

Letter
C5

From: Donna Tisdale
To: CAP
Subject: Blvd PG CAP comments
Date: Monday, September 25, 2017 11:51:49 AM
Attachments: BPG CAP comments 9-25-17.pdf

RE: CLIMATE ACTION PLAN (PDS2015-POD-15-002), GENERAL PLAN
 AMENDMENT (PDS2016-GPA-16-007), DRAFT SEIR (LOG NO. PDS2016-ER-16-00-
 003)

Hello CAP Team,

Please find the attached CAP comments from the Boulevard Planning Group.

Please confirm receipt.

Regards,

Donna Tisdale
 619-766-4170

Response to Comment Letter C5

Boulevard Planning Group
Donna Tisdale, Chair
September 25, 2017

BOULEVARD PLANNING GROUP

P.O. Box 1272, Boulevard, CA 91905

September 25, 2017

TO: San Diego County Planning & Development Services
Attn: Maggie Soffel
5510 Overland Avenue
Suite 310 San Diego, CA 92123
Via: CAP@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 (PDS2015-POD-15-002), GENERAL PLAN AMENDMENT (PDS2016-GPA-16-007), DRAFT SEIR (LOG NO. PDS2016-ER-16-00-003)

At our regular meeting held on September 7th, our group voted 6-0-0 (Seat 6 vacant) to approve the following motion: M/S: Strand/Goodnight: Authorize the Chair to submit appropriate comments based on the Boulevard Planning Group's ongoing opposition to large-scale renewable energy projects; and supporting the Enhanced Direct Investment Alternative that would reportedly reduce demand for large-scale energy projects.

C5-1

DRAFT CAP Plan:

Chapter 3 Greenhouse Gas Reduction Strategies & Measures:

T-1.1: Acquire Open Space Conservation Land

- The long delayed East County MSCP has allowed industrial scale energy projects to be approved in sensitive areas, including the Tule Creek floodplain/ McCain Valley Wildlife Management and Recreation Area that serve as wildlife corridors, habitat, and provide carbon sequestration.
- The same is true for most industrial scale energy projects proposed/approved in rural far East County.
- By the time the East County MSCP is finalized, many of our most sensitive and scenic lands and related habitat/carbon sequestration benefits will likely have already been lost to development.

C5-2

T-1.2: Acquire Agricultural Easements:

- We support the purchase of Agricultural Conservation Easements to preserve farmland and reduce non-agricultural development projects on those lands.

C5-3

T-2.2: Reduce New Non-residential Development Vehicle Miles Traveled

- Industrial scale energy / transmission projects in rural areas result in massive VMT and related GHG emissions.

C5-4

1

Boulevard Planning Group Draft CAP and Draft SEIS comments

9-25-17

C5 -1: The comment provides introductory remarks and expresses the planning group's opposition to large-scale renewable energy projects and support for the Enhanced Direct Investment Alternative. The comment does not address the adequacy of the SEIR; therefore, no further response is required.

C5-2: The comment asserts that because the East County MSCP has not been adopted, previously approved or currently proposed large-scale renewable energy projects in rural eastern San Diego County have compromised sensitive resources and reduced carbon sequestration benefits. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required or necessary. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-3: The comment expresses support for GHG Reduction Measure T-1.2, which would expand the opportunity for owners of agricultural land to participate in the County's PACE Program. The County acknowledges this comment. No further response is required or necessary.

C5-4: The comment asserts that large-scale renewable energy projects result in substantial VMT, rural projects require millions of gallons of groundwater to be pumped or trucked, and SDG&E's ECO Substation resulted in over 1 million VMT. As described on page 3-20 of the CAP, measure T-2.2 would commit the County to reducing commute VMT in new non-residential development by 15% by 2030. Therefore, this measure would require non-residential projects (e.g., employment centers) to facilitate trip reduction opportunities for employees such as telecommuting, car sharing, vanpools, carpools, shuttle service, bicycle parking facilities, and transit subsidies. Large-scale renewable energy projects would not likely be required to participate in this requirement as they do not typically employ a large number of workers. As described on pages 2.12-17 through 2.12-18 of the Draft SEIR, large-scale renewable energy projects would have the potential to

result in an increase in VMT during the construction of projects related to transporting materials and workers to the site. The Draft SEIR includes CAP Mitigation Measure M-TRAF-1 which requires the application of County Guidelines for Determining Significance and subsequent project-specific mitigation as needed, however because specific project locations and details are not known, it is not possible to guarantee that all impacts would be reduced. Therefore, the Draft SEIR determined impacts related to VMT to be significant and unavoidable at the programmatic level. However, the operational VMT associated with large-scale renewable projects is not typically considered significant because the facilities do not require the employment of a large number of workers, and the production of renewable energy would result in a net positive reduction in GHG emissions.

Additionally, as described in this Draft SEIR on pages 2.9-20 through 2.9-22, consumption of water for renewable energy projects varies considerably depending upon the type of technology and cooling features used, and the proximity of groundwater resources to the locations of future projects is unknown. The type of water used for construction and operation of large-scale renewable energy projects could come from other sources besides groundwater. However, impacts related to the consumption of groundwater resources were determined to be significant and unavoidable.

The Draft SEIR evaluated the potential for GHG emissions and groundwater resources impacts related to implementation of large-scale renewable energy systems at a program-level, however, all new large-scale renewable energy projects would be required to undergo discretionary review to receive a Major Use Permit and would be required to mitigate all impacts to the extent feasible. Therefore, the County finds that the Draft SEIR appropriately disclosed the potential environmental impacts related to the development of large-scale renewable energy facilities.

- Rural projects require that millions of gallons of groundwater be pumped and trucked and/or transported by trucks from distant sources in urban/suburban communities.
- According to public records, SDG&E's ECO Substation project located east of Jacumba, resulted in over 1 million VMT, just to haul water.

C5-4
cont.**T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects**

- Alternative fuels need to be vetted for life cycle impacts that may be greater than some fossil fuels.

C5-5

T-3.3: Develop a Local Vehicle Retirement Program

- The planned program to retire 800 late-model vehicles (model year 1996 or older) in the unincorporated county by 2030, would provide even more benefits if some of those funds were focused on predominantly low-income rural communities that have longer commutes, thereby getting more GHG reduction benefits per vehicle.
- Coordination and negotiations with tribal communities should be initiated to consider placement of EV charging stations at local casino facilities to benefit both tribal and non-tribal vehicles.

C5-6

C5-7

T-4.1 Establish a Direct Investment Program

- While we understand the underlying need, Carbon Offset programs may help destructive projects meet their GHG emissions requirements through purchase of carbon credits, at the expense of the impacted communities. It is basically allowing polluters to buy their way forward.

C5-8

Strategies**E-1.3: Improve Building Energy Efficiency in Existing Development**

- The proposed project to retrofit 500 homes for energy efficiency should require a certain portion of those funds to be spent in the more rural areas that are subject to colder winters and hotter summer weather that translates into higher energy consumption.

C5-9

E-1.4: Reduce Energy Use Intensity at County Facilities

- We are glad to see the County take responsibility and to lead by example, but it seems that much higher energy reduction targets should be aspired to than 10% below 2014 levels by 2020 and 15% below 2014 levels by 2030.

C5-10

E-2.1: Increase Renewable Electricity Use

- Contrary to the statement in this section, our real world on-the-ground experience with the construction of numerous large-scale renewable energy/transmission projects in East County and Imperial County is that the vast majority of the labor force is imported from out of state.
- On the other hand, most distributed/on-site renewable energy projects hire local labor and suppliers.

