

BOULEVARD PLANNING GROUP

P.O. Box 1272, BOULEVARD, CA 91905

Letter
X30

DATE: 1-16-18

TO: San Diego County Planning Commissioners via Lisa.Fitzpatrick@sdcounty.ca.gov ; cc: Maggie.Soffel@sdcounty.ca.gov , Dianne.jacob@sdcounty.ca.gov , Adam.Wilson@sdcounty.ca.gov

FROM: Donna Tisdale, as an individual and as Chair of the Boulevard Planning Group; tisdale.donna@gmail.com; 619-766-4170

RE: CLIMATE ACTION PLAN; POD 15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003 & RELATED ACTIONS

Dear Commissioners,

At our regular meeting, held on January 4th, the Boulevard Planning Group voted unanimously, with Seat 6 vacant and Seat 2 absent, to authorize me to submit comments and to represent the Group at the Planning Commission hearings on January 18th and 19th.

The 9 days between the January 8th release and the January 16th comment deadline for the PC hearing is vastly inadequate to review the volume and density of information and response to comments released for the CAP and related documents. Due to limited time available, these comments are neither thorough nor complete.

Project alternatives are allegedly developed to avoid or substantially lessen significant or potentially significant adverse environmental effects while attaining most of the basic project objectives.

1. *For that reason, we do support the Enhanced Direct Investment Program Alternative (without the Renewable Energy Program) with the Increased Solid Waste Diversion Alternative.*
2. *We continue to support the Distributed Generation Alternative which should not be eliminated (see related comments for Chapter 4-4.2.5).*
3. *We also support Option 2-Housing Affordability.*
4. *We strongly oppose the CAP Option 1- 100% Renewable Energy & Option 3 that includes the 100% Renewable Energy Alternative:*
 - a) There are currently too many unknowns regarding the potential location and impacts of large-scale projects for 100% renewable energy and related to the fate of existing and new base load gas-fired power plants that currently provide back-up energy for renewable. These base-load plants have already been paid for or are being paid for by ratepayers.
 - b) How will SDG&E and other utilities deal with billions in stranded investments in that base load infrastructure, if and when the County and other entities go 100% renewable.
 - c) The CPUC is still dealing with these major issues and who will pay for what. More facts are needed.
 - d) As recognized in 4.3.3.2 & 4.3.3.3 (Alternatives), Options 1 & 2 will likely increase the number and size of large scale renewable plants (energy sprawl) that could be

Response to Comment Letter X30

Boulevard Planning Group

Donna Tisdale, Chair

January 16, 2018

- X30-1** The comment provides introductory remarks and states that the Boulevard Community Planning Group voted unanimously to submit this comment letter. The comment also expresses concern regarding the review period for Final CAP and Final SEIR materials and concluded that it was too short to provide a comprehensive review. The County appreciates the comment and acknowledges that the 10-day period, though compliant with state law and County policies, was challenging. However, the review period was necessary to fulfill the County's commitment to present the project to the Board of Supervisors by Winter 2018. The comment will be included with the Final SEIR and submitted to decision makers.
- X30-2** The comment expresses support for the Enhanced Direct Investment Program, Increased Solid Waste Alternative, Distributed Generation Alternative, and CAP Option 2. The County acknowledges the comment and it will be included with the Final SEIR and submitted to decision makers.
- X30-3** The comment expresses opposition to CAP Option 1 and CAP Option 3 because of concerns related to the environmental impacts that are related to large-scale renewable energy systems. The Final SEIR adequately analyzed all potential environmental impacts related to large-scale renewable energy projects. On July 10, 2012, the County of San Diego Health and Human Services Agency issued a Public Health Position Statement (County 2012c) on human health effects of wind turbines that summarized the findings of evidence documented in the literature on the issue at that time. This Statement found that while the sound and noise associated with a wind turbine may cause annoyance, low frequency infrasound on humans is not well understood and researchers have concluded that there is no evidence of health effects

