

EXECUTIVE SUMMARY

This is a summary of the Draft Environmental Impact Report (EIR) for the Campo Wind Project with Boulder Brush Facilities (Project) prepared pursuant to the California Environmental Quality Act (CEQA). The Project would include wind energy generation facilities on the Campo Band of Diegueño Mission Indians Reservation (Reservation), and supporting infrastructure on private lands that are subject to the land use jurisdiction of the County of San Diego (County). This EIR addresses the Project as a whole. Although the County as Lead Agency is analyzing the Project as a whole, the County's land use jurisdiction is limited to the private lease lands within the Boulder Brush Boundary (i.e., the Boulder Brush Facilities). Operation of the generation transmission (gen-tie) line, access road, and high-voltage substation Off-Reservation would be subject to County jurisdiction. However, the switchyard and connection to the Sunrise Powerlink would be owned and operated by San Diego Gas & Electric (SDG&E), and thus subject to the jurisdiction of the California Public Utilities Commission for operation and maintenance.

The Bureau of Indian Affairs (BIA) has jurisdiction over the portion of the Project within the Reservation Boundary (i.e., Campo Wind Facilities), and has prepared an Environmental Impact Statement (EIS) to evaluate the impacts of the Project under the National Environmental Policy Act (NEPA). The impact analysis included in the subsections of this EIR herein hereby adopts and incorporates by reference the EIS.

The Notice of Preparation for the EIR was released for public review on February 14, 2019, and associated comment letters received during the public review period are included as Appendix A to this EIR. The Initial Study prepared for the Boulder Brush Facilities is also included in Appendix A. This EIR addresses issues identified in the Initial Study and comments received regarding the Notice of Preparation.

The Draft Environmental Impact Report (Draft EIR) for the proposed Project was prepared and circulated for public review from December 12, 2019 to February 3, 2020. During that time, the County received comment letters from Tribes, Agencies, Organizations, and Individuals. The County has prepared responses to each of the written comment letters. The comment letters and responses are included in Volume II of the Final EIR. In some cases, comments received prompted changes to the Draft EIR. In addition, updated information is provided where appropriate. These changes are shown in strikeout/underline in the Final EIR and are summarized in the Errata Summary Table, Table ES-2, below.

As required by CEQA, this EIR (1) assesses the potentially significant direct, indirect, and cumulative environmental effects of the Project; (2) identifies potential feasible means of avoiding or substantially lessening significant adverse impacts; and (3) evaluates a range of reasonable alternatives to the Project, including the required No Project Alternative. The County is the Lead

Agency for the Project and has the principal responsibility for preparing this EIR. Pursuant to the CEQA Guidelines, this EIR consists of an evaluation of the effects of the entire Project. This EIR will be used by the County to inform public agencies, the public, and decision makers of the significant environmental effects of the Project; identify ways to minimize significant effects; and describe reasonable alternatives to the Project.

Since the majority of the Project is located on the Reservation, the Project is also subject to NEPA. The BIA is the Lead Agency for the Project under NEPA, and has prepared an EIS for the Project. The County is a cooperating agency for the EIS. The BIA released a Notice of Intent to prepare an EIS on November 21, 2018, and closed the comment period on December 21, 2018. The BIA held a public scoping meeting on December 6, 2018, at the Tribal Hall on the Reservation. The Draft EIS was released on May 24, 2019, for a 45-day public review period, which ended on July 8, 2019. The BIA signed the Record of Decision (ROD) on April 7, 2020, approving the project and completing the NEPA process.

ES.1 Project Synopsis

ES.1.1 Project Description

For purposes of this EIR, the Project is referred to as the “Campo Wind Project with Boulder Brush Facilities,” or “Project” for short.

The Project consists of the Campo Wind Facilities that would be located on land leased from the Campo Band of Diegueño Mission Indians (Tribe) within the 16,000-acre Reservation Boundary, and the Boulder Brush Facilities that would be located on adjacent land to the northeast of the Reservation leased from a private landowner within the Boulder Brush Boundary. Implementation of the Campo Wind Facilities requires BIA approval of a 25-year lease (with the possibility of a 13-year extension) of land within the Reservation Boundary between the Tribe and the Developer (Campo Lease). Approval of the Campo Lease would allow Terra-Gen Development Company LLC to develop, construct, operate, maintain, and ultimately decommission the Campo Wind Facilities on leased land within the Reservation Boundary. Approval of the Campo Lease will authorize the Tribe’s lease of trust land consistent with federal laws and regulations governing the leasing of tribal trust lands and the federal trust responsibility to tribes. Collectively, the land within the Reservation Boundary and the Boulder Brush Boundary comprise the Project Area (see Figure 1-1, Project Location, and Figure 1-2, Project Area, in Chapter 1 of this EIR). Throughout this document, the term “On-Reservation” refers to anything within the Reservation Boundary, and the term “Off-Reservation” refers to anything outside of the Reservation Boundary.

The Campo Wind Facilities, which would consist of 60 wind turbines and associated infrastructure, would be located within a corridor of approximately 2,200 acres of land (Campo Corridor) within the Reservation Boundary. The Boulder Brush Facilities, which would consist of a portion of the Project gen-tie line and related facilities to connect energy generated by the Project to the existing SDG&E Sunrise Powerlink, would be located within a corridor of approximately 320 acres of land (Boulder Brush Corridor) within the approximately 2,000-acre Boulder Brush Boundary. These Private Lease lands are under the land use and permitting jurisdiction of the County. Collectively, the Campo Corridor and the Boulder Brush Corridor compose the approximately 2,520-acre Project Site. Project disturbances associated with the construction of the Campo Wind Facilities within the Campo Corridor are expected to be approximately 800 acres, whereas Project disturbances associated with the construction of the Boulder Brush Facilities within the Boulder Brush Corridor are expected to be approximately 130 acres.

The Project as a whole would consist of the construction, operation, maintenance, and ultimately the decommissioning of a renewable wind energy generation project consisting of 60 wind turbines, three permanent meteorological (MET) towers, six temporary MET towers, a temporary concrete batch plant for use during construction, a temporary equipment staging and parking area for use during construction, an operations and maintenance (O&M) facility, water collection and septic systems, access roads, an electrical collection and communications system (ECCS), an approximately 8.5-mile-long gen-tie line, a collector substation, a high-voltage substation, and a switchyard to interconnect the Project to the existing SDG&E Sunrise Powerlink (see Figure 1-3, Project Site Plan, in Chapter 1 of this EIR). A total of 76 wind turbine sites within the Reservation are shown in Figure 1-3 and have been analyzed in this EIR; however, only 60 turbines would be constructed in accordance with the Campo Lease. Further, as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized. The Project would operate for more than 30 years, after which it would be decommissioned, except for the SDG&E-owned and operated switchyard and connection lines to Sunrise Powerlink, which would not be decommissioned. The details regarding the Project components and construction thereof are provided in Chapter 1, Project Description, Location, and Environmental Setting, of this EIR.

Project Approvals and Permits

The Project requires approvals by BIA and the County. In addition, permits may be required by other state and federal agencies. The Campo Wind Facilities are subject to lease approval by the BIA and subject to environmental review under NEPA, as discussed above.

The Boulder Brush Facilities are subject to the land use jurisdiction of the County. Land use actions that would be required to implement the Boulder Brush Facilities include one or more Major Use

Permits (MUPs), building permit, grading permit, County Right-of-Way permit, and various administrative permits as described below.

- **Major Use Permit(s).** The Boulder Brush Facilities are considered a Major Impact Service and Utility type of use that requires approval of one or more MUPs. The land within the Boulder Brush Boundary has a zone classification of S92. Applications for MUPs would be processed according to Section 7350 of the Zoning Ordinance, including making required findings pursuant to Section ~~7359~~7358.
- **Building Permits.** The building of structures on private lands would require a building permit from the County. Although this is a ministerial permit, the applicant must adhere to all applicable regulations. Exact requirements for building permits are dependent upon the type of structure proposed.
- **Grading Permits.** The County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) is contained in Title 8, Division 7, of the Code of Regulatory Ordinances. The Project involves grading, clearing, and removal of natural vegetation and therefore requires a grading permit from the County for activities on private land. Proposed grading activities must meet requirements of the County's Grading Ordinance.

In addition to the BIA lease approval for the Campo Wind Facilities and County permit approvals for the Boulder Brush Facilities, other federal, state, and local agencies require approvals for the construction of the Project. Chapter 1 of this EIR identifies the permits, and/or approvals that may be needed for the Project. A final list would be refined throughout the planning and development process. Other local and state agencies may rely on this EIR in approving any discretionary permits required for the Project.

ES.1.2 Project Objectives

The fundamental purpose of the Project is to generate and deliver to the grid renewable wind energy to meet the demands of consumers.

Specific objectives for the Project are as follows:

1. Develop approximately 252 megawatts (MW) of renewable wind energy that can offset the need for additional energy production from fossil fuels and assist the state in meeting its air quality goals and reduce greenhouse gas (GHG) emissions in conformance with Assembly Bill 32 and Senate Bill 32.
2. Develop a wind energy project that can meet the criteria to achieve the maximum federal tax credit requiring placement into operation by December 31, 2020, which is intended to

decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease dependence of the United States on foreign energy supplies.

3. Assist in achieving the state's goal of delivering 100% zero carbon energy by 2045.
4. Develop a wind energy facility as near as possible to existing transmission infrastructure.
5. Develop a wind energy facility within the Reservation, enhancing their economy by creating short- and long-term employment opportunities and providing long-term revenue.
6. Support an economically feasible wind energy project that would be developed through commercially available financing.
7. Support displacement of approximately 58,000 tons of carbon dioxide (CO₂, a GHG) emissions per year that would otherwise be required to generate the same amount of electricity as generated by the Project.

ES.1.3 Project Location

The Project would be located in southeastern San Diego County (see Figure 1-1, Project Location, in Chapter 1). The Project consists of both the Campo Wind Facilities that would be located on Reservation land leased from the Tribe and the Boulder Brush Facilities that would be located on adjacent land to the northeast of the Reservation leased from a private landowner. The Project Site totals approximately 2,520 acres, which includes approximately 2,200 acres of land within the Reservation (Campo Corridor) and 320 acres on private lands (Boulder Brush Corridor). Land ownership surrounding the Project Area consists of a mixture of private, State of California, Bureau of Land Management, and tribal lands.

In the Project Vicinity, Community Plan areas (designated by the County's General Plan) include the Pine Valley Community Plan area, the Campo/Lake Morena Community Plan area, the Boulevard Subregional Planning Area, and the Mountain Empire Subregional Planning area. Figure 3.1.6-1, Existing Land Use Designations, in Section 3.1.6, Land Use and Planning, of this EIR depicts the surrounding Community Plans in relation to the Project Area. Project consistency with applicable plans is discussed in detail in Section 3.1.6 of this EIR.

Boulder Brush Boundary

The Boulder Brush Facilities would be located on private land in the McCain Valley area of the unincorporated County, north of the community of Boulevard and Interstate (I) 8 (see Figure 1-2, Project Area, and Table 1-2, Assessor's Parcel Numbers for Boulder Brush Facilities, in Chapter 1). Regional access is provided by I-8. Local access is provided by Ribbonwood Road.

Land within the 2,000-acre Boulder Brush Boundary currently consists of largely undeveloped ranch land, a portion of which had been used for cattle grazing in the past. There is evidence of off-highway vehicle activity within the Boulder Brush Boundary. Numerous “No Trespassing” signs have been posted at locations along the Boulder Brush Boundary to deter off-highway vehicle use by the public. The 500-kilovolt (kV) Sunrise Powerlink traverses the northeast portion of the Boulder Brush Boundary, and the existing Kumeyaay Wind and Tule Wind facilities are located to the west and northeast, respectively. In addition, several rural residential homes are located to the south.

The Boulder Brush Facilities would be located within a 320-acre corridor (Boulder Brush Corridor) within the Boulder Brush Boundary. The total disturbed area within the Boulder Brush Corridor would be approximately 131 acres.

Reservation Boundary

The Campo Wind Facilities would be located on lease lands within the 16,000-acre Reservation. The Campo Wind Facilities are proposed within an approximately 2,200-acre corridor (Camp Corridor) on the Reservation. The area of disturbance within the Camp Corridor would be approximately 800 acres. The Reservation extends from the United States/Mexico international border to north of I-8. Regional access is provided by I-8, and local access is provided by Crestwood Road, BIA 10/Church Road.

The Reservation is surrounded by open space and rural residential developments in unincorporated communities. The Manzanita Reservation borders the northern portion of the Reservation and the La Posta Reservation is located to the northwest.

ES.1.4 Environmental Setting

The following description of the environmental setting provides a general overview of the Project Area. More detailed descriptions of the environmental setting as it relates to each environmental issue area are provided in the individual sections of this EIR.

The Project Site lies between two major drainage divides: the Tecate Divide to the west, and the In-Ko-Pah Mountains to the east. This area occurs within the Live Oak Springs U.S. Geological Survey topographic quadrangle.

Boulder Brush Facilities

Land within the Boulder Brush Boundary is characterized by sparsely developed, high-desert rolling hills and surrounded, in part, by rural single-family residences, large-lot ranches, renewable energy and transmission infrastructure. The elevation ranges from approximately 3,280 feet above mean sea level (amsl) to approximately 4,120 feet amsl.

There are no existing or currently proposed residential uses within the Boulder Brush Boundary. Existing rural residences are located to the south of the Boulder Brush Boundary. The community of Boulevard, to the south of I-8, is located approximately 3.5 miles south of the Boulder Brush Boundary.

Native vegetation communities within the Boulder Brush Boundary consist of montane buckwheat scrub, big sagebrush scrub, granitic northern mixed chaparral, granitic chamise chaparral, red shank chaparral, semi-desert chaparral, wildflower field, emergent wetland, southern arroyo willow riparian forest, and coast live oak woodland (including open coast live oak woodland). The terrain in the area ranges from valley bottoms to house-sized boulder-covered ridgelines.

As previously described, there is evidence of off-highway vehicle activity within the Boulder Brush Boundary. Numerous ‘No Trespassing’ signs have been posted at locations along the Boulder Brush Boundary to deter off-highway vehicle use by the public. The Bureau of Land Management-managed McCain Valley Recreation Management Zone is located directly north of the Boulder Brush Boundary. Off-highway-vehicle use is considered a primary activity in the McCain Valley Recreation Management Zone, as identified in the Eastern San Diego County Resource Management Plan.

Campo Wind Facilities

Terrain within the Reservation is characterized by sparsely developed, high-desert rolling hills interspersed with renewable energy and transmission infrastructure. The elevation ranges from approximately 3,100 feet amsl to approximately 4,200 feet amsl.

The Reservation is in a desert transition zone, which supports a variety of habitat types and vegetation communities and is dominated by chamise chaparral with both a monotypic phase and a mixed chaparral phase. Additional vegetation communities found throughout this area and especially along ridges and slopes include red shank chaparral, big sagebrush scrub, and upper Sonoran subshrub scrub. A series of ridges running north to south is located throughout the Reservation separated by shallow valleys consisting of coast live oak woodland, nonnative grassland, and southern willow scrub vegetation. Various large rock-outcrops of light-colored boulders are scattered throughout this area but are primarily located along the ridgelines.

The Reservation includes scattered housing and some moderate development near the Tribal Administration Center, the Southern Indian Health Center Clinic, the current Campo Materials sand-mining operation, and the Golden Acorn Casino. Three highways cross the region: I-8, Old Highway 80, and State Route 94. San Diego Metropolitan Transit Service owns and operates the Desert Line railway that extends north and east from the U.S./Mexico border to Plaster City in Imperial County, where it joins the Union Pacific Railroad Line from El Centro. The rail line runs south of the Project Site.

Uses within the Reservation include rural residential, wind energy facilities, the Golden Acorn Casino, Tribal facilities, and Campo Materials aggregate activities. The Campo Corridor does not directly include these uses, although portions of the Campo Corridor are adjacent to these uses.

ES.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table ES-1, Summary of Significant Effects, presents the results of the environmental analysis completed for the Project. Mitigation measures have been identified to reduce environmental impacts associated with aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, noise, Tribal cultural resources, and traffic, and are included in Table ES-1. The mitigation measures would reduce potentially significant impacts to below a significant level, with the exception of impacts to aesthetics, biological resources, and noise which remain significant and unavoidable. A detailed analysis of significant environmental effects and mitigation measures is discussed throughout Chapter 2 of this EIR.

