

November 13, 2024



Submitted to: Greg Plucker
Colusa County Community Development Agency
Colusa County as Lead Agency for Janus Solar Project

Submitted by: Adam Borchard

Sent via e-mail: gplucker@countyofcolusaca.gov

Dear Mr. Plucker:

This letter is submitted during the public comment period on the Draft Environmental Impact Report (DEIR) related to the proposed Janus Solar Project, for which Colusa County Community Development Agency is the lead agency.

Commenting in my individual capacity as a water and natural resource policy professional in California, the comments in this letter pertain to the sections of the DEIR related to groundwater resources. Throughout the DEIR, including the Water Supply Assessment, the project applicant states multiple claims, assertions, and assumptions unfounded or unsupported by accompanying explanation about the project's benefits for the county's groundwater resources.

Due to a lack of adequate explanation, as lead agency, the Colusa County Community Development Agency should ask the project applicant the following questions:

1. Is the project applicant claiming that the project location will become a groundwater recharge site or facility?
2. Has the project applicant consulted the Colusa Groundwater Authority regarding the project site and its hydrologic characteristics?
3. What was the full scope of the consultation by the Colusa Groundwater Authority?
4. Who at the Colusa Groundwater Authority did the project applicant consult?
5. What are the professional qualifications, expertise, and experience of the staff at the Colusa Groundwater Authority who was consulted by project applicant?
6. When did project applicant consult with the Colusa Groundwater Authority?
7. Did the staff at the Colusa Groundwater Authority physically inspect the project site?

8. Was the proposed project's groundwater resource impacts reviewed under consideration of the latest version of the Colusa Groundwater Authority's groundwater sustainability plan, or GSP?
9. Did the project applicant consult or retain, as a subject matter expert, a hydrologist, geologist, soil scientist, environmental scientist, or natural resources specialist regarding the proposed project and the project site's hydrologic, soil, geologic, topographic, and seismic characteristics?
10. If a subject matter expert was consulted or retained, what is the expert's name?
11. If a subject matter expert was consulted or retained, what are the expert's professional qualifications, expertise, and experience?
12. If a subject matter expert was consulted or retained, is or was the expert an employee of project applicant?
13. If a subject matter expert was consulted or retained, was the expert an independent third party?
14. If a subject matter expert was consulted or retained, did or does the expert have a financial, pecuniary, or other property interest in project applicant and its business activities and operations?
15. If a subject matter expert was consulted or retained, what was the full scope of the consultation?
16. If a subject matter expert was consulted or retained, when did the consultation occur?
17. If a subject matter expert was consulted or retained, did the expert physically inspect the project site?
18. If a subject matter expert was consulted or retained and if a physical inspection of the project site occurred, when did the inspection occur?
19. If a subject matter expert was consulted or retained, did the expert produce written or verbal reports or offer recommendations?
20. If a subject matter expert was consulted or retained, was the expert familiar with the latest version of the Colusa Groundwater Authority's GSP at the time of consultation on behalf of the project applicant?
21. Did the project applicant consult or retain multiple subject matter experts, and if so, did they offer conflicting observations, recommendations, or reports?

Without adequately addressing the questions above, the DEIR's analysis regarding groundwater resources is insufficient.

Thank you for the opportunity to submit this letter, and I appreciate your consideration of my comments.

Sincerely,

Adam Borchard