C5-11

C5-5: The comment states lifecycle impacts of alternative fuels need to be described. Please see response to comment O5-7 related to this topic.

C5-6: The comment suggests that the County should focus some funds from GHG Reduction Measure T-3.3 on low-income rural communities. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR. The San Diego County Air Pollution Control District's related incentive program, the Carl Moyer Program, distributes at least 50% of grant funds to Environmental Justice communities, as defined in State law. However, there are no designated Environmental Justice communities as defined in State law in the unincorporated County.

C5-7: The comment suggests the County should coordinate with tribal communities to install EV charging stations at local casino facilities to reduce GHG emissions. The County will look for opportunities to partner with tribal communities on this matter. In addition, in response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. The comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, the comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-8: The comment asserts that carbon offset programs would allow destructive projects to meet their GHG emissions requirements. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, the comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

GHG Reduction Measure T-4.1 would establish local direct investment projects in the unincorporated County. This measure is different than the CAP Mitigation Measure M- GHG-1,

	<p>which is provided to reduce cumulative impacts. For an explanation of the functional differences between GHG Reduction Measure T-4.1 and CAP Mitigation Measure M-GHG-1 please see Master Response 13.</p> <p>C5-9: The comment suggests that a portion of funds for energy efficiency retrofits should be spent in rural communities. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-10: The comment states that much higher energy reduction targets should be aspired to than listed under GHG Reduction Measure E-1.4. In response to comments, the County has committed to increasing building energy efficiencies within its facilities to 20% below 2014 levels by 2030 (GHG Reduction Measure E-1.4). The County acknowledges this comment. Please refer to Master Response 9 related to the GHG reduction measure selection process. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-11: The comment states their experience is that large-scale renewable energy projects import labor from out of state while distributed/on-site renewable energy projects use local labor. In addition, the comment states that the Comprehensive Renewable Energy Project (CREP) Phase Two should be addressed prior to hearings on the CAP. The County acknowledges this comment. Regarding, labor forces for large-scale renewable energy projects versus distributed renewable energy projects, the comment offers no evidence to support this assertion and has no relation to the substantive environmental analysis conducted for the proposed CAP. Therefore, no further response can be provided. With regard to the CREP, on February 15, 2017 the Board of Supervisors directed the Chief Administrative Officer to consider several</p>
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CREP Phase One Report recommendations for CREP Phase Two, including: 1.) Establish a County of San Diego Sustainability Taskforce, 2.) Track Community Solar and Wind Initiatives, 3.) Increase the County's Renewable Energy Generation, Transmission, Use and Storage, 4.) Develop Strategies to Address Barriers to Alternative Fuel Deployment, 5.) Promote Vetted Renewable Energy Finance Mechanisms, 6.) Develop and Implement a Renewable Energy Education and Outreach Strategy, 7.) Develop and Implement a Strategy to Support Renewable Energy Legislation that Benefits San Diego County. These recommendations are included in the CAP as supporting efforts. In addition, the Board directed the Chief Administrative Officer to return to the Board in 12 months with a status update on other Community Choice Aggregation (CCA) feasibility studies in other jurisdictions in the state. The Board Hearing on the CAP will include information on CCAs, as well as other renewable energy programs, as part of the discussion of GHG Reduction Measure E-2.1 (Increase Renewable Electricity).

- Therefore, our group continues to support on-site renewable energy over disruptive and destructive large-scale energy projects that industrialize and destroy unique rural community character, landscapes, quality of life, and resources.
- Reference to Comprehensive Renewable Energy Plan (CREP) is limited to Phase One.
- CREP Phase Two and report back on the status of regional CCA plans should be addressed with public hearings prior to Planning Commission and Board hearings on this CAP project.

C5-11
cont.**E-2.2: Increase Renewable Electricity in Non-residential Development**

- Our group supports this requirement, pending the implementation of the State's Zero Net Energy (ZNE) standards by 2030.

C5-12

E-2.3: Install Solar Photovoltaics in Existing Homes. Increase installation of photovoltaic (PV) electrical systems in 52,273 existing residential homes by 2020 and additional 77,902 homes by 2030

- Location is critical. The County should consider prioritizing increased PV systems in homes located in the backcountry where winters are colder and summers are hotter, requiring more energy for heat and cooling.
- Onsite renewable energy generation also reduces the need for destructive and disruptive industrial scale energy projects on undeveloped sensitive lands in rural communities and natural areas.
- Boulevard is predominantly low income and disproportionately impacted by industrial solar and wind. Helping local residents reduce their energy costs and GHG emissions could help offset some adverse impacts from the industrial wind and solar projects.

C5-13

E-2.4: Increase Use of Renewable Electricity for County Operations

- The County can and should do much better than the plan to generate 10% of the County's operational electricity with renewables by 2020 and 20% by 2030.
- Why limit the County to just 10-20%??
- Our group appreciates the fact that County will focus on onsite renewables over Direct Access.

C5-14

SW-1: Increase Solid Waste Diversion in the Unincorporated County

- Our group commends the County's Strategic Plan to Reduce Waste to divert 75% of solid waste from landfills that generate GHG emissions and groundwater pollution, by 2025.
- As the former unwilling hosts of the previously proposed 600 acre Campo Landfill and La Posta Recycling Center, for burning hazardous wastes, we are especially supportive!
- County support for increased funds for successful clean up and waste collection events in rural communities, with no easy access to legal disposal sites, helps decrease illegal disposal and related problems.
- As of today, composite wind turbine blades are not recyclable and some solar panels include hazardous materials. Individual project requirements must include bonds to cover proper handling or other requirements to ensure the non-recyclable materials go back to their manufacturers.

C5-15

C5-16

C5-12: The comment expresses support for GHG Reduction Measure E-2.2. The County acknowledges this comment. No further response is required.

C5-13: The comment suggests that the County should prioritize the installation of PV systems in homes that are located in rural areas to save energy associated with colder winters and hotter summers and because it could offset some impacts from industrial wind and solar projects. As described within GHG Reduction Measure E-2.3, on page 3-56 of the CAP, the County has a variety of existing initiatives and programs designed to help facilitate the installation of solar photovoltaics (PV) in existing homes. Expedited and online permitting for small residential roof-mount solar PV is available to all unincorporated county residents, including those located in rural areas. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-14: The comment states the County should plan to generate more than 10% of the County's operational energy by 2020 and 20% by 2030. The County acknowledges this comment. Please refer to Master Response 9 related to the GHG reduction measure selection process. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-15: The comment expresses support for GHG Reduction Measure SW-1.1 which would establish a 75% waste diversion target for the county by 2030. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-16: The comment states that some wind turbine blades are not recyclable, and some photovoltaic panels contain hazardous materials and that future projects should include a bond to ensure that the materials are returned to the manufacturer. Please refer to response C5-5 regarding lifecycle emissions analyses. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

