

I37 Clifford and Concepcion Caldwell

- I37-1** The comment is a cover email to the attached comment letter. Responses to the individual comments within the documents and exhibits mentioned in this comment are included below. No further response is required.
- I37-2** The comment references a past comment letter submitted by the author for the Draft Environmental Impact Statement (EIS) prepared for the Campo Wind Project with Boulder Brush Facilities (Project) by the Bureau of Indian Affairs in 2019. The comment states the previous comments are incorporated by reference thereto. Please refer to Responses to Comments 7-1 through 7-18 in Appendix T, Response to Public Comments, of the Final EIS¹. The comment does not raise an issue pertaining to the analysis contained within the Draft Environmental Impact Report (EIR); therefore, no further response is required.
- I37-3** The comment provides an introduction to the comment letter and states the authors' intent to provide comments on the Draft EIR. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-4** The comment asks what the standard is that is involved in protecting the local aesthetics and views. The comment then lists County of San Diego (County) General Plan policies related to visual resources, including LU 12.4, COS 11.1, COS 11.7, and COS 13.1 (as reflected in Chapter 2.1, Section 2.1.2.3, of the Draft EIR). In response, the Draft EIR analyzes impacts to aesthetics and views pursuant to Appendix G of the California Environmental Quality Act (CEQA) Guidelines and the County's Guidelines for Determining Significance and Report Format and Content Requirements for Visual Resources. The County's CEQA Guidelines for Visual Resources state that a significant effect on visual resources would occur if "the project would not comply with applicable goals, policies, or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's Zoning." The applicable County plans for this Project are the Mountain Empire Subregional Plan and the Boulevard Community Plan. Please note these plans are only applicable to the private lands under the County's land use jurisdiction and are not applicable to the Campo Band of Diegueño Mission Indians Reservation (Reservation). A detailed analysis of aesthetics and views in the Project Vicinity is provided in Chapter 2.1, Aesthetics, and the Visual Resources Report (Appendix B) to the Draft EIR.

¹ The Final EIS can be found at <http://campowind.com/>.

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I37-5 The comment lists policies from the Mountain Empire Subregional Plan, including Land Use General Goal (Policies and Recommendations 5) and Conservation Environmental Resources (Policies and Recommendations 4 and 6). The comment also states these policies are reflected in Chapter 2.1, Section 2.1.2.3, of the Draft EIR. Please note these plans are only applicable to the private lands under the County's land use jurisdiction and are not applicable to the Reservation. In response, the comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

I37-6 The comment lists policies from the Boulevard Community Plan (as reflected in Chapter 2.1, Section 2.1.2.3, of the Draft EIR), including Policies LU 1.1.2 and LU 6.1.2. Please note these plans are only applicable to the private lands under the County's land use jurisdiction and are not applicable to the Reservation. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

I37-7 The comment states County and local policies are referenced but not followed in the Draft EIR. The comment further states that the Draft EIR ignores various local and County policies that encourage the preservation of scenic views, including views from adjacent properties and residential areas. Further, the comment states that none of the "visual assessment" photos clearly depict a proposed wind turbine or power pole at a distance of less than 1 mile.

In response, both Chapter 2.1 and the Visual Resources Report (Appendix B) of the Draft EIR were prepared in accordance with the County Guidelines for Determining Significance and the County Report Format and Content Requirements for Visual Resources. Chapter 2.1, Section 2.1.3.4, of the Draft EIR analyzes consistency with applicable plans and policies. As explained in Response to Comment I37-4, the Draft EIR analyzes the Boulder Brush Facilities consistency with applicable goals, policies, and requirements in the Mountain Empire Subregional Plan and the Boulevard Community Plan. The consistency analysis is included in Tables 2.1-2 and 2.1-3 of the Draft EIR. County community and subregional plans are not applicable to the Campo Wind Facilities proposed on the Reservation.

Regarding key views or key observation points (KOPs), County guidelines require the consideration of a number of key viewpoints that would most clearly display the visual effects of the project. As described in Chapter 2.1 and the Visual Resources Report (Appendix B) of the Draft EIR, of the 12 key observation points used in the analysis, 9 were selected for the Campo Wind Facilities and 3 were selected for the Boulder Brush Facilities. Of the nine key views selected for the Campo Wind Facilities, three are located

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within 1 mile of proposed wind turbine locations, including KOPs 3, 4, and 5. The distance between the KOPs and the nearest proposed wind turbines is disclosed in the Visual Resources Report for KOPs 3, 4, and 5. Please see Sections 5.2.3, 5.2.4, and 5.2.5 of the Visual Resources Report, and Section 2.1.3 in Chapter 2.1 of the Draft EIR. In addition, and regarding the On-Reservation gen-tie, KOP 8 (Westbound Interstate [I] 8) is located within 0.3 miles of the proposed alignment of the gen-tie and 150-foot high support poles. No revisions to the Draft EIR have been made in response to this comment.