arising from infrasound generated by wind turbines. The Statement also found that wind farms do not pose a threat to public health. Since that time, the State of California Energy Commission issued a final project report titled 'Public Health Research Roadmap on Emerging Electricity Systems' (CEC 2017). This report concluded that research to date has not provided convincing evidence to support the relationship between turbine infrasound and other health impacts, but that further research is needed. In addition, a peer-reviewed journal article from the International Commission on Biological Effects of Noise supports the same conclusions that there is no evidence of direct negative impact on human health of wind turbines. "The limited number of studies carried out on this issue and their methodological defects all suggest that it is currently not possible to conclude as to the impact of wind turbine noise on health" (ICBEN 2017). Please also refer to response to comments for letter C5 for previously published responses to these concerns. The comment will be included with the Final SEIR and submitted to decision makers.

- concentrated in one area with impacts localized. Most of those impacts are listed as significant and unavoidable.
- e) Concentration of large projects would result in increased and potentially significant and cumulatively considerable effects to the following areas of environmental concern for our rural residents and resources, identified in F.2 on page 13 of the Planning Commission Report dated January 18th: Aesthetics; Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural and Historical Resources; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Transportation and Traffic; and Tribal Cultural Resources
 - f) Community character, quality of life, and property values will also suffer
 - g) Existing wind and solar projects have removed and/or seriously eroded tons of top soil by clear grading for large-scale energy projects over thousands of acres documented at those sites.
 - h) Adjacent residents of existing wind and solar projects have personally complained and provided documentation of the increased air pollution, disturbed top soil, windblown sand, new sand build up/dunes around homes, foamy runoff onto roads and private properties during storm events related to soil stabilizers, increased traffic, road damage, and more.
 - i) Residents impacted by Pattern Energy's Ocotillo Wind project with 112 industrial wind turbines, located in western Imperial County, just down the hill from Boulevard, have documented the many adverse impacts and turbine/project failures on their [Ocotillo Wind Destruction Facebook page](#). Please take a minute to review their telling photos and postings: <https://www.facebook.com/OcotilloWindTurbineDestruction> .
 - j) Backcountry Against Dumps and the Protect Our Communities Foundation previously submitted professional reports documenting noise, infrasound, and electrical pollution at homes impacted by the Kumeyaay Wind and Ocotillo Wind turbines.
 - k) I have personally visited numerous homes, locally, in Palm Springs, and in Canada, that are impacted by large wind turbines and have experienced the same strange and disorienting reactions related to low frequency noise, vibrations, electrical pollution, and shadow flicker. For us, those impacts are real and must be addressed through this CAP that promotes industrial wind without any proper health impact assessments!
 - l) It is our understanding that the much delayed promise of biannual review of literature on adverse health impacts generated by low frequency noise, infrasound, vibrations and electrical pollution generated by industrial wind turbines will not be part of the CAP, even though industrial wind turbines are proposed to be part of the plan to reduce GHG emissions...
 - m) Further delaying/deferring review of the adverse health impacts, which are already being suffered within our turbine-impacted community, is another failure of the CAP EIR. You can't rely on an energy source when you refuse to address the impacts.
 - n) Further deferring any health impact assessment or literature review of impacts to a Renewable Energy Program is also inadequate, especially with a new San Diego Wind application in process for the Boulevard Planning Area.

X30-3
cont.

- o) What happens if the 100% Renewable Energy Alternative and related Renewable Energy Program do not get approved? Boulevard will be stuck with more impacts and little to no help from the County to protect public health and safety from these known hazards.
- p) Attempting to downplay or erase the impacts related to large-scale energy projects, on paper only, by stating that impacts are significant and unavoidable and mitigation is not feasible through empty mitigation measures and self-serving Statements of Overriding Considerations, is disingenuous at best and dangerous for those impacted.

X30-3
cont.

At page 2, the PC Hearing Report states that the draft Final CAP is structured to advance and build upon the 2011 GPU's vision and guiding principles to *promote health, sustainability, environmental stewardship, vitality of the local economy, and individual character of existing communities.*

At page 3, the PC report states that the GPU provides a framework for growth and development while *"maintaining and preserving the county's unique and diverse communities, agricultural areas, and open space"*.