<p>Water & Waste water:</p> <ul style="list-style-type: none"> • Our group commends the County and others for reducing the use of potable water that also reduces the energy and the need to treat waste water. • We also want to remind the County that all of our Boulevard Planning Area and many others are 100% reliant on at risk groundwater resources. • The vast majority of our homes and ranches are served by private wells and septic systems. • Has the County taken this information into account when making their calculations on water use and reduction requirements? • Easier access to discounted rain barrels in our rural areas would be appreciated. <p>A-2: Increase Carbon Sequestration</p> <ul style="list-style-type: none"> • This section should recognize the carbon sequestration benefits related to native chaparral, grasslands, and undisturbed soils. <p>A-2.1: Increase Residential Tree Planting</p> <ul style="list-style-type: none"> • Our group strongly supports the new requirement for the planting of two trees per new residential unit, but would encourage a higher number where lot size allows. • The high rate of oak mortality has had a significant adverse impact. <p>A-2.2: Increase County Tree Planting</p> <ul style="list-style-type: none"> • We strongly support the plan for the County to plant 3,500 trees annually starting in 2017 and request that a certain percentage of those trees be offered in rural communities that have been hit hard by the devastating loss of thousands of ancient oaks and pines. • Why wait until 2025 to conduct a tree canopy assessment? • Drought tolerant native trees should be used to reduce related water needs. <p>Chapter 4 Climate Change Vulnerability, Resilience, and Adaptation</p> <ul style="list-style-type: none"> • The Boulevard Planning Area and the rest of the backcountry are more vulnerable to most of the listed climate change impacts than the majority of the already built urban/suburban areas, especially increased temperatures, extreme heat, wildfire risk, changes in rain patterns and water supply. • Solar energy projects actually produce less energy when the temperatures rise, especially during extreme heat events, as has happened to industrial solar projects already operating in the Imperial Valley. • More energy is also required to keep the large solar inverters cooled in hotter climates. • Reliance on long distance transmission lines for rural industrial scale energy projects is also placed at risk during high temperatures / heat waves when those lines can fail. • Long periods of calm or low wind weather also reduce output from industrial scale wind projects. The same is true for high wind events when turbines are shut down. • Distributed generation in the already built environment and on new development would be less vulnerable to those impacts than industrial scale energy projects in the backcountry. <p>4 Boulevard Planning Group Draft CAP and Draft SEIS comments 9-25-17</p>	<p>C5-17: The comment commends the County for reducing use of potable water and reminds the County that the Boulevard Planning Area is 100% reliant on at-risk groundwater and asks if this was taken into account on water use assumptions. The County acknowledges this comment. The GHG emissions inventory accounts for energy use related to groundwater use in the county (please refer to Section 4.7 of Appendix A – 2014 Greenhouse Gas Emissions Inventory and Projections) and emissions from septic systems in the county (please refer to Section 4.9 of Appendix A – 2014 Greenhouse Gas Emissions Inventory and Projections). This comment does address the adequacy of the Draft SEIR. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-18: The comment requests access to rain barrels for rural residents in Boulevard to help conserve water. As part of GHG Reduction Measure W-2.1, described on page 3-74 of the CAP, the County will continue to work with County Water Authority and Metropolitan Water District of Southern California to provide rebates for rain barrels at County-sponsored outreach events. Residents in the Boulevard Planning Area and other areas in the backcountry can take advantage of the rebates for installation of rain barrels. This comment does not address the adequacy of the Draft SEIR. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-19: The comment states that Strategy A-2 should focus on the carbon sequestration benefits of native chaparral, grasslands, and undisturbed soil. Please refer to Master Response 11 related to carbon sequestration.</p> <p>C5-20: The comment supports GHG Reduction Measure A-2.1 and encourages planting a higher number of trees where lot size allows. As demonstrated in item 12a in the CAP Consistency Review Checklist, residential projects would be required to plant, at minimum, two trees per every new residential dwelling unit proposed. Project applicants may choose to plant additional trees beyond those required where lot size allows.</p>
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	<p>No further response is required because the comment does not address the adequacy of the Draft SEIR. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-21: The comment supports GHG Reduction Measure A-2.2 and requests that a portion of those trees be planted in rural areas and be drought tolerant species. The tree planting program adopted pursuant to this reduction measure will apply to residents in the Boulevard Planning Area as well as to other residents of the unincorporated county. As this measure is implemented, the County will continue to plant only drought-tolerant or native plant species. After the first year of the establishment period, little or no irrigation is required to maintain these trees. The County also uses other water conservation measures, including use of Calsense controllers for flow monitoring and water management, drip irrigation, landscape mulch or landscape fabric to minimize evaporation, and canopies and shading elements to reduce heat gain and minimize evapo-transpiration. The comment also asks why conducting a tree canopy assessment would not occur until 2025. As described on page 3-86 of the CAP, the County will conduct a tree canopy assessment by 2025, which means it would occur no later than that date. The commenter provides no reason as to why the County should conduct an assessment at an earlier date, nor is it required for the County to do such an assessment at any time. Nevertheless, the County is committed to this and all measures and the CAP, and as it is enforceable the assessment will occur prior to 2025. No further response is required because the comment does not address the adequacy of the Draft SEIR. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>C5-22: The comment pertains to Chapter 4 of the CAP, and the commenter asserts that Boulevard and other backcountry regions will experience disproportionate impacts related to climate change because of the extreme temperatures that typically occur there. The comment also asserts that any</p>
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renewable energy projects that are located in these areas will experience a decline in production with increased impacts related to climate change because of higher temperatures and lower wind speeds. This comment is acknowledged and will be included as part of the record and made available to the decision makers prior to a final decision on the project. The comment also asks if there will be a Phase Two of the Comprehensive Renewable Energy Plan. See response to C5-11. No further response is required because the comment does not address the adequacy of the Draft SEIR.

Chapter 5 Implementation and Monitoring

- Will there be a Phase Two of the Comprehensive Renewable Energy Plan?

CAP DRAFT SEIS

2.1 Aesthetics:

- **Adopted 2011 GPU policies:** It is ironic and sad that the majority of the policies and mitigation measures, designed to reduce impacts, listed on pages 2.1-2 to 2.1-5, are not being applied to large scale renewable energy /transmission projects that cover hundreds or thousands of acres and significantly and cumulatively impact rural neighborhoods. This practice is biased and discriminatory in nature.

Strategy T-4: Invest in Local Projects to Offset Carbon Emissions

- Our group supports the measures listed in T-4 and would encourage outreach and cooperation with local tribes to incorporate their casino shuttle buses and parking lots for park and ride facilities and locations for EV charging stations. Casino's also have large parking lots that could benefit from shaded solar parking covers that would serve to reduce casino energy use and GHG emissions.

Photovoltaic Solar or Concentrator Solar Systems (page 2.1-16)

- Large solar projects also include glare, on-site substations, and noisy inverter units, general clear grading of the project site with release of sequestered carbon, high-voltage lines to connect to nearest off-site substation, and the use of millions of gallons of water during construction.

Large-scale wind turbines (page 2.1-17)

- Industrial wind turbine facilities also include bright day and night lights that constantly flash on and off. They generate noise and electrical pollution that can adversely impact living beings.
- For perspective, the turbine in the photo below is 500 feet tall¹.



¹ <http://northeastwindmills.com/this-is-a-500-foot-wind-turbine/>

C5-22
cont.

C5-23

C5-24

C5-25

C5-26

C5-23: The comment states the General Plan policies and mitigation measures which are listed on pages 2.1 to 2.5 of the Draft SEIR are not appropriately applied to large-scale renewable energy projects in rural areas. The County disagrees with this assertion. The aesthetic impacts of large-scale renewable energy projects are evaluated in Section 2.1, Aesthetics, of the Draft SEIR, specifically within Section 2.1.4.1. Issue 1: Scenic Vistas or Scenic Resources (see pages 2.1-13 through 2.1-20), Section 2.1.4.2, Visual Character or Quality (see pages 2.1-25 through 2.1-29), and Section 2.1.4.3, Light and glare (see pages 2.1-32 through 2.1-35). Within each of those impact analyses, the County specifically identifies how implementation of GPU policies and required mitigation measures would reduce the visual impacts of renewable energy projects. Where the GPU policies and mitigation measures are effective at reducing impacts, the impact is concluded to be less-than-significant and where impacts are not reduced, additional mitigation is recommended where available. Regardless, consistent with the requirements of the GPU and other governing project requirements (e.g., 2012 Wind Energy Project and EIR), appropriate GPU policies and mitigation measures have and will be applied to proposed renewable energy projects under the CAP.

