

I40 Ed and Donna Tisdale

- I40-1** The comment consists of introductory language included in a cover letter and states that impacts identified within the Draft Environmental Impact Report (EIR) have been underestimated. Specific discussion of these underestimated impacts is not included in this comment; therefore, no further response is required.
- I40-2** The comment provides information regarding the authors' place of residence and their location in relation to the Campo Wind Project with Boulder Brush Facilities (Project). The comment also states that there are several additional rows of turbines planned to the west, northwest, and southwest of the authors' property that would significantly impact the authors and their neighbors. The comment does not raise any issues regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.
- I40-3** The comment provides information regarding a parcel the authors owns to the east of the Campo Band of Diegueño Mission Indians Reservation (Reservation) boundary, and states that the parcel is on the market and the proposed turbines must be disclosed to potential buyers. The comment also states that their residence is home to two disabled tenants, and that the persons living at their residence have health problems that would be greatly exacerbated by the installation of wind turbines. This comment does not specifically raise an issue regarding the analysis contained within the Draft EIR; therefore, no further response is required.
- I40-4** The comment begins by disclosing the distance the authors' homes are from the Reservation boundary, and states that impacts to their personal properties would be significant and unavoidable, as disclosed in the Draft EIR. The comment then goes on to state that there are additional significant effects beyond those identified and listed in the Draft EIR, and that these impacts could all be mitigated with the approval of the No Project Alternative. Although the comment states that there are additional significant effects not disclosed in the Draft EIR, there is no specific topic, information, or environmental issue area mentioned; thus, no further analysis and no further edits to the Draft EIR would be warranted. The comment references the No Project Alternative but does not raise any issues requiring edits to the analysis of this alternative.
- I40-5** The comment states that a "revised and recirculated Draft EIR should be mandated in order to address and correct the many errors, omissions, and misrepresentations that were carried over to this Draft EIR from the flawed Draft EIS [Environmental Impact Statement]." However, the comment does not specifically identify any errors, omissions, or misrepresentations. Thus, no further edits to the Draft EIR are warranted as a result of this statement.

Responses to Comments

I40-6 The comment references past photographic evidence of the visual landscape, wildlife, and peace and quiet made by the author on the Project Notice of Preparation, scoping, Draft EIS prepared for the Project by the Bureau of Indian Affairs, and Draft EIR. This comment does not raise an issue with the analysis contained within the Draft EIR; thus, no further response is required.

I40-7 The comment states that the Project components would place the authors' health, wellbeing, quality of life, water, wildlife, investments, and more at risk of significant and unavoidable effects, which are admitted in the Draft EIR sections analyzing visual aesthetics, shadow flicker, and noise. The comment then states that these impacts could be avoided by denying the Project, and that at a minimum the County of San Diego should insist that that turbines and other Project components be removed or moved farther away from existing homes, property lines, and other occupied structures.

In response, while this comment mentions specific topics analyzed by the Draft EIR (health, water resources, wildlife, aesthetics, shadow flicker, and noise), it does not raise a specific issue regarding the analysis of each of these topics within the Draft EIR. In addition, the County would not have jurisdiction to control the construction and placement of turbines within Reservation property, although it can deny approval for a Major Use Permit for the gen-tie line. Thus, edits to the Draft EIR would not be warranted, and no further response to this comment is required.

I40-8 The comments states that Backcountry Against Dumps and others have already documented that some locals are already adversely impacted by turbines several miles away, with infrasound and low-frequency noise documented up to 16 miles from specific turbine clusters. The comment further states now Terra-Gen wants to install larger turbines much closer to homes. In regard to low-frequency noise and infrasound, please refer to Global Response GR-2, Public Health, and Global Response GR-4, Noise. This comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required.

I40-9 The comment mentions a list of other comments submitted to the County of San Diego in response to the Project and incorporates these comment letters by reference. These comments letters are outlined below and have been responded to as follows:

- 12-21-18: Donna Tisdale's formal 17-page CAMPO WIND EIS SCOPING COMMENTS IN OPPOSITION submitted to BIA and San Diego County PDS
 - Comments from this EIS scoping letter were taken into consideration during the preparation of the Draft EIS

Responses to Comments

- 7-8-19: Tisdale’s 10-page formal CAMPO WIND/BOULDER BRUSH DEIS – OPPOSITION COMMENTS submitted to BIA and San Diego County PDS.
 - Appendix T to the Final EIS, Responses to Comments 1-1 through 1-30
- 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
 - Appendix T to the Final EIS, Responses to Comments J-1 through J-130
- 7-5-19: Snyder Geologic’s Campo Wind DEIS 3rd party opinion
 - Appendix T to the Final EIS, Responses to Comments 1-31 through 1-57
- 7-8-19: dBF Associates, Inc’s Campo Wind DEIS comments
 - Appendix T to the Final EIS, Responses to Comments 1-94 through 1-121
 - Responses to Comments O6-14 and O6-27 within the Final EIR
- 7-8-19: Wilson Ihrig’s Campo Wind DEIS noise analysis
 - Appendix T to the Final EIS, Response to Comments
 - Responses to Comments O6-14 and O6-27 within the Final EIR.
- July 31, 2019: dBF Associates, Inc: Long-Term Ambient Sound Level Measurements Boulevard, Campo, & Pine Valley, California
 - Appendix T to the Final EIS, Responses to Comments O3-2 through O3-5
 - Global Response GR-4 within the Final EIR
- 2-2-20: Boulder Brush-Campo Wind DEIR comments from Laura Buehning MD MPH
 - Response to Comments I29-1 through I29-7 within the Final EIR
- 2-3-20: Boulevard Planning Group’s Boulder Brush / Campo Wind DEIR comment letter and attachments
 - Responses to Comments O7 and O8 within the Final EIR
- 2-3-20: Backcountry Against Dumps’ Boulder Brush / Campo Wind DEIR comment letter and attachments
 - Response to Comments O1, O2, O3, O4, O5, and O6 within the Final EIR
- 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