ES.3 Areas of Controversy

CEQA Guidelines Section 15123(b)(2) requires that an EIR identify areas of controversy, including issues raised by other agencies and the public. Areas of known controversy associated with the Project that are relevant to the EIR are as follows:

Aesthetics

- Lighting from the wind turbines
- Degraded views
- Shadow flicker from the wind turbines

Biological Resources

- Avian species strikes
- Wildlife migratory routes

Hazards

- Public concerns of health effects including:
- Exposure to electric and magnetic fields (EMF)
- Exposure to low-frequency noise
- Exposure to shadow flicker
- Oil leakage from generators

Hydrology

- Availability of groundwater
- Contamination of the water table

Noise

- Noise from wind turbines
- Noise from construction
- Infrasound and low-frequency noise

Wildfire

- Fire hazards

ES.4 Issues to Be Resolved by the Decision-Making Body

The San Diego County Planning Commission serves as the decision-making body for Major Use Permits; however, the Boulder Brush Facilities require a Fire Services Agreement, which must be approved by the County Board of Supervisors. Therefore, for the Boulder Brush Facilities, the Board of Supervisors is the decision-making body for the Major Use Permit. The Planning Commission will make a recommendation on the Boulder Brush Facilities to the Board of Supervisors.

~~The San Diego County Planning Commission serves as the decision-making body for the Project.~~

Issues to be resolved by the Board of Supervisors ~~Planning Commission~~ include: (1) how to mitigate the significant effects of the Project; (2) whether to reject or approve one of the alternatives to the Project and other environmental findings; and (3) whether to reject or approve the Project.

The Board of Supervisors ~~Planning Commission~~ must adopt detailed findings on the feasibility of mitigation measures that substantially lessen or avoid the significant effects of the Project on the environment.

In addition to mitigation measures, the Board of Supervisors ~~Planning Commission~~ will decide whether or not to adopt the Project or any of the Project alternatives that would feasibly attain most of the Project objectives while avoiding or substantially reducing any of the significant impacts of the Project.

Because this EIR has identified adverse environmental effects that are unavoidable, the Board of Supervisors ~~Planning Commission~~ must also determine whether the adverse environmental effects are considered acceptable with consideration given to economic, social, technological, and other relevant benefits of the Proposed Project pursuant to CEQA Section 15093.

Although the County as Lead Agency is analyzing the Campo Wind Project with Boulder Brush Facilities as a single project, the County's land use jurisdiction for the Project is limited to the Boulder Brush Facilities. BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate the impacts of the Project under NEPA.

ES.5 Project Alternatives

Section 15126.6(f)(1) of the CEQA Guidelines states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries,... and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.”

The County selected a reasonable range of alternatives to the Project that would attain most of the basic objectives of the Project, would be feasible to implement, and would avoid or substantially lessen one or more of the significant effects of the Project. Accordingly, the following alternatives to the Project were selected:

- Alternative 1: No Project Alternative
- Alternative 2: No Boulder Brush Facilities on Private Lands Alternative
- Alternative 3: Alternative Gen-tie Route within Boulder Brush Boundary
- Alternative 4: Underground Gen-tie within Boulder Brush Boundary Alternative

Pursuant to Section 15126.6(d) of the CEQA Guidelines, each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the proposed Project. Each alternative is also evaluated to determine whether the Project objectives would be substantially attained.

The analysis methodology uses the following process:

- Determination of environmental impact resulting from the alternative.
- Comparison of the Project's impact and the alternative's impact with determinations of the following:
 - Less: Where the alternative's impact would be clearly less adverse or more beneficial than the impact of the proposed Project
 - Similar: Where the alternative and proposed Project would have roughly equivalent impacts

- Greater: Where the alternative’s impact would be clearly more adverse or less beneficial than the proposed Project
- The comparative analysis is followed by a general discussion based on the CEQA resource topic area and a discussion of the alternative’s ability to meet the Project objectives.

In several cases, the severity of the impact may be the same under an alternative as measured against the CEQA significance thresholds (e.g., both the Project and a given alternative would result in a less than significant impact). However, the actual magnitude of the impact may be slightly different, providing the basis for a conclusion of greater or lesser impacts, even though both are considered less than significant.

A detailed analysis of Project alternatives is outlined in Chapter 4, Alternatives, of this EIR.

ES.5.1 Alternative 1: No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of “no project” along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. As specified in Section 15126.6(e)(3)(B) of the CEQA Guidelines, the No Project Alternative for a development project consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) further states that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project Alternative assumes that no portion of the Project would be developed and the existing conditions would remain. No reasonably expected actions or changes to the Project Site would be anticipated.

Ability to Meet Project Objectives

The No Project Alternative would not achieve any of the Project objectives.

Feasibility

The No Project Alternative would be feasible to implement. The Project Site would remain in its current condition.

Comparison of the Effects of Alternative 1 to the Proposed Project

The No Project Alternative would result in minimal change to the existing baseline conditions. These baseline conditions are described in detail in each topic area of this EIR in the Existing

Conditions section (see also Section 4.3.1 and Table 4-1, Comparison of Impacts from Alternatives to the Project, in Chapter 4, Alternatives, of this EIR).

ES.5.2 Alternative 2: No Boulder Brush Facilities on Private Lands Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of “no project” along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. As specified in Section 15126.6(e)(3)(B) of the CEQA Guidelines, the No Project Alternative for a development project consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) further states that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Boulder Brush Facilities on Private Lands Alternative assumes that the Boulder Brush Facilities would not be developed and the existing conditions on lands within the County’s land use jurisdiction would remain. No reasonably expected actions or changes to the Boulder Brush Corridor would be anticipated if the County does not approve the MUP for the Boulder Brush Facilities. Because the Reservation is outside the jurisdiction of the County, the No Project on Private Lands Alternative may not result in no development of the Campo Wind Facilities. This alternative considers the connection of power generated on the Reservation by the 60 wind turbines to the grid via the Sunrise Powerlink, via a gen-tie route that extends across the Manzanita Band of Diegueño Mission Indians’ (Manzanita) Reservation and Bureau of Land Management (BLM) managed lands, connecting to a substation on a portion of the Sunrise Powerlink on BLM managed lands. The Alternative 2 On-Reservation gen-tie route alignment would generally be the same as that of the Project On-Reservation gen-tie route, but the Off-Reservation gen-tie line would traverse north and then east, eliminating the need for the Boulder Brush Facilities on private lands. The County does not have any authority or ability to (a) mandate that a gen-tie line alignment be approved on BLM-managed or Tribal lands or (b) exercise discretion for activities on the Reservation, Manzanita Reservation, or BLM-managed lands (including an alternative gen-tie line route, substation location on BLM or Tribal lands, or any components on the non-private lands).

Ability to Meet Project Objectives

The No Boulder Brush Facilities on Private Lands Alternative could achieve most of the Project objectives if the wind turbines on the Reservation were able to be built without the Boulder Brush Facilities and instead were connected to the Sunrise Powerlink via similar interconnection facilities on federal lands. The viability of this alternative is uncertain, however, given the need to obtain permission to cross land under the control of another tribe and BLM. The Developer does not have land rights to place the gen-tie line in this alternative alignment.

Feasibility

The No Boulder Brush Facilities on Private Lands Alternative may not be feasible to implement. The Boulder Brush Corridor would remain in its current condition.

Comparison of the Effects of Alternative 2 to the Project

While removing connection to the grid through private lands could jeopardize the feasibility of the Project, the Campo Wind Facilities could persist under the No Project On Private Lands Alternative if an alternative alignment that avoids private lands (e.g., connecting instead via facilities on Manzanita Reservation and BLM lands) could be achieved. As such, associated impacts for the Campo Wind Facilities would be the same as the Project and the analysis below addresses the change resulting from not undertaking the Boulder Brush Facilities on private lands. Impacts associated with the development of the gen-tie line and high-voltage substation would likely occur to a similar degree as Boulder Brush Facilities, but not on County-jurisdictional lands or subject to County discretion.

ES.5.3 Alternative 3: Alternative Gen-Tie Line Route within Boulder Brush Boundary

Alternative 3 would result in implementation of the Campo Wind Facilities as described under the Project, but a portion of the Off-Reservation gen-tie line would be located along an alternative alignment on private land within the Boulder Brush Boundary, as shown in Figure 4-1 in Chapter 4. The southern portion of the Off-Reservation gen-tie line route would follow an alternate route to the west. The northern portion of the Off-Reservation gen-tie route would follow the same alignment as the Project. Although this alternate gen-tie route would modestly increase the total length of the Off-Reservation gen-tie line from approximately 3.5 miles to 3.7 miles, there would not be an increase in the number of required pole structures. In addition, there would be one less pull site required due to a reduction in need for one angle structure, and there would be a reduction of approximately 1.1 miles of decomposed granite roads required to access pole structures since this alternative route would align much closer to the main east/west decomposed granite access road. Therefore, even though the overall length of the Off-Reservation gen tie line would increase by approximately 0.2 miles, there would be an approximately 8 to 10 acre net decrease in disturbed acres associated with construction of the Boulder Brush Facilities due to the reduction in disturbance associated with elimination of 1.1 miles of decomposed granite access roads and one pull site. Finally, the alternate route would span a narrower portion of the Tule Wash reducing disturbance resulting in a decrease in RPO wetlands and vegetation disturbance during construction. The high-voltage substation, 500 kV switchyard and incoming/outgoing connection lines, and the paved access road would be the same as described for the Project.

Ability to Meet Project Objectives

Alternative 3 would meet the stated Project objectives outlined in Chapter 1.

Feasibility

Alternative 3 would be feasible to implement.

Comparison of the Effects of Alternative 3 to the Proposed Project

Under this alternative, the Campo Wind Facilities would be the same as the Project, and the analysis presented in Section 4.3.3 and summarized in Table 4-1 in Chapter 4 of this EIR addresses the change resulting from altering the Off-Reservation gen-tie line on private lands only.

ES.5.4 Alternative 4: Underground Gen-Tie Line within Boulder Brush Boundary Alternative

Alternative 4, Underground Gen-Tie Line within Boulder Brush Boundary Alternative, would result in implementation of the Campo Wind Facilities as described under the Project; however, the Off-Reservation 230 kV gen-tie line from the Reservation Boundary to the high-voltage substation and switchyard across the private lands would be underground rather than overhead. The underground gen-tie alignment would attempt to follow the same route as the Off-Reservation 230-kV gen-tie line, as feasible (provided no previously unknown subsurface condition arises during either pre-construction geotechnical investigations or underground gen-tie line construction). The high-voltage substation, 500 kV switchyard and incoming/outgoing connection lines, and the main paved access road would be the same as described for the Boulder Brush Facilities (refer to Figure 4-2, Alternative 4: Underground Gen-Tie Line with Boulder Brush Boundary Alternative, in Chapter 4).

Construction of the high-voltage underground gen-tie line alternative would require additional construction activities when compared to construction of the overhead gen-tie line described for the Boulder Brush Facilities under the Project. These additional construction activities include additional trenching, excavating, blasting, grading and vegetation clearing and are anticipated to result in the following:

- Increased ground disturbance
- Increased dust, noise, and construction machinery and equipment emissions
- Increased concrete production and water demand
- Increased construction traffic
- Increased construction waste materials

Alternative 4 would require an approximately 3.5-mile-long, continuous trench of approximately 3.5 to 5 feet wide and approximately 5 to 7 feet deep to construct the underground high voltage transmission system. At approximately every 2,000 feet along the route, the trench would need to be widened and deepened to accommodate construction of a concrete splice vault which can be up to 8 feet wide by 8 feet tall and 24 feet long. Concrete splice vaults are required to provide areas for splicing the segments of the conductor cables during construction and to serve as permanent access points for routine line maintenance during operations.

Trenching would require additional temporary ground disturbance on either side of the trench for placement of construction supplies and equipment, the stockpiling of excavated material, and to provide access for the construction machinery and equipment. While the trenching activities would, to the extent possible, follow the alignment of the access road, these activities could fall outside of the disturbance area associated with the access road resulting in additional disturbed area. The additional disturbance could result in increased loss of natural vegetation and modification of terrain (e.g., alteration of topography). Required excavation, grading and vegetation clearing along the underground gen-tie line route would be greater than for construction of the overhead gen-tie line route for the Boulder Brush Facilities under the Project.

While the soil profiles may not be consistent throughout the entire 3.5-mile-long underground gen-tie line route, the geotechnical investigation (Appendix M) conducted at the high-voltage substation and switchyard area suggests that the open trench excavation associated with Alternative 4 may encounter areas that could require hard rock excavation techniques including controlled blasting and/or the use of an impact hammer (i.e. hoe ram), both of which could cause an increase in noise and dust emissions relative to construction of the overhead gen-tie line route for the Boulder Brush Facilities. In addition, the underground gen-tie line route could have to be re-routed and/or require additional, unanticipated blasting in the event that large, unexposed boulders are discovered in the path during the course of construction.

While the overall 14-month construction period for the Project would not need to be extended, Alternative 4 is anticipated to require a longer construction period than identified for the Off-Reservation overhead gen-tie line. Therefore, the increase in noise, dust and construction equipment emissions associated with this Alternative 4 could be compounded by the additional time required for construction of this alternative. While modeling for additional noise and air quality emissions has not been conducted, due to the overall duration and increased amount of additional disturbance and construction equipment required to construct an underground 230kV gen-tie line, both noise and air emissions are expected to be greater than that described for construction of the overhead gen-tie line route for the Boulder Brush Facilities under the Project.

Underground high voltage transmission line installations require that the high-voltage conductor cables and associated communications cables be installed in concrete encased polyvinyl chloride (PVC) duct banks for the entire length of the underground facilities. The amount of concrete

required (and water needed to mix the concrete) for both the duct bank and splice vaults would be greater than the amount of concrete required for the Off-Reservation overhead gen-tie pole structure foundations. Similarly, due to the increased ground disturbance required to construct an underground 230kV gen-tie line, the water needed for dust suppression during construction is expected to be greater than described for dust suppression during construction of the overhead gen-tie line route.

Since Alternative 4 would require additional equipment and supplies than described for construction of the Off-Reservation overhead gen-tie line, it could generate an increase in construction traffic. Such additional trips would be associated with equipment and materials deliveries as well as water trucks. In addition, underground, high-voltage transmission lines often require fluidized thermal backfill for backfilling the open trench after the underground system has been constructed. This thermal backfill is required to help dissipate the heat that is generated when underground high-voltage transmission lines are in operation. Additional construction traffic could be produced by both thermal backfill deliveries as well as the equivalent off-site hauling for disposal of excavated material replaced by the thermal backfill.

Alternative 4 could create increased construction waste compared to that described for construction of the overhead gen-tie line route for the Boulder Brush Facilities under the Project. The duct banks and splice vaults would require the use of wood, nails and other waste-generating construction supplies needed to construct temporary concrete forms. Upon completion of construction, these supplies would be dismantled and hauled off-site to either a landfill or recycling facility.

Ability to Meet Project Objectives

Alternative 4 would meet the stated Project objectives, with the exception of objective 6 (economically feasible wind energy project).

Feasibility

Alternative 4 would be challenging to implement based on the additional construction requirements described above. These include the physical difficulties associated with the topography and potential to encounter boulders below the surface. In addition, the cost to underground high-voltage transmission lines is expected to be between 5 to 20 times greater than the cost of an overhead high-voltage transmission line due to the time, materials, specialized labor and installation processes that are required.

Comparison of the Effects of Alternative 4 to the Project

While undergrounding the 230 kV high-voltage Off-Reservation gen-tie line is addressed under this alternative, Project components on the Reservation would be the same as described under the Project, and the analysis presented in Section 4.3.4 and summarized in Table 4-1 of Chapter 4 addresses the change resulting from altering the Off-Reservation gen-tie line on private lands only.

ES.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project must identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR must identify another Environmentally Superior Alternative among the remaining alternatives.

Table 4-1 in Chapter 4 compares the environmental impacts of each alternative to those of the Project. Based on the comparative analysis, Alternative 3, Alternative Gen-Tie Line Route within Boulder Brush Boundary, is considered environmentally superior to the Project. Compared to the Project, this Alternative would reduce impacts on Biological Resources, Cultural Resources and Tribal Cultural Resources during construction while all other impacts would be similar during construction and all impacts would be similar during operations.

