

Comment Letter K

Descanso Planning Group
 PO Box 38
 Descanso, CA 91916

Matthew Schneider
 DPLU Project Manager,
 5201 Ruffin Road, Suite B
 San Diego, CA 92123-1666

December 22, 2011

RE: Wind Energy Ordinance & General Plan Amendment DEIR; POD 10-007, LOG NO. 09-00-003; SCH NO. 2010091030

Dear Mr. Schneider,

The Descanso Community Planning Group at our regular meeting held on December 8, 2011, voted to go on record with the following positions:

1. WE STRONGLY OPPOSE THE PROPOSED DRAFT EIR FOR THE WIND ENERGY ORDINANCE AND GENERAL PLAN AMENDEMENT AND THE REDUCED PROJECT ALTERNATIVE
2. WE STRONGLY SUPPORT THE NO PROJECT ALTERNATIVE AS BEING THE MOST PROTECTIVE OF RURAL COMMUNITIES, RESIDENTS, AND RESOURCES.
3. WE STRONGLY SUPPORT THE BOULEVARD PLANNING GROUP'S REQUEST FOR A COUNTY-WIDE MORATORIUM ON LARGE-SCALE INDUSTRIAL WIND TURBINE PROJECTS AND THE INITIATION OF LEGITIMATE INDEPENDENT SCIENCE-BASED RESEARCH STUDIES TO DETERMINE SAFE SETBACKS¹, IF ANY, FROM OPERATING LARGE WIND TURBINE PROJECTS CAN BE DETERMINED AS ADEQUATE TO PROTECT PUBLIC HEALTH AND SAFETY FROM PROJECT-RELATED EMISSIONS / IMPACT/EFFECTS.

Our position is based on the following precedents being established that could be applied in our community with particular concern regarding future industrial solar projects:

- The County's General Plan and the Boulevard Community Plan was just approved in August and should not be amended (as proposed) in a manner that reduces protections for rural communities, impacted property owners, and sensitive resources, in order to facilitate and streamline the permitting of unnecessary, disruptive, and very expensive large-scale industrial wind energy projects.
- Industrial wind turbines projects , are not a "civic use". They are for-profit commercial industrial projects and should be recognized as such, regardless of which community or sensitive lands they are proposed in or adjacent to. Descanso land use designators also include "civic use" that no one imagines means industrial electricity generation.
- Large-scale wind turbine projects require an extensive land base, and air space, in addition to new power line and substation projects that represent an increased risk of wildfires in underserved fire-prone rural areas through potential malfunctioning turbine equipment and

¹ Explicit Cautionary Notice To Those Responsible for Wind Turbine Siting Decisions:
<http://wubrafoundation.com.au/Y2NpZD0xImNhaWQ9MTMmYWlKPSZjcM9MTQ00Tg1MjMyOA%3D%3D>

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Response to Comment Letter K

Descanso Community Planning Group

Michael A. Sterns

December 22, 2011

K-1

The County acknowledges the Descanso Community Planning Group (CPG) opposition to the proposed project and the reduced alternatives. The CPG position will be made clear to the decision makers for this project.

K-2

The County acknowledges that the Descanso CPG supports the No Project Alternative in the DEIR. This information will be provided to the County Planning Commission and Board of Supervisors.

K-3

The comment requests a moratorium for large wind turbine projects and the initiation of new studies to evaluate impacts from large wind turbines. This recommendation would conflict with the project objectives of the Wind Energy Ordinance. Nevertheless, the Descanso CPG can present this option to the County Board of Supervisors as a project alternative during the hearing process. In addition, the CPG's comments will be included in the Final EIR and staff report to the decision makers.

K-4

The County acknowledges the Descanso (CPG) opposition to the General Plan Amendment proposed

Reponses to Comments

	<p>for the Boulevard Community Plan. Both the Limited Large Wind Turbine Alternative and the No Project Alternative would maintain the existing language within the community plan. Ultimately, the County Board of Supervisors will determine which project or alternative will be implemented. The information in this comment will be in the Final EIR for review and consideration by the Board.</p> <p>K-5 This comment does not raise a significant environmental issue for which a response is required. For clarification, large wind turbine projects are categorized as Major Impact Services and Utilities in the Zoning Ordinance, which is a civic use type pursuant to Section 2105.a. The proposed Wind Energy Ordinance will not change this classification; therefore, large wind turbines would still fall under civic use types.</p> <p>K-6 Issues raised in this comment are not inconsistent with the existing content of the DEIR. Section 2.6.3.7 identifies potentially significant impacts associated with wildland fires for both large and small wind turbines. It should be noted, however, that issues related to fire insurance rates/coverage were not discussed in the DEIR since this topic is not related to environmental impacts. See CEQA Guidelines section 15131.</p>
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Reponses to Comments

<p>related infrastructure that can result in catastrophic wildfires, increased fire insurance rates, or loss of fire insurance coverage due to increased risk.</p> <ul style="list-style-type: none"> These industrial projects can also represent a significant loss of property values, and quality of life for impacted non-participating property owners as already documented by numerous professional real estate appraisers, and others, who are not associated with the wind industry or government funded studies meant to support and promote wind energy projects. <p>Our position also includes the following concerns being ignored in this process:</p> <ul style="list-style-type: none"> Large-scale Industrial wind turbine projects, with turbines up to 500 feet tall, are not compatible in bulk and scale with historic rural land uses, under County authority, and represent a degrading and invasive visual intrusion, day and night (with FAA required lighting), regardless of which San Diego County community's view shed is impacted. Adverse health effects have been documented in people living in homes up to 10 km (6.21 miles) of industrial wind energy projects and substations, with homes reportedly abandoned near wind projects in the US, Australia, Canada, Japan, and throughout Europe as documented by various groups including The Society for Wind Vigilance², The Waubra Foundation³, European Platform Against Windfarms⁴, North American Platform Against Windfarms⁵, Industrial Wind Action⁶, National Wind Watch⁷ and others. Significant adverse impacts to wildlife and livestock, from industrial wind turbine project operations, has been documented by many of the same groups noted above, in addition to national non-profit environmental organizations, news media, and others. <p>Please consider the County's obligation to protect the public health and safety and well being of all County residents along with the diverse natural resources.</p> <p>Respectfully, <i>M. A. Sterns</i> Michael A. Sterns, Chair</p> <p>CC: Supervisor Dianne Jacob</p> <p>² www.windvigilance.com ³ www.waubrafoundation.com.au ⁴ http://www.epaw.org/ ⁵ http://www.na-paw.org/ ⁶ www.windaction.org ⁷ http://www.wind-watch.org/</p>	<p>K-7 This comment raises concerns regarding property values. This topic was not evaluated in the DEIR since it is not related to environmental impacts. See CEQA Guidelines section 15131. However, this type of information can be presented to decision makers for their consideration during the hearing process for the project.</p> <p>K-8 Issues raised in this comment are not inconsistent with the existing content of the DEIR. Section 2.1 identifies potentially significant impacts associated with aesthetics and community character. While future large wind turbine projects will be required to minimize visual impacts, it is anticipated that most will have significant and unavoidable aesthetic effects.</p> <p>K-9 Please see response to comment F1.</p> <p>K-10 The County agrees that large wind turbine projects may result in significant impacts to wildlife, such as birds and bats, and to agricultural resources. See DEIR Sections 2.4.7 and 2.2.7.</p>
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