

Comment Letter I40

# MORNING STAR RANCH

ED AND DONNA TISDALE, PO BOX 1275, 1270 TIERRA REAL LANE  
BOULEVARD, CA 91905  
619-766-4170 OR [TISDALE.DONNA@GMAIL.COM](mailto:TISDALE.DONNA@GMAIL.COM)



March 2, 2014

Robert Hingtgen,  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Ste 110  
San Diego, CA 92123  
VIA: [Robert.hingtgen@sdcounty.ca.gov](mailto:Robert.hingtgen@sdcounty.ca.gov)

RECEIVED  
MAR 02 2014  
Planning and  
Development Services

RE: Comments on Soitec Solar Development Draft Program Environmental Impact Report (DPEIR):  
3800 12-010; 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) & Request of re-circulation of a  
revised DEIR

Dear Mr. Hingtgen,

I40-1

<sup>3</sup> Photos taken at Morning Star Ranch by Donna Tisdale


## Response to Comment Letter I40

Donna and Ed Tisdale, and family  
March 2, 2014

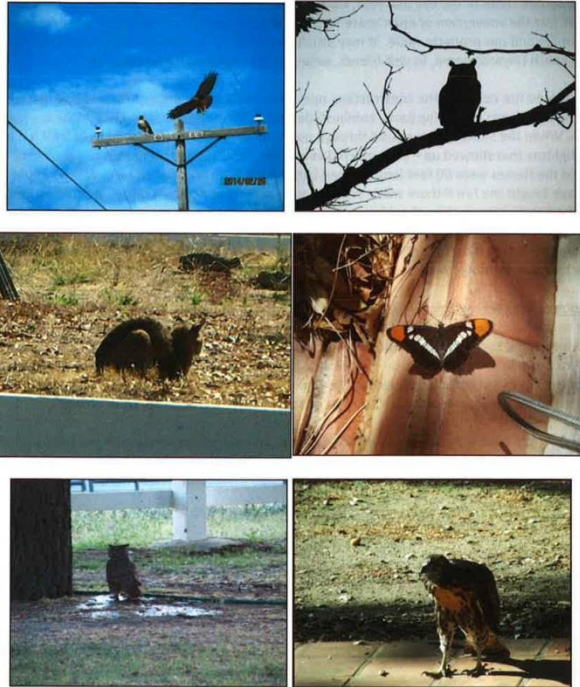
I40-1

This comment is introductory in nature and does not raise a significant environmental issue. This comment letter will be provided in the FEIR for consideration by the decision makers.