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Significant and Unavoidable Impacts			
<i>2.1 – Aesthetics</i>			
Boulder Brush Facilities			
<u>Impact AE-1</u>	<u>Alteration of visual character</u>	<u>No feasible mitigation</u>	<u>Significant and unavoidable</u>
<u>Impact AE-2</u>	<u>Interruption and degradation of existing vistas from surrounding roads</u>	<u>No feasible mitigation</u>	<u>Significant and unavoidable</u>
No significant and unavoidable impacts to Aesthetics			
Campo Wind Facilities			
Impact AE-A	Size and scale of proposed turbines	M-AE-A through M-AE-H	Significant and unavoidable
Impact AE-B	Alteration of visual landscape	M-AE-A through M-AE-H	Significant and unavoidable
Impact AE-C	Interruption and degradation of	M-AE-A through M-AE-G	Significant and unavoidable

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
	existing vistas from surrounding roads		
Impact AE-D	Lighting from proposed wind turbines on existing night views	M-AE-H	Significant and unavoidable
Cumulative Impacts			
Impact AE-CU-A	Cumulative impacts on the visual environment	M-AE-A through M-AE-H	Significant and unavoidable
<i>2.3 – Biological Resources</i>			
Boulder Brush Facilities			
No significant and unavoidable impacts to biological resources			
Campo Wind Facilities			
Impact BI-B	Direct loss of County List A and B special-status plants during construction	N/A	Significant and unavoidable
Impact BI-D	Permanent direct impacts to habitat for special-status wildlife species	N/A	Significant and unavoidable
Impact BI-M	Direct impacts to sensitive vegetation communities within the Campo Wind Corridor	N/A	Significant and unavoidable
Impact BI-U	Permanent direct impacts to RPO wetland and wetland buffer	N/A	Significant and unavoidable
<i>Cumulative Impacts</i>			
Impact BI-CU-1	Potential cumulative project impacts to sensitive plants and vegetation communities	M-BI-C (General Avoidance and Minimization Measures)	Significant and unavoidable

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<i>2.6 – Noise</i>			
Boulder Brush Facilities			
No significant and unavoidable noise impacts			
Campo Wind Facilities			
Impact N-A	Potentially significant noise impacts due to operational wind turbines	No feasible mitigation	Significant and unavoidable
Impact N-B	Potentially significant noise impacts due to operational wind turbines	No feasible mitigation	Significant and unavoidable
Impact N-C	Potentially significant noise impacts to noise-sensitive land uses On-Reservation	No feasible mitigation	Significant and unavoidable
Cumulative Impacts			
Impact N-CU-A	Cumulative noise impacts with regard to the L _{dn} Guidance Limit	N/A	Significant and unavoidable
<i>Significant Impacts Mitigated to a Level of Less Than Significant</i>			
<i>2.1 – Aesthetics</i>			
None (see significant and unavoidable impacts)			
<i>2.2 – Air Quality</i>			
Boulder Brush Facilities			
Impact AQ-1	Calculated cancer risk and non-cancer chronic hazard risk	M-AQ-1 through M-AQ-5	Less than significant
<i>Cumulative Impacts</i>			
Impact AQ-CU-1	Construction-related emissions of NO _x , PM ₁₀ , and PM _{2.5}	M-AQ-1 through M-AQ-5	Less than cumulatively considerable
Campo Wind Facilities			
No significant impacts to air quality			

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<i>2.3 – Biological Resources</i>			
Boulder Brush Facilities			
Impact BI-1	Permanent direct impacts to potentially occupied Quino checkerspot butterfly habitat	M-BI-1 (Quino checkerspot butterfly-specific avoidance, minimization, and mitigation measures)	Less than significant
Impact BI-2	Direct loss of County List A and B special-status plants during construction	M-BI-5 (habitat preservation)	Less than significant
Impact BI-3	Temporary direct impacts to County List A and B special-status Plants outside of designated construction areas	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP)	Less than significant
Impact BI-4	Temporary direct impacts to habitat for special-status wildlife species	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-6 (nesting bird surveys) M-BI-7 (revegetation of temporarily impacted areas)	Less than significant
Impact BI-5	Permanent direct impacts to habitat for special-status wildlife species	M-BI-5 (habitat preservation)	Less than significant
Impact BI-6	Temporary direct impacts to habitat for special-status wildlife species outside of designated construction areas	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing)	Less than significant
Impact BI-7	Direct electrocution or collisions impact to sensitive birds	M-BI-8 (Avian Power Line Interaction Committee Standards)	Less than significant
Impact BI-8	Permanent impacts to raptor foraging habitat	M-BI-5 (habitat preservation)	Less than significant
Impact BI-9	Indirect temporary impacts to special-status plant species (County List A and B special-status	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-10 (fugitive dust control),	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
	plants) during construction	M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants)	
Impact BI-10	Indirect permanent impacts to special-status plant species (County List A and B special-status plants) during operations and maintenance	M-BI-4 (SWPPP) M-BI-10 (fugitive dust control) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-13 (prevention of invasive plant species)	Less than significant
Impact BI-11	Temporary indirect impacts to special-status wildlife species during construction	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-6 (nesting bird survey) M-BI-7 (replanting temporarily impacted areas revegetation) M-BI-10 (fugitive dust control) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-13 (prevention of invasive species)	Less than significant
Impact BI-12	Permanent indirect impacts to special-status wildlife species during operations and maintenance	M-BI-10 (fugitive dust control) M-BI-11 (erosion and runoff control) M-BI-13 (prevention of invasive species) M-BI-14 (fire protection) M-BI-15 (access control)	Less than significant
Impact BI-13	Direct impacts to nesting raptors during construction	M-BI-6 (nesting bird surveys)	Less than significant
Impact BI-14	Direct impacts to sensitive vegetation communities within the biological study area	M-BI-5 (habitat preservation) M-BI-7 (revegetation of temporarily impacted areas) M-BI-16 (federal, and state, <u>and local</u> agency permits)	Less than significant
Impact BI-15	Direct impacts to sensitive habitat outside of the Boulder Brush Corridor	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-16 (federal, and state, <u>and local</u> agency permits)	Less than significant
Impact BI-16	Direct impacts to jurisdictional aquatic resources	M-BI-5 (habitat preservation) M-BI-16 (federal, and state, <u>and local</u> agency permits)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Impact BI-17	Direct impacts to jurisdictional habitat outside of Boulder Brush Corridor	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-7 (revegetation of temporarily impacted areas) M-BI-16 (federal, and state, <u>and</u> local agency permits)	Less than significant
Impact BI-18	Temporary indirect impacts to jurisdictional aquatic resources	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-16 (federal, and state, <u>and</u> local agency permits)	Less than significant
Impact BI-19	Permanent indirect impacts to jurisdictional aquatic resources	M-BI-4 (SWPPP) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-13 (prevention of invasive plant species) M-BI-14 (fire protection) M-BI-16 (federal, and state, <u>and</u> local agency permits)	Less than significant
Impact BI-20	Temporary indirect impact to sensitive vegetation communities	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-7 (revegetation of temporarily impacted areas) M-BI-10 (fugitive dust control) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants)	Less than significant
Impact BI-21	Permanent indirect impact to sensitive vegetation communities	M-BI-4 (SWPPP) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-13 (prevention of invasive plant species) M-BI-14 (fire protection) M-BI-16 (federal, and state, <u>and</u> local agency permits)	Less than significant
Impact BI-22	Permanent direct impacts to RPO wetland and wetland buffer	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-5 (habitat preservation) M-BI-7 (revegetation of temporarily impacted areas) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
		M-BI-16 (federal, and state, and local agency permits)	
Impact BI-23	Temporary direct impacts to habitat connectivity and wildlife corridors	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-7 (revegetation of temporarily impacted areas)	Less than significant
Impact BI-24	Impacts to wildlife species movement from collision and electrocution	M-BI-8 (APLIC standards) M-BI-9 (carcass removal)	Less than significant
Impact BI-25	Direct and indirect impacts to active migratory bird nesting	M-BI-2 (biological monitoring) M-BI-3 (temporary construction flagging/fencing) M-BI-4 (SWPPP) M-BI-5 (habitat preservation) M-BI-6 (nesting bird survey) M-BI-7 (revegetation of temporarily impacted areas) M-BI-10 (fugitive dust control) M-BI-11 (erosion and runoff control) M-BI-12 (regulation of chemical pollutants) M-BI-13 (prevention of invasive species) M-BI-14 (fire protection) M-BI-15 (access control)	Less than significant
Impact BI-26	Direct impacts to golden eagle foraging	M-BI-5 (habitat preservation)	Less than significant
Campo Wind Facilities			
Impact BI-A	Project impacts to 222.1 acres of potentially occupied Quino habitat	M-BI-A (Implementation of USFWS-Issued Terms and Conditions)	Less than significant
Impact BI-C	Temporary direct impacts to County List A and B special-status plants outside of designated construction areas	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-E	Impacts to special-status wildlife species from collisions	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant
Impact BI-F	Impacts to special-status wildlife species from electrocution	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Impact BI-G	Permanent impacts to raptor foraging habitat	N/A	Less than significant
Impact BI-H	Indirect temporary impacts to special-status plant species (County List A and B special-status plants) during construction	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-I	Indirect permanent impacts to special-status plant species (County List A and B special-status plants) during operations and maintenance	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-J	Temporary indirect impacts to special-status wildlife species during construction	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-K	Permanent indirect impacts to special-status wildlife species during operations and maintenance	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-L	Direct impacts to active raptor nests	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant
Impact BI-N	Direct impacts to sensitive habitat outside of Campo Wind Corridor	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-O	Direct impacts to jurisdictional aquatic resources	M-BI-D (Jurisdictional Waters and Wetlands Compensation)	Less than significant
Impact BI-P	Direct impacts to jurisdictional habitat outside of Campo Wind Corridor	M-BI-C (General Avoidance and Minimization Measures)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Impact BI-Q	Temporary indirect impacts to jurisdictional aquatic resources	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-R	Permanent indirect impacts to jurisdictional aquatic resources	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-S	Temporary indirect impact to sensitive vegetation communities	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-T	Permanent indirect impact to sensitive vegetation communities	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-V	Temporary direct impacts to wildlife access to foraging and breeding habitat	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
Impact BI-W	Impacts to wildlife species movement from electrocution	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant
Impact BI-X	Impacts to wildlife species movement from collisions	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant
Impact BI-Y	Direct and indirect impacts to active migratory bird nesting	M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)	Less than significant
<i>Cumulative Impacts</i>			
Impact BI-CU-2	Potential cumulative indirect impacts (invasive species and dust) to sensitive plants and vegetation communities	M-BI-C (General Avoidance and Minimization Measures)	Less than significant
2.4 – Cultural Resources			
Boulder Brush Facilities			
Impact CR-1	Project development has potential to affect resources within 50 feet of Boulder Brush ADI or within buffers	M-CR-1 (temporary exclusionary fencing)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Impact CR-2	Potential to affect 37 cultural resources that are important under the County CEQA Guidelines	M-CR-2 (archaeological monitoring)	Less than significant
Impact CR-3	Potential to affect unknown human remains	M-CR-3 (avoidance through preservation in place)	Less than significant
Impact CR-4	Potential to affect undiscovered cultural resources that may qualify as significant under County Guidelines	M-CR-1 (temporary exclusionary fencing) M-CR-2 (archaeological monitoring) M-CR-3 (avoidance through preservation in place)	Less than significant
Campo Wind Facilities			
Impact CR-A	Project development has potential to affect resources within 50 feet of Project ADI or within buffers	M-CR-A (Monitoring and Treatment Plan)	Less than significant
Impact CR-B	Potential to affect 37 cultural resources that are important under the County CEQA Guidelines	M-CR-B (archaeological and Native American monitoring) and M-CR-C (significance evaluation and data recovery)	Less than significant
Impact CR-C	Potential to affect unknown human remains	M-CR-B (archaeological and Native American monitoring)	Less than significant
Impact CR-D	Potential to affect undiscovered cultural resources that may qualify as significant under County Guidelines	M-CR-A (Monitoring and Treatment Plan) M-CR-B (archaeological and Native American monitoring) M-CR-C (significance evaluation and data recovery)	Less than significant
<i>2.5 – Hazards and Hazardous Materials</i>			
Boulder Brush Facilities			
Impact HZ-1	Potential for accidental spills and unauthorized releases of hazardous materials	M-HZ-1	Less than significant
Impact HZ-2	Wildfire hazards	M-WF-1	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
Campo Wind Facilities			
Impact HZ-A	Potential for accidental spills and unauthorized releases of hazardous materials	M-HZ-A through M-HZ-D	Less than significant
Impact HZ-B	Hazardous materials sites	M-HZ-A through M-HZ-D	Less than significant
Impact HZ-C	Wildfire hazards	M-BI-C (h)	Less than significant
<i>2.6 – Noise</i>			
Boulder Brush Facilities			
Impact N-1	Potentially significant construction noise impacts	M-N-1 (construction noise best management practices for activities on private land)	Less than significant
Campo Wind Facilities			
None (see significant and unavoidable impacts)			
<i>2.7 – Tribal Cultural Resources</i>			
Boulder Brush Facilities			
Impact TCR-1	Possibility of unknown resources	M-TCR-1 (temporary exclusionary fencing) M-TCR-2 (archaeological and Tribal monitoring) M-TCR-3 (avoidance through preservation in place)	Less than significant
Campo Wind Facilities			
Impact TCR-A	Possibility of unknown resources	M-CR-A (Monitoring and Treatment Plan) M-CR-B (archaeological and Native American monitoring) M-CR-C (significance evaluation and data recovery)	Less than significant
<i>2.8 – Traffic and Transportation</i>			
Boulder Brush Facilities			
No significant traffic and transportation impacts			
Campo Wind Facilities			
Impact TR-A	Impacts to roadway facilities	M-TR-A (Use of Traffic Flagger during PM Peak Hour)	Less than significant
Impact TR-B	Potential damage to existing roadways during construction	M-TR-B (Repair and Restoration of Roads)	Less than significant
Impact TR-C	Increase in hazards and adequate emergency access	M-TR-C (Traffic Control and Management Plan)	Less than significant

**Table ES-1
Summary of Significant Effects**

Impact No.	Impact	Mitigation	Conclusion and Mitigation Effectiveness
<i>2.9 – Wildfire</i>			
Boulder Brush Facilities			
Impact WF-1	Potential for increased wildfire risk.	M-WF-1 (Implementation of all fire protection measures and features identified in the Boulder Brush Facilities FPP)	Less than significant
Campo Wind Facilities			
Impact WF-A	Potential for increased wildfire risk.	M-BI-C (h) (Preparation of a Fire Protection Plan for the Campo Wind Facilities)	Less than significant

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
<i>Executive Summary</i>		
Executive Summary, Page ES-1	<p>The following text shown in underline has been included to describe the public review period for the Draft EIR, and where comments and response to comments can be found within the Final EIR:</p> <p><u>The Draft Environmental Impact Report (Draft EIR) for the proposed Project was prepared and circulated for public review from December 12, 2019 to February 3, 2020. During that time, the County received comment letters from Tribes, Agencies, Organizations, and Individuals. The County has prepared responses to each of the written comment letters. The comment letters and responses are included in Volume II of the Final EIR. In some cases, comments received prompted changes to the Draft EIR. In addition, updated information is provided where appropriate. These changes are shown in strikeout/underline in the Final EIR and are summarized in the Errata Summary Table, Table ES-2, below.</u></p>	Update
Executive Summary, Page ES-2	<p>The following text shown in underline has been included to reflect the current status of the EIS prepared for the Project by the BIA:</p> <p><u>Since the majority of the Project is located on the Reservation, the Project is also subject to NEPA. The BIA is the Lead Agency for the Project under NEPA, and has prepared an EIS for the Project. The County is a cooperating agency for the EIS. The BIA released a Notice of Intent to prepare an EIS on November 21, 2018, and closed the comment period on December 21, 2018. The BIA held a public scoping meeting on December 6, 2018, at the Tribal Hall on the Reservation. The Draft EIS was released on May 24, 2019, for a 45-day public review period, which ended on July 8, 2019. The BIA signed the Record of Decision (ROD) on April 7, 2020, approving the project and completing the NEPA process.</u></p>	Update