I37-8 The comment requests clarification as to why KOPs used in the Visual Resources Report were not established on private property. KOPs were not established on private property because neither CEQA Appendix G nor the County Guidelines for Determining Significance and Report Format and Content Requirements – Visual Resources specifically protect private views. See Section 5.1.3, Key Observation Points, of the Visual Resources Report, and Section 2.1.3 in Chapter 2.1 of the Draft EIR. The intent of KOPs (or key views) and visual simulations is to approximate the visual change associated with a proposed project through the use of best available information and as experienced from representative public vantage points in the surrounding area. Private vantage points are not typically selected as KOPs as they would represent visual changes that would be experienced by one property owner as opposed to the wider public.

While private vantage points were not selected as KOPs, the Visual Resources Report analyzes the entirety of the Project and considers the various viewer groups in the Project Vicinity when determining the severity of visual change and visual impacts. See Section 4.2, Viewer Groups, Exposure, and Sensitivity, of the Visual Resources Report. Further, the visual impact assessment analyzes the Project in accordance with established County thresholds for visual resources that consider contrasts with the existing visual character/quality of a community or localized area and generally, not from individual vantage points. As stated in Section 5.1.3 in the Visual Resources Report, analyzing all the views from which the Project would be seen is not feasible. No revisions to the Draft EIR have been made in response to this comment.

I37-9 The comment asks if local roads are going to be enlarged and whether adjacent private property owners are going to be dealing with substantial grading on their properties, which would impact the visuals. In response, as described in Chapter 1, Project Description, Location, and Environmental Setting, of the Draft EIR, additional roads would be constructed on the Reservation and approximately 15 miles of existing roads on the Reservation would need to be temporarily widened during construction. Impacts such as those associated with temporary widening and related grading are not anticipated for Off-Reservation roads to accommodate construction of the Campo Wind Facilities.

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Regarding the Boulder Brush Facilities, an approximately 1-mile off-site segment of Ribbonwood Road located north of Opalocka Road would be widened up to 30 feet and paved. This segment of Ribbonwood Road is a private road. In addition, access to the gen-tie poles and high-voltage substation and switchyard would be provided within the Boulder Brush Corridor. Visual change associated with widening of the particular segment of Ribbonwood Road is described and assessed in Chapter 2.1 and the Visual Resources Report (Appendix B) of the Draft EIR. Proposed widening of Ribbonwood Road north of Opalocka Road would be within the existing County right-of-way and/or non-exclusive easements for road, drainage, and utility purposes. In response to this comment, revisions to Chapter 2.1 of the Final EIR have been made to clarify that the proposed widening of Ribbonwood Road north of Opalocka Road would occur within existing County right-of-way and/or non-exclusive easements.

I37-10 The comment states that the Visual Resources Report and Draft EIR do not disclose from which roads the proposed gen-tie poles and lines would substantially impact the views. The comment also asks for the location of visual simulations depicting substantially impacted views from public roads and requests a quantification of the number of viewers that would have to deal with impacted views on a daily basis. In response, the commenter is referencing analysis specific to the gen-tie poles and lines that would be located on private lands within the Boulder Brush Corridor. As proposed, the nearest Off-Reservation gen-tie pole and lines would be located approximately 0.5 miles from the nearest residence on private lands under the land use jurisdiction of the County. The nearest On-Reservation gen-tie pole would be located approximately 0.15 miles from the nearest residence on private lands, located just outside the Reservation boundary to the east.

The intent of the visual analysis in the Draft EIR is not to make an assessment of substantial impact for each Project component from all available roads or vantage points. Please refer to Response to Comment I37-8 above regarding the intent of visual simulations and KOPs. In addition, analyzing all the views from which the Project would be seen is not feasible. Further, County guidelines of significance for visual resources do not establish a threshold pertaining to number of impacted views required to generate a substantial or significant impact. As previously stated in Response to Comment I37-7 above, both Chapter 2.1 of the Draft EIR and Appendix B, Visual Resources Report, were prepared in accordance with CEQA Appendix G and the County Guidelines for Determining Significance and the County Report Format and Content Requirements for Visual Resources. No revisions to the Draft EIR have been made in response to this comment. Also please refer to Global Response GR-8, Visual Impacts.