<p>We are neighbors of Soitec's proposed Tierra Del Sol Solar project. These comments are filed on behalf myself, my husband, Ed, and our adult son and his young family, who own the 148 acres and home (38236 Tierra Real Road) next to our 120 acre Morning Star Ranch and home on Tierra Real Road.</p> <p><b>Property and health impacts:</b> Ed bought our ranch in 1963 as a young man. Today, he is a 75 year old cancer survivor with a pacemaker. We are very careful about our living environment and try to avoid high electrical magnetic fields for obvious reasons. Our son bought his property from us in the 90's. Currently he is working out of state and has his home rented out, but wants to return and eventually retire here. Both our homes survived the 2012 Shockey Fire but much of our old growth chaparral and fields that supported abundant and diverse wildlife and helped protect our watershed, were burned through. Removal of remaining chaparral and excessive clear grading will expose residents and wildlife to increased air pollution, dust storms, and loss of chaparral's ability to sequester carbon above and below ground and to help rainfall soak in and recharge local wells instead of running offsite and creating erosion and loss of recharge of precious rainfall.</p> <p><b>Drought:</b> Our drought and fire stressed oak groves are slowly recovering and our diverse wildlife is beginning to return. In the last few years we have lost several large oaks and don't want to lose anymore due to excessive pumping of local and interconnected groundwater resources. Less rain means less recharge to support current residents, livestock and a functioning ecosystem.</p> <p><b>Views:</b> Ed and I also own 3 additional parcels on Tierra Real Road that total 90 acres (APN 68-040-07-00; 659-040-14-00; 658-050-15-00). Our 50 acre parcel was burned through as well, while our two 20 acre parcels, with old growth chaparral, survived unscathed. All of our properties have views of the Tierra Del Sol Solar site and are reliant on the same highly fractured and drought stressed Campo-Cottonwood Creek Sole Source Aquifer.</p> <p><b>Well impacts:</b> One of our main ranch well was impacted by a large earthquake in the 80's and now by the bulk water sales to SDG&amp;E's ECO Substation from wells on the Campo Reservation, just to our west. Since last summer, when the water trucks started rolling, our water levels have dropped and well recovery is much slower with less water than we had before. The same will likely happen to well owners, on both sides of the US/Mexico border who surround the Tierra Del Sol Solar site, with impacts radiating out, depending on which fracture zones are tapped and how they interconnect with existing wells. Groundwater dependent habitat is also at risk.</p> <p><b>Road Impacts:</b> Tierra Del Sol Road (TDS) is the only legal access we have to all of our properties. It will be impacted by heavy truck traffic during any construction process. The intersection of Tierra Real Road and Tierra del Sol Road, which has an active school bus stop, is a dangerous one, due to the sharp curve in TDS as it winds through the historic Hi Pass neighborhood where the small homes, that survived the 2012 Shockey Fire, hug the tight and twisty road. TDS has a limited shoulder area, with large boulders and oak trees lining the road. Hi Pass, also known as Tierra Del Sol, was built in the early 1900's as part of the construction for Spreckle's Impossible Railroad. Historic rock culvert work, from the WPA era, lines the entire length of Tierra Del Sol Road. There used to be a train stop, shops, small cabins, and a lodge. Heavy construction traffic on this road, that also sees a lot of Border Patrol activity, will result in adverse impacts, degrade road quality, and increased number of accidents.</p> <p><b>Neighborhood protection efforts:</b> We have been active citizen volunteers in protecting our rural neighborhood and at risk ground water, from unnecessary and obnoxious projects, for over 30 years. We started the County's groundwater monitoring program here in the early 90's; we successfully petitioned the USEPA for designation of the Campo-Cottonwood Creek Sole Source Aquifer; we spent over 25 years to successfully fight off the 600 acre Campo Landfill and Infigen's Shu'luuk Wind and solar</p>	<p>I40-1 Cont.</p> <p>I40-2</p> <p>I40-3</p> <p>I40-4</p> <p>I40-5</p>	<p><b>I40-2</b> Potential impacts to biological resources, including impacts related to the removal of vegetation, were considered and addressed in Section 2.3, Biological Resources, of the Draft Program Environmental Impact Report (DPEIR). Potential impacts related to air pollution and dust were considered and addressed in Section 2.2, Air Quality, of the DPEIR. Refer to responses to comments C2-82 through C2-84 regarding carbon sequestration.</p> <p><b>I40-3</b> Potential impacts to groundwater resources, including impacts to the aquifer and the potential for well drawdown, were considered and addressed in Section 3.1.5.3.4, Groundwater Resources, of the DPEIR. Potential impacts to groundwater-dependent vegetation, including oaks (<i>Quercus</i> sp.), were addressed in Section 2.3, Biological Resources, of the DPEIR. Potential impacts related to scenic views were considered and addressed in Section 2.1, Aesthetics, of the DPEIR. Also see response to comments O10-23, I38-3, and I66-2.</p> <p><b>I40-4</b> This comment addresses road impacts resulting from heavy equipment and vehicle use during construction and describes existing features along Tierra del Sol Road. Impacts to roadway operations and potential conflicts between construction and local traffic during construction of the Tierra del Sol solar farm are discussed in Section 3.1.8, Transportation and Traffic, of the DPEIR. In addition, please refer to common</p>
---	--	--