C5-24: The comment supports Strategy T-4 and states the County should work with local tribal governments to locate EV charging stations or park-and-ride facilities at local casinos. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. Additionally, the comment states that solar shade at these locations could reduce energy consumption and provide additional GHG emissions reductions. The County acknowledges this comment. No further response is required because the comment does address the adequacy of the Draft SEIR. However, this comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

	<p>C5-25: The comment lists several environmental impacts of large-scale solar projects. The Draft SEIR evaluated the environmental impacts for each of the issues listed in the comment as follows:</p> <ol style="list-style-type: none"> 1. Glare impacts are described on pages 2.1-33 through 2.1-34 of the Draft SEIR; 2. On-site substations, inverter units, transmission lines are included as components of large-scale projects page 2.1-16 and evaluated for noise on pages 2.11-12 through 2.11-13 of the Draft SEIR; 3. Site clearing and grading are evaluated for biological resources impacts on pages 2.4-10 through 2.4-20 of the Draft SEIR. 4. Water use is included as a component of large-scale projects on page 2.1-16 and impacts related to groundwater use are evaluated on pages 2.9-20 through 2.9-22 of the Draft SEIR. <p>Regarding carbon sequestration impacts, please refer to Master Response 11 related to carbon sequestration. The comment does not offer any evidence that the analysis in the Draft SEIR is inadequate; therefore, no further response is required or necessary.</p> <p>C5-26: The comment states wind turbine facilities include bright day and nighttime lighting that flashes; the facilities cause noise and electrical pollution; and that new wind turbines can be as much as 787 feet tall. The comment suggests that the County should establish height limits for these facilities. The Draft SEIR evaluated the light and glare, hazard, and noise impacts for wind turbine projects as follows:</p> <ol style="list-style-type: none"> 1. Lighting is included and evaluated on pages 2.1-33 through 2.1-34 of the Draft SEIR; 2. Noise impacts related to large-scale wind turbines are evaluated on pages 2.11-12 through 2.11-13; permanent increases in noise related to large-scale wind turbines are evaluated on page 2.11-11; and temporary noise impacts related to large-scale wind turbines are evaluated on page 2.11-27 through 2.11-28 of the Draft SEIR;
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3. The typical height of large-scale wind turbines is described on page 2.1-17 and evaluated as part of the discussion of scenic vistas on pages 2.1-15 through 2.1-20 and visual character and quality on pages 2.1-27 through 2.1-28 of the Draft SEIR. The commenter suggests that new wind turbines may be taller than the typical size of 500 feet cited in the Draft SEIR; however, the Draft SEIR is a program-level EIR that seeks to inform the public about the general physical environmental impacts resulting from implementation of the CAP, while recognizing that individual projects would be evaluated at the time of project application. The County does not attempt to predict how future technological changes may impact the possible heights of future projects.

The comment does not provide any evidence to dispute the analysis of the Draft SEIR. Therefore, no further response is required or necessary.

New wind turbines are now going super-sized up to 4 MW and 787 feet to tip of blades ² on land and, almost 300 feet taller than the turbine in photo above, and plans for up to 1,500 feet tall for off-shore turbines.³

The County should have some form of height limits in place.

C5-26
cont.

2.2 Agricultural Resources:

- We strongly object to the conversion of agricultural resources for renewable energy unless it is limited to small on-site use projects.

C5-27

2.3 Air Quality:

- Large-scale energy projects do result in air quality impacts resulting from dust and particulates generated by clear grading and removal of hundreds of acres of carbon sequestering native chaparral and disturbance of underlying soils, thereby releasing all that stored carbon.
- Soil stabilizers do not appear to be very good at controlling dust beyond the initial application.
- Initial application of soil stabilizers can also result in off-site odor and air quality impacts for adjacent neighbors, livestock, pets, and wildlife during spray on application.
- Electrical pollution is also generated by renewable energy projects and related infrastructure.

C5-28

2.4 Biological Resources:

- Our group has previously submitted comments on adverse biological impacts during the environmental review for the Wind Energy Ordinance, Tule Wind, Soitec Solar, Sunrise Powerlink, ECO Substation, Jacumba Solar, Shu'luuk Wind, Energia Sierra Juarez, and other related energy / transmission related projects. We incorporate those comments by reference.

C5-29

2.5 Cultural Historical and Paleontological Resources

- It has been our experience that PDS supports renewable energy/transmission projects over protection of cultural and historical resources in the Boulevard area.

C5-30

2.6 Energy

- Increased energy use as an alternative fuel and for increasingly high-tech and high energy use equipment must be addressed.

C5-31

2.7 Greenhouse Gas Emissions

- Most of the listed effects of climate change are expected to have impacts on our backcountry communities that are only exacerbated by the approval and construction of large-scale energy and electrical infrastructure.
- It is not readily apparent that the life cycle impacts of large-scale wind and solar projects are addressed in the Draft CAP or Draft SEIS, including the mining and processing of silica, steel, rare

C5-32

²<http://nawindpower.com/ge-rolls-biggest-onshore-wind-turbine-yet>

³<http://www.sandiegouniontribune.com/sdut-super-sized-wind-turbines-2016mar10-story.html>

C5-27: The comment objects to the County allowing any conversion of farmland for renewable energy unless limited to small on-site uses. As evaluated on pages 2.2-8 through 2.2-13 of the Draft SEIR, future large-scale renewable energy projects could result in the direct or indirect conversion of agricultural farmland. This comment is acknowledged and will be in the Final EIR and made available to the decision makers prior to a final decision on the project.

C5-28: The comment asserts that the following impacts from large-scale renewable energy projects could occur: dust and particulates, loss of carbon sequestration, off-site odor and air quality impacts related to soil stabilizers, and electrical pollution. The Draft SEIR evaluated these impacts as follows:

1. Dust and particulates related to large-scale renewable energy projects are evaluated on page 2.3-26 through 2.3-28 of the Draft SEIR and determined these impacts would be significant and unavoidable after mitigation.
2. Odor impacts related to large-scale renewable energy projects are evaluated on page 2.3-56 of the Draft SEIR. The Draft SEIR determined that large-scale renewable energy projects do not typically result in substantial sources of odor and impacts would be less than significant.
3. Regarding carbon sequestration impacts, please refer to Master Response 11 related to carbon sequestration.
4. It is unclear what is meant by electrical pollution; therefore, no response to this issue can be provided.

The comment does not offer any evidence that the analysis in the Draft SEIR is inadequate; therefore, no further response is required or necessary. Further, all future large-scale renewable energy projects would be subject to a discretionary review process during which individual projects would be conditioned to address any project specific impacts to the extent feasible.

