





which are admitted in the DEIR: visual, shadow flicker, noise. These effects can and be avoided by outright by San Diego County denying the Boulder Brush Facilities. At a minimum they should insist that turbines and other project components proposed for the Campo Reservation be fully removed, or at a minimum, moved further away from existing homes, property lines, and other occupied structures.

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Cont.

**Backcountry Against Dumps and others we work with have already documented that some locals are already adversely impacted by turbines up to several miles away, with acoustic pressure waves (infrasound and low-frequency noise) documented up to 16 miles or so from specific turbine clusters. Now, Terra-Gen wants to install much larger turbines much closer to homes and other occupied structures. It is a wholly avoidable disaster in the making for our community!**

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140-8

**We hereby fully incorporate by reference the following Boulder Brush /Campo Wind comments and all attachments that were timely submitted to PDS’s Susan Harris and Nicholas Koutoufidis and/ or former PDS Project Manager, Bronwyn Brown:**

- 12-21-18: Tisdale’s formal 17-page CAMPO WIND EIS SCOPING COMMENTS IN OPPOSITION submitted to BIA and San Diego County PDS.
- 7-8-19: Tisdale’s 10-page formal CAMPO WIND/BOULDER BRUSH DEIS – OPPOSITION COMMENTS submitted to BIA and San Diego County PDS.
- 7-8-19: Law Offices of Stephan C. Volker’s Campo Wind –Boulder Brush DEIS letter and attachments on behalf of Backcountry Against Dumps and Donna Tisdale.
- 7-5-19: Snyder Geologic’s Campo Wind DEIS 3<sup>rd</sup> party opinion
- 7-8-19: dBF Associates, Inc’s Campo Wind DEIS comments
- 7-8-19: Wilson Ihrig’s Campo Wind DEIS noise analysis
- July 31, 2019: dBF Associates, Inc: Long-Term Ambient Sound Level Measurements Boulevard, Campo, & Pine Valley, California
- 2-2-20: Boulder Brush-Campo Wind DEIR comments from Laura Buehning MD MPH.
- 2-3-20: Boulevard Planning Group’s Boulder Brush / Campo Wind DEIR comment letter and attachments.
- 2-3-20: Backcountry Against Dumps’ Boulder Brush / Campo Wind DEIR comment letter and attachments.
- 2-3-20: Law Offices of Stephan C. Volker’s Boulder Brush/ Campo Wind DEIR letter and attachments on behalf of Backcountry Against Dumps and Donna Tisdale.
- 2-3-20: dBF Associates, Inc: Boulder Brush / Campo Wind DEIR 3<sup>rd</sup> party review /noise analysis

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140-9

**Groundwater impacts:**

- The proposed Campo Reservation groundwater well sources are located along fractures near us that we believe are interconnected with our own property and groundwater resources that supply our homes, pastures, and at-risk centuries old oak trees.
- The significant adverse impacts on the very same Campo well sources, during construction of SDG&E’s ECO Substation, have already been well documented, including the fact that they over-pumped them to the point of failed recharge and had to curtail water sales/export.

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- We believe that our own house well and oak trees suffered from that over pumping. Our house well is currently marginal at best and cannot withstand additional over pumping at the proposed well sites or at the proposed O&M site on BIA 10 immediately adjoining our property.
- Our groundwater fractures are interconnected and can impact existing users for miles around.

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**Figure I-2. Approximate Locations of Sound Level Meters (SLMs) during 2018 and 2019 Field Surveys<sup>1</sup>**

- Figure 1.2 documents that monitoring site tagged LT-1 was located on our northwestern property line on the common boundary with the Campo Reservation, route BIA -10, and the immediately adjacent 7 -4.2 MW turbines proposed for Terra-Gen’s Campo Wind, in addition to the proposed O &M Building with planned rock crushing, heavy truck traffic, lots of dust and industrial scale and traffic noise and more—and potential for increased Project use of at-risk limited groundwater resources adjacent to our already stressed domestic /ranch wells and centuries old oak trees.
- The DEIR documents the fact that the equipment with the second round of measurements for several locations, including those of LT-1, was stolen or vandalized and that data was lost.
- Instead of throwing everything out and starting over, they unethically used the highest measurement inappropriately recorded right next to a busy BIA-10, ignoring the lower noise level monitoring level data provided by dBF Associates, Inc. for LT-1 and other locations.
- This continued unethical pattern of behavior rewards Terra-Gen at the expense of our family, tenants, and many others.