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
<p>Section ES 1.1, Page ES-3</p>	<p>As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included:</p> <p>The Project as a whole would consist of the construction, operation, maintenance, and ultimately the decommissioning of a renewable wind energy generation project consisting of 60 wind turbines, three permanent meteorological (MET) towers, six temporary MET towers, a temporary concrete batch plant for use during construction, a temporary equipment staging and parking area for use during construction, an operations and maintenance (O&M) facility, water collection and septic systems, access roads, an electrical collection and communications system (ECCS), an approximately 8.5-mile-long gen-tie line, a collector substation, a high-voltage substation, and a switchyard to interconnect the Project to the existing SDG&E Sunrise Powerlink (see Figure 1-3, Project Site Plan, in Chapter 1 of this EIR). <u>A total of 76 wind turbine sites within the Reservation are shown in Figure 1-3 and have been analyzed in this EIR; however, only 60 turbines would be constructed in accordance with the Campo Lease. Further, as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized.</u></p> <p>The Project would operate for more than 30 years, after which it would be decommissioned, except for the SDG&E-owned and operated switchyard and connection lines to Sunrise Powerlink, which would not be decommissioned. The details regarding the Project components and construction thereof are provided in Chapter 1, Project Description, Location, and Environmental Setting, of this EIR.</p>	<p>Update</p>
<p>Section ES.4, Page ES-9</p>	<p>The following text has been corrected and is shown in strikeout (deleted text)/underline (added text):</p> <p><u>ES.4 Issues to Be Resolved by the Decision-Making Body</u> <u>The San Diego County Planning Commission serves as the decision-making body for Major Use Permits; however, the Boulder Brush Facilities require a Fire Services Agreement, which must be approved by the County Board of Supervisors. Therefore, for the Boulder Brush Facilities, the Board of Supervisors is the decision-making body for the Major Use Permit. The Planning Commission will make a recommendation on the Boulder Brush Facilities to the Board of Supervisors.</u> The San Diego County Planning Commission serves as the decision-making body for the Project.</p> <p>Issues to be resolved by the <u>Board of Supervisors</u> Planning Commission include: (1) how to mitigate the significant effects of the Project; (2) whether to reject or approve one of the alternatives to the Project and other environmental findings; and (3) whether to reject or approve the Project.</p>	<p>Correction</p>

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	<p>The Board of Supervisors Planning Commission must adopt detailed findings on the feasibility of mitigation measures that substantially lessen or avoid the significant effects of the Project on the environment.</p> <p>In addition to mitigation measures, the Board of Supervisors Planning Commission will decide whether or not to adopt the Project or any of the Project alternatives that would feasibly attain most of the Project objectives while avoiding or substantially reducing any of the significant impacts of the Project.</p> <p>Because this EIR has identified adverse environmental effects that are unavoidable, the Board of Supervisors Planning Commission must also determine whether the adverse environmental effects are considered acceptable with consideration given to economic, social, technological, and other relevant benefits of the Proposed Project pursuant to CEQA Section 15093.</p>	
Table ES-1, Page ES-17	A correction has been made to Table ES-1, Summary of Significant Effects, in the Executive Summary chapter of the Final EIS to include the identified significant and unavoidable aesthetics impacts for the Boulder Brush Facilities (Impact AE-1 and Impact AE-2). These impacts were identified in both the Aesthetics Draft EIR Chapter and the Visual Resources Report (Appendix B), but mistakenly were not included in Table ES-1.	Correction
Table ES-1, Pages ES-19, ES-21, ES-22, and ES-23	The title of mitigation measure M-BI-7 has been revised as follows: M-BI-7 (revegetation of temporarily impacted areas).	Correction
Table ES-1, Pages ES-21, and ES-22	The title of mitigation measure M-BI-16 has been revised as follows: M-BI-16 (federal, and state, and local agency permits).	Correction
Table ES-2, Pages ES-30 through ES-63	Table ES-2, Errata Summary Table, has been included in the Executive Summary for the Final EIR to reflect revisions made to the Final EIR as a result of public comments received during the public review period, as well as updated information.	Update
<i>Chapter 1 Project Description</i>		
Section 1.2.1, Pages 1-4, and 1-5; Section 1.2.2.1, Page 1-26; Section 1.2.2.2, Page 1-35	Related to comment O10-6, an editorial revision in Chapter 1 Project Description of the Draft EIR was implemented. As requested by SDG&E, references to “control house” have been revised to “control shelter” in the Final EIR.	Correction
Section 1.2.1, Page 1-6	In the first paragraph on Page 1-6 of the Project Description, the term retention pond has been changed to earthen bottom detention basin.	Correction
Section 1.2.2, Page 1-7	In response to comment O10-7, and as requested by SDG&E, the following text has been added: <u>“SDG&E will have use of the access roads after construction is complete for the purpose of operations and maintenance of their facilities.”</u>	Response to Comment

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Section Page	Change	Reason for Change
Section 1.2.1, Page 1-9	<p>As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included. Additionally Figure 1-3 has been updated to reflect the text included:</p> <p>The Project would include up to 60 wind turbines within the Campo Corridor on the Reservation. <u>A total of 76 wind turbine sites within the Reservation are shown in Figure 1-3 and have been analyzed in this EIR; however, only 60 turbines would be constructed in accordance with the Campo Lease. Further, as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized. These four wind turbine sites are located in the northwestern corner of the Reservation (Refer to Figure 1-3). The 60 wind turbines would be arranged in accordance with applicable industry siting recommendations for optimum energy production and minimal land disturbance.</u></p>	Update
Section 1.2.2, Page 1-18; Section 1.2.2.2, Page 1-31; and Section 1.2.7, Page 1-42; Section 1.2.2.3, Page 1-38 and 1-39	In response to comment O12-15, text has been revised to refer to “revegetation” rather than “restoration” for consistency with mitigation M-BI-C (e) which states revegetation.	Correction
Section 1.2.2.3, Pages 1-38 and 1-39	In response to comment O12-15, text stating “Local seed sources would be used where feasible” has been revised to state “Locally available seed will be used, and that seed from species that are unavailable for collection would not be incorporated into the final seed palette.”	Response to Comment
Table 1-4, Page 1-57	Related to comment O6-76, in Table 1-4 a correction has been made to the status of cumulative project Rugged Solar, and the status has been changed from “Under Construction” (UC) to <u>“Approved” (A) original application and “Under Review”(UR) revised application.</u>	Correction
<i>Chapter 2.1 Aesthetics</i>		
Section 2.1.3, Page 2.1-17	<p>For clarification, reference to the Supplemental Shadow Flicker Analysis has been added:</p> <p><u>“Additionally, for informational purposes, the County has conducted a Supplemental Shadow Flicker Analysis which is included as Attachment 1 to Appendix O.”</u></p>	Response to Comment
Section 2.1.3.1, Page 2.1-31	<p>In response to comment I37-9, the following text has been added:</p> <p><u>“The proposed widening of Ribbonwood Road would occur within existing County right-of-way and/or non-exclusive easements (acquisition of private property for widening would not be required).”</u></p>	Response to Comment

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Section Page	Change	Reason for Change
Section 2.1.3.2, Page 2.1-41	The following revision has been made in strikeout as a correction to the sentence: These components would would create strong form, line, and color contrast with the characteristic landscape (see Figure 2.1-9, KOP 2; Figures 2.1-10 and 2.1-11, KOP 3 and KOP 4; Figure 2.1-12, KOP 5; and Figure 2.1-14, KOP 7).	Correction
Section 2.1.3.3, Page 2.1-45	In response to comment I37-9, the following text has been added: "Improvements to Ribbonwood Road would consist of paving and where needed, widening of an existing road <u>within existing County right-of-way and/or non-exclusive easements.</u> "	Response to Comment
Section 2.1.3.6, Page 2.1-66	As a result of information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included. A Shadow Flicker Analysis prepared for the Project and is included as Appendix O to this EIR (November 13, 2019). <u>For informational purposes, and due to public comments received which noted the difference in the rotor diameter described in Chapter 1 (up to approximately 460 feet) and the rotor diameter assumed in the Shadow Flicker analysis (450 feet), a Supplemental Shadow Flicker Analysis, dated August 28, 2020 was prepared and included as Attachment 1 to Appendix O. The Supplemental Shadow Flicker Analysis assumed a rotor diameter of 460 feet, consistent with the Project description in Chapter 1 of the Draft EIR, whereas the 2019 analysis assumed the same maximum tip height with a rotor diameter of 450 feet. The supplemental analysis compared the modelled results based on a rotor diameter of 460 feet versus a rotor diameter of 450 feet and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR. This analysis uses the Alameda County guideline as suggested by the County to evaluate potential shadow flicker effects from Project turbines on receptors both On- and Off-Reservations. For the purposes of this analysis, the term "On-Reservations" refers to anything within the reservation boundaries of the Campo, La Posta, and Manzanita tribes, while the term "Off-Reservations" refers to anything outside of the Campo, La Posta, and Manzanita tribal reservation boundaries.</u>	Update
Section 2.1.3.6, Page 2.1-66 and 2.1-67	As a result of Federal Aviation Administration review of the Project, the following text shown in underline has been included. In accordance with the Campo Lease, no Project turbines would be sited within 0.25-mile (or 1,320 feet) of any receptor on the Reservation. In addition, and based on the modeled 76-turbine layout, no Project turbines are sited within 1,000 feet of any receptor outside of the Campo Reservation. As described in the Shadow Flicker Analysis (Appendix O), the modeling results are conservative as it analyzes 76 turbine sites, 16 more turbines than will be constructed under the terms of the Campo	Update

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	<p>Lease. <u>Further as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized (Refer to Figure 1-3).</u> However, based on the shadow flicker modeling conducted as part of the analysis, On- and Off-Reservations receptors may experience shadow flicker effects. Shadow flicker would result from turbines associated with the Campo Wind Facilities which are located within the Reservation Boundary, and thus, turbine siting and approval are outside the control of the County.</p>	
<i>Chapter 2.2 Air Quality</i>		
<p>Section 2.2.6, Page 2.2-47</p>	<p>Mitigation Measure M-AQ-2 (f.) has been corrected as shown in <u>strikeout underline</u>:</p> <p style="padding-left: 40px;">f. Visible track-out into traveled public streets shall be removed with the use of sweepers, water trucks, or similar method within 30 minutes of occurrence <u>when active operations cease or every 24 hours for continuous operations.</u></p>	<p>Correction</p>
<i>Chapter 2.3 Biological Resources</i>		
<p>Sectoin 2.3.1.4, Page 2.3-11</p>	<p>Reference to the Quino checkerspot butterfly has been included at the end of this sentence for clarification. The included text is shown in underline:</p> <p>Of the total species observed, 27 of these are considered special status, one of which is a federally listed species (<u>Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)</u>).</p>	<p>Clarification</p>
<p>Section 2.3.1.6, Page 2.3-23 and 2.3-24</p>	<p>The reference 'Faulkner, D.K., and M.W. Klein 2012' has been revised to year 2003 instead of 2012 as a correction</p>	<p>Correction</p>
<p>Section 2.3.3.2, Page 2.3-52 and 2.3-53</p>	<p>Multiple comments received on the Draft EIR expressed concern regarding the studies and analyses performed to identify potential impact on bats. In terms of the impact analysis for bats, the wind turbines were considered to present a potential risk to bats for both collision and barotrauma impacts. The Final EIR has been revised to clarify this point. The added text is shown as underlined.</p> <p>“The Campo Wind Facilities would include approximately 60 turbines. Birds protected under the MBTA would be at risk for collisions with the turbines and gen-tie line support poles, and these impacts would be potentially significant (Impact BI-E). The infrequent sightings during the eagle point surveys and USGS biotelemetry data suggests that the Campo Corridor and surrounding area receives little use by eagles and is not the core territory of any eagles. Additionally, there were low occurrences of bats during surveys within the Campo Corridor, particularly when compared to other areas with higher-quality habitat types in the region. <u>Risk to bats associated with the Project primarily stems from direct impacts to roost sites, electrocution, barotrauma, and collision. In this case, no maternity roost sites are known from the area or nearby.</u> <u>Additionally, because of the type of turbine infrastructure and turbine wiring protections, electrocution is also of limited risk. Moreover, because</u></p>	<p>Correction</p>

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	<p><u>of the slower speeds associated with Project turbines, barotrauma is also of limited to no risk. The Shu'luuk data and Jewell Valley data sets showed most of the bat activity occurred around the lower microphone, or 15 feet off the ground and far under the rotor swept area. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. Therefore, bats and golden eagles are not anticipated to have a high number of collisions with turbines due to the low occurrence of these species using the site.</u></p>	
<p>Section 2.3.3.2, Page 2.3-53</p>	<p>Further clarification as to why direct impacts to bats from electrocution would be negligible. The added text is shown as underlined.</p> <p><u>“Direct impacts to bats could result in mortality or injury due to collisions at wind turbines. However, potential effects of the Project on the meta-community of bats in the region, including those species known to be susceptible to collision with turbine blades, would be negligible. Additionally, because of the type of turbine infrastructure and turbine wiring protections, electrocution is also of limited risk. Further, no maternity roost sites are known in the area”.</u></p>	<p>Update</p>
<p>Section 2.3.3.2, Pages 2.3-53 and 2.3-54</p>	<p>In response to comment O12-41, text has been revised to clarify the significance determinations for impacts to County List D species. Deleted text is shown as strikeout and added text is shown as underlined.</p> <p><u>“There would be no direct impacts to County List C plant species resulting from implementation of the Boulder Brush Facilities. Potential impacts to County List D species include Colorado Desert larkspur within the Boulder Brush Corridor, and Payson’s jewelflower (Chorizanthe leptotheca), and pride-of-California (Lathyrus splendens) within the Campo Corridor, which is considered less than significant per the County Guidelines because the Project would not impact the long-term survival of this plant. Impacts to County List D species Payson’s jewelflower, Peninsular spineflower (Chorizanthe leptotheca), and pride-of-California (Lathyrus splendens) within the Campo Corridor are considered significant and unavoidable”.</u></p>	<p>Response to Comment</p>
<p>Section 2.3.3.6, Page 2.3-103</p>	<p>Reference to Table 2.3-5 has been included at the end of this sentence for clarification, shown in underline:</p> <p>The Boulder Brush Boundary is located within the boundaries of the draft MSCP East County Plan area. The Boulder Brush Facilities conform to the goals and requirements as outlined in the East County MSCP Planning Agreement Conservation Objectives, <u>see Table 2.3-5.</u></p>	<p>Clarification</p>
<p>Section 2.3.3.6, Page 2.3-108</p>	<p>The following revision shown in underline has been made as a correction to the sentence:</p> <p>Based on the low golden eagle use within the Campo Corridor for foraging, <u>impacts</u> are considered less than significant.</p>	<p>Correction</p>
<p>Section 2.3.4.1, Page 2.3-111</p>	<p>A revision has been to correct the acreage of disturbance associated with the biological cumulative analysis study area. The impacted acreage has been corrected to 2,367 from 2,893 acres.</p>	<p>Correction</p>

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Section 2.3.6, Pages 2.3-122 thru 2.3-127	The conservation measures (CM) included in, and required by, the Biological Opinion (BO) of the Final EIS have been added to mitigation measure M-BI-1 in Chapter 2.3 of the Final EIR and will be required to be implemented by the Project. The conservation measures required by the BO include CM-1: Offsite Land Conservation, CM-2: Limiting Impacts to Occupied Habitat, CM-3 Avoidance of Vehicle Strikes, CM-4: Revegetation of Temporary Impacts, CM-5: Weed Control, CM-6: Trash Control, CM-7: Dust Control, CM-8: Fire Prevention. The added text is shown as underlined in M-BI-1 in Chapter 2.3 of the Final EIR.	Updated
Section 2.3.6, Page 2.3-131	In response to comment O12-57, the Final EIR has been updated to clarify in Mitigation Measure M-BI-5 that the mitigation plan for the off-site open space shall include a combination of relocation and plantings. Added text is shown as underlined. “...If any special-status species are found <u>during the pre-construction surveys</u> , the Applicant shall develop a plant relocation <u>mitigation</u> plan for the off-site open space. <u>The mitigation plan shall be</u> (prepared by a biologist with at least 5 years of experience in rare plant relocation <u>and/or mitigation</u>), <u>and the plan shall include a combination of preservation relocation and/or plantings</u> with plant specimens grown on site or from local seed or cutting sources <u>to achieve the mitigation ratios required by the County</u> . The individuals shall be planted within the open space to secure a 2:1 mitigation ratio for any County List A species, and a 1:1 mitigation ratio for County list B species identified. <u>If relocation and/or plantings is conducted as part of the mitigation plan,</u> The plant relocation mitigation plan shall require the Applicant to submit a revegetation plan, including annual monitoring reports for at least 5 years after the replanting to demonstrate that the plants have been successfully established at the required mitigation ratio.”	Response to Comment
Section 2.3.6, Pages 2.3-134 and 2.3-135	The title of mitigation measure M-BI-7 has been revised, and additional text has been added to mitigation measures M-BI-7 to address the preparation and implementation of the decommissioning plan. The added text is shown as underlined. “ Revegetation of Temporarily Impacted Areas . Disturbed areas that are not required to be clear for operations and maintenance activities (i.e., temporarily disturbed areas) shall be revegetated or stabilized using soil binders within 90 days of construction completion. The Boulder Brush Facilities would result in temporary impacts to sensitive upland and jurisdictional aquatic resources (ephemeral channels). Temporary impacts shall be revegetated to provide erosion control, slope stabilization, or other necessary function. Revegetation areas may incorporate salvaged materials, such as seed collection and translocation of plant materials, as determined to be appropriate. The Project Biologist shall review the plant materials prior to grading and determine if salvage is warranted.	Updated