- Our ground zero area is targeted for industrial energy/transmission projects. From our perspective, the empty words noted above have been repeatedly used to support massive projects that have left our area, our residents, our community character, our quality of life, and our at-risk resources disproportionately impacted in a significant and cumulatively considerable and visually intrusive and degraded manner.
- Anyone living in or driving through our area day or night cannot avoid the sight of industrial wind turbines that now dominate our once uncluttered and scenic ridgelines north of I-8, and east of Jacumba, that are now visible for miles and miles around. The bright red flashing FAA night lights are equally distracting and dominating where once dark skies were the norm.
- *New invasive and out-of-character projects proposed here include Invenergy's 100MW energy storage facility, one of the largest in the world, and Terra Gen's San Diego Wind project.*
- Existing industrial solar projects in Jacumba and Imperial County, with their hundreds of inverters, their substations, and new gen-tie lines show us what the future holds for our open spaces and resources if approved/proposed projects go forward. It is not a pretty picture.
- Staff's response to requests for information related to the number, name-plate capacity, and acreage of the large-scale energy/transmission projects approved within the County are still outstanding. The same is true for the amount of groundwater/water consumed during the construction of Iberdrola's Tule Wind project.
- The requested information was needed in a timely manner in order to provide factual comments on this CAP and related documents/actions.

X30-4

Response C5-2:

- At ES-2, the CAP states that it is relying on the MSUP and other County Sustainability Programs, and that aligns with and builds upon these past efforts through complementary implementation-focused actions.
- *The CAP and related documents are inadequate due to the failure to move forward with the long-deferred East County MSUP to the point that it cannot be relied on to protect our*

X30-5

X30-4 The comment expresses concerns related to the potential for new large-scale renewable energy projects in the Boulevard area. The Final SEIR adequately analyzed all potential environmental impacts related to large-scale renewable energy systems. The County acknowledges these concerns and has addressed them comprehensively in response to comment letter C5. See response X30-3 above regarding impacts from wind projects.

X30-5 The comment asserts that the CAP is inadequate because the County has not adopted an East County Multiple Species Conservation Plan. The County disagrees with the assertion because the CAP is not reliant upon the adoption of any future conservation plans. As stated on page 3-10, GHG Reduction Measure T-1.1 would result in the additional acquisition of conservation land and subsequent GHG emissions reductions in the absence of the adoption of any future conservation area plans.

resources that are placed at risk by large-scale industrial wind, solar and related transmission projects.

- *Stated reliance on a non-existing East County MSUP, where the majorities of large-scale projects have been approved and are proposed, is unjust.*

Response C5-4

- Where is the evidence that the renewable energy projects would result in net positive reductions in GHG emissions?
- How could the Draft SEIR evaluate the potential for GHG emissions and groundwater resource impacts related to implementation of large-scale renewable energy systems, at a program level, when even Staff cannot foresee the number or location of future renewable energy projects and is now proposing to increase to 100% renewable energy?

Social Equity & Environmental Justice:

- Staff's **response #C5-6** dismisses our Environmental Justice concerns by stating that there are no designated Environmental Justice communities as defined by state law in the unincorporated county.
- The CAP and related documents talk about "social equity" but talk is cheap.
- At this point, the Boulevard Planning Group and many of our constituents do not perceive that we are receiving the same degree of social equity and protection from environmental and health hazards. You cannot ignore or waive away health hazards just because they are generated by industrial wind, solar, and electrical infrastructure.
- The CAP fails to provide evidence that a community must be designated in order to receive fair treatment and the same degree of protection from environmental and health hazards.
- State law defines environmental justice to mean "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies."¹
- The USEPA defines Environmental Justice as follows²:
 - Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
 - EPA has this goal for all communities and persons across this nation. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards, and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.
- We repeat that our predominantly low-income Boulevard Planning Area and adjacent areas, including the Campo, La Posta, and Manzanita tribal reservations, and Jacumba, have been disproportionately impacted with industrial scale energy/transmission/storage projects, while project related conservation and other mitigation has largely taken place outside our area to the benefit of other communities and entities.

