



December 16, 2011

County of San Diego  
Department of Planning and Land Use  
Attn: Matthew Schneider  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Subject: Wind Energy Zoning Ordinance and General Plan Amendment, POD10-007, LOG NO. 09-00-003; SCH NO. 2010091030

Dear Mr. Schneider,

The purpose of this letter is to provide the County with comments on the proposed Wind Energy Ordinance Amendment and the draft Environmental Impact Report.

E-1

Key Concerns and Recommendations:

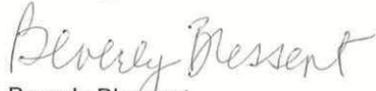
- 1) The requirement that electricity generated for use on the same lot where a small turbine is located would prohibit excess electricity to be sold to SDG&E by property owners of small wind turbines. Allowance of the excess electricity to be used outside of the lot should be permitted in order to maximize the use of the generated wind energy.
- 2) The siting of wind turbines on a lot may cause potential safety issues to SDG&E facilities. The site plan should be evaluated by the County to ensure adequate buffers are implemented to avoid negative impacts to on-site and off-site utility structures.
- 3) Figure 1-4 Large Wind Turbine(s) Project Area should be modified to exclude tribal and publicly-owned lands to clarify the areas where the large wind turbines are allowed under the ordinance.

E-2  
E-3  
E-4

Thank you for allowing SDG&E this opportunity to comment on the proposed zoning ordinance amendment and draft EIR. Should you have any questions please don't hesitate to contact me.

E-5

Sincerely,



Beverly Blessent  
Senior Land Planner  
SDG&E Environmental Programs  
8315 Century Park Court, CP21E  
San Diego, CA 92123-1548  
858-637-3702

## Response to Comment Letter E

**SDG&E Environmental Programs**  
**Beverly Blessent**  
**December 16, 2011**

- E-1** This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- E-2** This comment does not raise significant environmental issues for which a response is required. However, the County wishes to point out that the proposed ordinance does not "...prohibit excess electricity to be sold to SDG&E by property owners of small wind turbines." The proposed ordinance defines Small Wind Turbine as: "A wind turbine with or without a tower, which has a rated capacity of not more than 50 kilowatts that generates electricity primarily for use on the same lot on which the wind turbine is located." While the primary use of a small turbine should be to generate electricity for use on the same lot on which the turbine is located, excess electricity may be exported for use off site.
- E-3** The County agrees with this comment. All turbines will be subject to review through the Zoning Verification and Building Permit review process to ensure they are located safe distances from utility structures. As with any building permit, development is not permitted within SDG&E easements and standard setbacks are adhered to. The County has also added another provision under the criteria for small wind turbines in Section 6951.a requiring a 300-foot setback, or 5 times the height of the turbine, from transmission towers and lines.
- E-4** The County appreciates this comment. Figure 1-4 Large Turbine(s) has been revised to clarify the areas where large wind turbines are allowed under the proposed ordinance amendment.
- E-5** This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required.

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