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- I37-11** The comment asks at what distance one would have to be from a facility in order to not substantially contrast with the traditional theme and style of the Boulevard Community Plan area. In response, distance is not the sole factor determining the likelihood for substantial contrast. In determining the severity of change, a variety of design characteristics including form, line, color, and texture, as well as analysis factors including dominance, angle of observation, exposure, and spatial relationships, are considered. Existing context, including the presence or lack thereof of like development, is also considered. Further, the County does not have established guidance regarding the relationship between distance and substantial contrast and as such, the determination of substantial contrast is supported by field observations, visual simulations, project characteristics, and analysis factors. At distances of 2 miles or more, facilities may not substantially contrast with existing visual character or quality; however, a variety of factors are considered in the determination. Please refer to Table 2.1-2 and Table 2.1-3 in Chapter 2.1, Aesthetics, of the Final EIR which outline Boulder Brush Facilities compliance with the Mountain Empire Subregional Plan and the Boulevard Community Plan. No revisions to the Draft EIR have been made in response to this comment.
- I37-12** The comment states that there has been no valid assessment of the views of the numerous residences bordering Ribbonwood Road and/or located south and southeast of the proposed 150-foot-tall gen-tie line poles, and wind turbines that will make up part of the proposed Project. The comment also states that the selected KOPs are not representative of available viewing angles and/or distances and requests a worst-case representation of a 586-foot-tall wind turbine from an adjacent owner's property line. Please refer to Response to Comment I37-7 and I37-8 regarding the KOP selection methodology and intent of visual simulations in the Visual Resources Report. No revisions to the Draft EIR have been made in response to this comment.
- I37-13** The commenter asks how many local inhabitants will be dealing with views of the proposed improvements. In response, while Chapter 2.1 and the Visual Resources Report (Appendix B) of the Draft EIR do not identify the specific number of local inhabitants that would be exposed to views of the Project, the approximate extent of available views to the dominant component of the Project (i.e., 586-foot-high wind turbines) within the Project Area is disclosed in Figure 2.1-4, Modeled Topographic Viewshed Analysis: Campo Wind Facilities, of the Draft EIR. In addition, the approximate extent of available views to the dominant component of the Boulder Brush Facilities (i.e., 150-foot-high gen-tie poles) within the Project Area is disclosed in Figure 2.1-5, Modeled Topographic Viewshed Analysis: Boulder Brush Facilities. As shown on Figure 2.1-4, views to proposed wind turbines would be available from

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- a large geographic area within the Boulevard and Campo/Lake Moreno areas. In order to provide an accurate approximation, visibility to the Project Site (and available air space above the Project Site to account for vertical Project components) from all residential properties identified as being within the “Visible as Modeled” polygon on Figure 2.1-4 would have to be documented. Further, impacts to existing visual character and quality were concluded to be significant and unavoidable in the Draft EIR and quantification of viewers would not increase the severity of the significant and unmitigable impact. No revisions to the Draft EIR have been made in response to this comment.
- I37-14** The comment includes a policy of the Mountain Empire Subregional Plan and asks where in the document views from adjacent properties and residences on nearby hills are reflected. In response, the views of residents are considered in Chapter 2.1, Section 2.1.3, of the Draft EIR, and Section 4.2 of the Visual Resources Report (Appendix B to the Draft EIR). Neither the Mountain Empire Subregional Plan nor the County Guidelines require the establishment of key views on private property, including private property adjacent to a project site. The lack of a KOP on an adjacent property and a related visual simulation does not in and of itself determine that the views of residents were not considered in the visual impact analysis in the Draft EIR or that the Draft EIR has determined that the views of residents on adjacent properties are irrelevant. Rather, the visual simulations and KOPs were utilized to assist with the Project analysis. No revisions to the Draft EIR have been made in response to this comment.
- I37-15** The comment states the huge facilities will be a “blight on the local community character and views.” The comment also states that blinking lights atop wind turbines will destroy nighttime visuals. In response, the Draft EIR concluded that the Campo Wind Facilities would result in significant and unavoidable impacts to existing visual character and quality, scenic vistas, and nighttime views. In addition, the Draft EIR concluded the Boulder Brush Facilities would result in a significant and unavoidable impact to scenic vistas. The Draft EIR further concluded the Project would result in cumulatively considerable visual impacts that would remain significant and unavoidable. No revisions to the Draft EIR have been made in response to this comment.
- I37-16** The comment is a summary of the issues previously provided in Comment I37-13 regarding quantification of local inhabitants that would be directly affected by the Project. Please refer to Response to Comment I37-13, which explains the extent of available views to proposed wind turbines and other Project components in the surrounding area. Please also refer to Draft EIR Figure 2.1-4 and Figure 2.1-5, which illustrate the anticipated visibility of prominent features (i.e., wind turbines and gen-tie poles) of the Project within a 10-mile radius. While the Draft EIR Chapter 2.1 and the

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Visual Resources Report (Appendix B to the Draft EIR) do not quantify the number of local inhabitants directly provided views to Project features (which is not a required element of visual report pursuant to the County's Report Format and Content Requirements: Visual Resources), the modeled topographic viewshed analyses approximate the physical extent of Project visibility in a large area that encompasses Campo, Boulevard, and Jacumba.

The comment also asks if any buffer areas have been identified and set up to protect local inhabitants. The comment does not identify an appropriate buffer area to consider nor does the comment qualify a buffer area that would successfully "protect the local inhabitants." Regarding transmission facilities, north of I-8 the On-Reservation gen-tie (support by 150-foot tall poles) would be sited approximately 0.15 miles from the nearest Off-Reservation residences. The Off-Reservation gen-tie would be sited approximately 0.5 miles from the nearest County residences. Lastly, the high-voltage substation/switchyard facility would be sited in the remote, northeastern corner of the Boulder Brush Facilities boundary, over 3 miles from the nearest existing Off-Reservation residence.