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	<p>Ephemeral channels will be restored to pre-construction conditions, as feasible.</p> <p><u>Prior to decommissioning of Boulder Brush Facilities, a decommissioning plan consistent with the terms of the Private Lease would be prepared and implemented. The decommissioning plan shall include revegetation of the previously disturbed areas. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed would be used, and seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of disturbed areas shall provide a minimum of 40 percent cover of plant species native to adjacent habitats within 2 years of construction completion. If 40 percent cover of native species is not achieved within 2 years, adaptive management measures will be pursued until 40 percent cover of native species is achieved.</u></p>	
<p>Section 2.3-6, Pages 2.3-135 and 2.3-136</p>	<p>As a correction, the last sentence of Mitigation Measure M-BI-11 has been removed. The deleted text is shown as strikeout:</p> <p>“M-BI-11 Erosion and Runoff Control. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This shall protect sensitive vegetation from being inundated with sediment-laden runoff.</p> <p>Dewatering shall be conducted in accordance with standard regulations of the Regional Water Quality Control Board (RWQCB). A construction National Pollutant Discharge Elimination System permit, issued by RWQCB to discharge water from dewatering activities, shall be required prior to start of construction. This shall minimize erosion, siltation, and pollution within sensitive communities.</p> <p>Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. An Urban Runoff Plan and operational best management practices shall be approved by the San Diego County Department of Planning & Development Services prior to construction.”</p>	<p>Correction</p>
<p>Section 2.3.6, Pages 2.3-136 and 2.3-137</p>	<p>Additional text has been added to mitigation measure M-BI-13 to address the weed management plan. The added text is shown as <u>underlined</u>.</p> <p>“Prevention of Invasive Plant Species. A County of San Diego – approved plant list shall be used for the revegetation areas. A hydroseed mix that incorporates native species and is appropriate to the area, shall be used for slope stabilization in transitional areas. No invasive plant species as included on the most recent version of the California Invasive Plant Council’s California Invasive Plant Inventory for the Project region shall be included in the seed mix, and the plant palette shall be composed of native species that do not require high irrigation rates. The hydroseed mix and a map of the seeded areas shall be submitted and approved by the County of San Diego prior to re-seeding.</p> <p><u>Additionally, a weed management plan shall be developed prior to commencement of construction activities. The plan will cover a Weed</u></p>	<p>Correction</p>

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	<p><u>Management Area (WMA) which includes all project disturbance areas, and a 50 foot buffer. The plan shall include the following:</u></p> <ol style="list-style-type: none"> 1. <u>Baseline weed inventory and risk assessment, identifying species targeted for control that currently occur within, or that may invade, the WMA</u> 2. <u>Identification of baseline infestation areas and necessary containment/preventive measures</u> 3. <u>Annual surveys within the WMA to document weed species during construction and for 2 years post construction</u> 4. <u>Success standards, such as no more than a 10% increase in target weed species within the WMA</u> 5. <u>Control techniques and adaptive management measures</u> 6. <u>Reporting</u> <p><u>All herbicide application shall be in compliance with applicable laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator.</u></p>	
<p>Section 2.3.6, Page 2.3-127</p>	<p>Reference to mitigation measure M-WF-1 has been included as the last sentence to M-BI-14, shown in underline: Fire Protection. To minimize impacts to biological resources from fire hazards, the Boulder Brush Facilities Fire Protection Plan shall be implemented in conjunction with development of the Boulder Brush Facilities. <u>See also mitigation measure M-WF-1, Chapter 2.9 Wildfire.</u></p>	<p>Clarification</p>
<p>Section 2.3.6, Pages 2.3-137 and 2.3-138</p>	<p>In response to comment O12-60, additional text has been added to Mitigation Measure M-BI-16 to clarify the requirements for the Conceptual Wetlands Mitigation and Monitoring Plan. The title of the mitigation measure has also been revised. Added text is shown as underlined and deleted text is shown as strikeout.</p> <p><u>“Federal, and State, and Local Agency Permits</u> “...Prior to issuance of land development permits, including clearing, grubbing, and grading permits for activities that would impact jurisdictional aquatic resources, the Boulder Brush Developer shall prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the Director of Planning & Development Services (or his/her designee) and the applicable Resource Agencies...”</p>	<p>Response to Comment</p>
<p>Section 2.3.6, Page 2.3-138 and 2.3-139</p>	<p>In response to comment O12-56, Mitigation Measure M-BI-A has been updated to reflect the requirements outlined in the approved BO. Added text is shown as underlined and deleted text is shown as strikeout.</p> <p><u>“Implementation of USFWS-Issued Terms and Conditions</u> All terms and conditions developed as part of the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the Project’s Biological Opinion shall be implemented. Terms and conditions shall apply to any ESA-listed species that may be impacted by the Project. Ratios for habitat-based mitigation (if any) shall be determined during the Section 7 consultation process. The mitigation shall focus on habitat preservation and</p>	<p>Response to Comment</p>

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	<p>creation for long-term conservation of metapopulation dynamics. Per coordination with USFWS, seasonal avoidance of mapped suitable Quino checkerspot butterfly habitat during Project construction would not be required. Terms and conditions outlined in the Project’s Biological Opinion shall take precedence over the measure outlined herein. The measure described below would be subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and by the County of San Diego for the Boulder Brush Facilities. The Project’s Biological Opinion will be issued to the BIA and the BIA will be responsible for implementing the terms and conditions of the Biological Opinion.</p> <p>(a) Construction Flagging-Fencing and Signage. Construction flagging-fencing and/or signage will be installed when construction of the Project occurs immediately adjacent to mapped occupied Quino checkerspot butterfly habitat (i.e., within a 200-meter radius around host plant concentrations or Quino checkerspot butterfly detections that are located within 1 kilometer of a mapped Quino checkerspot butterfly location) to prevent unnecessary intrusion into occupied Quino checkerspot butterfly habitat. Signage shall be installed where construction activity high-use areas of the lease area border suitable Quino checkerspot butterfly habitat to prevent intrusion into sensitive habitat and remind personnel of restrictions regarding activities within these areas.”</p> <p>(b) Seasonal Avoidance. To the extent practicable, all construction clearing and grubbing in mapped suitable QCB habitat (i.e., within a 200-meter radius around host plant concentrations or QCB detections that are located within 1 kilometer of a mapped QCB location) associated with construction of the Project shall occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, as determined by the USFWS. Vegetation management during the operation and maintenance phase of the Project shall also occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, to the extent practicable.</p>	
<p>Section 2.3.6, Pages 2.3-142 - Page 2.3-147</p>	<p>In response to comment O12-56, Mitigation Measure M-BI-C has been updated to reflect the requirements outlined in the approved BO. Added text is shown as underlined.</p> <p>General Avoidance and Minimization Measures.</p> <p>(a) Project Biologist(s). A Project biologist(s) approved by the U.S. Fish and Wildlife Service (USFWS) and the Campo Band of Diegueño Mission Indians (Tribe) shall be designated by the Ddeveloper. The Campo Environmental Protection Agency is recommended to oversee <u>shall enforce</u> the duties of the Project biologist for all work conducted on the Reservation. The Ddeveloper shall submit the names, documented experience, any relevant permit numbers, and resumes for the Project biologist(s) to USFWS and the Tribe for approval prior</p>	<p>Response to Comment</p>

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	<p>to initiation of construction. The Project biologist(s) shall be responsible for the following:</p> <ul style="list-style-type: none"> • Providing training to all construction workers (may take the form of any documentable training platform). • Reviewing and/or designating the construction area in the field with the construction contractor in accordance with the final grading plan prior to clearing, grubbing, or grading. • Conducting a field review of the staking to be set by the professional surveyor, designating the limits of <u>all</u> construction activity prior to clearing, grubbing, or grading. • Flushing wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from occupied habitat areas immediately prior to (i.e., within 2 hours) brush-clearing and earthmoving activities. This does not include disturbance of nesting birds (see M-BI-B) or “flushing” of federally listed species (e.g., Quino checkerspot butterfly [see M-BI-A]). • Regularly monitoring construction activities to verify that construction is proceeding in compliance with all permit requirements specific to biological resources. • Overseeing the construction site so that cover and/or escape routes for wildlife from excavated areas are provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them, and/or excavations shall provide an earthen ramp or boards to allow for a wildlife escape route at the ends and every 30 feet. • Maintaining communication with the appropriate personnel (construction Project manager, resident engineer) so that issues relating to biological resources are appropriately and lawfully managed. • Verifying that grading plans include a stormwater pollution prevention plan. • Reporting any noncompliance issues to the Bureau of Indian Affairs, resident engineer, and the Tribe. <p>(b) Environmental Training Program. A worker environmental awareness program shall be developed and implemented prior to the start of construction. The Project biologist(s) shall use this program to conduct environmental training for construction personnel. All construction site personnel shall be required to attend the environmental training in conjunction with hazard and safety training prior to working on site.</p> <p>(c) SWPPP. The stormwater pollution prevention plan (SWPPP) or equivalent shall include, at a minimum, the best management practices listed below. The combined implementation of these requirements shall protect adjacent habitats and special-status</p>	

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	<p>species during construction to the maximum extent practicable. At a minimum, the following measures and/or restrictions shall be incorporated into the SWPPP and noted on construction plans, where appropriate, to avoid impacts to special-status species, special-status vegetation communities, and/or jurisdictional waters during construction. The measures described in the SWPPP would be <u>are</u> subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and the County of San Diego for the Boulder Brush Facilities Off-Reservation areas.</p> <p>The Project biologist(s) shall verify the implementation of the following design requirements:</p> <ul style="list-style-type: none"> • No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the Project region) shall be permitted. • Construction activity shall not be permitted in jurisdictional waters of the United States except as authorized by applicable law and permit(s), including permits and authorizations approved by the U.S. Army Corps of Engineers. • Silt settling basins installed during the construction process shall be located away from areas of ponded or flowing water to prevent discolored, silt-bearing water from reaching areas of ponded or flowing water during normal flow regimes. • Temporary structures, staging, and storage areas for construction equipment and/or materials shall not be located in jurisdictional waters, including wetlands and riparian areas. • Any equipment or vehicles driven and/or operated within jurisdictional waters of the United States shall be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse. • No stationary equipment, such as motors, pumps, generators, and welders, or fuel storage tanks shall be located within 200 feet of jurisdictional waters of the United States. • No debris, bark, slash sawdust, rubbish, cement, concrete, oil, or petroleum products shall be stored where it may be washed by rainfall or runoff into jurisdictional waters of the United States. • When construction operations are completed, any excess materials or debris shall be removed from the work area. • No equipment maintenance shall be performed within 200 feet of jurisdictional waters of the United States where petroleum products or other pollutants from the equipment may enter these areas. • Fully covered trash receptacles that are animal-proof and weather-proof shall be installed and used by the construction contractor(s) to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering shall be prohibited and trash shall be removed from construction areas daily. All food- 	

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	<p>related trash and garbage shall be removed from the construction sites on a daily basis.</p> <p>(d) Fugitive Dust Control. The Developer or its designee shall implement the <u>develop a fugitive dust control plan in compliance with San Diego County Air Pollution Control Regulations to reduce particulate matter less than 10 microns (PM₁₀) and fine particulate matter less than 2.5 microns (PM_{2.5}) emissions during construction and decommissioning. The fugitive dust control plan shall include names, addresses, and phone numbers of persons responsible for the preparation, submission, and implementation of the plan; description and location of operation(s); and a list of all fugitive dust emissions sources included in the operation.</u></p> <p><u>The following dust control measures shall be implemented:</u></p> <ul style="list-style-type: none"> • <u>All on-site unpaved roads shall be effectively stabilized using soil stabilizers that can be determined to be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers, and shall not increase any other environmental impacts including loss of vegetation. Application of the soil stabilizer shall be undertaken strictly to the manufacturer's directions for application and cognizant of the weather forecast to avoid application immediately before a rain event.</u> • <u>All material excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed areas.</u> • <u>All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</u> • <u>Soil loads shall be kept below 18 inches of the freeboard of the truck.</u> • <u>Drop heights shall be minimized when loaders dump soil into trucks.</u> • <u>Traffic speeds on unpaved roads shall be limited to 15 miles per hour.</u> • <u>Disturbed areas shall be minimized.</u> <p>measures outlined in project design features PDF-AQ-2 and PDF-AQ-3 (Fugitive Dust Control) of the Final EIR. (e) Revegetation. <u>Disturbed areas that are not required to be clear for operations and maintenance activities (i.e., temporarily disturbed areas) shall be revegetated or stabilized using soil binders within 90 days of construction completion. If soil binders are used they shall be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed will be used, and that seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of temporarily disturbed areas shall provide a minimum of 40 percent% cover of plant</u></p>	

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	<p>species native to adjacent habitats within a 2 <u>two</u>-year time frame. If 40 percent% cover of native species is not achieved within 2 <u>two</u> years, adaptive management measures (e.g., supplemental seeding, erosion control, pest control) will be pursued until 40 percent% cover of native species is achieved.</p> <p>If the Campo Wind Facilities were to be decommissioned Prior to decommissioning of Campo Wind Facilities, a decommissioning plan would be prepared and implemented. The decommissioning plan shall include revegetation of the previously-impacted disturbed areas. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed would be <u>will be</u> used, and seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of disturbed areas shall provide a minimum of 40 percent% cover of plant species native to adjacent habitats within a 2 <u>two</u>-year time frame. If 40 percent% cover of native species is not achieved within 2 <u>two</u> years, adaptive management measures will be pursued until 40 percent% cover of native species is achieved.</p> <p>(f) Erosion and Runoff Control. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This will protect jurisdictional resources from being inundated with sediment-laden runoff. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes.</p> <p>(g) Weed Management. A weed management plan shall be developed and approved by the Tribe prior to commencement of construction activities on the Reservation. <u>The plan will cover a Weed Management Area (WMA) which includes all project disturbance areas, and a 50 foot buffer.</u> The plan shall include the following:</p> <ul style="list-style-type: none"> • <u>Baseline Wweed inventory and risk assessment, identifying species targeted for control that currently occur within, or that may invade, the WMA;</u> • Identification of <u>baseline infestation</u>problem areas and necessary <u>containment</u>preventive measures; • Annual surveys within the <u>WMA restoration areas</u> to document <u>weed species during construction and for</u> weed patches for 2 years post construction; • Success standards of such as no more than a 10% increase in <u>target weed species within the WMA</u>in restoration areas; • <u>Control techniques and</u> Aadaptive management measures; and • Reporting. <p>All herbicide application shall be in compliance with applicable <u>all</u> state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator.</p>	