C5-29: The comment states that the group submitted comments on adverse biological impacts during the environmental review for the Wind Energy Ordinance, Tule Wind, Soitec Solar, Sunrise

	<p>Powerlink, ECO Substation, Jacumba Solar, Shu'luuk Wind, Energia Sierra Juarez, and other related energy / transmission related projects and those comments are incorporated by reference. The incorporated by reference comments do not address the project or the analysis provided in the Draft SEIR. Therefore, no further response can be provided.</p> <p>C5-30: This commenter states that its experience is that the County's PDS Department supports renewable energy projects over protection of cultural and historical resources. The comment offers no evidence to support this statement. The cultural and historical resources impact of renewable energy projects is programmatically evaluated throughout Chapter 2.5, Cultural and Historical Resources. The comment offers no evidence to dispute the analysis provided in the Draft SEIR. Therefore, no further response is required or necessary.</p> <p>C5-31: The comment is related to the consumption of energy resources, but it is unclear what message the comment is trying to convey; therefore, no further response can be provided. Energy use is addressed in Chapter 2.6 of the SEIR.</p> <p>C5-32: The comment states that the effects of climate change in its communities would be exacerbated by the construction of large-scale renewable energy projects. This comment is acknowledged; however, the comment offers no evidence to support its statement. The Draft SEIR evaluated potential construction traffic impacts from large-scale renewable energy projects on pages 2.12-17 through 2.12-19 and water supply impacts related to large-scale renewable energy projects on pages 2.9-20 through 2.9-21 and the comment does not raise specific issues with the analysis. Therefore, no further response to this issue can be provided.</p> <p>Additionally, the comment questions whether the lifecycle impacts of large-scale renewable energy projects are addressed. Please refer to response C5-5 regarding lifecycle emissions analyses.</p>
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earth minerals, the mining of ground water, and the long-haul trucking during construction and retrofit periods, potential chemical breakdown, and the end of life disposal of mostly non-recyclable materials.

C5-32
cont.

2.8 Hazards and Hazardous Materials

- See response to 2.7 above.

C5-33

2.9 Hydrology and Water Quality

- Our group has previously submitted our comments on adverse impacts on our sole-source groundwater resources during the environmental review for the Wind Energy Ordinance, Tule Wind, Soitec Solar, Sunrise Powerlink, ECO Substation, Jacumba Solar, Shu'luuk Wind, Energia Sierra Juarez, and other related energy / transmission related projects. We incorporate those comments by reference.

C5-34

2.10 Land Use and Planning

- The Boulevard Planning Group would like to amend the Mt. Empire Subregional Plan to establish the Boulevard Community Plan as a stand-alone plan like Campo/Lake Morena and Pine Valley.
- *In the Boulevard Planning Area, we have seen LU-11.2 (Compatibility with Community Character) and LU-12.4 (Planning for Compatibility), Policy H-2.1 (Development that respects Community Character) twisted and manipulated to benefit industrial scale wind, solar and transmission projects over rural community character.*

C5-35

2.11 Noise

- Boulevard is the only San Diego County planning area impacted by industrial scale wind turbine facilities and the potentially debilitating noise and vibrations that go with them, including ground borne vibrations.
- *We are still waiting for the updated reports on wind turbine noise and vibration impacts on public health and safety that the Planning Commission requested when they approved the Wind Energy Ordinance back in 2012.*
- PDS also inexplicably waived Tule Wind's need to comply with the new noise restrictions in the Wind Energy Ordinance, thereby denying those protections to our adversely impacted rural residents.
- Industrial scale solar energy projects also include very noisy inverters and substations.
- Large scale battery storage facilities also include large fans, AC units and other noisy components.
- *We strongly disagree with the statement that industrial scale energy facilities will result in less than significant impacts. They result in cumulatively significant adverse impacts to our residents and visitors.*
- Cumulatively considerable and disproportionate adverse impacts result when more than one industrial scale renewable energy project is located in close proximity to each other and to residents such as Tule Wind and the approved Rugged Solar project.

C5-36

C5-37

C5-38

C5-39

C5-33: The comment refers the reader to comment C5-32. Please refer to response to comment C5-32.

C5-34: The comment states that the group submitted comments on adverse sole-source groundwater impacts during the environmental review for the Wind Energy Ordinance, Tule Wind, Soitec Solar, Sunrise Powerlink, ECO Substation, Jacumba Solar, Shu'luuk Wind, Energia Sierra Juarez, and other related energy / transmission related projects and those comments are incorporated by reference. The incorporated by reference comments do not address the project or the analysis provided in the Draft SEIR. Therefore, no further response can be provided.

C5-35: The comment states it would like to amend the Mt. Empire Subregional Plan to establish the Boulevard Community Plan as a stand-alone plan. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary.

C5-36: The comment states the community is waiting for updated reports on wind turbine noise and vibration impacts from the Wind Energy Ordinance. The County acknowledges this comment. The Draft SEIR evaluated impacts related to noise and vibration related to wind turbines on pages 2.11-12 through 2.11-14, 2.11-18 through 2.11-19, 2.11-21 through 2.11-23, and 2.11-26 through 2.11-28. The comment does not raise specific issues with the analysis. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary.

C5-37: The comment expresses the commenter's opinion regarding the application of noise regulations to the Tule Wind project. This comment references a previously approved project for which the County was a Responsible Agency under CEQA and is not related to the contents of the CAP or the adequacy of the Draft SEIR. No further response is required or necessary. This comment is noted and will be included in the Final EIR and made available to the decision makers prior to a final decision on the project. The Draft SEIR evaluated noise impacts related to wind turbines as described below in response to comment C5-37.

C5-38: The comment disagrees with the statement that industrial scale energy facilities would result in less-than-significant noise impacts. The Draft SEIR evaluated the noise impacts of large scale renewable energy systems and determined that impacts would be less than significant related to solar and geothermal facilities. The Draft SEIR also evaluated impacts related to wind energy facilities and determined the following:

- Excessive noise impacts related to large-scale wind turbines were evaluated on pages 2.11-12 through 2.11-13 of the Draft SEIR and were determined to be significant and unavoidable;
- Permanent increases in noise related to large-scale wind turbines were evaluated on page 2.11-11 of the Draft SEIR and were determined to be significant and unavoidable; and
- Temporary noise impacts related to large-scale wind turbines were evaluated on page 2.11-27 through 2.11-28 of the draft SEIR and were determined to be as significant and unavoidable.

As stated in the Draft SEIR, future projects would be required to undergo a discretionary review process and would be conditioned to mitigate significant impacts, where feasible.

C5-39: The comment states that cumulatively considerable and disproportionate adverse impacts result when more than one industrial scale renewable energy project is located in close proximity to each other. While the CAP includes measures to implement large-scale renewable energy projects, it does not propose specific projects or locations, the determination of which is too speculative. The Draft SEIR evaluated and provided conclusions regarding the potential significance of cumulative impacts for each issue area throughout the document. The comment does not address any specific inadequacies of the Draft SEIR; therefore, no further response is required or necessary.

