calculation i.e. electrolysis. The analysis should define the decomposition of poles accelerated rate created by electrolysis of the poles content of each and every pole with average soil moisture contents. The water quality of the entire water shed area over the 25 year plus proposed project life will be a cumulative effect. The weathering and resultant oxidation and creation of free metal ions, ready for hydraulic transport, associated with the proposed 5,700 pylon units will manifest as a leaching and release of many including metallic ions over the projects entire lifespan, and this is a "significant" concern to all residents. With respect, we ask the County of San Diego's professional staff to not neglect the details of historical analysis of decomposition of said metals over project life term into ground impact. as compared to historic data available to the team. This is a "significant" potentially mitigating required concern demanding more than a "brush off" by responsible County of San Diego staff within this EIR. Metallurgic content of the steel poles proposed is very pertinent as the additional current created by daily panel output surplus current discharged by the PVC panels into direct surface area of pole to ground discharge. The proposed "grounding" of each unit/panel is releasing surplus electrical current into the ground and the into the surrounding soil increasing metal oxidation rate of the poles. We need to understand the compounding effect of the daily electrical current generated by the panels being

grounded adjacent the metal tracker poles. The weathering and resultant oxidation and creation of free metal ions from these massive 5,700 poles charged with current that will be leached and released over the projects entire lifespan. The County should use hard might rely on historical data to calculate the merit of this discussion, and not "dismiss" these very direct issues as insignificant, that would be destructive to our incredible County of San Diego. Please respond with a description of the County of San Diego's analysis performed potentially toxic metal ions directed into the ground from said Soitec proposals of discussion.

Please help us, as local Boulevard residents, understand the Counties method of evaluation, and resultant findings on the long term water quality concerns described. We all are aware a proposed project that has a "lifespan" of 25 plus years could have even longer lasting potentially negative effects to our soils and need be scrutinized in detail . Please detail your analytical process and historical data used in the evaluation of the decisions made over the projects lifespan of decomposition of the steel poles into the direct and adjacent water shed area. Our local ground water resources are paramount in concern for today and future support of offspring in our beautiful county that we all call home.

Thank you,

York Heimerdinger

February 20, 2014

Attn: Mark Wardlaw, Ashley Gungle, Darren Gretler, & Robert Hingtgen
County of San Diego/ Department of Planning and Development
5510 Overland Ave., St 310
San Diego, CA 92123

Re: Notice of Preparation for a Programmatic Environmental Impact Report for the Soitec Solar Projects

SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, LOG NO. PDS2012-3910- 120005 (ER); 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); SCH NO. 2012121018

The intent of our letter, is to provide comments on this proposed project to you, the EIR lead agency that help make environmentally sound decisions for the County of San Diego. This project has the ability to dramatically change the local area in many ways. Subjects of concern are included as topic areas reviewed from the EIR. As local land owners, our perspective (if we can be so bold) includes critical areas of concern that may not be found directly in the subjects to be evaluated. Therefore, the following is intended to give you, the lead agency at The County of San Diego, a true menu of concerns from local property owners' viewpoints.

Below are our comments on specific subjects listed to be analyzed on the EIR (specifically the areas of the proposed Rugged Solar project)....

Ground Water

Our largest concern is in regard to the water wells in the immediate area of the proposed Rugged Site. A true assessment of the wells in the immediate area has not been completed, most predominately of which the closest property APN #611-091-02-00 is located 439 feet south of the pumping wells. According to the EIR there are three off-site residential wells have been identified within 2,700 feet of pumping Wells 6a and 6b (Dudek, 2013; GLA 2010; GLA 2012), this study did not include the water well located on the #611-091-02-00 parcel. The closest property contains an active and certified residential use water well, making it the closest active residential groundwater well to the project; directly contradicting the EIR report of 1,742 feet as the closest residential ground water well. The project wells 6a & 6b pull water directly from the same water table

used by the well located on parcel #611-091-02-00, negatively subjecting the residential/agricultural well to the usage of the project wells.

We would like to express our alarm for the water wells in the immediate area and any compromised integrity during and after the construction phase of the project. The ground vibration created from construction, drilling, pounding and installation methods for the CPV masts can have a detrimental effect on the integrity of the adjacent water wells.

Another concern is the leaching of ground water on and around the CPV 28"diameter metal poles into our water table and affecting the water quality in the existing well. What are the specifications of the metal masts that are inserted into the ground? Are the poles galvanized or coated to prevent oxidation over time into the soil and water table?

Zoning

The parcel #611-091-02-00 is the closest property to the Rugged Solar Project. According to the EIR the parcel (APN# 611-091-02-00) is non-residential, and undeveloped which is clearly not accurate. This property is zoned S92, it has been approved by the Health Department for residential development (3 bedroom home, and 330 leech line.) The land has been in development consisting of agricultural/residential improvements since 2010. The project will directly border this residential property. Why would the EIR provide false information in the report regarding this property?

We residents in the area are still feeling the impact of the County 2020 Plan. Allowing this rezoning requested within the Rugged project appears to go directly against the 2020 Plan. A zoning change to property once zoned S92 for this application should not be allowed it is now directly adjacent the proposed enormous power project's boundaries. In our opinion this project is "industrial" by nature and most other definitions and should be well separated from an owner's residential property.