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**Campo Wind Noise analysis debunked by 3<sup>rd</sup> party noise expert, dBF Associates, Inc (DBFA) in letters dated 2-3-20, 7-8-19, and 7-31-19. DBFA is listed on San Diego County’s current list of CEQA Consultants – Noise. DBFA included our property and others, close to the Project’s monitoring points, in their independent noise monitoring.**

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- **The February 3<sup>rd</sup> DBFA comment letter includes the following information and much more:**
  - *In its current form, the analysis under predicts project noise levels at (Noise Sensitive Land Uses) NSLUs and underreports the severity and quantity of project noise impacts.*
  - Numerous errors pointed out in previous July 8, 2019 Campo Wind DEIS letter and July 31, 2019, Long-Term Ambient Sound Level Measurements Boulevard, Campo, & Pine Valley, California were not addressed or corrected in the DEIR.
  - The current Acoustic Analysis Report (AAR) uses much smaller turbines than those proposed and fails to include source data for octave band sound source data, even for those smaller turbines.
  - The AAR should evaluate pure tone noise, as directed by the County of San Diego Wind Energy Turbine (WET) Guidelines, as a threshold of significance
  - The current AAR incorrectly bases impact findings on the higher ambient noise levels. Despite the limitations of the Type 2 equipment, the 2018 measurements demonstrate

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<sup>1</sup> <https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/BoulderBrush/DEIR/Apx%20G%20-%20Acoustical%20Analysis%20Report.pdf>

- that the ambient noise environment can be quieter than characterized by the 2019 measurements. Using the louder of the measured levels understates potential impacts.
- The AAR incorrectly bases impact findings on the higher ambient noise levels. Despite the limitations of the Type 2 equipment, the 2018 measurements demonstrate that the ambient noise environment can be quieter than characterized by the 2019 measurements. Using the louder of the measured levels understates potential impacts.
  - At several locations, the microphone positions were not representative of ambient noise levels near NSLUs.
  - These microphone placements overstate the ambient noise environment and consequently underreport project noise impacts. The AAR should repeat these measurements at locations acoustically equivalent to NSLUs, and sufficiently removed from known transportation noise sources.
  - AAR Section 6.3.2 states “As locations of On-Reservation NSLU locations cannot be confirmed...” Locations of most or all on-reservation residences and any other NSLU should be readily available from tribal documentation. Alternatively, most on-reservation structures are clearly identifiable on publicly available aerial photography maps. In addition, the representative locations used to evaluate impacts do not indicate or approximate the number of represented NSLUs. The AAR should identify the quantity and locations of On-Reservation NSLUs.
  - Underprediction of project noise levels by 3 dB, while barely perceptible, is meaningful. Project noise levels that are higher than predicted by 3 dB would result in impacts during several more conditions than reported in the AAR. The AAR should utilize multiple CadnaA models rather than spreadsheets, or the AAR should provide the spreadsheets as an appendix.
  - Some measurement positions are not appropriate for use as impact evaluation locations (At least 50 or more homes are identified in this section of DBFA’s comments)
  - The analysis should evaluate the project noise levels at the closest potential NSLU(s).