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	(h) Fire Protection. To minimize the potential exposure of the Project to fire hazards, a Boulder Brush Fire Protection Plan (FPP) shall be prepared and a Fire Protection Plan for the Campo Wind Facilities shall be prepared to the satisfaction of the CRFPD. The FPPs shall be implemented in conjunction with development of the Project.”	
Section 2.3.7, Page 2.3-148	Text has been included under the Candidate, Sensitive, or Special-Status Species (Project) The added text is shown as underlined. “There are no federally or state-listed plants within the Boulder Brush Corridor, Campo Corridor, or limits of grading. A portion of the Boulder Brush Facilities would result in the loss of sensitive plant species (County List A and County List B). The Project would result in permanent and temporary direct impacts to habitat for special-status (County Group 1 species or CDFW SSC) wildlife species. Project impacts to special-status plant and wildlife species would be reduced to below a level of significance with mitigation for all impacts in the Boulder Brush Facilities. <u>Some impacts associated with the Campo Wind Project will remain significant; however, most are reduced to below a level of significance with mitigation.</u> ”	Correction
Section 2.3.7, Pages 2.3-149, 2.3-151, 2.3-152, 2.3-154 and 2.3- 155	Reference to mitigation measure M-BI-7 has been changed. Deleted text is shown as strikeout. M-BI-7 (revegetation of temporarily impacted areas)	Correction
Section 2.3.7, Pages 2.3-151 and 2.3-152	Reference to mitigation measure M-BI-16 has been changed. Deleted text is shown as strikeout and added text is shown as underlined. BI-16 (federal, <u>and state, and local</u> agency permits)	Correction
Section 2.3.7, Page 2.3-151	A correction has been made under the significance conclusion for Impact BI-L. Deleted text is shown as strikeout. “These potential impacts would be reduced to below a level of significance with the implementation of EIS-recommended mitigation measures M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures).”	Correction
<i>Chapter 2.5 Hazards and Hazardous Materials</i>		
Chapter 2.5, Page 2.5-1	The Supplemental Shadow Flicker Analysis has been included to the list of technical reports. Added text is shown as underlined. • <u>“Supplemental Shadow Flicker Analysis: Campo Wind Project with Boulder Brush Facilities prepared by AWS Truepower LLC (a UL Company) for Terra-Gen Development Company LLC in August 2020 (Attachment 1 to Appendix O)”</u>	Correction
Section 2.5.1, Page 2.5-8	In response to comment O-10-8, SDG&E has requested they be removed from a sentence stating their affiliation with either owning or operating treatment, storage, or disposal facilities within the County. Deleted text shown as underlined.	Response to Comment

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	“Within unincorporated San Diego County, multiple treatment, storage, and disposal facility sites exist, such as those owned and operated by the U.S. military and SDG&E. ”	
Section 2.5.3.2, Page 2.5-37	For consistency with O5-51 and to avoid confusion over FAA requirements for the text has been revised. Added text shown as underlined. “ <u>Due to the height of the proposed turbines the Developer would be required to submit form FAA 7460-1 to the FAA 45 days prior to the start of construction.</u> ”	Response to Comment
Section 2.5.3.5	The word “upon” has been corrected to include a missing letter.	Correction
Section 2.5.3.5, Page 2.5-53	A discussion of the Supplemental Shadow Flicker Analysis now included as Attachment 1 to Appendix O of the Final EIR has been included. Added text is shown as underlined. <u>Additionally, for informational purposes, and due to public comments received which noted the difference in the rotor diameter described in Chapter 1 (up to approximately 460 feet) and the rotor diameter assumed in the Shadow Flicker analysis (450 feet), the County conducted a Supplemental Shadow Flicker Analysis (August 2020) which is included as Attachment 1 to Appendix O. The Supplemental Shadow Flicker Analysis assumed a rotor diameter of 460 feet, consistent with the Project description in Chapter 1 of the Draft EIR, whereas the 2019 analysis assumed the same maximum tip height but a rotor diameter of 450 feet. The supplemental analysis compared the modelled results based on a rotor diameter of 460 feet versus a rotor diameter of 450 feet and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR.</u>	Update
<i>Chapter 2.6 Noise</i>		
Section 2.6.1.3, Page 2.6-7	As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included: Sensitive noise receptors (i.e., noise-sensitive land uses [NSLUs]) are located at various locations in proximity to the 2,520-acre area of land, including the Campo Corridor plus the Boulder Brush Corridor (Project Site) both On-Reservation (i.e., within the Reservation Boundary) and Off-Reservation. Almost all of the NSLUs are residential homes. Other NSLUs On-Reservation include facilities such as the Campo Tribal Hall, the Kumeyaay Head Start preschool, and the Campo Health Center, which are generally located along Church Road. The nearest Off-Reservation NSLU to the Boulder Brush Facilities (in this instance an access road) is approximately 300 feet away from the proposed access road. The nearest Off-Reservation NSLU to the Campo Wind Facilities (in this instance also an access road) is an existing residence located approximately 800 feet away from an access road. Up to 76 turbine sites have been identified, of which only 60 would be constructed in accordance with the Campo Lease.	Update

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	<u>As a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized (Refer to Figure 1-3). No Project turbines will be sited within 0.25 miles of any residential structure or tribal building on the Reservation. The closest Off-Reservation NSLU (i.e., on private lands) to a Project turbine site is approximately 1,030 feet away.</u>	
<i>Chapter 2.8 Traffic and Transportation</i>		
Section 2.8.3, Page 2.8-10	The following text shown in underline has been included to the County of San Diego Transportation Fee Ordinance description: <u>Subsequent to adoption of the County's Transportation Guidelines in June 2020, the County is currently not implementing the local Transportation Impact Fee program and is currently not collecting fees for mitigation of projects analyzed using VMT. The existing program was based on Level of Service impacts, which are no longer analyzed under CEQA in accordance with Senate Bill 743.</u>	Update
Section 2.8.4, Page 2.8-21	The following text shown in strikeout/underline has been included to the second sentence of the analysis under Threshold b): CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) for determining the significance of transportation impacts. The VMT provisions of Section 15064.3 are not applicable to this Project until <u>because this EIR was circulated for public review prior to July 1, 2020 (CEQA Guidelines §§15007(c), 15064.3(c)).</u>	Clarification
Section 2.8.4, Page 2.8-23	The following text shown in underline has been added under Threshold c) for clarification: <u>Please refer to the analysis in response to threshold (d) below.</u>	Clarification
Section 2.8.4, Page 2.8-23	The following text shown in underline has been added under Threshold c) for clarification: <u>The analysis herein addresses both threshold c) and d).</u>	Clarification
<i>Chapter 2.9 Wildfire</i>		
Section 2.9.2.3, Page 2.9-21	The reference for San Diego County Code of Regulatory Ordinances Chapter 4 has been revised from '1985' to year '2004.'	Correction
Section 2.9.3.2, Page 2.9-30	The concluding paragraph for the Project related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/underline has been revised: While the Project would comply with all applicable fire codes and provide design features for fire suppression, the Project would be located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire. Therefore, impacts related to wildfire risk are determined to be FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation of the Project would result in a potentially significant impact (Impact WF-1/Impact WF-A).	Correction

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Section 2.9.3.2, Page 2.9-33	<p>The concluding paragraph for the Boulder Brush Facilities related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/<u>underline</u> has been revised:</p> <p>While <u>The Boulder Brush Developer would participate in a Fire Service Developer Agreement with the County, which would outline a fair-share funding agreement for fire services, and the Boulder Brush Facilities would comply with all applicable fire codes and provide design features for fire suppression as recommended and required by the FPP, the Boulder Brush Facilities are located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire. FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation of As such, the Boulder Brush Facilities would result in a potentially significant impact (Impact WF-1) regarding wildfire hazards.</u></p>	Correction
Section 2.9.3.2, Page 2.9-34	<p>The concluding paragraph for the Campo Wind Facilities related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/<u>underline</u> has been revised:</p> <p>While the Campo Wind Facilities would comply with all applicable fire codes and provide project design features for fire suppression, the Campo Wind Facilities are located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire. FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation <u>-As such, implementation of the Campo Wind Facilities would result in a potentially significant impact (Impact WF-A) regarding wildfire hazards.</u></p>	Correction
Section 2.9.4, Page 2.9-40	<p>The cumulative impact analysis has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout has been removed:</p> <p>While the Project would comply with all applicable fire codes and provide design features for fire suppression, the Project, and cumulative projects, would be located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire. As such, the Project would result in a potentially significant cumulative impact (Impact C-WF-3/C-WF-C) regarding wildfire risk.</p>	Correction

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<i>Chapter 3.1.1 Agricultural Resources</i>		
Section 3.1.1.1, Pages 3.1.1-6 and 3.1.1-7	The reference 'Dudek 2018' has been revised to reference 'Appendix F-2.'	Correction
<i>Chapter 3.1.2 Energy</i>		
Section 3.1.2.2, Page 3.1.2-10	The following state regulation has been included in the regulatory setting Section: <u>California EO N-79-20</u> <u>Executive Order N-79-20 establishes a new statewide goal that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It establishes a further statewide goal that 100% of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It also establishes a statewide goal to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible.</u>	Update
Section 3.1.2.2, Page 3.1.2-14	The following text shown in underline has been included in the description of the County's Climate Action Plan as an update and for clarification: The County developed a Climate Action Plan that is a comprehensive strategy to reduce GHG emissions in the unincorporated communities of the County. The Climate Action Plan includes two strategies and five measures to reduce energy consumption and increase renewable energy generation (County of San Diego 2018). <u>As outlined in Chapter 3.1.4 of this Final EIR, while the County Board of Supervisors rescinded the CAP, the Board provided direction to continue to implement GHG reduction measures and to work on fixing the CAP EIR and bring back a corrected CAP for adoption:</u>	Update
<i>Chapter 3.1.4 Greenhouse Gas Emissions</i>		
Section 3.1.4.2, Page 3.1.4-12	California Executive Order N-79-20 has been included to the list of applicable state regulations, as shown in underline: <u>California EO N-79-20.</u> <u>EO N-79-20 establishes a new statewide goal that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It establishes a further statewide goal that 100% of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It also establishes a statewide goal to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible.</u>	Update
Section 3.1.4.2, Page 3.4-19 and Page 3.1.4-20	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout and added text is shown as <u>underlined</u> .	Update

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	<p>The court opinion did not address the majority of CAP measures, and the County finds those measures would reduce GHG emissions. For example, Measure E-2.1, Increase Renewable Energy, specifies a goal to achieve 90% renewable electricity for the unincorporated County by 2030. This measure is consistent with General Plan Strategy A-3, listed below. <u>On appeal, the 4th District Court of Appeal for the most part held the lower court ruling and set aside the County's CAP. As with the lower court opinion the appellate court provided strong statement that the measures identified in the CAP, including Measure E-2.1, are valid measures to pursue to reduce GHG emissions. As the courts have set aside the County's CAP, and that the Checklist items in the CAP are not applicable to renewable energy projects, disclosure of consistency with the CAP has been removed from this EIR without consequence to the conclusions herein. The County Board of Supervisors rescinded the CAP and provided direction to continue to implement GHG reduction measures and to work on fixing the CAP EIR and bring back a corrected CAP for adoption.</u></p> <p>A project's consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Consistency Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's GHG projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the CAP Consistency Checklist. Step 2 of the CAP Consistency Checklist identifies CAP GHG reduction measures that would apply to discretionary projects, and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Consistency Checklist are required as a condition of project approval. A project must provide substantial evidence that demonstrates how the project would implement each applicable CAP Consistency Checklist requirement described in Appendix C of the County's CAP, to the satisfaction of the Director of Planning and Development Services.</p>	
<p>Section 3.1.4.3, Page 3.1.4-25</p>	<p>For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout and added text is shown as <u>underlined</u>.</p> <p>To address the CEQA Guidelines checklist question number 2, whether the Project is consistent with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, the Project was evaluated against the County's CAP<u>General Plan and Strategic Energy Plan</u>, AB 32, SANDAG's RTP/SCS, and EO B-55-18.</p>	<p>Update</p>

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	<p>In addition to the Project's potential impacts on GHGs using the GHG thresholds set forth in CEQA Appendix G, the analysis evaluates the Project using considering the County's CAP Consistency Checklist General Plan and Strategic Energy Plan.⁺ In December 2018, a court set aside the CAP and its supporting EIR. The court order allows the County to continue processing projects that do not require carbon offsets to mitigate impacts from GHG emissions. However, the County's CAP is still considered the applicable planning document for CEQA purposes. A project's consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the CAP Checklist. Step 2 of the CAP Checklist identifies CAP GHG reduction measures that would apply to discretionary projects and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Checklist is required as a condition of project approval. Projects must provide substantial evidence that demonstrates how that project would implement each applicable CAP Checklist requirement (see Appendix C of the Air Quality and Greenhouse Gas Technical Report [Appendix C to this EIR]) to the satisfaction of the Director of Planning and Development Services.</p>	
<p>Section 3.1.4.3, Page 3.1.4-30 and Page 3.1.4-31</p>	<p>For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout.</p> <p>County of San Diego CAP Consistency Checklist Step 1 – Land Use Consistency</p> <p>In the County's General Plan, the land use designation for the Boulder Brush Boundary is designated as Rural Lands 80 (RL-80). The Boulder Brush Boundary is zoned General Rural (S92) by the County of San Diego Zoning Map (County of San Diego 2017c). The County does not have jurisdiction over Reservation land. Minor and major impact utilities may be allowed with approval of a Major Use Permit. Major impact services and utilities (e.g., wind energy facilities) and minor impact utilities (e.g., electrical distribution substations) are defined under Sections 1350 and 1355 of the County Zoning Ordinance. The Boulder Brush Facilities require approval of a Major Use Permit from the County, but would not require a change in land use designation or zoning. The County's General Plan and zoning do not apply to land within the Reservation Boundary.</p>	<p>Update</p>

⁺—The CAP is the subject of current litigation.

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	<p>The Project does not include a residential component that would increase local population growth, or a commercial component that would substantially increase employment; rather, the Project would involve construction and operation of a renewable energy generation project. Implementation of the Project would not result in development in excess of that anticipated in local plans, or an increase in population/housing growth beyond those contemplated by SANDAG when preparing its SCS to reduce GHG emissions from mobile sources. As such, vehicle trip generation and planned development for the Project have been anticipated in the State Implementation Plan and San Diego Regional Air Quality Strategy. The Project would be consistent with Checklist Step 1. Step 2 – CAP Consistency Checklist</p> <p>The County CAP includes Strategy E-2, Increase Renewable Electricity Use, transitioning from fossil fuels to renewable energy for electricity generation (County of San Diego 2018), which would reduce emissions and provide a more sustainable source of electricity. The Project would aid the County in achieving Measure E-2.1, Increase Renewable Electricity, with the goal to achieve 90% renewable electricity for the unincorporated County by 2030 to lower GHG emissions by relying on cleaner energy (County of San Diego 2018). As a renewable energy project, the Project is a unique development that is not addressed in the County's CAP Consistency Checklist. The Project would not include a residential component, typical commuting workers (such as commuters traveling to and from an office land use), or agricultural operations, which are addressed in the CAP Consistency Checklist. Implementation of the Project would not interfere with the County's implementation of the CAP Consistency Checklist action items on projects where they are applicable. Additionally, the Project would further CAP Measure E-2.1, Increase Renewable Energy. Further, the CAP was developed to reduce GHG emissions throughout the County over time; therefore, any project that is contemplated in the CAP and/or would be consistent with the CAP would directly aid in the County's reduction of GHG emissions throughout the County's jurisdictional area.</p> <p>Each CAP Consistency Checklist item, along with an explanation of why each specific measure does not apply to the Project, is outlined in Table 3.1.4-7, Climate Action Plan Consistency Checklist. Also see Appendix C for the Project's completed CAP Consistency Checklist. The Project is consistent with the land use build-out assumptions in the County's CAP, and would implement all applicable action items from the CAP Consistency Checklist.</p> <p>The Project would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist's individual GHG measures would not apply to the Project because the CAP Checklist is designed for commercial, institutional, and residential projects, and not renewable energy projects, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP.</p>	