- I37-17** The comment is a summary of the issues previously provided in Comment I37-7 concerning visual simulations and the lack of KOPs within 1 mile of a proposed wind turbine. Please refer to Response to Comment I37-7, which details the three selected KOPs located within 1 mile of a proposed wind turbine.
- I37-18** The comment states the conclusion that the Boulder Brush Facilities would not substantially detract from or contrast with the existing visual character or quality and that the impact would be less than significant is at best laughable. In response, the comment does not provide specific information regarding the rationale for impact determinations and does not raise a specific concern pertaining to the analysis contained within the Draft EIR. The less-than-significant impacts to existing visual character and quality associated with operation of the Boulder Brush Facilities are discussed in Chapter 2.1, Section 2.1.5.2, Community Character, of the Draft EIR.
- I37-19** The comment contains language taken verbatim from the Draft EIR in Chapter 2.9, Wildfire. The comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I37-20** The comment cites Section 2.9.2, Regulatory Setting, in Chapter 2.9 of the Draft EIR, regarding fire protection, beginning on page 2.9-10 of the Draft EIR. The comment then asks who has the authority/responsibility to enforce the numerous mitigation measures, codes, plans, and regulations as they pertain to fire protection. The comment

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- then lists various agencies that have jurisdiction over the Project and references Section 2.9.2 of the Draft EIR. In response, as stated in Chapter 2.9 of the Draft EIR and the Boulder Brush Facilities Fire Protection Plan (FPP) (Appendix I of the Draft EIR), the Boulder Brush Boundary is located within a State Responsibility Area, and therefore the California Department of Forestry and Fire Protection (CAL FIRE) is the agency primarily responsible for enforcement of fire protection standards on the Boulder Brush Facilities. San Diego County Fire Authority (SDCFA) and CAL FIRE both provide significant resources to the Project Area, and both agencies are co-located in the nearest fire station. State regulations are not applicable on the Reservation, and are therefore not applicable to the Campo Wind Facilities. The Campo Reservation Fire Protection District (CRFPD) is responsible for enforcement of fire protection standards on the Reservation.
- I37-21** The comment asks whether the County has jurisdiction over the Boulder Brush Facilities and the Campo Wind Facilities to enforce the myriad of fire control provisions (state, federal, Reservation, and County). SDCFA and CAL FIRE have jurisdiction over the Boulder Brush Facilities, while the CRFPD has jurisdiction over the Campo Wind Facilities on the Reservation. Please also refer to Response to Comment 137-20.
- I37-22** The comment asks if the County will be overseeing and enforcing the fire control provisions both on and off the Reservation. As stated in Responses to Comments I37-20 and I37-21, the County does not have authority on the Reservation. The CRFPD is responsible for fire protection enforcement on the Reservation.
- I37-23** This comment further restates the question of County jurisdiction on the Reservation. As stated above, the County does not have jurisdiction on the Reservation, and fire protection will be managed and enforced by the CRFPD.
- I37-24** The comment contains language taken verbatim from the Draft EIR in Chapter 2.9. The comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I37-25** The comment asks if the Project will be shut down during Red Flag Warning periods. In response, during Red Flag Warnings, when conditions such as low humidity and high winds are present, construction activities would be limited and precautions may be taken on site. Red Flag Warnings are issued by the National Weather Service and indicate that conditions are such (low humidity, high winds) that wildfire ignitions and spread may be facilitated. To ensure compliance with Red Flag Warnings restrictions, the National Weather Service website would be monitored at the Boulder Brush Facilities (<http://www.srh.noaa.gov/ridge2/fire/briefing.php>). Upon announcement of

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a Red Flag Warning, red flags will be prominently displayed at the entrance gate and main office, indicating to employees and contractors that restrictions are in place. Any “hot work” (work that could result in ignition sources or increase fire risk), grading, or any other work that could result in heat, flame, sparks, or may cause an ignition to vegetation would be prohibited during Red Flag Warning conditions. If vehicles are required to be used during Red Flag Warning conditions, vehicles shall remain only on disturbed areas during construction and within Project access roads during operations.

During operations, in the case of a Red Flag Warning, the Project would not automatically shut down. Please refer to Global Response GR-7, Fire Protection Services and Wildfire Impacts, and Response to Comment O9-7.

I37-26 The comment summarizes language contained within the Draft EIR pertaining to the shared responsibility of the CRFPD, CAL FIRE, and the SCDFFA for fire protection services. The comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.

I37-27 The comment restates language contained in the Draft EIR pertaining to the conclusions reached regarding impacts due to wildfire hazards and emergency response and evacuation plans. The comment then states the section does not speak to the additional risks to the surrounding Campo residents or to their evacuation.

