

Thank you for your comment, Rosa Soto.

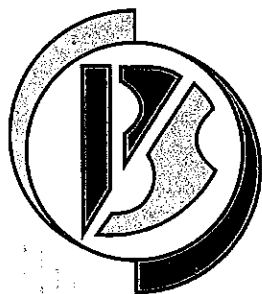
The comment tracking number that has been assigned to your comment is SolarS50591.

Comment Date: July 15, 2008 16:56:39PM
Solar Energy Development PEIS
Comment ID: SolarS50591

First Name: Rosa
Middle Initial: A
Last Name: Soto
Organization: Imperial County Planning & Dev Serv Dept
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Privacy Preference: Don't withhold name or address from public record
Attachment: Solar Energy PEIS July 2008.pdf

Comment Submitted:

[See Attachment.](#)



IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

PLANNING / BUILDING INSPECTION / ECONOMIC DEVELOPMENT / PLANNING COMMISSION / A.L.U.C.

JURG HEUBERGER AICP, CEP, CBO
PLANNING & DEVELOPMENT SERVICES DIRECTOR

July 15, 2008

Solar Energy PEIS Scoping
Attn: Heidi Hartmann
Argonne National Laboratory
9700 S. Cass Avenue—EVS/900
Argonne, IL 60439

**SUBJECT: Response to Programmatic Environmental Impact Statement
to Evaluate Future Solar Energy Development**

Dear Ms. Hartmann:

The County of Imperial has received the notice of the "Public Scoping Meeting" on the Programmatic Environmental Impact Statement (PEIS) that was held on July 10, 2008, at 6:00 p.m. in the Imperial County Board of Supervisors Chambers. The County Planning & Development Services Department has also received a copy of the Federal Register that states as follows: "...The PEIS will evaluate a facilitated development alternative (proposed action) that includes the establishment of (1) for DOE, a solar energy program of environmental policies and mitigation strategies that would apply to the deployment of solar energy project supported by DOE; and (2) for the BLM, a Bureau-wide solar energy program and the amendment of individual BLM land use plans to address future development of solar energy resources on BLM-administered lands. For this alternative, the Agencies will create a reasonably foreseeable development (RFD) scenario to define the potential for future utility-scale solar energy development over a 20-year study period..."

The County Planning & Development Services Department is the County's CEQA "Lead Agency" for any future development of all renewable energy projects whether it is solar energy, wind energy, geothermal energy, bio-mass energy, natural gas plants, and/or ethanol plants within the County's jurisdiction.

The PEIS states that "...Policies and mitigation measures adopted as part of the proposed solar energy technology deployment program would identify for DOE, industry, and stakeholders the best practices for deploying solar energy and ensuring minimal impact to natural and cultural resources on BLM-administered lands or other Federal, State, tribal, or private lands..."

Solar Energy PEIS Scoping
July 15, 2008
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Also, the PEIS under "BLM Planning Criteria" states that "...One outcome of the PEIS could be to amend some of the BLM's existing RMP's to adopt a new Bureau-wide solar energy program...The BLM will coordinate with Federal, State, and local agencies and tribal governments in the PEIS and plan amendment process to strive for consistency with existing plans and policies, to the extent practicable..."

The County has had a long history of working with the local BLM El Centro Field Office in the permitting of renewable energy projects, such as geothermal power plants. In order to participate as a "cooperating agency" for the PEIS process, we have prepared and attached hereto a brief summary of issues that relate to implementation of the State of California's "California Environmental Quality Act (CEQA)" for solar energy projects on private lands. For those projects that impact both private lands and federal lands, the County has in the past worked with BLM to prepare joint NEPA and CEQA documents to establish policies and mitigation measures to reduce project-specific environmental impacts.

If you have questions on the above or the attachment, please contact me at (760) 482-4236, extension 4279.

Sincerely,

JURG HEUBERGER, AICP, CEP
Planning & Development Services
Department Director

By: 
Darrell Gardner
Asst. Planning & Dev. Services
Department Director

Attachment

cc: Ralph Cordova, County Executive Officer
Andy Home, Deputy County Executive Officer
Michael Rood, County Counsel Office
Jurg Heuberger, AICP, CEP, Planning & Dev. Services Director
Jim Minnick, County Planning Division Manager
Solar Energy Program EIS file
Files: 10.101, 10.102, 10.105, 10.109, 10.130, 10.133

SOLAR POWER PLANT SITING ISSUES

SUMMARY:

The following are a few of the significant environmental issues that will need to be addressed for siting of a Solar Power Plant on state or private properties in the County of Imperial:

If the solar plant is proposed lands zoned as A-2 (General Agriculture), A-2-R (General Agriculture-Rural), A-3 (Heavy Agriculture), S-1 (Open Space/Recreation), and/or S-2 (Open Space/Preservation), a Conditional Use Permit and possible Variance shall be required, which shall include, but not be limited to, new roads, electrical substation, cooling towers, and related transmission lines..

If the solar power system proposed for any size plant is to be a "photovoltaic" process (at any MW size) then the State California Energy Commission permit procedures shall not be a requirement and only involve the Imperial County's permitting and monitoring process.