¹ <https://oehha.ca.gov/calenviroscreen>

² <https://www.epa.gov/environmentaljustice>

X30-5
cont.

X30-6

X30-7

X30-6 The comment is provided in response to comment C5-4 and questions the availability of evidence that large-scale renewable energy project would result in net positive GHG emissions reductions. See the previous response to C5-4. Additionally, the County notes that SDG&E's current renewable energy portfolio generated over 40% of the total energy delivered by the local utility. However, GHG Reduction Measure 1.2, which may result in large-scale renewable energy projects, would be required to achieve 90% renewable energy. Therefore, implementation of the CAP would result in net GHG emissions reductions by necessity.

The comment also questions how the Final SEIR determined impacts related to the consumption of groundwater and GHG emissions at the plan level. As described throughout the Final SEIR, and more specifically in Chapter 2.9, Hydrology and Water Quality, impacts related to groundwater consumption were determined to be significant and unavoidable because the locations, type, and scale of large-scale renewable energy projects are unknown at this time. The Final SEIR also notes the potential to exacerbate these impacts with the adoption of the 100% Renewable Energy Alternative as described in Chapter 4, Alternatives on pages 4-19 through 4-48. The Final SEIR determines that GHG emissions impacts will be significant and unavoidable because the CAP will not result in meeting the 2050 goal. Refer to Chapter 2.7, Greenhouse Gas Emissions for more information. Impacts can be reasonably identified at the program level but as noted throughout the Final SEIR, project-level CEQA evaluation would provide additional analysis at the time of discretionary review. The comment will be included with the Final SEIR and submitted to decision makers.

X30-7 The comment relates to response to comment C5-6 and expresses additional concerns that Boulevard and surrounding areas are disproportionately impacted by the environmental impacts related to large-scale renewable energy projects. The County acknowledges the comment and concerns by the group and as stated previously has comprehensively addressed these concerns in response to comment letter C5. As was stated at the Planning Commission Hearing on the

CAP on January 18, 2018, the state now requires jurisdictions to include an Environmental Justice element as General Plans are updated under Senate Bill 1000. Therefore, the County will evaluate communities within the unincorporated area for demographic and social inequities during the preparation of this new element.

- The County should conduct a legitimate Health Impact Assessment for residents suffering impacts from the operation of the existing Kumeyaay and Tule Wind turbines that impact residents within the Boulevard Planning Area. Coordination with the Indian Health Services should be considered due to the number or tribal residents impacted who also reside within the Boulevard Planning Area boundaries.
- We incorporate by reference our many formal comments previously submitted to the County on the Wind Energy Ordinance, Soitec Solar projects, Tule Wind, Jewel Valley Wind, Shu'luuk Wind, Sunrise Powerlink, ECO Substation, Fire Hardening and increased capacity of TL931, and all the other wind and solar projects listed in our previous CREP comments.

X30-7
cont.

Response C5-11:

- *If the Board hearing on the CAP will include information on CCAs, as well as other renewable energy programs as part of the GHG Reduction Measure E-2.1 (Increase in Renewable Electricity) this would appear to be a predetermined decision that the Renewable Energy Option to increase to 100% will be approved by the Planning Commission prior to the Board hearing.*
- Staff states that we provided NO evidence that most large-scale energy projects import most of their labor from out of state.
- We did provide our first-hand experiences and eye-witness observations as evidence of hundreds of out-of-state vehicles and laborers on our roads, in our markets, gas stations, campgrounds, motels, and neighborhoods and Jacumba's during the construction of the SDG&E's Sunrise Powerlink, SDG&E's ECO Substation and new 138kV lines, Iberdrola's Tule Wind, and SDG&E's fire hardening and approximately 5-fold increased carrying capacity of TL 6931 (Boulevard) , Jacumba Solar, Energia Sierra Juarez Gen-tie line, Ocotillo Wind, and a dozen or so large-scale solar and related projects constructed on productive farm land in Imperial County.
- *Most justice systems rely on eye-witness accounts. On the other hand, Staff provided NO evidence to contradict our eye-witness accounts other than their unsupported statements.*
- *Repeating the same unsupported statements does not make them true.*