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Section 3.1.4.3, Page 3.1.4-33	<p>For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout.</p> <p>County Greenhouse Gas Reduction Plans As discussed above, the Project would be consistent with the County’s CAP through application of the CAP Consistency Checklist. The Project also is consistent with County plans and policies adopted to reduce GHG emissions. The County’s General Plan includes many goals and policies adopted to reduce GHG emissions, which the General Plan organizes into “strategies.”...</p>	Update
Section 3.1.4.3, Page 3.1.4-34; Page 3.1.4-45; Section 3.1.4.6, Page 3.1.4-52;	Table 3.1.4-7 Climate Action Plan Consistency Checklist has been removed from this Chapter. All following tables have been renumbered accordingly, including Table 3.1.4-8 which has been revised to Table 3.1.4-7.	Update
Section 3.1.4.3, Page 3.1.4-36; Page 3.1.4-49; Section 3.1.4.6, Page 3.1.4-52;	Table 3.1.4-7 Climate Action Plan Consistency Checklist has been removed from this Chapter. All following tables have been renumbered accordingly, including Table 3.1.4-9 which has been revised to Table 3.1.4-8.	Update
Section 3.1.4.6, Page 3.1.4-38	<p>For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout.</p> <p>Project The Project would reduce GHG emissions more than it would cause them, thereby having a net beneficial effect on GHG emissions. The Project is consistent with state and local goals to increase renewable energy, including the state’s RPS targets and the County’s General Plan goals to add renewable energy sources in the County. The Project is also consistent with applicable plans, policies, and regulations adopted to reduce GHG emissions, including SB X1 2, SB 350, and SB 100, and County General Plan Strategy A-3. The Project would not require a General Plan Amendment or zone change. The Project also supports the County’s Strategic Energy Plan. Although the CAP Consistency Checklist’s individual GHG measures would not apply to the Project, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP. Additionally, the generation of renewable energy from the Project is integral in the County meeting CAP Goal E-2.1, “Increase Renewable Energy,” and General Plan Strategy A-3, “Increase generation and use of renewable energy sources.” Therefore, the Project would result in a less than cumulatively considerable contribution to significant cumulative impacts related to climate change.</p>	Update
Section 3.1.4.6, Page 3.1.4-39	<p>For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout.</p> <p>Boulder Brush Facilities The Boulder Brush Facilities are necessary to transmit the energy produced by the Campo Wind Facilities wind turbines to end users. The Boulder Brush</p>	Update

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	Facilities are a necessary component to a wind energy project and are consistent with state and local goals to increase renewable energy, including the state's RPS targets and the County's General Plan goals to add renewable energy sources in the County. The Boulder Brush Facilities would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist individual GHG measures would not apply to the Boulder Brush Facilities, the Boulder Brush Facilities would be consistent with the underlying assumptions of the CAP and would support goals within the CAP. The Boulder Brush Facilities' net GHG emissions and impact will be further assessed to include the benefit of producing zero GHG emission energy and the avoided GHG emissions associated with its use within the regional power grid. Therefore, the Boulder Brush Facilities would result in a less than cumulatively considerable contribution to significant cumulative impacts related to climate change.	
Section 3.1.4.6, Page 3.1.4-39	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout . Campo Wind Facilities Although there are no specific requirements for evaluating GHG emissions under NEPA, estimated Project-generated construction and operational GHG emissions are included for disclosure. The Campo Wind Facilities would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist individual GHG measures would not apply to the Campo Wind Facilities, the Campo Wind Facilities would be consistent with the underlying assumptions of the CAP and would support goals within the CAP. The Campo Wind Facilities' net GHG emissions and impact will be further assessed to include the benefit of producing zero GHG emission energy and the avoided GHG emissions associated with its use within the regional power grid. Therefore, Campo Wind Facilities would result in a less than cumulatively considerable contribution to significant cumulative impacts related to climate change.	Update
Section 3.1.4.6, Page 3.1.4-43; Page 3.1.4-44; Page 3.1.4-45	For consistency with updates to the County's Climate Action Plan (CAP), Table 3.1.4-7 Climate Action Plan Consistency Checklist, has been removed from this Chapter. All following tables have been renumbered accordingly	Update
<i>Chapter 3.1.6 Land Use and Planning</i>		
Section 3.1.6, Page 3.1.6-1	For consistency with updates to the County's Climate Action Plan (CAP), the following associated document has been updated. Deleted text is shown as strikeout and included text is shown in <u>underline</u> : <ul style="list-style-type: none"> • <u>San Diego County General Plan Update Final Environmental Impact Report (County of San Diego 2011g) Supplemental EIR to the 2011 General Plan Update Program EIR for the Climate Action Plan, General Plan Amendment, GHG Threshold, and Guidelines for Determining Significance for Climate Change (County of San Diego 2018a)</u> 	Update

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<i>Chapter 4 Project Alternatives</i>		
Section 4.3.2, Page 4-11 and Page 4-12	<p>The following text shown in underline has been added to the Alternative 2 analysis for clarification:</p> <p>The No Boulder Brush Facilities on Private Lands Alternative assumes that the Boulder Brush Facilities would not be developed and the existing conditions on lands within the County's land use jurisdiction would remain. No reasonably expected actions or changes to the Boulder Brush Corridor would be anticipated if the County does not approve the Major Use Permit for the Boulder Brush Facilities. Because the Reservation is outside the jurisdiction of the County, the No Boulder Brush Facilities on Private Lands Alternative may not result in no development of the Campo Wind Facilities. This alternative considers the connection of power generated on the Reservation by the 60 wind turbines to the grid via the Sunrise Powerlink, via a gen-tie route that extends across the Manzanita Band of Diegueño Mission Indians' (Manzanita) Reservation and Bureau of Land Management (BLM) managed lands, connecting to a substation on a portion of the Sunrise Powerlink on BLM managed lands. The Alternative 2 On-Reservation gen-tie route alignment would generally be the same as that of the Project On-Reservation gen-tie route, but the Off-Reservation gen-tie line would traverse north and then east, eliminating the need for the Boulder Brush Facilities on private lands. <u>The gen-tie under Alternative 2 would be estimated to be approximately up to 11 miles, depending on terrain. While it would be further from County residences than the Boulder Brush Facilities it would likely be closer to Tribal residences. It would extend across terrain similar to that of the proposed Boulder Brush Facilities.</u> The County does not have any authority or ability to (a) mandate that a gen-tie line alignment be approved on BLM-managed or Tribal lands or (b) exercise discretion for activities on the Reservation, Manzanita Reservation, or BLM-managed lands (including an alternative gen-tie line route, substation location on BLM or Tribal lands, or any components on the non-private lands).</p>	Clarification
Section 4.3.3, Page 4-18	<p>The following correction shown in strikeout/underline has been made under the Alternative 3 analysis:</p> <p><u>Feasibility</u> Alternative 2<u>3</u> would be feasible to implement.</p>	Correction
<i>Chapter 5 References</i>		
Section 5.4, Page 5-9; Section 5.10, Page 5-19; Section 5.11, Page 5-22; Section 5.16,	<p>The following references have been corrected. Deleted text is shown as strikeout and added text is shown as underlined.</p> <p>Faulkner, D.K., and M.W. Klein. 200342<u>42</u>. Sensitive Butterflies of San Diego County, California. San Diego's Sensitive Butterflies: A Workshop Focusing on Nine Local Species.</p>	Correction

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Section Page	Change	Reason for Change
Page 5-34 and Page 5-35	<p>County of San Diego. 20041985. San Diego County Code of Regulatory Ordinances Chapter 4: Removal of Combustible Vegetation and Other Flammable Materials. March July 24.</p> <p>The following document is included in Appendix F-2 and thus is deleted as a reference. Dudek. 2018. <i>Phase 1 Environmental Site Assessment. Torrey Wind Project.</i> September 2018.</p> <p><u>County of San Diego. 2011g. San Diego County General Plan Update Final Environmental Impact Report. August 2011. Accessed October 14, 2020.</u></p> <p><u>County of San Diego. 2018a. Final Supplement to the 2011 General Plan Update Program CEQA Considerations Document for the Climate Action Plan, General Plan Amendment, GHG Threshold, and Guidelines for Determining Significance for Climate Change. January 2018.</u></p>	
<i>Chapter 7 List of Project Design Features, Mitigation Measures, and Environmental Design Considerations</i>		
Section 7.3.1, Pages 7-10 thru 7-15, 7-19, 7-23 thru 7-25, 7-27, and 7-31 thru 7-35	<p>Mitigation measures M-BI-1, M-BI-5, M-BI-7, M-BI-11, M-BI-13, M-BI-14, M-BI-16, M-BI-A, and M-BI-C have been updated to reflect the revised Biological Resources mitigation measures in Chapter 2.3 of the Final EIR. These revisions are outlined in this table above under Chapter 2.3 Biological Resources</p>	Response to Comments/Corrections
Errata Summary of Campo Wind with Boulder Brush Facilities Draft EIR Appendices Text Changes		
<i>Appendix A – Notice of Preparation, Initial Study, and Comment Letters</i>		
Page 59 of the PDF	In response to comment O6-6, the Boulevard Planning Group letter dated 2-12-2019 has been included in Appendix A of the Final EIR. This letter is part of the County record and considered by the County as part of the application for the MUP including development of the Draft EIR.	Response to Comment
<i>Appendix B – Visual Resources Report</i>		
Cover Page	In response to comment, the Preparer of the Visual Resources Report has been included under 'Preparer': <u>Dudek</u>	Response to Comment
Section 5.1.4, Page 33	In response to comment O-6-79, the following text has been added to disclose the height of proposed wind turbine assumptions used in the development of Project visual simulations. Added text is shown as underlined. <u>Lastly, in the visual simulations, wind turbines are modeled at their proposed maximum height (approximately 586 feet tall from tower base to fully extended blade tip).</u>	Response to Comment
Section 5.3.2, Page 53	In response to comment I-37-9, the following text regarding Ribbonwood Road improvements has been added: <u>"The proposed widening of Ribbonwood Road would occur within existing County right-of-way and/or non-exclusive easements (acquisition of private property for widening would not be required)."</u>	Response to Comment

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Section Page	Change	Reason for Change
Section 5.3.2, Page 57	In response to comment I-37-9, clarification has been provided regarding Ribbonwood Road improvements. Added text is shown as underlined. Proposed improvements to Ribbonwood Road would consist of paving and where needed, widening of an existing road <u>within existing County right-of-way and/or non-exclusive easements</u> .	Response to Comment
<i>Appendix C – Air Quality and Greenhouse Gas Emissions Analysis Technical Report</i>		
Cover Page	The date of the Errata Appendix C has been updated from December 2019 to September 2020.	Update
Page iii and Page iv	As a result of text revisions throughout the Errata Appendix C, the list of Appendices and Tables in the Table of Contents has been updated	Update
Section 3.2.3, Page 105	For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Added text is shown in underline. Although the CAP must be set aside, the court opinion did not address the majority of CAP measures, and the County finds those measures would reduce GHG emissions. For example, Measure E-2.1, Increase Renewable Energy, specifies a goal to achieve 90% renewable electricity for the unincorporated County by 2030. This measure is consistent with General Plan Strategy A-3, listed below. <u>On appeal, the 4th District Court of Appeal for the most part held the lower court ruling and set aside the County’s CAP. As with the lower court opinion the appellate court provided strong statement that the measures identified in the CAP, including Measure E-2.1, are valid measures to pursue to reduce GHG emissions. As the courts have set aside the County’s CAP, and that the Checklist items in the CAP are not applicable to renewable energy projects, disclosure of consistency with the CAP has been removed from this document without consequence to the conclusions herein.</u>	Update
Section 3.4.1, Page 116	For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Added text is shown in underline and deleted text is shown in strikeout . In regards to evaluating the project’s significance with respect to CEQA Guidelines number 1, the project GHG emissions will be compared to its production of carbon-free electricity. <u>In addition to the Project’s potential impacts on GHGs using the GHG thresholds set forth in Appendix G, the analysis will evaluate the project using the County’s CAP Consistency Checklist.² A project’s consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Checklist assesses a project’s consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP’s projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use</u>	Update

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	<p>designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the Checklist. Step 2 of the CAP Checklist identifies CAP GHG reduction measures that would apply to discretionary projects and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Checklist shall be required as a condition of project approval. The project must provide substantial evidence that demonstrates how the Project would implement each applicable CAP Checklist requirement described in Appendix C of the County's CAP to the satisfaction of the Director of Planning and Development Services (see Appendix C of this report).</p> <p>To address the CEQA Guidelines question number 2, whether the project is consistent with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, the project will be evaluated against the County's CAP General Plan and Strategic Energy Plan, AB 32, SANDAG's RTP/SCS, and EO B-55-18.</p>	
<p>Section 3.5.1, Page 118</p>	<p>For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout.</p> <p>1. County of San Diego Climate Action Plan Consistency Checklist Step 1 – Land Use Consistency</p> <p>Although the County as Lead Agency is analyzing the Project as a whole, the County's land use jurisdiction is limited to the Boulder Brush Facilities. The Bureau of Indian Affairs has jurisdiction over the Campo Wind Facilities, and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019).</p> <p>In the County's General Plan, the land use designation for the Boulder Brush Boundary is Rural Lands 80 (RL-80). The Boulder Brush Boundary is zoned General Rural (S92) by the County of San Diego Zoning Map (County of San Diego 2017e). Minor and major impact utilities may be allowed with approval of a Major Use Permit. Major impact services and utilities (e.g., wind energy facilities) and minor impact utilities (e.g., electrical distribution substations) are defined under Sections 1350 and 1355 of the County Zoning Ordinance. The Boulder Brush Facilities require approval of a Major Use Permit from the County, but would not require a change in land use designation or zoning. The County's General Plan and zoning do not cover land within the Reservation Boundary. The Project would not result in residential, commercial, or growth-inducing development; rather, the Project would construct and operate a renewable energy generation Project. Implementation of the Project would not result in development in excess of that anticipated in local plans or increases in population/housing growth beyond those contemplated by SANDAG when preparing its Sustainable Community Strategy to reduce GHG emissions from mobile sources. As such, vehicle trip generation and planned development for the Project is considered to be anticipated in the SIP and RAQS. Therefore, the project would be consistent with the CAP Consistency Checklist Step 1.</p>	

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	<p><u>Step 2 – Climate Action Plan Consistency Checklist</u> The County CAP includes Strategy E-2, Increase Renewable Electricity Use, transitioning from fossil fuels to renewable energy for electricity generation, which would reduce emissions and provide a more sustainable source of electricity. The Project would aid the County in achieving Measure E-2.1, Increase Renewable Electricity, with the goal to achieve 90% renewable electricity for the unincorporated County by 2030 to lower GHG emissions by relying on cleaner energy (County of San Diego 2018). As a renewable energy project, the Project is a unique development that is not addressed in the County’s CAP Consistency Checklist. The Project does not include a residential component, typical commuting workers (such as commuters traveling to an office land use), or agricultural operations, which are addressed in the CAP Consistency Checklist. Implementation of the Project would not interfere with the County’s implementation of the Consistency Checklist action items on Projects where they are applicable. Additionally, the Project would further the CAP Measure E-2.1 “Increase Renewable Energy.” Further, the CAP was developed to reduce GHG emissions throughout the County over time; therefore, any Project that is contemplated in the CAP and/or would be consistent with the CAP would directly aid in the County’s reduction of GHG emissions throughout the County’s jurisdictional area. Each CAP Checklist item and why each specific measure does not apply to the Project is outlined in Table 23.</p> <p align="right">Table 23</p> <p>Climate Action Plan Consistency Checklist</p> <table border="1"> <thead> <tr> <th data-bbox="414 1213 867 1249">CAP Checklist Item</th> <th data-bbox="867 1213 1133 1249">Project Compliance</th> </tr> </thead> <tbody> <tr> <td data-bbox="414 1249 867 1654"> <p>1a. Reducing Vehicle Miles Traveled: Non-Residential: For non-residential Projects with anticipated tenant occupants of 25 or more, will the Project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.</p> </td> <td data-bbox="867 1249 1133 1654"> <p>Not Applicable. The Project would employ 10 to 12 persons, and thus would not accommodate 25 or more tenant occupants.</p> </td> </tr> <tr> <td data-bbox="414 1654 867 1900"> <p>2a. Shared and Reduced Parking: Non-Residential: For non-residential Projects with anticipated tenant occupants of 24 or less, will the Project implement shared and reduced parking strategies that achieves a 10% reduction in emissions from commute VMT? Check “N/A” if the Project is a residential Project or if the Project would</p> </td> <td data-bbox="867 1654 1133 1900"> <p>Not Applicable. As a renewable energy development Project, the Project is not a typical commercial or retail development that would have tenants. Employee trips would be related</p> </td> </tr> </tbody> </table>	CAP Checklist Item	Project Compliance	<p>1a. Reducing Vehicle Miles Traveled: Non-Residential: For non-residential Projects with anticipated tenant occupants of 25 or more, will the Project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.</p>	<p>Not Applicable. The Project would employ 10 to 12 persons, and thus would not accommodate 25 or more tenant occupants.</p>	<p>2a. Shared and Reduced Parking: Non-Residential: For non-residential Projects with anticipated tenant occupants of 24 or less, will the Project implement shared and reduced parking strategies that achieves a 10% reduction in emissions from commute VMT? Check “N/A” if the Project is a residential Project or if the Project would</p>	<p>Not Applicable. As a renewable energy development Project, the Project is not a typical commercial or retail development that would have tenants. Employee trips would be related</p>	
CAP Checklist Item	Project Compliance							
<p>1a. Reducing Vehicle Miles Traveled: Non-Residential: For non-residential Projects with anticipated tenant occupants of 25 or more, will the Project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.</p>	<p>Not Applicable. The Project would employ 10 to 12 persons, and thus would not accommodate 25 or more tenant occupants.</p>							
<p>2a. Shared and Reduced Parking: Non-Residential: For non-residential Projects with anticipated tenant occupants of 24 or less, will the Project implement shared and reduced parking strategies that achieves a 10% reduction in emissions from commute VMT? Check “N/A” if the Project is a residential Project or if the Project would</p>	<p>Not Applicable. As a renewable energy development Project, the Project is not a typical commercial or retail development that would have tenants. Employee trips would be related</p>							