Also, if the solar power plant is less than 50 MW's (net) on state and/or private lands, then the County shall be the CEQA "Lead Agency" for the environmental review process. However, if the existing SDG&E, Imperial Valley Substation, is involved in any manner , i.e. an expansion in/out of the Substation, new additional transmission line(s) or upgrading of the existing transmission lines (single circuit to a double circuit), then the BLM El Centro Field Office shall be involved and a NEPA environmental review is required, e.g. preparation of an Environmental Assessment (EA), a Categorical Exemption (CE), Finding of No Significant Impact (FONSI) and/or preparation of an Environmental Impact Statement (EIS).

For CEQA purposes, the following is a summary of potential issues to be addressed:

- 1) **Aesthetics**: Due to potential glare from the solar panels, electrical substation and transmission lines, new roads, and their impacts a degradation of the existing visual and open space character of the solar plant site and its adjacent surroundings could occur. Visual impacts as perceived by local residents, travelers on adjacent roads and state highways, nature sightseers/hikers, and/or civilian and military aircraft may require mitigation of these impacts.

- 2) **Agricultural Resources**: The conversion of agricultural lands shall require mitigation for the loss of such lands and/or conversion of adjacent lands to non-agricultural uses as required by state and local laws.

SOLAR POWER PLANT ISSUES (continued)

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- 3) **Air Quality**: The construction and operation of the solar plant could create emissions impacting local air quality during construction, operation and maintenance activities and shall require an application to the Imperial County Air Pollution Control District for an "Authority to Construct" and a "Permit to Operate" to the local Imperial County Air Pollution Control District for all construction and operational activities.
- 4) **Biological Resources**: The solar plant site, substation and electrical transmission lines and ancillary properties shall require a biological survey to be prepared done for the Burrowing Owl and any other rare/endangered/sensitive species, no matter where the plant is located in the County of Imperial.
- 5) **Cultural/Archaeological Resources**: The solar plant site will also require preparation of a cultural/archaeological/pre-historic resources survey meeting the requirements of State law and contacts made with all affected Native American Tribes in the area prior to approval of the project by the County of Imperial.
- 6) **Geology & Soils**: The solar plant site shall have a Phase I Survey prepared (unless it is a non-disturbed/pristine site) to determine if there are any potential pesticide/herbicide residues and/or other geological impediments to siting the solar power plant, its electrical substation and related transmission lines in the vicinity, e.g. geologic features such as earthquake fault(s) in the immediate vicinity.
- 7) **Hazards & Hazardous Materials**: The plant site shall require an Emergency Response Plan to be prepared for any transportation, use and/or disposal of any hazardous materials/waste that may be used as part of the solar plant and/or creation of a reasonably foreseeable upset and/or accidental release of hazardous materials/waste into the environment. Any ash produced by the solar plant shall require the preparation of an Ash Disposal Plan for management of this ash for various uses, e.g. road base, agricultural uses, or landfill cover material.
- 8) **Hydrology and Water Quality**: The plant site shall require a grading/drainage study to be prepared in order to eliminate any off-site runoff or degradation to local surface and/or subsurface waters and their quality impacts with appropriate review by the Regional Water Quality Control Board, Imperial Irrigation District, and Imperial County Public Works Department. The use of water for the washing of the solar panels and dust suppression during construction/operational/maintenance activities shall require the IID's approval and/or approval of a Conditional Use Permit for the water well.

SOLAR POWER PLANT ISSUES (continued)

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- 9) **Land Use and Planning:** Wherever the proposed solar plant is located in Imperial County, the project shall require a land use and a zoning review identifying land ownerships, e.g. federal, state, military, tribal lands, wilderness areas, OHV areas, transportation/circulation impacts, agricultural lands, impacts local residents, agricultural aerial applicators, commercial/industrial impacts, as well as any wildlife and habitat conservation plans in the vicinity.
- 10) **Mineral Resources:** The solar plant site shall identify any mineral resources and potential impacts on minerals, e.g. sand and gravel resources, geothermal, or gold mining resources.
- 11) **Noise:** The construction/operation/maintenance of the proposed solar plant may significantly increase the existing ambient noise levels above those now existing without the project and a noise survey shall be required to be prepared to determine any impacts to local residents or wildlife resources.
- 12) **Population and Housing:** The proposed solar plant shall require an analysis of the number of employees during construction and operation of the plant, any impacts on the local housing market, and related issues.
- 13) **Public Services:** The solar plant shall require new or additional services, e.g. such as new roads, electrical substation, new transmission lines, water/sewer services, fire protection services, sheriff surveillance services, telephone service, cable service, local school impacts, and need for other related public services.
- 14) **Recreation:** The proposed future number of employees at the plant shall require a review of existing recreational resources for these families.
- 15) **Transportation/Traffic:** A traffic study shall be required to determine the solar power plant's effect on local/state roadways, e.g. number of employee vehicles during construction/operation/maintenance, number of trucks to/from the site, visitors, and any improvements necessary on County roads/intersections and improvements on adjacent CALTRANS-maintained Interstate and State Routes in the vicinity of the site.
- 16) **Utilities and Service Systems:** The solar power plant shall require new electrical and water services, possible construction of new storm water drainage facilities, and a solid waste management plan prepared for any disposal of solid and/or liquid wastes. If a water well is to be drilled, then a Conditional Use Permit approved by the County is required (whether or not the well is to be located on federal, state or private land).