

Comment Letter 10: Adams Broadwell Joseph and Cardozo (November 6, 2015)

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November 6, 2015

VIA E-MAIL AND OVERNIGHT MAIL

Ross Fehrman
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Re: Errata to Comments on the Recirculated Draft Environmental Impact Report for the Willow Springs Solar Array Project (PP10232) (State Clearinghouse No. 2010031023)

Dear Mr. Fehrman:

We are writing to correct the fugitive dust calculation contained in the October 19, 2015 comments ("October 19th Comments") submitted by Kern County Citizens for Responsible Solar on the Recirculated Draft Environmental Impact Report ("RDEIR") prepared by the County of Kern ("County") for the Willow Springs Solar Array Project ("Project"). Table 1 of Exhibit B of the October 19th Comments (the Dr. Pless Comment Letter) did not incorporate all relevant available data and thus underestimated potential fugitive dust emissions from Project construction.

10-A

Attached is a revised version of the Dr. Pless Comment Letter that corrects this error. Please replace Exhibit B with this document. The only revisions contained in the Revised Dr. Pless Comment Letter are to Table 1 on page 6 of the Dr. Pless Comment Letter and to the last paragraph of Section II.B.2 on page 6, which summarizes the findings of Table 1. The rest of the Dr. Pless Comment Letter and attachments in Exhibit B remain unchanged.

10-B

2467-009j

November 6, 2015

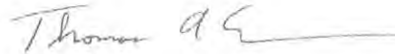
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The corrected calculations do not affect the conclusions or objections raised in the October 19th Comments. Both the prior and the updated calculations demonstrate that the RDEIR substantially underestimated PM10 emissions from Project construction and failed to identify a significant impact to air quality. Under both the prior and the updated calculations, the sum of PM10 emissions from windblown dust plus PM10 emissions from the remainder of the Project construction emissions will exceed the 15 ton per year significance threshold even if just 100 acres of the 1,402 acre Project site are disturbed at one time. The corrected fugitive dust emissions simply demonstrate that the scope of the Project's potential PM10 impacts would be even greater than the significant impacts disclosed in the October 19th Comments.

10-C

Please let me know if you have any questions regarding this revision.

Sincerely,



Thomas A. Enslow

TAE:ljl

Attachment: Revised Exhibit B

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