

I22 Mark Ostrander

- I22-1** The comment is an introduction to comments that follow. Responses to the individual comments within the documents and exhibits mentioned in this comment are included below. No further response is required.
- I22-2** The comment expresses opposition to the Campo Wind Project with Boulder Brush Facilities (Project) but does not raise any issue concerning the adequacy of the Draft Environmental Impact Report (EIR). No further response is required.
- I22-3** The comment states the Project would alter views and the visual landscape. The visual impacts of the Project (and cumulative projects) are analyzed in Chapter 2.1, Aesthetics, and the Visual Resources Report (Appendix B) of the Draft EIR. Please also refer to Global Response GR-8, Visual Impacts. The comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I22-4** The comment refers to the cumulative impacts of past and present projects as well as proposed or foreseeable future projects within the Campo, Boulevard, and Jacumba area. The comment also states that Ocotillo should be included in the cumulative impact analysis for aesthetics because of its close proximity to Project Area. In response, the cumulative visual impact analysis is presented in Chapter 2.1, Section 2.1.4, of the Draft EIR. The Ocotillo Wind Project was not considered in the cumulative impact analysis for aesthetics because it is located outside of the viewshed for the Project, located approximately 15 miles from the Boulder Brush Boundary in Imperial County. As the existing wind development is located outside of the Project viewshed, inclusion of the Ocotillo Wind Project would not directly inform the analysis of potential cumulative effects to visual resources within the Project Area. Therefore, no changes to the Draft EIR have been made in response to this comment.
- I22-5** The comment states that the Project wind turbines will have significant and unavoidable noise impacts. The comment also refers to third party noise testing that was conducted, including on the author's property. In response, the Draft EIR analyzes the Project as a whole, which includes the Campo Wind Facilities (including turbines) on the Campo Band of Diegueño Mission Indians Reservation and the Boulder Brush Facilities proposed on private land subject to the County of San Diego's land use jurisdiction. Please refer to Chapter 2.6, Noise, and the Acoustical Analysis Report (Appendix G) of the Draft EIR. Please also refer to Global Response GR-4, Noise.

Responses to Comments

I22-6 The comment expresses concern regarding living in a Very High Fire Danger Area and the addition of potential ignition sources where none previously existed that would greatly increase the chance of a fire starting. The comment also states that overhead lines will hamper aerial operations and provides an example of how overhead lines caused a phase-to-ground strike due to an air tanker drop. The comment also states that insurance policies are being cancelled and rates are going up.

In response, as discussed in Chapter 2.9, Wildfire, of the Draft EIR and Global Response GR-7, Fire Protection Services and Wildfire, the Project is required to implement the Boulder Brush Facilities Fire Protection Plan (FPP), which has been prepared to the satisfaction of the San Diego County Fire Authority (Appendix I to the Draft EIR). A separate FPP will be prepared for the Campo Wind Facilities to the satisfaction of the Campo Reservation Fire Protection District, which is responsible for fire response on the Campo Band of Diegueño Mission Indians Reservation. Both FPPs are required to be implemented in conjunction with development of the Project.

The purpose of the FPPs for the Project is to address potential adverse environmental effects that the Project may have on or from wildfire. The Boulder Brush Facilities FPP assesses potential impacts resulting from wildfire hazards and identifies measures necessary to adequately mitigate those potential impacts. Recommendations for effectively mitigating identified impacts are based on site-specific characteristics and incorporate input from the local fire jurisdiction. The Boulder Brush Facilities FPP also assesses the potential impacts on existing fire protection services due to implementation of the Boulder Brush Facilities. In regard to impacts to aerial operations, please refer to Global Response GR-9, Aviation. In regard to insurance policies, this comment does not raise an issue regarding the adequacy of the Draft EIR.

I22-7 The comment states that the construction phase of the Project would result in fire-related incidents due to wildfire risk, which could cause a lack of resources to be available to residents unless more personnel and equipment are put in place during construction. Please refer to Response to Comment I22-6. Additionally, a Construction Fire Prevention Plan (CFPP) is included as Appendix A of the Boulder Brush Facilities FPP (Appendix I to the Draft EIR). The primary goal of the CFPP is to identify clearly defined protocols and procedures for reducing fire risk and maintaining a fire-safe worksite. Specific fire prevention measures are included in the CFPP. Refer to mitigation measure M-WF-1, Fire Protection Measures for the Boulder Brush Facilities. In regard to the Campo Wind Facilities, mitigation measure M-BI-C(h) includes measures that would be employed to reduce the risk of ignition during construction. Also, construction activities would be limited and precautions may be taken on site during periods of a Red Flag Warning, when conditions such as low