X30-8

Response C5-19:

- The response, to our concerns over loss of carbon sequestering chaparral and soils for large renewable energy projects, directs us to Master Response 11 which basically states that this issue is still in flux awaiting the State's CALAND effort.
- Assumptions are stated that renewable energy project benefits would outweigh GHG impacts and any feasible mitigation would be required during project specific CEQA review.
- We have lost faith in the system. Our concern is over concentrated impacts related to being a targeted area for conversion into a renewable energy sacrifice zone and the fact that most mitigation for local impacts for existing projects, like preservation of similar resources, has taken place outside our impacted area. Where is the equity?

X30-9

Response C5-23:

X30-10

X30-8 The comment relates to response to comment C5-11 and expresses concerns about the possibility of the establishment of a community renewable energy program. The comment does not provide new information related to the concerns previously asserted, therefore no further comment is required or necessary. In addition, there has been no “predetermined decision” related to Reduction Measure E.2.1. The comment will be included with the Final SEIR and submitted to decision makers.

X30-9 The comment relates to response to comment C5-19 and expresses continued concerns related to the loss of carbon sequestration benefits of chaparral and soils as a result of developing large scale renewable energy projects. No new information is provided, and the County acknowledges this comment. The comment will be included with the Final SEIR and submitted to decision makers.

X30-10 The comment is provided in relation to responses to comments C5-23, C5-25, C5-26 and expresses continued concerns related to environmental impacts from the development of large-scale renewable energy systems. No new information is provided, and these concerns have been previously addressed in response to letter C5. The comments will be included with the Final SEIR and submitted to decision makers.

- This response is inadequate as is the related CAP content.
- Simply pointing to alleged mitigation measures, just words on paper, does not address the real world impacts of looking at industrial scale wind turbines or hundreds of acres of solar panels from and elevated or close up view from your residential property.
- These impacts are destruction and cannot be mitigated away, as repeatedly admitted in the CAP and related documents.
- The only viable mitigation is to avoid large-scale in-your-face projects that impact residential and recreational areas.

Response C5-25:

- Staff response is inadequate as is the related CAP content.
- See response to C5-19

Response C5-26:

- Staff response is inadequate as is the referenced CAP evaluation /content.
- We have provided plenty of content to dispute the analysis in the SEIR.
- It is easy to sit in a chair in an office in town when you don't have to live with the reality of these large-scale projects the way our rural residents do.
- See response to Response C5-6 under Social Equity & Environmental Justice
- See comments 4 e-p on pages 2-3 above.
- We hereby incorporate by reference our previous comments and evidence submitted to the County previously for GPU 2011, SDG&E's Sunrise Powerlink, SDG&E's ECO Substation and new 138kV lines, Iberdrola's Tule Wind, and SDG&E's fire hardening and approximately 5-fold increased carrying capacity of TL 6931 (Boulevard), Jacumba Solar, Energia Sierra Juarez Gen-tie line, Ocotillo Wind, and a dozen or so large-scale solar and related projects constructed on productive farm land in Imperial County.
- The comments for various projects that are incorporated by reference do address the adverse impacts related to large-scale renewable energy and transmission projects and should be used as an example of what to expect for future projects, especially if Option 1-100% Renewable Energy is approved. The comments address the project and analysis in the SEIR better than some of the assumptions used.

Response C5-28:

- *Denial of understanding what is meant by "electrical pollution" as an excuse not to provide a response is vastly inadequate and alarming. A quick internet search provides plenty of information.*
- Electrical pollution /radiation is a side effect generated by most if not all electrical power and transmission sources, it includes stray voltage, harmonics, dirty electricity, and radiation.