- There should be no potential waivers or industrial wind turbines. It would be harmful to human health and human rights.
- *Using terms like temporary or periodic increases in ambient noise levels is not based on the realities of being impacted by industrial wind turbines where you live, work, and/or play.*
- *Adverse impacts can last 24/7 depending on the weather conditions.*
- *Claiming there is no mitigation for significant and unavoidable and cumulative excessive noise impacts from wind turbines is simply false.*
- *The feasible mitigation is to not allow industrial scale wind turbines within several miles of homes and other sensitive receptors.*
- *Rural residents have rights, too!*
- *It is disingenuous and simply false for the County to continue to claim there is no evidence of adverse health effects generated by wind turbines.*
- *In April 2017, Dr. Wayne Spring, a recently retired Australian sleep specialist wrote that wind turbine health impacts can be like sea sickness and those affected could suffer disabling symptoms including nausea, vertigo, sleep disturbance, and a sense of feeling unwell.⁴*
- *At the end of June 2017, a new study in Australia was announced, by the Sydney University-affiliated Woolcock Institute of Medical Research, to analyze potential links between wind turbines and health issues⁵.*
- *On May 12, 2017 a paper was published in the Open Journal of Social Sciences that focuses on noise pollution from "Wind Farms": Evans, A. (2017) Environmental Noise Pollution: Has Public Health Become too Utilitarian? Open Journal of Social Sciences, 5, 80-109. <https://doi.org/10.4236/ojs.2017.55007>. Evans is with the Centre for Public Health, Queen's University Belfast, Belfast, UK.*
 - *The paper's conclusion: "So has Public Health become too utilitarian? All the available evidence indicates that an important minority of local inhabitants is severely impacted by noise emitted by wind farms sited too close to their homes. This degree of Collateral Damage is too large to accept in terms of Utilitarianism. Public Health must exercise the Precautionary Principle and retain as much independence from government as possible in assessing the health effects of national policies. The Health and Human Rights of rural-dwelling citizens are every bit as important as those of the rest of society. In fact, in terms of wind energy, the overall benefit is fairly modest [113] [114] and the adverse effect on people's health is far from small. It is essential that separation distances between human habitation and wind turbines are increased. There is an international consensus emerging for a separation distance of 2 km; indeed some countries are opting for 3 km and more. Furthermore, the appropriate, focused studies should be undertaken as soon as possible."*
- *In July 2016, Portuguese scientist, Dr Alves-Pereira, presented research findings in Ireland which indicated significant risks from turbines and other mechanisms⁶.* She mentioned many studies, including research at a military aircraft facility and a wind farm in Portugal. The

C5-40

C5-41

C5-42

⁴ <http://waubrafoundation.org.au/wp-content/uploads/2017/05/Spring-W-Wind-turbines-echo-seasickness-media-release.pdf>

⁵ <http://www.sbs.com.au/news/article/2017/06/29/new-study-shed-light-potential-health-risks-wind-turbines>

⁶ <http://www.tullamoretribune.ie/articles/news/59524>

C5-40: The comment states there should be no noise waivers for large-scale wind turbine projects. Noise waivers for large-scale wind turbines were included as part of the County's Wind Energy Ordinance and are available for some projects if findings can be made to support the request as part of the Major Use Permit process. The Wind Energy Ordinance EIR was certified in 2012. This comment does not address the adequacy of the Draft SEIR and no further response is required or necessary.

C5-41: The comment expresses concern with the characterization of noise impacts as temporary or periodic and suggests that the appropriate mitigation for noise impacts would be to prohibit large turbines within several miles of private residences. The Draft SEIR provides a comprehensive evaluation of the noise impacts related to the implementation of the CAP (see Section 2.11, Noise), which includes evaluation of excessive, temporary or periodic, and permanent increases in noise related to each CAP component including wind energy projects. CEQA requires when significant impacts occur, they must be mitigated to the extent feasible. The Draft SEIR provides an evaluation of noise impacts on pages 2.11-9 through 2.11-33. The Draft SEIR determined that noise impacts would be significant and unavoidable after mitigation for excessive noise, permanent increases in noise, and temporary or periodic increases in noise related to the development of large-scale wind turbines. However, each future wind turbine project would be required to obtain a Major Use Permit and undergo project-specific analysis, which would allow the County to condition each project according to site-specific details.

Regarding limiting the location of where wind turbines could be sited, the County determined that the setbacks for large-scale wind turbines which are adjacent to private residences should be equal to 1.1 times the height of the wind turbine, unless a noise waiver is granted. This is described in the County's Wind Energy Ordinance, and codified in Zoning Code Section 6951. The EIR for the Wind Energy Ordinance was certified in 2012. The Draft SEIR for the CAP considered a limitation on the

	<p>number of renewable energy projects in any one location, but determined this to be infeasible because it may reduce the effectiveness or GHG Reduction Measure E-2.1 and achievement of the County's 2030 reduction target. The CAP is not a land use plan or zoning ordinance and does not propose changes to the 2011 GPU designated land uses or the County's existing zoning ordinance.</p> <p>C5-42: The comment expresses concern regarding the health impacts related to noise that is generated by large-scale wind turbines and cites studies regarding the effects of wind turbines. As described in the previous comment, setbacks are established by the County's Wind Energy Ordinance, Zoning Code Section 6951 and are required to be equal to 1.1 times the height of the wind turbine, unless a noise waiver is granted. See Response to Comment C5-38 for how the SEIR analyzed these impacts. See also Response to Comment C5-41. The County disagrees with the studies that are cited by the commenter as they are not peer reviewed, and do not provide conclusive evidence regarding health effects or supporting a minimum separation distance. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p>
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researchers were surprised to find the same effects on the aeronautics workers and people living near a wind farm. "People who live in infrasound and low frequency noise see an accelerated onset of the symptoms," she said. "In our wind turbine case in Portugal and other cases of infrasound and low frequency noise in the home, we have given them the same medical diagnostic tests that we've given the aircraft technicians." "We didn't believe in the beginning that we'd get anything, and there it was."

- In July 2017, the Board of Selectmen for the town of Falmouth Massachusetts voted not to appeal a court order⁷ to shut down their two 397 foot tall wind turbines that were deemed a nuisance after neighbors sued, complaining the turbines negatively affected their health and enjoyment of their properties⁸. Sound studies previously documented low frequency and infrasound present in impacted homes. The photo below shows the proximity of the Falmouth wind turbines to homes.



C5-42
cont.

Chapter 4 –Project Alternatives

- **4.2.5 Distributed Generation SHOULD NOT BE REJECTED AS AN ALTERNATIVE:**

- This alternative should not be rejected. It is the preferred alternative for our group.
- *At page 4-9, why does the County rely on an outdated 2009 study that appears to be limited to rooftops thereby excluding the hundreds thousands of acres of open parking lots that could be covered with solar parking structures that would serve to increase renewable energy, reduce GHG emissions, protect vehicles from sun damage and also cool asphalt parking lots.*
- The number of rooftops within County jurisdiction has surely grown since 2009.

C5-43

C5-44

⁷ <http://waubrafoundation.org.au/resources/falmouth-mass-judge-muse-decision-shut-down-wind-turbines-causing-irreparable-harm/>

⁸ <http://www.capecodtimes.com/news/20170620/falmouth-ordered-to-shut-down-turbines>

C5-43: The comment states that the Distributed Generation Alternative should not be rejected. The comment questions why the County relies on an outdated study. The Anders and Bailek (2009) study referenced in the Draft SEIR is the best available information that documented existing residential and commercial roof top space that could support solar facilities. While the comment suggests that parking areas could be covered with structures for solar, the purpose of the 2009 study was to determine how much rooftop space is currently available and would not require substantial investment in infrastructure, the feasibility of which is unknown. The comment offers no evidence to dispute the validity of the study, therefore no further response is required or necessary. The Distributed Generation Alternative was rejected from further evaluation in the SEIR as explained in section 4.2.5.

C5-44: The comment suggest that the number of rooftops has grown since 2009. The comment does not address the adequacy of the SEIR; therefore, no further response is required or necessary. Please refer to response to comment C5-43 and O16-6.