<p>project (with tribal help)— all planned for tribal land next door. And we helped stop the La Posta Hazardous Waste Incinerator project, master planned communities, commercial OHV Park, other wind and solar projects, and more.</p> <p><b>No Golden Years:</b> Now, when we would like to take time to enjoy life, we are forced to defend ourselves and our investments, and that of our neighbors, again, from Soitec's Tierra Del Sol Solar. We need a break!</p> <p><b>Glare:</b> After visiting Soitec's Newberry Springs project we know that glint and glare will be a big problem for us at certain times of the day and year, from certain areas of our various properties. Even without the glare, just the conversion of open space to dense and tracking industrial clutter will degrade our quality of life and our property value. It may also be a problem when driving along Tierra Del Sol Road heading south towards home, to visit friends, or just to take a drive around the area.</p> <p><b>Fire:</b> Increased fire risk from the construction, operation and maintenance of such a large electrical power plant with lots of moving parts, combustible electrical components, and lubricants is a major concern. When the Shockey Fire roared through our family's property, we stayed to defend it. I talked to the firefighters that showed up—after much damage had occurred and numerous fire retardant drops. They said the flames were 60 feet long and had laid out flat in an unusual pattern. When I asked if they could have fought the fire if there was a 300 acre solar project or 400 foot tall wind turbines next door (as planned at that time), they all said no—it would have been a major impediment and they might have stayed further back from energized projects. They also said they personally could not support the development of such large potential fire ignition sources in our fire prone area that is a designated wildfire corridor. Fighting fires on such large energized projects would be very dangerous.</p> <p><b>The Shockey Fire came within 1/2 mile or less of the NW corner of the Tierra Del Sol Solar Project</b> which is close to the SE corner of our son's property near the railroad crossing by the Astronomy Association's observatory and it burned through their gen-tie route north of the railroad and east of McCain Valley Road. We had a lightning strike fire on Tierra Real Lane in 2011 and numerous fires occur immediately south of the Tierra Del Sol Solar project on the Mexican side of the border near Ejido Jazines Del Rincon that hugs the border fence—less than 100 feet or so from the Tierra Del Sol Solar project.</p> <p><b>Here to stay:</b> We have truly invested our blood, sweat, and tears here, along with our hard-earned life savings. We are as deeply rooted as our remaining oaks. The pictures, above and below, good and bad, tell the story of why we love it here. And why we continue to fight for what's right.</p> 	<p>I40-5 Cont.</p> <p>I40-6</p> <p>I40-7</p> <p>I40-8</p> <p>response TRAF1, which addresses maintenance of Proposed Project area roads in regard to the potential for degradation of road quality.</p> <p><b>I40-5</b> This comment does not raise specific issues related to the Proposed Project or the adequacy of the environmental analysis in the DPEIR; therefore, no additional response is provided or required.</p> <p><b>I40-6</b> Potential impacts related to glare were considered and addressed in the DPEIR (see Section 2.1, Aesthetics). 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 type of information can be presented to decision makers for their consideration during the hearing process for the Proposed Project.</p> <p><b>I40-7</b> The comment provides no substantiation of who provided the statements regarding firefighting during the Shockey Fire, or what responding fire agency was involved. Regardless, the fire behavior indicated in the comment is consistent with fire behavior modeled to occur in native fuels adjacent to the site. The proposed Tierra del Sol solar farm site has been planned to include setbacks based on fire behavior modeling. It should be clarified that the flame lengths of 60 feet can occur as pockets of heavier fuels are consumed and driven by wind. The average flame length in this area would be closer to 40 feet, with some areas producing</p>
---	---

We have lots of owls (taking baths in our yard), mating hawks, kestrels, falcons, turkey vultures, and other raptors like the young one below that just walked onto our porch one day. We have seen Golden Eagles here and have seen Condors on Tierra Del Sol Road the past, eating road kill. Bald Eagles used to nest in our son's oaks, and we had American Badgers that burrowed here, too. We still have mountain lions, bobcats (sunning in our pasture), and lots of Black-tailed jack rabbits, kangaroo rats, desert rats, bats, foxes, lots of butterflies, humming birds, song birds, and more.



I40-8  
Cont.

**I40-8**

lower flame lengths, and some areas higher. Further, Fire Agencies Having Jurisdiction have indicated that with acceptance of the project's Fire Protection Plan and with the proposed fire protection features and additional resources provided through the fire and emergency service protection agreement fair-share funding (PDF-PS-1) and developer agreement, that fire facilities will be adequate to serve the Proposed Project (County of San Diego 2014a, 2014b). It must be noted that if the Proposed Project is constructed, with its non-combustible CPV trackers and managed fuel modification, it is reasonable to expect that fire spread would be much slower, fire intensity would be much lower, and the fire more easily controlled. The Proposed Project would be expected to act as a fuel break through the removal of high British thermal unit (BTU) fuels and replacement with low-BTU, managed and maintained fuels beneath the CPV trackers.

Potential impacts to wildlife and vegetation were considered and addressed in the DPEIR (see Section 2.3, Biological Resources). Potential impacts related to fire hazard were considered and addressed in the DPEIR (see Section 3.1.4, Hazards and Hazardous Materials). Potential impacts related to glare, scenic views, and changes in the visual character of the Proposed Project site were considered and addressed in the DPEIR (see Section 2.1, Aesthetics).

