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San Diego County Department of Planning and Land Use



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DEPARTMENT OF PLANNING AND LAND USE

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Solar Energy Development PEIS Scoping
Argonne National Laboratory, EVS/900
9700 S. Cass Ave.
Argonne, IL 60439

COMMENTS ON THE NOTICE OF INTENT TO PREPARE A PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT TO EVALUATE SOLAR ENERGY DEVELOPMENT, DEVELOP AND IMPLEMENT AGENCY-SPECIFIC PROGRAMS, CONDUCT PUBLIC SCOPING MEETINGS, AMEND RELEVANT AGENCY LAND USE PLANS, AND PROVIDE A NOTICE OF PROPOSED PLANNING CRITERIA

F0010-35

The County of San Diego has received and reviewed the above-named Notice of Intent (NOI) published in the Federal Register on May 29, 2008 and appreciates this opportunity to comment. The notice was provided by the Office of Energy Efficiency and Renewable Energy, Department of Energy (DOE); and the Bureau of Land Management (BLM), Department of the Interior. The San Diego County Department of Planning and Land Use (DPLU) has completed its review and has the following comments regarding the proposed Program Environmental Impact Statement (PEIS) for development of solar energy programs, land use plan revisions, and planning criteria.

GENERAL COMMENTS

1. The NOI indicates that Department of Energy (DOE) supported solar energy projects could occur on private lands. The County requests that full consideration of the County's General Plan goals and policies and ordinance requirements be given to any projects on private lands, including transmission corridors, in the County's jurisdiction. Furthermore, the proposed policies and planning criteria should recognize that proposed projects on private lands will need to apply for and seek approval of any necessary discretionary permits as required by County regulations.

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2. The County of San Diego, Land Use and Environment Group has developed Guidelines for Determining Significance that are used as guidance for determining the significance of environmental impacts in the unincorporated portions of the County of San Diego. The Guidelines also provide mitigation options for addressing potentially significant impacts. Project impacts, including impacts from transmission corridors, that could have potentially significant adverse effects to the unincorporated County or County facilities, should evaluate and propose mitigation for environmental impacts using the guidance described in the County's Guidelines for Determining Significance, where applicable. The County of San Diego Guidelines for Determining Significance are available online at: <http://www.sdcounty.ca.gov/dplu/procguid.html#guide>.
3. New energy transmission corridors, including associated infrastructure and roads, should be avoided to the extent feasible. Any new transmission corridors should include a thorough analysis of the demonstrated need, capacity, proposed location(s), and fire risk. Potential adverse impacts to biological, cultural, visual resources; community character of surrounding areas; panoramic views of ridgelines, skylines, and natural landscapes should be considered. Undergrounding transmission lines should be identified as the preferred option to minimize visual impacts and fire hazards.
4. The restoration of land following use should be addressed by the PEIS.
5. The programs and plans for solar energy development should consider solar energy technologies that require less development of previously undeveloped land area. As the technology of solar energy production is undergoing rapid change, the PEIS should allow for adjustments to implement new technology that would minimize environmental impacts.

BIOLOGICAL RESOURCES

6. The BLM plays a vital role in preserving land, protecting species, and enhancing habitat, making it a necessary component to success of the County's Multiple Species Conservation Program (MSCP). To better address shared resources and concerns, a working relationship between the County and BLM has developed. In 1994 and 2007, this mutual support and cooperation in habitat conservation planning and management was formally recognized in Memorandums of Understanding (MOUs) between the County, US Fish and Wildlife Service (USFWS), California Department of Fish and Game, BLM, and others. The MOUs outline the BLM's commitment to manage lands to the standards necessary to meet the goals and objectives of the MSCP, including conserving the area's rich and unique biological diversity. The County

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appreciates the BLM's formal commitment toward resource conservation planning efforts.

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As the County's East County MSCP is in the habitat and species modeling phase (with the preserve design not yet developed), close coordination between the BLM and County is essential for resource planning and management in this region. The County requests that BLM coordinate with the MSCP Division regarding any changes in land use policies that could affect the East County MSCP Study Area. County and BLM's coordination will be necessary to protect habitat and species, as the County is seeking coverage for approximately 153 species under this plan. The species list is available online at http://www.sdcounty.ca.gov/dplu/mscp/ec_species.html.