As discussed in Chapter 2.5, Hazards and Hazardous Materials, of the Draft EIR, emergency response calls on the Reservation would be routed to CRFPD. Therefore, response capabilities of the SCDFFA and CAL FIRE to nearby residents would not be impacted. Regarding Off-Reservation emergency response capabilities and evacuation, please refer to Section 2.9.3.1 and Section 2.9.4 in Chapter 2.9 of the Draft EIR. As outlined in Chapter 2.9, the Boulder Brush Facilities would include fire access and circulation throughout the Boulder Brush Corridor and adequate emergency access would be provided. Construction of the Boulder Brush Facilities would not decrease or inhibit adequate response action or times from the closest fire station, Fire Station 47, which is approximately 3.7 miles away.

In addition, access roads to the Boulder Brush Facilities would be improved, and the Boulder Brush Developer would adhere to the Fire and Emergency Services Agreement with the County/SDCFA that would provide funding to support improvements to future fire services consistent with the County General Plan. Additionally, as outlined in the Boulder Brush Facilities Fire Protection Plan (Appendix I of the Draft EIR), emergency service requirements of the Project are not expected to significantly impact County response capabilities, and in turn are not expected to impact the emergency response

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and evacuation capabilities to surrounding residents. As stated in Section 2.9.7 of the Draft EIR, it is determined that anticipated impacts to emergency response, emergency call volumes, and on-site evacuation as a result of the Project would be less than significant. For detailed responses related to wildfire risks, please refer to Global Response GR-7.

- I37-28** The comment restates language contained in the Draft EIR pertaining to the conclusions reached regarding impacts due to wildfire risks. The comment does not raise an issue with the adequacy of the analysis included in the Draft EIR; therefore, no further response is required.
- I37-29** The comment restates language included in the Draft EIR pertaining to the analysis of impacts to emergency response and evacuation plans. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-30** The comment restates language included in the Draft EIR pertaining to the analysis of impacts associated with wildfire risk. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-31** The comment restates language included in the Draft EIR pertaining to the analysis of impacts associated with wildfire risk. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-32** The comment restates language included in the Draft EIR pertaining to the analysis of impacts associated with wildfire risk. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-33** The comment restates the lack of analysis within the Draft EIR regarding wildfire impacts to the surrounding residents. The comment also states that although the Draft EIR indicates fires can be a tremendous hazard in the area, it does little to discuss the manner in which additional risks will be handled or to really define the risks to local inhabitants from the Project. The comment further states that if you surround the local residential areas with electrical generation and transmission equipment, then clearly you are increasing the risk of local fires. Lastly, the comment states that the use of “may increase the chances of a wildfire and increase the number of people and structures exposed to risk of loss, injury or death” in regards to the construction of the facilities, is a misstatement of fact as it “will” increase the risk.

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In response, Chapter 2.9, Section 2.9.3.2, of the Draft EIR acknowledges that the Project Area and surrounding communities are in an area of high wildfire risk due to the presence of vegetated slopes and occurrences of high winds. Equipment on the Project Site that could be ignition sources during operation include the wind turbines, transformers located within the fenced boundary of both collector and high-voltage substations, the switchyard, electric collection and transmission lines, vehicles, and gas- or electric-powered small hand tools. This equipment represents a risk of sparking or igniting nearby fuels, particularly with off-site flammable vegetation and during high wind conditions. The analysis finds that while the Project would comply with all applicable fire codes and provide design features for fire suppression, the Project would still be located in a Very High Fire Hazard Severity Zone and additional measures are warranted.

The Project would implement mitigation measures M-WF-1 and M-BI-C(h), which address wildfire risks associated with implementation of the Boulder Brush Facilities and the Campo Wind Facilities, respectively. Section 2.9.4 in Chapter 2.9 of the Draft EIR analyzes cumulative wildfire risk. As required by the County's Consolidated Fire Code Section 4903, proposed projects would be required to prepare Construction Fire Prevention Plans and FPPs to lessen fire risk during and after construction, and would likely include additional mitigation and design measures, similar to the Project. For a detailed analysis on fire protection measures to be implemented for the Boulder Brush Facilities, please refer to the FPP (Appendix I to the Draft EIR). For a detailed response related to wildfire risks, please refer to Global Response GR-7.

I37-34 The comment asks how the Project intends to deal with the effects of ignition sources it is inserting into the local community. The comment states that the Draft EIR has not directly addressed the inherent risks of fire associated with electrical generation of power and the attendant use of transmission lines to move the generated power.

The Boulder Brush Facilities FPP (Appendix I to the Draft EIR) discusses increased fire risk associated with electrical generation and transmission. In response, design features would be put in place to limit fire risk associated with these activities. These include fuel modification zone buffers around each gen-tie power line pole, the high-voltage substation, switchyard, and roads. Additionally, the high-voltage substation and switchyard within the Boulder Brush Boundary would include a contiguous fuel modification zone of 50 feet around the perimeter fence (approximately 100 feet from the electrical components on the pad areas). Prohibited plants (Appendix F of the Boulder Brush Facilities FPP) would not be allowed, and planting and spacing would be reviewed by the SDCFA Fire Marshal.