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**Appx O Shadow Flicker Analysis: Flawed analysis used smaller turbines than the 4.2 MW turbines already disclosed in this DEIR and the Campo Wind DEIS.**

- As stated, we own 2 parcels with 167 total acres that share a ½ mile common boundary with the Campo Reservation on the eastern boundary along BIA 10: APN 658-050-05-00 & 658-050-06-00.
- Seven-586’ tall 4.2 MW wind turbines are proposed immediately west of our property, along our entire western horizon view, as documented in both proposed Campo Wind turbine locations Alternative 1 and 2: See Campo Wind DEIS Figures 2-1A and 2-1B in Appendix E-Figures Referenced in the Draft EIS.
- ***Figure C2-1<sup>2</sup> Expected –case-scenario Off-Reservation Receptors table at pages 30 and 31 of 34 demonstrates that our occupied homes, farm buildings (#670, 671, 678, 677 & 678), main yard, patio, pastures, pens, and riding arena, will be subjected to between 39-41 minutes per day and 97.3 and 123.20 hours of shadow flicker per year - even though the analysis used shorter 3.83 MW turbines instead of the 4.2 MW turbines documented in the BIA’s DEIS.***

I40-22

<sup>2</sup> See attached copy of FigureC2-1

**We are deeply rooted in our home and ruggedly beautiful property that we love and own free and clear.** We don't want to be forced to move away to start over in our senior years after our over 100 years of combined life-time investment of capital, blood, sweat, and tears. And we feel the same for our friends and neighbors both on and off the Campo Reservation. They love it here, too. Why are Terra-Gen's alleged investments more important and valuable than all our lives and the human and capital investments it took us all to get here?

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**Property Value Protection Plans**

At a minimum, if the Campo Wind project is unjustly and unethically allowed to move forward as planned, our family and other significantly affected receptors should be offered fair market value, of similar properties located away from turbines, along with moving expenses.

The same should be offered to tribal members who may no longer be able to live on their ancestral lands due to the proximity and toxicity of existing and proposed turbines. It would be an unjust travesty not to provide for those who choose not to live with turbines and may be forced to vacate to protect themselves, through no fault of their own, and at their own expense.

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If we are forced to sue to be justly and fairly compensated, like the 68 neighbors who successfully sued Ibederola's Hardscrabble Wind project in Herkimer County, New York, so be it.