Responses to Comments

- humidity and high winds are present. Further, potential impacts associated with wildfire risk are assessed in Chapter 2.9 of the Draft EIR, and a detailed response to wildfire risk is provided in Global Response GR-7.
- I22-8** The comment states that property values have gone down since the wind projects in the area have come online and many owners are unable to sell their homes. Please refer to Global Response GR-1, Socioeconomic Impacts. This comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-9** The comment states when the project starts the trucks, equipment, dust, and water trucks continuously traveling on roads will take the peace and quiet the author once had. Please refer to Chapter 2.6 and the Acoustical Analysis Report (Appendix G) of the Draft EIR regarding noise impacts during construction. Please refer to Chapter 2.2, Air Quality, for an analysis of air quality impacts during construction, including fugitive dust. The comment does not raise an issue related to the adequacy of the analysis contained within the Draft EIR; thus, no further response is required.
- I22-10** The comment states burglary rates increased during past construction projects and trespassing has occurred. The comment also states that tourism, which is the community's main industry, is declining because of past projects. Please refer to Global Response GR-1. This comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-11** This comment states that the community is groundwater dependent and that some have had their well levels drop during the construction phase of past projects. The comment also states that past projects, such as the ECO Substation, underestimated their water use and that they were granted a waiver. The comment further states the author is concerned that their well will drop again during Project construction if the Jacumba Community Services District sells water to the proposed Project. In response, please refer to Chapter 3.1.5, Hydrology and Water Quality; the Groundwater Resources Evaluation Report (Appendix J-1); and the Groundwater Reports for Boundary Creek and Flat Creek Watersheds (Appendices J-2 and J-3, respectively) of the Draft EIR. Please also refer specifically to Project Design Feature PDF-HY-2, which requires the Boulder Brush Developer to implement Groundwater Mitigation Monitoring and Mitigation Plans for the Flat Creek and Boundary Creek Watersheds to ensure non-potable water purchased from the Jacumba Community Services District does not result in impacts to the aquifers accessed by Jacumba Community Services District's non-potable water production wells.

Responses to Comments

- I22-12** The comment states that quality of life for the author has gone down for several years due to other projects occurring within the area, and that property values would be further reduced with implementation of the Project. In regard to property values, please refer to Global Response GR-1. The comment does not raise an issue related to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-13** The comment expresses concern regarding visual impacts due to previously approved wind farms, solar panels, and power lines, and states that now more areas will be taken away by the Project. For a discussion of impacts related to aesthetics and views, please refer to Chapter 2.1 of the Draft EIR. The comment does not raise an issue related to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-14** The comment states this project will increase the risk of fire no matter what mitigation may be done. The comment also asks why this additional risk is being added and suggests that enough risk has been added from past projects. Please refer to Chapter 2.9 in the Draft EIR and Global Response GR-7. The comment does not raise an issue related to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-15** The comment addresses a report about wind turbine fire risk and damage costs from an article titled Wind Turbine Fires: Not “If” – “When.” The comment also states that the fire and fuels need to be evaluated by all parties from the federal, state, and local fire agencies. The comment also states San Diego County is in a fire prone environment and adding more projects that have a potential to start fires is a risk to life and safety, not to mention the revised tactics that have to be deployed by firefighters due to the turbines. The comment states further that the communities of Boulevard, Manzanita, and Jacumba are at risk due to being located in a very high fire hazard severity zone area. Additionally, the response area within the Project Area traditionally has had minimal foot traffic and vehicle traffic, but the Project infrastructure and traffic will increase fire activity. Finally, the comment concludes the fire impacts are unmitigatable and will leave residents with no alternative but to evacuate their residences to be safe. The commenter concludes this is unacceptable.

In response, the article referenced in the comment is noted. The article does not raise any issues that have not been contemplated and addressed by the Draft EIR analysis. The Project’s impacts to fire protection services and wildfire related impacts are analyzed in Chapter 3.1.8, Public Services, and Chapter 2.9. The Project would be required to implement the Boulder Brush Facilities Fire FPP, which is included as

Responses to Comments

- Appendix I to the Draft EIR, and an FPP that will be prepared to the satisfaction of the Campo Reservation Fire Protection District for the Campo Wind Facilities. It was determined that wildfire risk impacts would be less than significant with implementation of the FPPs. In regard to training for fire agencies, as stated in the Boulder Brush Facilities FPP, training sessions would be conducted with the local fire station personnel. A San Diego County Fire Authority–approved and California Department of Forestry and Fire Protection–approved training video would be provided to the local fire agencies for refresher training and training new firefighters who may rotate into potentially responding areas. Please also refer to Global Response GR-7.
- I22-16** The comment states that roads are in bad shape from past projects and they only get patched, if they get fixed at all. In response, as discussed in Chapter 2.8, Traffic and Transportation, of the Draft EIR, damage to existing roadways by construction vehicles and equipment could occur during construction of the Boulder Brush Facilities. Compliance with County of San Diego haul route requirements would ensure construction-related damages to existing roads are adequately repaired. For the Campo Wind Facilities, mitigation measure M-TR-B would ensure repair and restoration of roads.
- I22-17** The comment states the community is groundwater dependent and the Project should get their water from outside the area. See Response to Comment I22-11 above. The comment does not raise an issue related to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I22-18** The comment makes a general statement that past projects need to be evaluated as part of the cumulative impacts for the Project. The comment also states the concerns of local residents need to be a priority and not the project owners. In response, past projects are included in the cumulative analysis as part of baseline conditions. Added to baseline conditions are reasonably foreseeable, approved, and pending projects. See Table 1-4 in Chapter 1, Project Description, Location, and Environmental Setting, of the Draft EIR. These projects are also illustrated in Figure 1-12, Cumulative Projects, in Chapter 1 of the Draft EIR. As required under the California Environmental Quality Act, the cumulative analysis contained within each environmental issue area section in the Draft EIR considered past, present, and reasonably foreseeable projects in the analysis; thus, no further edits to the cumulative impact discussion of the Draft EIR are required.

INTENTIONALLY LEFT BLANK