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- Section 2.9.3.3 in Chapter 2.9 of the Draft EIR states the Campo Wind Facilities include potential ignition sources including wind turbines, gen-tie line, the collector substation, and meteorological towers; however, the Project would include conversion of ignitable fuels to lower flammability landscape and include 24-hour surveillance, anticipated to aid in earlier observation and reporting of wildfires. Additionally, the Campo Wind Facilities would be designed and constructed to the satisfaction of the CRFPD and applicable fire codes. The FPP and Construction Fire Prevention Plan to be prepared for the Campo Wind Facilities would be subject to review and approval by the CRFPD, to which equal rigor is applied as County Fire review for projects on private lands within the County. The FPP prepared for the Campo Wind Facilities would be implemented in conjunction with development of the Project. As discussed in Response to Comment I37-33, the Project would implement an FPP for Campo Wind Facilities consistent with mitigation measure M-BI-C(h).
- I37-35** The comment provides a general comment regarding fire protection agencies and fire protection measures proposed in the Draft EIR. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-36** The comment summarizes the language contained within the filing made in April 2019 before the California Public Utilities Commission reflecting the testimony of Don Widjaja, the Director of Financial Planning and Regulatory Accounts for San Diego Gas & Electric. The comment includes a summary of the testimony, provided by the author of this comment. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-37** The comment provides a general statement that fire protection measures identified in the Draft EIR are “fantasy statements” that fail to address the wildfire risks to the community. Please refer to Global Response GR-7. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR, and no edits to the Draft EIR are required.
- I37-38** The comment asks the question about how to “mitigate” for the increased risk of fire to the local populace and the local area if a fire were to start from the facilities. Please refer to Section 2.9.6 in Chapter 2.9 of the Draft EIR, which includes the mitigation measures to reduce impacts associated with the possibility of wildfire risk. Mitigation measure M-WF-1 requires all fire protection measures and features identified in the Boulder Brush Facilities FPP be implemented. The Draft EIR also identifies that an FPP for the Campo Wind Facilities will be prepared to the satisfaction of the CRFPD consistent with mitigation measure M-BI-C(h). Please also refer to Response to Comment I37-33 and Global Response GR-7.

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- I37-39** The comment questions how the County protects a property and its occupants from a fire and how residents will be properly noticed in the case of a fire. In response, as outlined in Chapter 2.9, Section 2.9.3.1, of the Draft EIR, the County clarifies that the San Diego County Operational Area (OA) was formed to better establish mutual aid capabilities and improve communication between jurisdictions and agencies, as well as to assist the cities and the County in developing emergency plans and exercising those plans. The OA Emergency Operations Plan is used by the County and all of the cities within the County to respond to major emergencies and disasters, including wildfire. The OA Emergency Operations Plan has been adopted and is complete with 16 functional annexes, including an Evacuation Annex (Annex Q). The OA Evacuation Annex is intended to be used as a template for the development of other jurisdictional evacuation plans and describes how emergencies are managed and how the evacuation of residents and their pets are implemented. The OA Evacuation Annex outlines strategies, procedures, recommendations, and organizational structures that can be used to implement a coordinated evacuation effort in the OA.²
- I37-40** The comment expresses concern regarding wildfire evacuation and questions where local people and their animals are to go if a fire consumes their properties. Please refer to Responses to Comments I37-27 and I37-39.
- I37-41** The comment expresses concerns regarding fire insurance. Fire insurance cost is a topic outside the scope of analysis required under CEQA. This comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I37-42** The comment discusses the topic of strict liability for electrical operators if their facilities are the cause of a fire that results in damage to personal property. The comment does not raise an issue relating to the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-43** The comment states that the new wildfire fund and law (Assembly Bill 1054) signed by Governor Gavin Newsom in 2019 reflects the continuing problem of wildfires in California. This comment does not raise any issue regarding the adequacy of the analysis within the Draft EIR; therefore, no further response is required.
- I37-44** The comment states that the wind facility operator should be required to indemnify the local Boulevard community for any fire damages resulting from the electrical generation facilities, and if the operator is unable to, then this responsibility should fall

² County of San Diego. 2018. *Unified San Diego County Emergency Services Organization And County of San Diego – Operational Area Emergency Operations Plan*. Office of Emergency Services. September 2018.

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on the County. The comment does not raise an issue pertaining to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

I37-45 The comment contains a discussion regarding fire insurance rates and includes a discussion of efforts put forth by the California legislature to reduce utility suppliers' liability for fire damages they may cause. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; thus, no further response is required.