X30-10
cont.

X30-11

X30-11 The comment is provided in relation to response to comment C5-28 and expresses continued concerns related to electrical pollution that is generated from some types of industrial infrastructure. The comment was previously submitted. No new information is provided, and these concerns have been previously addressed in response to letter C5 and above in X30-3. The Final SEIR adequately analyzed potential environmental impacts related to large-scale renewable energy systems. In addition to the Final SEIR's disclosure of impacts from these future projects, each new large-scale renewable energy project would also be required to undergo a comprehensive discretionary review process and independent CEQA analysis at the time of project application. The comment will be included with the Final SEIR and submitted to decision makers.

- Here are links to documents/scientific research describing electrical pollution/radiation and the related adverse health effects^{3,4}.
- Large scale wind, solar, energy storage, substations, transformers, transmission lines all generate electrical pollution/interference that can travel through the air and ground and invade people's homes and bodies through their grounded plumbing, electrical lines, and through the air.
- A study was conducted locally, Nov 18-20, 2012 by Sal La Duca, Environmental Assay, Inc, documenting electrical pollution in homes impacted by the Kumeyaay Wind and Ocotillo Wind turbines. It was submitted to the County during the Wind Energy Ordinance review period and is incorporated by reference here.
- Large scale solar projects and electrical transmission infrastructure also generate similar electrical pollution that migrates off-site in a similar manner.

X30-11
cont.

Response C5-29

- See response to Response C5-26

Response C5-30:

- The County provides no evidence to counter our experience that PDS supports renewable energy projects over protection of cultural and historical resources.

Response C5-31:

- Our comment was directed at the increased use of electric vehicles and pending conversion of agricultural and other equipment to electricity from fossil fuels and the related ramp up in consumption of electricity and the need to generate more electricity to meet that demand.

X30-12

Response C5-32:

- As a lay person, it is difficult to translate what we are seeing and experiencing in the real world into comments that will be taken seriously by bureaucrats.
- My personal experience driving in and around industrial scale solar projects in Imperial County show a higher temperature on the roads adjacent to those solar projects than when driving through the undeveloped desert and irrigated fields near those solar projects.
- **There is also some scientific information now available that confirms the heat island effect around solar projects:**
 - The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures⁵: [Greg A. Barron-Gafford, Rebecca L. Minor, Nathan A. Allen, Alex D. Cronin, Adria E. Brooks & Mitchell A. Pavao-Zuckerman; Scientific Reports 6,](#)

³<http://www.rebprotocol.net/November2007/WHAT%20YOU%20SHOULD%20KNOW%20ABOUT%20ELECTRICAL%20POLLUTION%20and%20dirty%20electricity%2010pp.pdf>

⁴<http://www.bioinitiative.org/research-summaries/>

⁵<https://www.nature.com/articles/srep35070>

X30-12 The comment is provided in relation to responses to comment C5-29 through C5-32, C5-34, C5-36, C5-37, C5-39 through C5-44, and C5-50. These comments have been previously submitted and addressed. The comment also cites a study concerning the potential “heat island” effect of large-scale photovoltaic (PV) projects. As described previously, the CAP does not propose any specific photovoltaic projects, but does promote renewable electricity (see GHG Reduction Measure E-2.1). The study by the commenter does not definitively conclude that every PV project would result in a heat island effect, nor does it definitively conclude what the physical impacts on the environment would be. As the CAP and Final SEIR are programmatic, it cannot be determined at this level of review if a PV project would result in the purported “heat island” effect referenced by the commenter. As acknowledged in the referenced study, there are a number of site-specific factors (and project design factors) that need to be taken into account. Again, the study does not make any definitive conclusions on the physical impacts to the environment. If a specific PV project is proposed subsequently under the CAP, the “heat island” effect would be analyzed accordingly in the appropriate environmental issue area (i.e., biological resources). As acknowledged in the Final SEIR, construction and operation of GHG Reduction Measure E-2.1 could affect special-status species, riparian habitat or other sensitive natural communities; federally protected wetlands; wildlife movement corridors or nursery sites; or conflict with local policies or ordinances and adopted habitat conservation plans or NCCPs. The comments will be included with the Final SEIR and submitted to decision makers.