7. The County's existing MSCP plans and proposed North and East County plans (including species covered or potentially covered by those plans) and preserves should be considered in analysis for the PEIS based on shared resources and issues in the region, such as habitat fragmentation, wildlife migration corridors, and core habitat areas.
8. Due to the nature of solar energy generation, desert landscapes comprise much of the land that may be suitable under the PEIS. The desert maintains many unique and sensitive habitats and species, which must be given careful consideration in the designation of lands suitable for solar energy development. Potential impacts to habitat and species, including wildlife corridors, from solar energy development (including siting of facilities, associated infrastructure, transmission corridors, and related construction activities) should be carefully reviewed as part of the PEIS and on a case-by-case basis in reviewing individual applications.
9. Transmission corridors have the potential to be located near the borders of protected areas, which could threaten the overall migratory ability of wildlife in the region. In order to maintain core habitat, buffers, and links to conservation areas the PEIS should undertake a landscape-scale analysis to ensure the functionality of habitats is maintained. Proposed solar energy development policies should discourage solar energy facilities and associated infrastructure such as roads or transmission lines where important wildlife corridors would be fragmented.
10. The County recently provided comments on the South Coast Resource Management Plan Revision (SCRMPR) which raise a number of issues. As the document has not yet been revised for the next stage of public and agency review, uncertainty remains with respect to potential allowable land uses on BLM land covered by the SCRMP, including, but not limited to, energy production

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through solar development. The PEIS should identify any proposed revisions to policies or plans that could change the resource management status of BLM lands in the South Coast region, including but not limited to, the Otay Mountain Wilderness Area, Hauser Mountain, Beauty Mountain, Hellhole Canyon, and Agua Tibia.

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11. The proposed solar energy programs and plans should incorporate policies to ensure solar facilities, infrastructure, staging areas, or transmission corridors are not sited within areas that may impact narrow/endemic, sensitive, threatened, or endangered species or in Areas of Critical Environmental Concern (ACEC), Wilderness Areas, Wilderness Study Areas, or Wild and Scenic Rivers. Policies should also be incorporated that require ongoing management and monitoring for impacts to habitats and species, including an adaptive management program.
12. The PEIS should evaluate the potential for non-native/invasive species introduction through the creation of new roads and construction activities from solar development projects or intensified use of existing infrastructure.

RECREATION AND TRAILS

13. The PEIS should consider the County Trail Master Plan as a framework for trail planning on BLM lands and coordinate with the County's Department of Parks and Recreation to ensure connectivity with existing and proposed trails.

WILDFIRE AND FIRE PROTECTION

14. As BLM lands encompass a significant area prone to wildfire, in close proximity to unincorporated areas of the County and MSCP preserves, the PEIS should fully evaluate the potential increased hazards related to wildfire susceptibility from solar energy development and transmission corridors. The highest priority should be given to public health and safety and appropriate policies should be incorporated to ensure future solar energy development does not increase wildfire hazards.

WATER SUPPLY

15. The PEIS should evaluate the water requirements of future solar energy projects. Solar energy facilities can require water to condense steam to power turbines, for cleaning panels to ensure maximum solar collection, or other purposes. Technologies that use the least amount of water feasible should be encouraged. As groundwater is the primary source of water in the eastern two-thirds of the County, the PEIS should fully evaluate the adequacy of the water supply to support solar energy projects. Consideration should be given to the potential

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impacts to groundwater basins, as these are shared resources and a sole water supply for many unincorporated area residents. The PEIS should evaluate the overall sustainability of potentially affected groundwater basins and impacts to habitat as a result of groundwater use.

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The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project, the PEIS for review, or providing additional assistance at your request. If you have any questions regarding these comments, please contact Robert Hingtgen at (858) 694-3712.

Sincerely,



ERIC GIBSON, Interim Director
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Reference County Project IJN 08-061