Referring specifically to APN #611-091-02-00, this residential/agriculture zoned parcel will be severely impacted by the proposals of the Rugged project.

Easement

How will the proposed rugged project address the easement that is access from Ribbonwood Rd, to the residential parcel #611-091-02-00?

Storm Water Management (Run-off)

What measures will be taken to control water runoff from thunderstorm, rain, and snow melt? Will the soil stabilizer be able to maintain the massive run-off of graded land in flash flood conditions?

Wildfire Hazard

As stated in the EIR the Rugged Solar project falls within the Very High Fire Hazard Severity Zone. Has there been studies conducted to determine the heat around the solar panels, and the risk of combustion of the surrounding vegetative materials? Will the stored water be enough to combat a fire if one was to occur?

Due to the high probability of fire in the area of the proposed project, what are the predetermined plans for repair of the damage incurred by the fire?

If a fire was to be started by the project (construction, or future use alike) who will be held responsible for the damages inflicted, and the costs accrued to fight the fire?

Aesthetics (Visual Resources)

We are concerned with the proposed project's potential effects on visual resources in the Boulevard community; because the proposed project area is highly visible from the Interstate 8 freeway in east bound and west bound directions. Any passerby or resident will look down on a metaphorical "sea" panels that blanket the ground. The existing wind turbines that are the Kumeyaay Windfarm (and the newly proposed Tule Wind Project) already obstruct the views, and damage the aesthetics. The adverse environmental affects that the Rugged Solar Project will have to visual resources include visual character; how a viewer observes the visual environment as a whole; visual quality, the environment's brilliance, distinction, and/or excellence seen by the observer; viewers response from the highway the composite view is from the right-of-way;

the viewing distance is vast and extensive, the number of viewers will be high due to the extensive use of Interstate 8. The Sunrise Powerlink attempted to blend into their environment by coloring the towers. Will the poles of the CPV panels used in the Rugged project be painted, or colored, to fit in with the surroundings?

Air Quality (Dust Control)

In the Boulevard area, blowing winds are continuing occurrences; gusts frequently blow up to 70 miles per hour or more. Concerns arise not only during construction of the Rugged Acres Solar project, but also for the life of the project. Barren lands will include but not limited to, of area underneath the CPV panels, new and existing roadways, fire barriers, and access roads. These large exposed areas in combination with the unfailing wind, and dry conditions (annual precipitation of 15.84"), create a continuous particulate in the air affecting the surrounding area. The high impact of air quality will not be limited to the construction phase of the project.

Biological Resources

The proposed project area contains natural habitats with the potential for use by sensitive and/or protected species. This project creates the potential for substantial adverse effects through habitat modifications, including the invasive species. In the proposed area, any disrupted land is quickly taken and the native flora is pushed out; additionally any moisture in the soil is monopolized due to the adaptation of invasive species.

Boundaries

We feel there is dire necessity for the County to increase the proposed required set back distances from Rugged project fences and CPV panels/masts near adjacent neighbors water wells and property boundaries. This distance should be lengthened substantially when adjacent to a residential/agricultural (S92) zoned parcel. Without additional space from project fencing to an adjacent residential property boundary the tall masts and CPV panels will appear to "loom" intrusively over our boundaries. The Rugged project, the Kumeyaay Windfarm, Tule Wind projects, and the Sunrise Powerlink all encroach onto populated areas, our homes and Ranches. These projects have left us in the area

feeling as though we are being "stepped on." Are we as local individuals, property owners, residents, and future residents obsolete and irrelevant?

Dark Skies and Glare

A concern arises with the reflective light from the CPV panel surfaces. Most of the proposed grids of high density panels on the Rugged project are situated in a highly visual valley. As these CPV panels follow the path of the sun, through the sky, the reflective light from the panels will be reflected on the southern and western horizons. Residential homes, ranches, yards, freeway traffic (potentially dangerous effects to travelers along HWY I-8 from the reflected light also could occur,) individuals, including children at local school bus stops, are all within view of these horizons, and will be negatively impacted from the reflected light of these CPV panels lenses.

There are homes that will be directly impacted by glare every day during the sunset. Limited duration of glare is not a solution to the fact that the home owners, and guests are visually negatively impacted by the afternoon.

The Laguna Observatory, as well as local star observers, have a clear direct view of the project area; will the reflected moon light impact the observatory adversely affecting their work?

Land Mitigation

Impacts to sensitive habitat should be mitigated through conservation of a habitat, as specified by the County. Any land used for mitigation should be protected for conservation, and a grant should be in place so that the mitigated land can be managed for all time.

Traffic

Can the existing and proposed roads (Ribbonwood Road and the proposed dirt road that will be used for ingress and regress) support the amount of traffic flow, construction traffic, and weight of the vehicles traveling these corridors? As residents in the area, we are especially concerned with condition of the existing asphalt of Ribbonwood Rd after the project is

concluded, and the how the land will be affected, during and after, the use of the proposed dirt Rugged project access road.

Wildlife Movement

There is an abundance of life in the proposed Rugged project area, with an array of animal species living in or using the area for movement. Concerns arise with the seven foot high, barbed wire fences that will incase the entire area, limiting the valley's use as a wildlife habitat and a wildlife corridor.

Project Alternatives

Please consider the complete removal of the proposed Rugged section from the project.

Thank you for the opportunity to comment on the EIR for the proposed project.