- The County could surely partner with other local cities to cover their open parking lots with solar parking shade covers with EV charging stations, and battery storage units. C5-45
 - Renewable energy generation should be required at all County facilities first, before converting undeveloped rural land and chaparral that sequester carbon. C5-45
 - **4.3.2 Enhanced Direct Investment Program Alternative:**
 - While we voted to support it, it is not entirely clear to our disproportionately impacted community that the Enhanced Direct Investment alternative will actually reduce the incentive or demand for large-scale renewable energy projects, especially if local Community Choice programs are approved, implemented, and then solicited and enticed by large-scale energy developers to contract with their projects C5-46
 - We appreciate the fact that this alternative, if it actually reduces the incentive or demand for large-scale renewable energy projects, will reduce impacts for hazards and Hazardous materials, noise, reduce use of finite groundwater supplies in rural communities, land use, noise, and transportation. C5-47
 - **4.3.3 100% Renewable Energy Alternative:**
 - While this alternative is laudable, we do not believe it is currently technically achievable or sustainable. Some form of base load energy is still needed. C5-48
 - We are concerned with the greater magnitude of impacts identified under this alternative for large-scale renewable energy projects that would likely impact our predominantly low-income community, and others, for conversion of agricultural lands, air quality, biological resources, hazards and hazardous materials, hydrology and water quality, land use, noise, transportation and traffic, and tribal cultural resources. C5-49
 - **4.3.4 Increased Solid Waste Diversion Alternative:**
 - While we support solid waste diversion, as the unwilling host of previous waste disposal projects like the Campo Landfill and the La Posta Hazardous Waste incinerator, we cannot encourage the expansion of existing or the pursuit of new waste disposal sites. C5-50
 - Instead of new waste disposal sites, Anaerobic Digestion of waste in the absence of oxygen may be more feasible if facilities are constructed on existing or closed waste sites. This process can reduce GHG emissions from landfills while producing renewable biogas that can fuel alternative energy use.⁹ C5-51
 - **4.3.4 Environmentally Superior Alternative:**
 - While we much prefer the Distributed Generation Alternative as the Environmentally Superior Alternative, for reasons state above. C5-52
 - As our second choice we do support the Enhanced Direct Investment Program Alternative, based on the Comparison of Impacts Table 4-1. C5-52
- Chapter 7 – List of Mitigation Measures**
- **7.1.1 Aesthetics**
 - CAP Mitigation measure M-AES-1 sounds commendable in writing but in our real world these words mean nothing because impacts are twisted and manipulated into mere C5-53

⁹ https://en.wikipedia.org/wiki/Anaerobic_digestion

C5-45: The comment states that the County could partner with other local cities to cover open parking lots with solar shade covers, EV charging stations, and battery storage units. The County acknowledges this comment. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. Chapter 5 of the CAP recognizes that interagency coordination and partnerships with other organizations are critical to ensuring implementation of certain measures. The County will continue to evaluate partnership opportunities during implementation of the CAP. In addition, the comment states that renewable energy generation should be required at all County facilities first, before converting rural land. GHG Reduction Measure E-2.4 addresses renewable energy at County facilities. The comment does not address any specific inadequacies of the Draft SEIR; therefore, no further response is required or necessary.

C5-46: The comment states it is not clear if the Enhanced Direct Investment Alternative would result in a reduced demand for large-scale renewable energy projects. As described on pages 4-14 through 4-19 of the Draft SEIR, the Enhanced Direct Investment Alternative would result in the establishment of a more aggressive menu of direct investment projects in lieu of implementing the renewable energy component of GHG Reduction Measure E-2.1. This would eliminate the inducement of demand from the CAP Measure E-2.1 for new large-scale renewable facilities. However, large-scale renewable energy projects would still be allowed in the unincorporated County through a Major Use Permit and CEQA review.

C5-47: The comment states its appreciation that Enhanced Direct Investment Alternative would reduce impacts related to hazardous materials, noise, hydrology, land use, and transportation if this alternative were adopted. This comment is acknowledged. The comment does not address the adequacy of the Draft SEIR. However, this comment is noted and will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

	<p>C5-48: The comments states that it does not believe the 100% Renewable Energy Alternative is technically achievable or sustainable. The comment offers no evidence to support this statement. Therefore, no further response is required or necessary.</p> <p>C5-49: The comment expresses concern for the greater level of impacts associated with the 100% Renewable Energy Alternative. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.</p> <p>C5-50: The comment states it cannot support the Increased Solid Waste Diversion Alternative. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. This comment will be included as in the Final EIR and made available to decision makers prior to a final decision on the project.</p> <p>C5-51: The comment suggests that instead of waste disposal sites, anaerobic digestion facilities could be installed on existing or closed waste sites. The County acknowledges this comment. Organic Waste Digestion is a potential project that the County could undertake as part of GHG Reduction Measure T-4.1. Refer to Master Response 3 related to direct investments. See also Chapter 2.7 and Appendix B of the CAP SEIR. The comment does not address the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.</p> <p>C5-52: The comment prefers the Enhanced Direct Investment Program Alternative. The comment states that the Distributed Generation Alternative is Environmentally Superior Alternative. This is not correct. The SEIR identified the Enhanced Direct Investment Program Alternative as the Environmentally Superior Alternative. See section 4.3.5 of the SEIR. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.</p>
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C5-53: The comment is related to the CAP Mitigation Measure M-AES-1 and expresses concern regarding the potential for mitigation to minimize or eliminate aesthetic impacts. As described on page 2.1-37 of the Draft SEIR, CAP Mitigation Measure AES-1 would require new large-scale renewable energy projects to obtain a Major Use Permit and undergo a discretionary review process. In the case of significant aesthetic and visual impacts, projects would be required to apply feasible and appropriate project-specific mitigation to reduce or eliminate impacts. As described, this mitigation measure would reduce and minimize impacts but could not be guaranteed to eliminate all impacts related to scenic vistas and scenic resources. Therefore, the County determined that this impact was significant and unavoidable after mitigation. The commenter offers no evidence that mitigation as proposed would be infeasible; therefore, no further response is required or necessary.

nothingness, while impacted residents have to live with the very ugly and invasive real world impacts of large-scale renewable energy projects that dominate and destroy rural neighborhoods and scenic and biological resources.

- CAP Mitigation Measure M-AES-2: While laudable, it is unclear to us how the County can shield FAA required lighting and glare from the top 400-600 foot tall wind turbines and related MET towers from public viewing areas. It is also unclear if residential properties are protected from the same impacts. They should be protected from this significant degradation of their view sheds, quality of life, and property values.
- CAP Mitigation Measure A-AES-3: Again, this measure is laudable. However, wind turbine shadows are visible against the turbine tower itself and on hillsides from several miles away. Evidence of this is visible from Tierra Del Sol Road looking north towards the Kumeyaay Wind Turbines which are located north of Interstate 8. The shadows are also evident from other local roads and properties from several miles away.

• 7.1.2 Agricultural Resources

- We support the protection and avoidance of converting non-renewable productive agricultural land for renewable energy projects.
- Our concern lies with the twisting and manipulation of site specific facts during CEQA review to artificially reduce the level of real world significant impacts to less than significant in order to approve the project. We see it time and time again. The practice is alarming.

• 7.1.3 Air Quality

- CAP Mitigation Measure M-AQ-1: In rural areas where inspectors rarely venture, standard mitigation measures of dust control efforts; grading or fuel use restrictions; use of modified equipment; and restrictions on vehicle idling time, are often violated. The damage is generally already done by the time the County responds to complaints.

• 7.1.4 Biological Resources

- CAP Mitigation Measure M-Bio-1: We repeat our concerns and experience that significant impacts are manipulated to allege less-than-significant impacts.
- It is unconscionable that mitigation lands are generally secured outside the adversely impacted planning, adding insult to injury.

• 7.1.6 Energy

- There are cumulatively significant impacts related to increase electrical infrastructure required to handle all the new renewable energy, EV charging stations, and battery storage proposed by various entities, including San Diego County.
- The Boulevard Planning Area has been disproportionately impacted by numerous such projects and pending projects including the Sunrise Powerlink, the ECO Substation and Boulevard Substation rebuild plus new double circuit 138kV lines, Tule Wind with new 138kV line, Boulevard Solar with new 138kV line, SDG&E's alleged fire hardening of TL931 which increased the carrying capacity by about 5 times.
- These projects have degraded previously undeveloped, scenic, biologically, and culturally sensitive areas.
- The Jacumba Planning Area has been impacted by many of the same projects in addition to the Jacumba Solar project and Energia Sierra Juarez Wind turbines in Mexico.