2012 Shockey fire burned through our properties, just missing Soitec's Tierra Del Sol Solar site.



Shockey Fire map. Soitec's TDS site is under the words "Branch II". The fire burned within ½ mile of the NW corner of the site and through the gen-tie route between Tierra Del Sol Road and Rattlesnake Mountain. Our properties are in the mid-section of the fire footprint. Our son's SE corner is less than ½ mile from the project site. As the crow flies, we are very close.



140-8  
Cont.

The 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 for review and consideration by the decision makers.

**References**

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

County of San Diego. 2014a. Project Facility Availability Form (Fire) for Rugged Solar LLC solar farm. October 23, 2014.

County of San Diego. 2014b. Project Facility Availability Form (Fire) for Tierra del Sol Solar Farm LLC solar farm. October 23, 2014.

Post-Shockey Fire = lost old growth chaparral, habitat, and innocent victims that could not escape the fire or emergency vehicles

C



Black tailed Jack Rabbit and Desert Rat



I40-8  
Cont.

King snake, tiny horned lizard, that I placed on a post it note to show how tiny and perfect he was, and turkey vultures doing clean up and airing their wings. At times we had hundreds of vultures here....



I40-8  
Cont.

Below (left) is view of our son's home and property, looking SE with Soitec's Tierra Del Sol Solar site on the ridgeline with tall Pine trees. On Right, is view over our property with the Tierra Del Sol Solar site, and glaring window (on Tierra Del Sol Road) reflecting the setting sun, on the same ridgeline (post Shockey Fire). All the homes in pictures will all be impacted, one way or another, by Soitec's Tierra Del Sol Solar project



Below (L) view from the burned eastern half our our Morning Star Ranch property, looking SE across our son's SE corner, to Soitec's Tierra Del Sol Solar project along the ridgeline with tall trees, that spans the width of the photo, right to left. Below (R) is view from our son's western boundary across his 148 acres to Rattlesnake Mountain in the distance. Even with the fire, which can be cleansing, the views are still expansive and soul soothing. That will all change with Soitec moving in...



I40-8  
Cont.



Just two of the many fire that burn just south of the border, our ranch, and Soitec's TDS project site

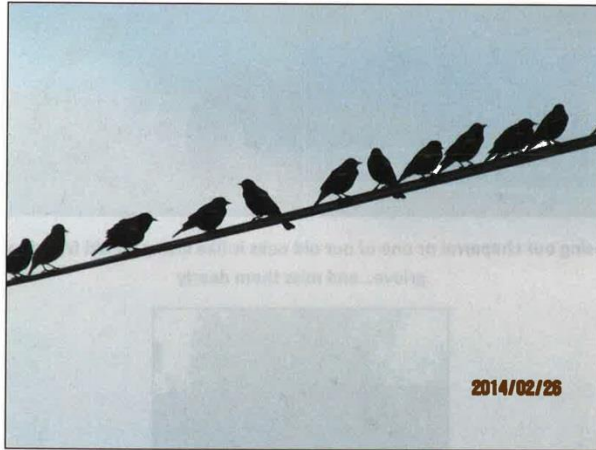


Losing our chaparral or one of our old oaks is like losing an old friend...we grieve...and miss them dearly



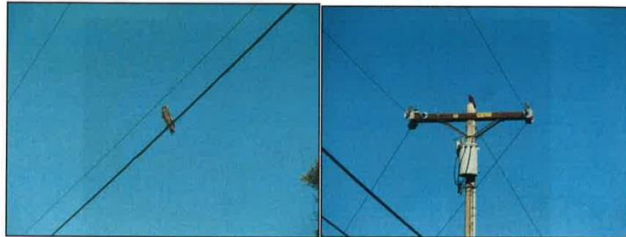
I40-8  
Cont.

Tricolored Black Birds on our phone line.  
They visit in large noisy groups every year



↑  
140-8  
Cont.  
↓

Two small raptors below...



Nature is amazing and is healing the scorched earth here. Wildlife is returning and looking for a new home.



We hope that Soitec's projects are rejected, as they should be, and that they leave us in peace to enjoy the years we have left at Morning Star Ranch.

Regards

Donna and Ed Tisdale, and family

I40-8  
Cont.

INTENTIONALLY LEFT BLANK