**Thank you for your consideration of these comments which are restricted  
due to time and budget constraints.**

**~Any errors or omissions are unintentional~**

**Attachments:**

1. Boulder Brush Facilities –Campo Wind DEIR Figure C2-1: Annual Shadow Flicker (11-8-19)



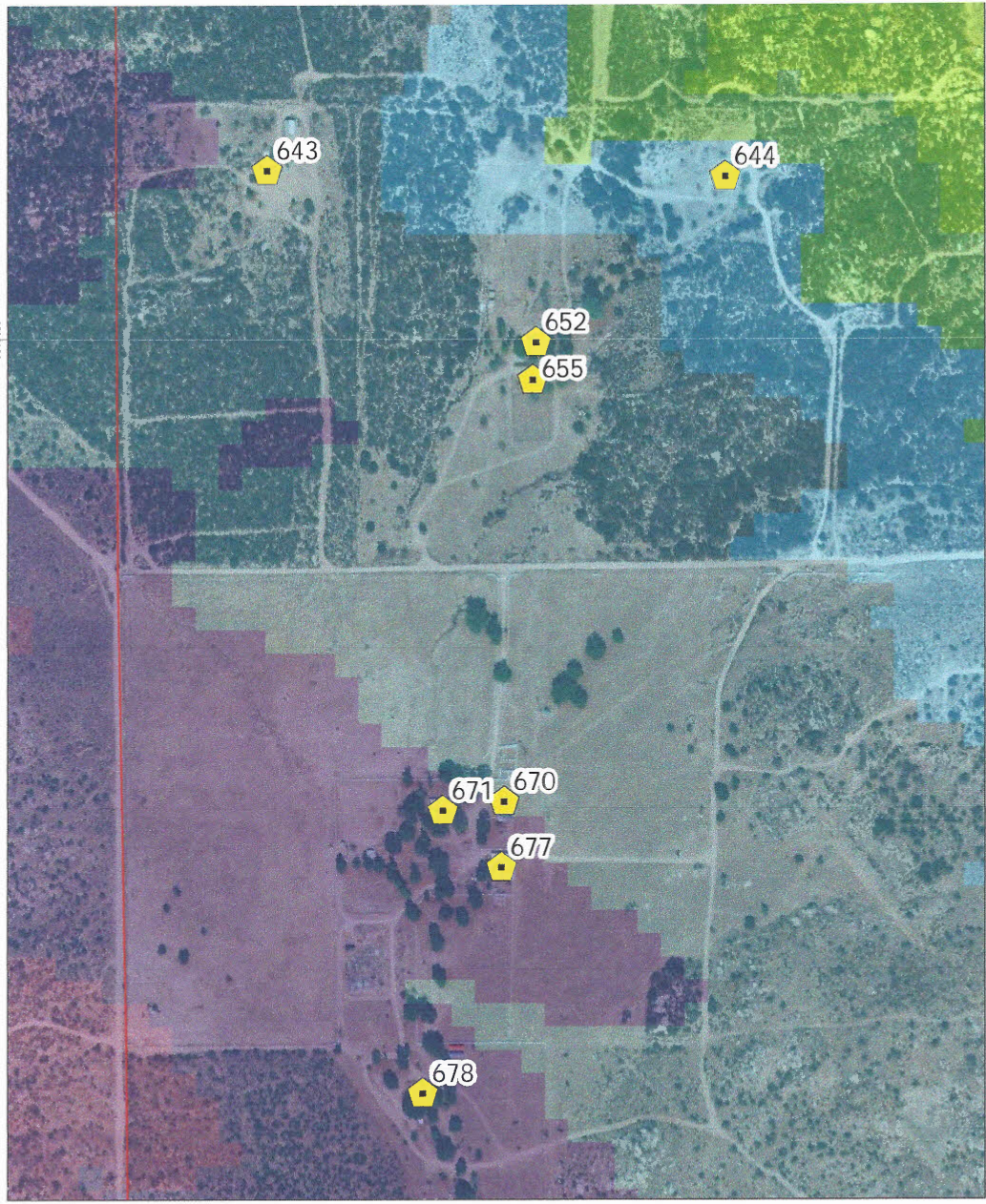


FIGURE C2-1  
 SCENARIO 213: ANNUAL SHADOW FLICKER  
*Expected-Case Scenario*  
*Off-Reservations Receptors*

- Legend**
- Golden Acorn Casino: GE 1.85-82.5 Turbine (80-m HH)
  - Kumeyaay: Gamesa G87-2.0 MW Turbine (87-m HH)
  - Tule: GE 2.3-107 Turbine (80-m HH)
  - Campo: GE 3.83-137 Turbine (110-m HH)
  - Torrey: GE 3.83-137 Turbine (110-m HH)
  - ▲ Meteorological Tower
  - Boulder Brush Boundary
  - Campo Reservation Boundary
  - La Posta Reservation Boundary
  - Manzanita Reservation Boundary
- Off-Reservations Receptors**
- ⊕ Does Not Exceed 30 Min. Per Day and/or 30 Hrs. Per Year
  - ⊙ Exceeds 30 Min. Per Day and/or 30 Hrs. Per Year
- Shadow Flicker (Annual Hours)**
- 1 - 10
  - 10 - 20
  - 20 - 30
  - 30 - 50
  - 50 - 100
  - 100 - 200
  - > 200

**Reference**

0 0.0150 0.030 0.045 0.06  
 Kilometers

0 0.01 0.02 0.03 0.04  
 Miles

Shadow Flicker Data Resolution: 20 m  
 Coordinate System: UTM 11N  
 Datum: WGS84

**Originator**

Date: 08-Nov-2019  
 Department/Originator: ESILD  
 Client: Terra-Gen Development Company, LLC

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