Article number: 35070 (2016)doi:10.1038/srep3507; received 26 May 2016;
 Accepted:23 September 2016, Published in Scientific Reports online:13 October 2016

Response to C5-34:

- See response to Response C5-29.

Response to C5-36:

- The County’s failure to conduct the biannual literature review for adverse health impacts related to wind turbines deprives our turbine impacted community, with a new wind project pending, of the benefit of any updated review and new information.
- We are the only community in the unincorporated area to be subjected to industrial wind turbines and we are being deprived of potential information to better protect our public health and safety.

Response to C5-37:

- See response to Response C5-36.
- The CAP proposed to increase renewable energy, including industrial wind turbines.
- Tule Wind should be now be tested for noise compliance now that operation has commenced.
- Where is the equity in that?
- The SEIR’s failure to include those updates renders it inadequate for this issue.

Response C5-39:

- The CAP already admits that projects could be concentrated resulting in localized impacts.

Response C5-40:

- See responses to Responses C5-36 and C5-37.
- *Waivers should not be allowed without up-to-date science-based studies of actual projects, like the KUMEYAAY AND OCOTILLO WIND TURBINE FACILITIES NOISE MEASUREMENTS, dated 2-28-14, produced by Dr. Richard Richard A. Carman, Ph.D., P.E. and Michael A. Amato of Wilson Ihrig and Associates. This report was previously submitted to the County and is incorporated by reference here.*

Response C5-41:

- See response to C5-40.
- Waiting for project specific MUPs is just kicking the can down the road when the new projects will be allowed to tier off this SEIR.

Response C5-42:

X30-12
cont.

- See response to Responses C5-40 and C5-41
- We disagree with the County’s determination that the studies we cited are not peer reviewed.

Response C5-42:

- Based on our first-hand experience with existing wind turbines we reiterate that the Wind Energy Ordinance setbacks are vastly inadequate to protect public health and safety.

Response C5-43 & C5-44:

- The County should have but did not conduct an updated study to determine any new information on increased rooftop capacity or the capacity of parking lots for solar shade covers. Therefore, the SEIR is inadequate.

Response to C5-50:

- For clarification, our comment said we do support solid waste diversion and also suggested using closed waste sites for Anaerobic Digestion.

3.1.6 Utilities & Services @ page 3.8

- This section inexplicably denies and fails to address the high use of water resources for construction, with very real potential for significant and cumulatively considerable impacts to impacted and drought stressed sole source groundwater resources.
- This section fails to address the waste that can and will be generated by industrial wind and solar projects due to wild fires, natural disasters, or other forms of equipment failures or equipment upgrades that will result in significant amounts of waste that may not be recyclable, such as composite wind turbine blades and certain solar panels that contain hazardous materials.
- This section still fails to address the direct impact of an increased number of industrial scale wind and solar projects on the need for new / upgraded electrical transmission and storage infrastructure, all of which have the potential for significant and cumulatively considerable adverse impacts. Our previous CREP comments listed many of these projects and are incorporated by reference here.
- Adoption of Option 1-Renewable Energy has the real potential to increase and exacerbate the related impacts noted above.

Chapter 4.3.3 100 percent Renewable Energy Alternative – Expanded Analysis

- Unfortunately, most of the impacts related to large-scale renewable energy /transmission projects are listed as potentially significant and /or unavoidable with some having no feasible mitigation—other than to avoid the projects and their impacts.

Chapter 4-4.2.5 Distributed Generation should not be eliminated (see Master Response 8)

X30-12
cont.

