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COMMENTS ON PROPOSED SOITEC DEVELOPMENT DRAFT EIR

LOG# PDS2012-3910-12005

Proposed Projects: Tierra del Sol, Rugged Solar, Lan West, Lan East

Mr. Hingtgen:

The Anza-Borrego Foundation (ABF), the non-profit cooperating association of Anza-Borrego Desert State Park, would like to provide comments regarding the Draft EIR for the proposed Soitec Development project adjacent to the southern boundary of the state park.

The ABF was established in 1967 and has successfully acquired more than 50,000 acres of private lands from willing sellers to be added to Anza-Borrego Desert State Park including recent acquisitions in the Jacumba area. ABF provides support to protect the park from threats, provides services for education and research, and assists the park with interpreting the desert environment to people from all over the world.

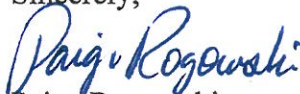
The Anza-Borrego Foundation is opposed to the expansion of solar and wind projects adjacent to Anza-Borrego Desert State Park, including those proposed in the Soitic Development Draft EIR. The recently constructed Ocotillo Wind project was built on 12,500 acres of BLM land along five miles of common boundary with Anza-Borrego DSP. Ocotillo Wind has had a profound negative impact upon the park's natural and cultural resources, has created a barrier to wildlife, has encroached upon a documented desert bighorn sheep lambing area, and has forever blighted the scenic qualities of the entire southern sector of the state park.

ABF recommends the County of San Diego select the “No Project” alternative for the Soitec proposal for the following reasons:

- 1) Negative impacts to the groundwater in the Jacumba/Boulevard region. Consumption of huge amounts of groundwater from the headwaters of the Carrizo Creek Watershed will have negative impacts on the amount and quality of surface waters available to desert wildlife within Carrizo Gorge and its tributaries within Anza-Borrego Desert State Park. As evidenced by the recent construction activities by SDG&E on the ECO Substation, initial water use estimates made in the EIR were grossly underestimated. SDG&E originally told us they would be using 30 million gallons of water for the project, yet they recently submitted a change in the usage to 90 million gallons. Soitec estimates in the DEIR can be expected to be underestimated by at least the same factor, given the “fast track” broad-brushed analysis given to the proposal, and the same company and crew doing the estimates.
- 2) Downstream impacts on water availability can be expected in Carrizo Creek, Boundary Creek, Tule Creek, and Walker Creek, all of which feed into Carrizo Gorge and Carrizo Canyon. Current restoration work to remove non-native tamarisk trees in Carrizo Gorge and Carrizo Canyon will not be nearly as successful if massive amounts of water are drawn from the upstream aquifer for construction and cleaning of four new solar projects.
- 3) Wildlife which are key to the local habitat include the Peninsular bighorn sheep (listed as an Endangered Population by the US Fish & Wildlife Service), the golden eagle, which nest in this area, the federally Endangered Quino Checkerspot butterfly, the peregrine falcon and scores of other sensitive animal and plant species.
- 4) Construction of yet another group of solar projects will further impede the free movement of wildlife by reducing habitat connectivity and ruining wildlife corridors. Anza-Borrego Desert State Park and the Anza-Borrego Foundation own lands adjacent to the proposed project in the area of Jacumba. Park lands are on both sides of Interstate 8 and currently about one mile north of the border with Mexico.
- 5) ABF opposes the concept of “Fast Tracking” energy projects on private or public lands. “Fast Tracking” is a euphemism for avoiding laws put in place to address environmental impacts, the very essence of why the United States enacted NEPA and the California Legislature created CEQA.
- 6) Rooftop solar installation in the San Diego metro area will provide sufficient power and it is unnecessary to disturb the San Diego backcountry.

The Board of the Anza-Borrego Foundation thanks you for allowing us the opportunity to make comments on the proposed Soitec Development and asks that the San Diego County Board of Supervisors vote for “No Project” in order to safeguard the wild lands, natural and cultural resources, and the waters of our east county.

Sincerely,



Paige Rogowski
Executive Director