I37-46 The comment asks the question of whether the BIA, the County, or the Project proponents and purveyors of the electrical generation facilities would agree to be held strictly liable for any fire damage caused as a result of the Project. The comment does not raise an issue pertaining to the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

I37-47 This comment focuses on the finding of the Groundwater Resources Evaluation (Appendix J-1 of the Draft EIR) that the water level could decline by up to 31 feet (13 to 31 feet) at the nearest Off-Reservation groundwater well (4,500 feet from the wellfield), if the full construction water demand is supplied by On-Reservation wells. The commenter also expresses skepticism that the County's significance threshold is adequately protective of off-site well users. The comment also refers to cumulative impacts of multiple renewable energy projects.

In response, implementation of Project Design Feature PDF-HY-1 and PDF-HY-2 would ensure water level declines remain below the County's thresholds of significance (20 feet for fractured rock aquifers). The ways in which these PDFs avoid exceedance of significance thresholds for groundwater are explained in Draft EIR Chapter 3.1.5, Hydrology and Water Quality. As stated in Appendix J-1 of the Draft EIR:

According to the County Groundwater Geologist, the primary author of the County of San Diego Guidelines, the intent of the above guideline was to cover projects that have continual ongoing water uses that remain static over time. Historically, this has been the case for the vast majority of groundwater dependent projects processed by the County. This Project, however, proposes to use variable quantities of water, with intensive pumping over short periods. The intensive pumping during short periods may cause direct well interference impacts. Therefore, to evaluate potential impacts from short-term pumping of groundwater, the County Groundwater Geologist has requested a short-term drawdown analysis, in addition to the 5-year projection of drawdown, to evaluate the potential impacts from operating at the highest rate of pumping.

Responses to Comments

All groundwater analyses referenced in the Draft EIR (Appendices J-1, J-2, and J-3) took into account the cumulative effects of reasonably foreseeable projects. The commenter's remarks on the East County Substation Project do not relate to the adequacy of the analysis in the Draft EIR. Additionally, please refer to Global Response GR-6, Groundwater.

I37-48 The comment states that the use of groundwater will cause stress to groundwater-dependent habitat (e.g., mature oak trees). In response, Draft EIR Chapter 2.3, Biological Resources, Guideline C (Groundwater); Appendix J-1, Groundwater Resources Evaluation; and Appendix N, Water Supply Assessment, all evaluate groundwater drawdown and associated impacts to groundwater-dependent habitat. The analysis in Chapter 2.3, Section 2.3.3.3 (Guideline C), of the Draft EIR states:

Water sources during construction would include On- and Off-Reservation facilities such as production wells on the southern end of the Reservation and commercially obtained non-potable water from permitted Off-Reservation purveyors such as Jacumba Community Service District (JCSD), which provides non-potable groundwater for construction or Padre Dam Municipal Water District (PDMWD), which provides recycled water for construction. The O&M [operations and maintenance] facility would require a potable water source for employee uses; estimated water use is approximately 210 gallons per day (gpd). It is anticipated that groundwater sourced from an existing, On-Reservation groundwater well would be used for the Project's operation, otherwise water would be trucked in from JCSD or PDMWD. Water demand from the O&M building is less than demand from a typical single-family home and the available groundwater wells have sufficient sustainable yield to supply that demand without reducing the groundwater table levels (Appendix N, Water Supply Assessment, of the Draft EIR). Therefore, the Project would have a less-than-significant impact to groundwater or groundwater-dependent habitat, such as emergent wetland and southern arroyo willow riparian forest.

Additionally, Appendix N, Water Supply Assessment, of the Draft EIR states:

To evaluate the impacts to the fractured rock aquifers (fractured rock and alluvial) intercepted by [Jacumba Community Services District] Well 6, Dudek performed a watershed-scale soil moisture balance analysis to evaluate the cumulative impacts of pumping Well 6 to supply construction water (a total of 224 AF [acre-feet]) over a 2-year period

from the Boundary Creek Watershed. The analysis included existing water demands, the proposed Project, along with reasonably foreseeable future projects . . . along with JCSD pumping for municipal demand assuming full buildout according to the existing General Plan. The soil moisture balance analysis incorporated historical climate data (using a minimum 30-year precipitation record), which includes historical periods of increased rainfall and periods of extended drought. Results of this analysis indicated that reduction in groundwater storage, well interference impacts, impact to groundwater dependent habitat and water quality would be less than significant. It is reasonable to expect that the capped production of 100,000 gallons per day would be available from Well 6 during an average, single-dry and 3-year-dry period. Therefore, no significant impacts [including impacts to groundwater dependent habitat], according to San Diego County's Guidelines for Determining Significance, would result from obtaining Project construction water.

