

From: Scott A McMillan
To: [Harris, Susan](#); [Koutoufidis, Nicholas](#)
Cc: [Noorhan Buttres](#)
Subject: BOULDER BRUSH FACILITIES, PDS2019-ER-19-16-001, PDS2019-MUP-19-002
Date: Tuesday, December 31, 2019 2:38:06 PM

Re: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (SCH No. 2019029094), MAJOR USE PERMIT BOULDER BRUSH FACILITIES, PDS2019-ER-19-16-001, PDS2019-MUP-19-002

Copy by mail to:

December 31, 2019

Susan Harris, Planning & Development Services, 5510 Overland Avenue, Suite 310, San Diego, CA 92123

Ms. Harris & Mr. Koutoufidis,

Please accept this comment on the inadequacy of the Environmental Impact Report identified above.

I am a resident at 35900 Shockey Truck Trail, Campo, CA 91906. My property is immediately adjacent to the project. The Boulder Brush Facilities are to be tied into the Campo Turbines and should be considered as an entire project despite such project being partially on the Campo reservation.

For the following reasons, the EIR fails for a lack of adequacy, completeness, and a good faith effort at full disclosure.

1. I note that there was a lack of notice of this project to the Federal Aviation Administration and Customs and Border Protection. The EIR fails to identify the impact on air operations immediately adjacent to the U.S. / Mexican Border for consideration. As you are probably aware, the U.S. Customs and Border Protection agency (CBP) has daily flights along the border. The wind turbines will exceed 500' in height, and thus will extend into FAA jurisdiction airspace. From the maps that I looked at, there are six turbines that are to be constructed adjacent to Shockey Truck Trail, which are near the flight path of the CBP helicopter. The placement of the turbines presents a danger to the occupants of the helicopters, as well as to the residents nearby as a helicopter crash that follows the collision with the spinning blades of the wind turbine may create a risk of fire, or direct impact of bodies and debris. I noted a complete lack of discussion of the impact on flight operations regarding this project, or any part of it.

Construction of turbines near the border impair National Security as the air operations of the CBP support the efforts of the Border Patrol agents on the ground. The project proponents' failure to discuss and address air operations of the CBP is reckless at best.

There is no discussion whatsoever regarding air operations from what I could see in my review of the material.

2. I have seen personnel and their vehicles that were either installing or maintaining the

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I48-2
I48-3

weather monitoring station immediately adjacent to Shockey Truck Trail on that road and Tierra Del Sol road. Those roads are unimproved, save for the regular efforts fo the CBP contractors and the residents that live off the road, including myself. There is a lack of discussion in the EIR, nay -- even mention, of the use of either Shockey Truck Trail or Tierra Del Sol road in the EIR. Am I and my neighbors expected to fix the road that the proponents of the project destroy? Are we expected to repair that road at our own expense? These roads are not county maintained, yet I see the proponents' contractors using them and wearing on them. Those roads are unpaved and vehicles and equipment traveling those roads will generate substantial dust, noise, and will degrade the road. I have experienced dust from the roadway as have my neighbors. We do not like breathing the dusty air. Further, the spilling of contaminants on these unpaved roads will result in pollution of our water supply which we draw from the wells. I am concerned that oil and petroleum products from the leaking trucks will enter our drinking water supply through the porous soil. To the extent that the developers suggest that they will use a different route to connect their grid-tie equipment or the wind turbines they are not being truthful. Shockey TT and Tierra Del Sol road are the two main arteries into the southern-most areas of the project. The failure to include discussion of the environmental impact of travel on Shockey Truck Trail and Tierra Del Sol road and the intended means of mitigating such impact could not have been an accident. Absence of that discussion renders the EIR inadequate and incomplete. For instance, paving the road and providing drainage for the road would mitigate the damage of heavy equipment going over the roads. The EIR discusses paving roads, but does not identify which roads will be paved.

148-3
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3. The EIR fails to identify a spring that is located just west of the road on Shockey Truck Trail. The Kumeyaay's of Campo and the other residents know **exactly** which spring I am referring to. There is no way that the proponents or their investigators can be uninformed about that spring as well because it is identified by the nearby historic watering trough. The omission of that spring demonstrates the lack of good faith in the proponents' disclosure. That spring provides a water source for the birds and mammals that occupy that canyon and surrounding area. Construction of the grid-tie, and the interconnection between the turbines will have a cumulative, if not direct effect upon the already stressed wildlife in the area. There are no provisions in the EIR for providing the wildlife in the area access to water, and no discussion of what will take place to preserve existing natural wildlife watering stations. The failure to provide the wildlife access to water will drive mammals into our properties. Mammals such as the cougar, the bobcat, and coyote will struggle to find water and will be forced into the neighboring residential parcels. I do not want to have any unnecessary encounter with a thirsty cougar. Moreover, there is not always water available nearby. The elimination of the springs threatens to substantially reduce the habitat of the large mammals and eliminate their number, if not restrict their range.

148-4

4. The EIR fails to identify and discuss well known archeological landmarks nearby the project on Tierra Del Sol road nearby the Walker Ranch. The proponents were no doubt aware that the locale presently bounded by the Walker Ranch and the surrounding area was a historic gathering place for the Kumeyaay people. The EIR fails to identify, or even suggest that a good faith survey of the area by archeologists took place. I do not want to see the archeological landmarks destroyed.

148-5

5. The ground water study fails to take into account the burgeoning development on the Mexican side of the border. Without a discussion of all of the wells that are drawing off of the aquifer, the EIR is incomplete. The Southern-most boundary of the project is less than a 1/4 mile from the US / Mexico border. There has been significant development on the

148-6

Mexican side of the border, which is obvious just from looking at old satellite images and comparing them to what is presently visible. The new development is drawing from the aquifer. The failure of the project proponents to discuss the water use on the Mexican side renders the EIR inadequate, incomplete, and lacking in a good faith effort at full disclosure. I do not want to have my pump burn out and be without water because the proponents of the project caused the water to be used up by not taking into account the development on the Mexican side of the border.

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6. The EIR fails to address the ambient noise level of the homes along Tierra Del Sol road. Such noise level will be permanent, and bothersome. The EIR discusses blasting operations. Such noise will terrify my animals, including my horse and my neighbors' horses. The EIR does not address that obvious impact or how to mitigate that impact.

148-7

7. I am a member of San Diego Astronomy Association, which has its star-watching center in Tierra Del Sol. Presently, Campo / Tierra Del Sol is one of the best stargazing locations in California. The EIR does not address the impact that the project will have on stargazing, or how to mitigate such impact.

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