X30-13

X30-14

X30-13 The comment is provided in response to Section 3.1.6 of the Final EIR and asserts that a discussion of groundwater resources should be provided. The topic of groundwater is discussed comprehensively in Chapter 2.9, Hydrology and Water Quality, of the Final SEIR. The Final SEIR identifies impacts related to groundwater consumption as significant and unavoidable because the exact locations, types, and scale of projects is not yet identified. The comment also expresses concern for waste that may be produced from natural disasters and the use of renewable energy equipment. It is not clear which GHG Reduction Measure that the commenter believes would result in the addition of waste, therefore, no specific response can be provided. However, the CAP does contain a GHG Reduction Measure SW 1.1 which would result in the increase in waste diversion to 75% by 2030, which would include any new waste created from the implementation of the CAP. The commenter also states that there will be a need for new or upgraded transmission and storage infrastructure. The auxiliary infrastructure that could accompany large-scale renewable energy systems because of implementing GHG Reduction Measure E-2.1 was evaluated throughout the Final SEIR by environmental topic area. The County acknowledges this comment and it will be included with the Final SEIR and submitted to decision makers.

X30-14 The comment states that because large-scale renewable energy projects would result in environmental impacts, the County should consider adopting the Distributed Generation Alternative. However, as described on pages 4-9 and 4-10 of the Final SEIR, the Alternative was determined to be infeasible because there are not enough available and feasible sites for small-scale renewable energy systems. See response to comment letter X32-21. The County acknowledges this comment and it will be included with the Final SEIR and submitted to decision makers.

- The Distributed Generation Alternative should not be eliminated or limited to residential rooftops.
- The CAP and FSEIR are inadequate due to the stated reliance on an outdated 2009 solar feasibility study that discusses residential and commercial rooftop space and fails to address or quantify the current amount of public/private parking lot space that could accommodate solar parking shades, updated rooftop capacity, or distributed energy storage or micro grid options.
- It seems incomprehensible and a failure of the CAP and related documents that the County would not and did not conduct updated feasibility studies, At page 4-10,
- The bias towards large-scale renewable energy projects is discriminatory in nature and pushes increased development towards rural communities that are located within the targeted areas, including Boulevard, Jacumba, Borrego, and Ocotillo Wells.
- Rural large-scale projects are also more vulnerable to wildfire and loss of transmission lines.

X30-14
cont.

Chapter 7 Mitigation Measures:

- The County's response to our previous comments is inadequate as are the alleged mitigations measures that do little to nothing to reduce the real world impacts to our residents and communities related to large-scale renewable energy /transmission/storage projects that already exist, have been approved, and/or are proposed within our Boulevard Planning Area and other impacted rural communities.
- We incorporate our previous comments and concerns related to inadequate and mostly useless mitigation measures.
- M-AES-1: Fails to address how to mitigate the day and night visual impact of industrial wind turbines that now average 500-600 feet tall.
- M-AES02: Fails to address the significant and cumulative adverse impacts related to industrial wind turbines.
- M-BIO-1: how can "feasible and appropriate mitigation measures" be incorporated into large-scale energy projects when it has already been determined that effects remain significant and unavoidable?⁶
- The same is true for all these measures.

X30-15

There was not enough time to file complete comments. It is incredibly disheartening and frustrating to have our sincere and legitimate comments and concerns for our residents and resources repeatedly questioned, downplayed, and basically waived away with weasel wording and Statements of Overriding Considerations that open the gate for further significant and cumulatively considerable adverse impacts/damage to the resources and places that we love and appreciate.

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⁶Attachment M-4 @page 17
<https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/FinalPublicReviewDocs/CAPWebAttachments/m4renewableenergyoptionfindingsandsocs.pdf>

X30-15 The comment expresses concern regarding the mitigation measures incorporated into the Final SEIR. Specifically, the commenter is concerned that Mitigation Measures M-AES-1 and M-AES-2 do not result in less than significant impacts. This is consistent with the impact conclusions identified on pages 2.1-36 through 2.1-42. The County acknowledges this comment and it will be included with the Final SEIR and submitted to decision makers.