C5-54: The comment is related to the CAP Mitigation Measure M-AES-2 and expresses that it will be difficult to ensure that lighting impacts from large wind turbines are reduced such that lighting is not visible from public viewing areas. As described on page 2.1-41, large-scale renewable energy projects would be required to prepare a Lighting Mitigation Plan to demonstrate that the design and installation of all permanent lighting would minimize any impacts associated with glare, visibility, or emitting light into the sky. However, the impact after mitigation was determined to be significant and unavoidable because it is not possible to guarantee that all impacts would be avoided.

The commenter also questions whether a similar level of protection is provided to shield private residences from the impacts of lighting. CEQA requires that impacts related to aesthetic resources are considered based upon views from public vantage points such as roadways, parks, and trails but does not require the consideration of private views. However, the County's Major Use Permit process for which all large-scale renewable energy projects would be required to apply, does provide a measure of protection for private residences because it allows the County to condition projects such that impacts are minimized to the extent feasible. In addition, the County's Zoning Ordinance Section 6951 which specifically regulates wind turbine projects provides requirements for setbacks from private property boundaries that would help ensure that lighting impacts are minimized. In the case of large-scale wind turbines, the Draft SEIR anticipates that the required FAA lighting would be difficult to shield, so this impact was determined to be significant and unavoidable. The comment offers no evidence to dispute the analysis and the mitigation in the Draft SEIR.

C5-55: The comment is related to the CAP Mitigation Measure M-AES-3 and expresses concern that turbine shadows will still be present, even from a measurable distance away. As described on page 2.1-41, CAP Mitigation Measure M-AES-3 would require that a Shadow Flicker Study be prepared as part of the Major Use Permit process to model and minimize the potential

	<p>shadow flicker that would result up to 6,562 feet away from turbines, which is the distance at which the human eye can discern shadows. However, this impact was determined to be significant and unavoidable after mitigation because the types, locations, and scale of all future large-scale renewable energy projects are unknown.</p> <p>C5-56: The comment expresses the commenter's preference to avoid converting productive agricultural land for large-scale renewable energy projects. This comment is acknowledged. The comment does not raise an environmental issue related to the adequacy of the Draft SEIR. This comment is noted and will be included as part of the record and made available to decision makers prior to a final decision on the project.</p> <p>C5-57: The comment is related to agricultural resources and expresses the commenter's opinion regarding the application of CEQA and determination of project impacts. This comment does not raise an issue related to the adequacy of the Draft SEIR. The commenter also does not provide any evidence to suggest that site specific analysis of past projects is inadequate. However, the comment is noted and will be included as part of the record and made available to decision makers prior to a final decision on the project.</p> <p>C5-58: The comment asserts that mitigation measures are often violated in rural areas. The comment offers no evidence to support this assertion. The County utilizes a variety of regulatory actions during the discretionary development process such as project conditioning, monitoring, and code enforcement to ensure that regulations intended to protect the health and safety of residents, and the environment in which they live, are enforced. Therefore, the County enforces mitigation measures that are adopted to ensure that the physical environmental impacts of a project are reduced. This comment does not address the adequacy of the Draft SEIR. However, the comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.</p>
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- C5-59:** The comment is related to the CAP Mitigation Measure M-BIO-1 and states the opinion that impacts are not characterized appropriately or mitigated adequately. The County disagrees with this assertion and the comment offers no evidence to support its statement. Therefore, no further response is required or necessary. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.
- C5-60:** The comment states there are cumulatively significant impacts related to the increased need for additional electrical infrastructure because of implementation of the CAP and associated projects such as electrical vehicle charging stations, battery storage, and renewable energy projects. As described on pages 2.6-19 through 2.6-20 of the Draft SEIR, consistent with CEQA Guidelines Appendix F, significant cumulative impacts would result if implementation of the project in combination with cumulative development would cause wasteful, inefficient, and unnecessary consumption of energy or require new or expanded facilities, the construction of which could result in significant environmental effects. Implementation of the project would decrease the region's reliance on fossil fuels and would ultimately reduce energy consumption in the unincorporated county because many of the measures proposed in the CAP would apply new standards and requirements to future development projects in the county and to County operations, which would contribute to reducing overall energy demand. Therefore, the Draft SEIR determined that this impact would be less than significant. Additionally, impacts related to construction activities have been evaluated throughout each issue area in the Draft SEIR and adequately disclosed.
- C5-61:** The comment states that the Boulevard and Jacumba planning areas have been disproportionately affected by the development of large-scale renewable energy projects and associated environmental impacts. While the CAP does include GHG Reduction Measure E-2.1 which may result in the inducement of demand for additional renewable energy in the unincorporated area, the mechanism through which that

	<p>demand may be met has not been determined. The CAP does not propose to construct new renewable energy facilities. Any resulting projects would be subject to a separate discretionary review process including CEQA, and the requirement to obtain a Major Use Permit which would result in project-specific conditioning to reduce significant impacts. Further, locations of any future projects have not been selected and are not part of the CAP proposal.</p>
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- **7.1.7 Green House Gas Emissions**

- All of the energy infrastructure noted above emits GHG emissions /air pollution through its electrical infrastructure.
- Have these GHG emissions been factored into the CAP and any potential carbon off-set credits applied to renewable energy projects?

C5-62

- **7.1.8 Hydrology and Water Quality**

- Feasible mitigation would include the Distributed Generation Alternative to reduce the cumulatively significant impacts of large-scale renewable energy projects that consume millions of gallons of at risk groundwater resources in rural groundwater dependent communities.

C5-63

- **7.1.9 Land Use Planning**

- Feasible mitigation would include the Distributed Generation Alternative to reduce cumulatively significant impacts of large-scale renewable energy projects.

C5-64

- **7.1.1 Noise:**

- Feasible mitigation would include the Distributed Generation Alternative to reduce cumulatively significant impacts of large-scale renewable energy projects.

C5-65

Thank you for your consideration of our comments and concerns...

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C5-62: The comment asks whether GHG emissions associated with increased use of energy has been factored into the methodology of the CAP. Air quality impacts related to large-scale renewable energy projects were evaluated on pages 2.3-12 through 2.3-63 of the Draft SEIR and were determined to be significant and unavoidable for the topics of air quality standards, criteria pollutants, sensitive receptors and odors. GHG emission impacts related to large-scale renewable energy projects were evaluated on pages 2.7-20 through 2.7-35 of the Draft SEIR and were determined to be less than significant.

C5-63: The comment is related to the topic of hydrology and water quality impacts and states that the adoption of the Distributed Generation Alternative would be one of the ways to reduce cumulatively significant groundwater consumption. As described on pages 4-9 and 4-10 of the Draft SEIR, the Distributed Generation Alternative was rejected from further analysis in the SEIR because it was determined to be infeasible.

C5-64: The comment is related to the topic of land use and planning impacts and states that the adoption of the Distributed Generation Alternative would be one of the ways to reduce cumulatively significant impacts of large-scale renewable energy projects. Please see Response to Comment C5-63.

C5-65: The comment is related to the topic of noise impacts and states that the adoption of the Distributed Generation Alternative would be one of the ways to reduce cumulatively significant impacts of large-scale renewable energy projects. Please see Response to Comment C5-63.