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	<p>accommodate 25 or more tenant-occupants.</p>	<p>only to as-needed operation and maintenance activities associated with operation of the wind facility. Carpooling will be encouraged to the extent practical to reduce VMT during operation and the Project's parking spaces would not exceed County's code requirements.</p>
	<p>3a. Electric or Alternately Fueled Water Heating Systems Residential: For Projects that include residential construction, will the Project, as a condition of approval, install the following types of electric or alternately fueled water heating system(s)?</p> <p><input type="checkbox"/> Solar thermal water heater</p> <p><input type="checkbox"/> Tankless electric water heater</p> <p><input type="checkbox"/> Storage electric water heaters</p> <p><input type="checkbox"/> Electric heat pump water heater</p> <p><input type="checkbox"/> Tankless gas water heater</p> <p><input type="checkbox"/> Other</p>	<p>Not Applicable. The Project does not include a residential component.</p>
	<p>4a. Water Efficient Appliances and Plumbing Fixtures Residential: For new residential Projects, will the Project comply with all of the following water efficiency and conservation best management practices?</p> <p>1. Kitchen Faucets: The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 pounds per square inch (psi). Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi.</p> <p>2. Energy Efficient Appliances: Install at least one qualified ENERGY STAR dishwasher or clothes washer per unit.</p>	<p>Not Applicable. The Project does not include a residential component.</p>
	<p>5a. Rain Barrel Installations: Residential: For new residential Projects, will the Project make use of incentives to install one rain barrel per every 500 square feet of available</p>	<p>Not Applicable. The Project does not include a residential component.</p>

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	<p>roof area? Check "N/A" if the Project is a non-residential Project; if State, regional or local incentives/rebates to purchase rain barrels are not available; or if funding for programs/rebates has been exhausted.</p>	
	<p>6a. Reduce Outdoor Water: Residential: Will the Project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current Maximum Applied Water Allowance (MAWA) for outdoor use?</p> <p>Non-Residential: Will the Project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current MAWA for outdoor use?</p>	<p>Not Applicable. The Project would not include any landscaping that would necessitate preparation of a landscape plan or Landscape Document Package.</p>
	<p>7a. Agricultural and Farming Equipment: Will the Project use the San Diego Air Pollution Control District's (SDAPCD's) farm equipment incentive program to convert gas- and diesel-powered farm equipment to electric equipment? Check "N/A" if the Project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.</p>	<p>Not Applicable. The Project would not include gas or diesel-powered farm equipment and would not contain any agricultural or farming operations.</p>
	<p>8a. Electric Irrigation Pumps: Will the Project use SDAPCD's farm equipment incentive program to convert diesel- or gas-powered irrigation pumps to electric irrigation pumps?</p> <p>Check "N/A" if the Project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.</p>	<p>Not Applicable. The Project would not include irrigation pumps and would not contain any agricultural or farming operations.</p>
	<p>9a. Tree Planting: Residential: For residential Projects, will the Project plant, at a minimum, two trees per every new residential dwelling unit proposed?</p> <p>Check "N/A" if the Project is a non-residential Project</p>	<p>Not Applicable. The Project does not include a residential component.</p>

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	<p>Source: County of San Diego 2018 (see Appendix C). Notes: CAP – Climate Action Plan; SDAPCD – San Diego Air Pollution Control District.</p> <p>As discussed above, the Project would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist individual GHG measures would not apply to the Project, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP. Therefore, the Project would have a less than significant impact on GHG emissions.</p>	
Section 3.5.1, Page 121	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 24 which has been revised to Table 23	Update
Section 3.5.1, Page 121 and Page 122	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 25 which has been revised to Table 24	Update
Section 3.5.1, Page 122 and Page 123	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 26 which has been revised to Table 25	Update
Section 3.5.1, Page 123	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 27 which has been revised to Table 26	Update
Section 3.5.1, Page 124	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 28 which has been revised to Table 27	Update
Section 3.5.2, Page 125	<p>For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout.</p> <p>County Greenhouse Gas Reduction Plans</p> <p>As discussed in Section 3.5.1.1, the Project would be consistent with the County’s CAP through application of the CAP Consistency Checklist. The Project also is consistent with County Plans and policies adopted to reduce GHG emissions.</p>	Update
Section 3.5.2, Page 126 and Page 130	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 29 which has been revised to Table 28	Update
Section 3.5.2, Page 132, Page 133 and Page 134	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 30 which has been revised to Table 29	Update
Section 3.5.4, Page 134	<p>For consistency with updates to the County’s Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout and added text is shown in <u>underline</u>.</p> <p>The Project would be consistent with the County’s CAP<u>General Plan</u>, the Scoping Plan, and SANDAG’s Regional Plan; therefore, impacts related to GHG emissions would be less than significant. No mitigation is required.</p>	Update

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<i>Appendix D – Biological Resources Technical Report</i>		
Section 3.4, Page 50	The following edits have been made regarding special status plants. Added text is shown as underlined and deleted text is shown as strikeout . Six flowering rare plants were found before starting surveys which included desert beauty (<i>Linanthus bellus</i>), Jacumba milk-wyetch (<i>Astragalus douglasii</i> var. <i>perstrictus</i>), southern jewelflower (<i>Streptanthus campestris</i>), pygmy lotus (<i>Acemisson haydonii</i>), sticky geranium, and alpine gold (<i>Hulsea californica</i>), Tecate tarplant (<i>Deinandra floribunda</i>), and Colorado Desert larkspur (<i>Delphinium parishii</i> ssp. <i>subglobosum</i>).	Correction
Section 4.5.1, Page 253	The reference to the southern Colorado has been correct to delete 'southern.'	Correction
Section 4.5.1, Page 268	The reference 'County of Riverside 2008' has been revised to 'County of Riverside 2003' as a correction.	Correction
Section 5.3.2, Pages 583 thru 585	The discussion regarding impacts to bats under Impact W-D has been expanded. The added text is shown as underlined. “ Impact W-D Impacts to Wildlife Species from Collisions and Electrocution <i>Avian.</i> There are potential impacts from avian collisions with turbines or towers and electrocution by transmission lines (gen-tie) (Impact W-D). Birds can collide with structures during migration or hunting/foraging activities. <i>Bats.</i> The abundance of bats adjacent to the Campo Corridor is low when compared to other habitat types and regions. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. <u>Risk to bats associated with the Project primarily stems from direct impacts to roost sites, electrocution, barotrauma, and collision. In this case, no maternity roost sites are known from the area or nearby. The Shu'luuk Wind Project found limited non-maternal roost locations potentially supporting one or few animals only. The Tule Wind Project found only one horizontal mine shaft that had potential to support roosting bats; located 1 mile from Project turbines. Because of the type of infrastructure and wiring protections, electrocution is also of limited risk. Additionally, because of the slower speeds associated with Project turbines, barotrauma is also of limited to no risk. The National Renewable Energy Laboratory (NREL 2018) conducted one of the few studies to attempt to analyze actual risk related to the barotrauma hypothesis. They used computational simulations and analytics to determine actual risk. Using realistic assumptions regarding activity (e.g., 15 m/s as the highest wind speed that bats would be expected to fly) and survival pressures (i.e., existing data regarding rats as a surrogate), and comparing three different distances from the blade, they concluded that (1) the pressure drop on the suction side of the blade was a factor of four less than the lethality threshold for rats, (2) the low-pressure region over the blade is highly localized, and (3) the minimum pressure in the tip vortex is a factor</u>	Updated

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Section Page	Change	Reason for Change
	<p><u>of three less than the lethality threshold for rats. While the actual relationship between rat thresholds and bat thresholds are not known, they seem to be an equivalent surrogate and the conclusion was that it seemed unlikely that barotrauma is a significant contributor to turbine-related bat deaths.</u></p> <p><u>Regarding the potential relative risk of collision for bats, a number of factors are important to consider. The abundance of bats within and adjacent to the biological study area is low when compared to other habitat types and regions. The Searchlight Nevada project (O'Farrell 2010) used paired high and low acoustic monitoring units similar to the acoustical bat surveys for performed for the Jewell Valley project; the majority of species, excluding the migratory tree bats and high-flying molossids, were found to fly less than 30 meters in height and those that did occur within the higher spaces represented only a small fraction of total activity. The Shu'luuk data and Jewell Valley data sets showed most of the bat activity occurred around the lower microphone, or 15 feet off the ground and far under the rotor swept area. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. The overall magnitude of bat usage within the Campo Corridor is significantly less than any locations studied that contain attractant features (see Section 4.4, Wildlife Diversity). This suggests that the risk for bat collisions with Project wind turbines is low when taking into account the overall low abundance of bats in the area and lower abundance of high-flying bats (see Table 19 in Appendix H to the Campo EIS). The acoustical bat results indicate that the activity at the higher microphone (which captures bats that tend to fly higher) was lower when compared to the lower microphone.</u></p> <p><u>CEC (2013) notes that bats can be more attracted to areas with strong lights because of the increased insect prey availability and hypothesized that some observed mortalities may have been generated by the presence of strong lights in the vicinity of roost sites and turbines. CEC also notes that there is no evidence that aviation lighting associated with nacelles contribute to bat mortality (Kunz et al. 2007, as cited in CEC 2013). No turbines will be located closer than 0.25 miles from an On-Reservation receptor, so the possibility of resident-induced lighting attractants are reduced.</u></p> <p>Direct impacts to bats could result in mortality or injury due to collisions at wind turbines. However, potential effects of the Project on the meta-community of bats in the region, including those species known to be susceptible to collision with turbine blades, would be negligible.</p>	
<p>Section 6.4.1, Pages 624 thru 629, 633, 637 thru 640</p>	<p>All revisions made to Boulder Brush Facilities mitigation measures M-BI-1, M-BI-5, M-BI-11, M-BI-13, M-BI-16 in Chapter 2.3, Biological Resources, of the Final EIR have been incorporated into the Biological Resources Technical Report</p>	<p>Update</p>

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
Section 6.4.1, Page 638	The reference to mitigation measure M-BIO-8 has been revised as M-BI-8.	Correction
Section 6.4.2, Pages 642, 646 thru 651	All revisions made to Campo Wind Facilities mitigation Measures M-BI-A and M-BI-C in Chapter 2.3, Biological Resources, of the Final EIR have been incorporated in the Biological Resources Technical Report.	Update
Section 6.5.2, Pages 653 and 654; Section 7.2.1, Page 660; Section 7.2.2, Page 662; Section 7.2.4, Page 666; Section 7.5, Pages 673 and 674; Section 8.2, Page 677; Section 9.24.1, Page 687; Section 9.5, Page 688; Section 10.5, Page 699; Table 11-1, Pages 701 thru 713	Reference to mitigation measure M-BI-7 has been revised to read ' M-BI-7 (revegetation)'	
Section 12, Pages 716 and 722	The following references have been included as References. Added text is shown as underlined. <u>CEC (California Energy Commission). 2013. <i>Bird and Bat Movement Patterns and Mortality at the Montezuma Hills Wind Resource Area</i>. Publication Number CEC-500-2013-015. Prepared by D.S. Johnston, J.A. Howell, S.B. Terrill, N. Thorngate, J. Castle, J.P. Smith (H.T. Harvey & Associates), T.J. Mabee, J.H. Plissner, N.A. Schwab, P.M. Sanzenbacher, and C.M. Grinnell (ABR Inc.).</u> <u>NREL (National Renewable Energy Laboratory). 2018. <i>Estimating the Likelihood of Bat Barotrauma Using Computational Simulations and Analytical Calculations</i>. Prepared by M. Lawson, S. Jenne, and R. Thresher. March 20, 2018.</u>	Correction
Appendix B-2	Figures associated with Appendix B-2 of the Biological Resources Technical Report were mistakenly not included. These figures are now included in Appendix B-2 as part of the Final EIR.	Correction
<i>Appendix E – Cultural Resources Report</i>		
Section 1.2.1, Page 4	The reference 'Dudek 2018' has been revised to reference the 'Appendix D to the Project's EIR'	Correction
Section 5.1.1, Pages 121; Section 7, 162	The reference 'Schmitt et al. 2013' has been revised to 'Schmitt et al. 2012'	Correction

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
Section 7, Page 123	The reference 'Comeau et al. (2015)' has been changed to (2016)	Correction
Section 7, Page 162	The reference 'USFWS 1998' has been removed as it is not cited in-text.	Correction
<i>Appendix I – Boulder Brush Facilities Fire Protection Plan</i>		
Section 7, Page 42	The Fire Protection Measures have been revised from a numbered list to a bulleted list for consistency with the Wildlife EIR Chapter of the EIR.	Correction
Section 7, Page 49	The reference 'American Petroleum Institute (API) 2008' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 49	The reference 'Bushey, C.L. 1985' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'Linn, R. 2003' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'OSHA 2002' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'OSHA 2007' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'OSHA 2008' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'SANGIS 2014' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'Sneeuwjagt and Frandsen 1977' has been removed from the references cited list as it is not cited in-text.	Correction
<i>Appendix N – Water Supply Assessment</i>		
Section 3.1.2, Page 17	The reference 'Dudek 2019c' on Page 17 has been revised to 'Dudek 2019e' as a correction.	Correction
Section 5, Page 29	The reference 'Dudek. 2019c. Groundwater Resources Investigation for the Campo Wind Project with Boulder Brush Facilities. November 2019' has been revised to 'Dudek. 2019e', as a correction	Correction
Section 5, Page 29	The second instance of reference cited 'Dudek 2019a' has been removed as it is a duplicate.	Correction
Section 5, Page 29	The second instance of reference cited 'Dudek 2019b' has been removed as it is a duplicate.	Correction
<i>Appendix O – Shadow Flicker Analysis</i>		
Attachment 1 to Appendix O	For informational purposes, a supplemental shadow flicker analysis was conducted to model turbines with a rotor diameter of 460 feet. This memo was prepared on June 22, 2020 and presents an overview of the changes from the November 2019 Shadow Flicker Analysis (Appendix O to the Draft EIR) as well as a summary of the results. This supplemental analysis assumes a theoretical "maximum dimension" turbine and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR.	Response to Comment

Table ES-2
Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
<i>Appendix P-1 - USFWS Biological Opinion</i>		
Appendix P-1	For informational purposes, the USFWS's Biological Opinion (January 2020) prepared for the BIA's proposed approval of the Wind and Solar Resource lease (Campo Lease) has been included for reference as part of the Final EIR.	Update
<i>Appendix P-2 - Biological Assessment</i>		
Appendix P-2	For informational purposes, the Biological Assessment prepared by Dudek (August 2019) pursuant to the Endangered Species Act to evaluate the potential effects of BIA's approval of a WSR lease (Campo Lease) has been included for reference as part of the Final EIR.	Update
<i>Appendix P-3 - Supplemental Information Regarding the Biological Assessment</i>		
Appendix P-3	For informational purposes, the Section 7 Supplemental Letter regarding the Biological Assessment for the Campo Wind Project with Boulder Brush Facilities, prepared by Dudek (December 2019), has been included for reference as part of the Final EIR.	Update
<i>Appendix Q – Fire and Emergency Services Agreement</i>		
Appendix Q	The Fire and Emergency Services Agreement between the Developer and the San Diego County Fire Authority has been included as Appendix Q.	Update

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