- I37-49** The comment raises the question of whether local rainfall patterns would continue unabated in the short term or whether there may be a decreased rainfall pattern. While CEQA does not directly require an analysis of the Project's impact on rainfall patterns, rainfall recharge is an important aspect of the health and sustainability of local groundwater basins. Appendix N, Water Supply Assessment, of the Draft EIR evaluated the available water supply under normal year, single-dry-year, and multiple-dry-year conditions over a 20-year projection, accounting for the projected water demand of the Project and the general projected demand for groundwater in the Basin. As stated in Appendix N to the Draft EIR:

Based on a soil moisture balance prepared as part of the Groundwater Resources Investigation Report for the Project, the average annual groundwater recharge rate for the Jacumba Alluvial Aquifer over the 59-year period examined is approximately 250 AFY [acre-feet per year]. The estimated groundwater extraction for Project O&M of 0.25 AFY represents an approximately 0.008% loss of groundwater in storage during drought years when no rainfall recharge occurs. In years with normal to above average rainfall, sufficient recharge (i.e., greater than 0.25 AFY) occurs to replenish the fractured rock aquifer of water extracted for O&M purposes. Taking into account severe drought, there is sufficient groundwater supply from On-Reservation groundwater wells to support Project O&M demand over 20 years, and other current and projected future uses.

Responses to Comments

- I37-50** The comment states that local residents object to the idea that the purveyors of this Project feel it is sufficient that maybe in 5 years our surrounding water table will drop no more than 20 feet. Please Refer to response to Comment I37-49. Additionally, the Project would implement PDF-HY-1, which includes Campo Environmental Protection Agency groundwater monitoring. Moreover, the Project includes a Groundwater Mitigation Monitoring and Mitigation Plan as a project design feature (PDF-HY-2), which includes setting thresholds protective of groundwater resources; regular monitoring of non-potable water production and water levels in surrounding monitoring wells, annual reporting to County Planning & Development Services, and provisions to cease pumping if groundwater level thresholds are exceeded to ensure that groundwater impacts remain less than significant.
- I37-51** The comment asks what the diversion of local water resources to benefit this Project will do to surrounding areas, if it increases the risk of fire due to reduction of water resources and the stressing of local trees and vegetation. The Draft EIR concludes that the Project would not have a significant impact on the amount of groundwater in storage or on groundwater dependent ecosystems. Please refer to Chapter 3.1.5, Section 3.1.5.3, of the Draft EIR, as well as Chapter 3.1.9, Section 3.1.9.3. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-52** The comment is addressing short-term and long-term effects on property values. The comment refers to the County's refusal to discuss the cumulative effects these various projects are having on property values. The comment also makes general mention to impacts to neighboring views, wildlife populations, local water resources, trees and vegetation, noise and infrasound, health of local inhabitants, and fire risks. In regard to property values, please refer to Global Response GR-1, Socioeconomic Impacts. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-53** The comment provides an introductory statement to the following individual comments (I37-55 through I37-60). No further response is required.
- I37-54** The comment states that there is an issue with the Draft EIR regarding the analysis of cumulative impacts of other projects within the local area, such as the Torrey Wind Project. However, the comment does not specifically identify issues within the cumulative analysis provided for each environmental issue area throughout the Draft EIR. The Torrey Wind Project was included in the list of cumulative projects considered in completing the cumulative analysis (refer to Table 1-4 of the Draft EIR). Since no specific issues regarding the cumulative impact analysis are discussed in this comment, no further response can be provided.

Responses to Comments

- I37-55** The comment refers to problems with noise and infrasound impacts from the facilities on neighboring areas, individuals, animals, pets, and noise-sensitive species such as bats and birds (and the problems of masking noise on these animals). 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. In regard to impacts on wildlife, please refer to Chapter 2.3 and the Biological Resources Technical Report (Appendix G) of the Draft EIR. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- I37-56** The comment expresses concern with problems with the Draft EIR, including the death of birds, bats, and other animal species arising from the Project. Chapter 2.3 and the Biological Resources Technical Report (Appendix D) of the Draft EIR analyzed potential impacts and identified mitigation measures for impacts to birds, bats, and other special-status species. Please also refer to Global Response GR-5, Biological Resources. This comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I37-57** The comment expresses concerns regarding impacts on the health of local inhabitants, animals, and wildlife species. Please refer to Global Response GR-2, Public Health. Please also refer to Chapter 2.3 and the Biological Resources Technical Report (Appendix D) of the Draft EIR in regard to wildlife. This comment does not raise a specific issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I37-58** The comment expresses concern with problems with the Draft EIR, including impacts to local wetlands, sensitive plants, vegetation, and nesting patterns of birds. Chapter 2.3 and the Biological Resources Technical Report (Appendix D) of the Draft EIR analyzed potential impacts and identified mitigation measures for impacts to wetlands, special status plants, vegetation, and nesting birds. Please also refer to Global Response GR-5. This comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I37-59** The comment provides a general statement that there is a problem with the Draft EIR regarding the impacts from the introduction of thousands of vehicle trips through the local neighborhoods. Please refer to Chapter 2.8, Traffic and Transportation, and the Transportation Impact Analysis (Appendix H) of the Draft EIR. This comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.

Responses to Comments

I37-60 The comment provides a general statement that there is a problem with the Draft EIR regarding the impacts from road widening and the effects of heavy equipment and water trucks on the roads, in addition to impacts to traffic patterns. Please refer to Chapter 2.8 and the Transportation Impact Analysis (Appendix H) of the Draft EIR. This comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.

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