Responses to Comments

- Appendix T to the Final EIS, Response to Comment 1-95
- Response to Comment O6-84 within the Final EIR
- 2-3-20: dBF Associates, Inc: Boulder Brush / Campo Wind DEIR 3rd party review /noise analysis
 - Responses to Comments O6-81 through O6-112
 - Global Response GR-4 within the Final EIR

I40-10 The comment expresses concern over the interconnectedness of fractures and the potential impacts of groundwater pumping for the Project. Please refer to Chapter 3.1.5, Hydrology and Water Quality, and the Groundwater Resources Evaluation (Appendix J-1) of the Draft EIR. The Draft EIR evaluates the impact of the Project, including all other projects in the cumulative scenario, on groundwater levels surrounding the wells being proposed for use. Please refer to Project Design Feature PDF-HY-2, which requires the Developer to implement Groundwater Mitigation Monitoring and Mitigation Plans for the Flat Creek and Boundary Creek Watersheds (refer to Appendices J-2 and J-3 of the EIR). Please also refer to Global Response GR-6, Groundwater.

I40-11 This comment expresses concerns regarding noise measurement locations and states that the ambient noise measurements taken were inaccurate. Please refer to Global Response GR-4, Noise.

I40-12 This comment states the noise analysis is debunked by a third-party noise consultant (dBF Associates) who was hired to critique the noise analysis in the Draft EIR. Please refer to Global Response GR-4.

I40-13 This comment expresses concern that the noise analysis underpredicts noise levels at noise-sensitive land uses (NSLUs). Please refer to Responses to Comments O6-81 and O6-103, as well as Global Response GR-4.

I40-14 This comment addresses the Acoustic Analysis Report (Appendix G of the EIR) and has concerns with the methodology. Please refer to Response to Comment O6-84 and Global Response GR-4. The Acoustic Analysis Report conservatively used sound data from a wind turbine model that was louder than that of a representative 4.2-megawatt wind turbine considered for the Project. The overall sound power levels for the wind turbine model used for the predictive analysis appear in Table 9 of Appendix G of the Draft EIR.

Responses to Comments

- I40-15** This comment states the Acoustical Analysis Report (Appendix G of the EIR) should evaluate pure tone noise, as directed by the County Wind Energy Turbine Guidelines, as a threshold of significance. In response, the County does not require pure tone analysis as part of the acoustical study and does not have an adopted pure tone threshold to which the Project is subject under the California Environmental Quality Act (CEQA). Additionally, Ordinance 10262, Section 6952(f)(1), does not direct a pure tone evaluation as part of an acoustical study. Section 6952(f)(3) applies the pure tone condition as a means to make the -5 dBA adjustment to applicable noise limits in Section 36.404 of the noise ordinance. The Acoustical Analysis Report was prepared in accordance with County standards and CEQA; therefore, no further analysis is required. However, see Response to Comment O6-85 through O6-87 and Global Response GR-4.
- I40-16** This comment states the Acoustical Analysis Report (Appendix G of the EIR) incorrectly bases impact levels on higher ambient noise levels. In response, the Draft EIR (see Addendum to the Acoustical Analysis Report) uses both 2018 data and 2019 data. For some locations, the ambient level relied for the analysis was actually lower, not higher than the 2018 data. The County updated the 2018 levels based on available data from the 2019 survey collected with ANSI Type 1 instruments.
- I40-17** This comment states the Acoustical Analysis Report (Appendix G to the EIR) incorrectly bases impact findings on the higher ambient noise levels. Please refer to Response to Comment O6-90.
- I40-18** The comment states that at several locations, the microphone positions were not representative of ambient noise levels near NSLUs, and that these microphone placements overstate the ambient noise environment. Please refer to Response to Comment O6-103.
- I40-19** This comment states the Acoustical Analysis Report (Appendix G of the EIR) should be able to confirm On-Reservation NSLU locations of most or all On-Reservation residences and any other NSLUs should be readily available from tribal documentation. The comment also states the Acoustical Analysis Report should identify the quantity and locations of On-Reservation NSLUs. Please refer to Response to Comment O6-107.
- I40-20** The comment states that underprediction of project noise levels by 3 decibels, while barely perceptible, is meaningful and that the Acoustical Analysis Report should utilize multiple CadnaA models rather than spreadsheets or provide the spreadsheets as an appendix. Please refer to Response to Comment O6-104.

Responses to Comments

- I40-21** The comment states that some measurement positions are not appropriate for use as impact evaluation locations and that the analysis should evaluate the project noise levels at the closest potential NSLUs. Please refer to Response to Comment O6-103.
- I40-22** This comment states the Shadow Flicker Analysis (Appendix O of the Draft EIR) is a flawed analysis because it used smaller turbines than the 4.2-megawatt turbines disclosed in the Draft EIR and the Draft EIS. Please refer to Response to Comment O6-13 and Global Response GR-8, Visual Impacts, for a discussion of shadow flicker.
- I40-23** The comment provides concluding remarks and discusses the authors' personal experience within their property. 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.
- I40-24** The comment states that property value plans should be put in place in order to offset impacts to property values. In regard to property values, please refer to Global Response GR-1, Socioeconomic Impacts. 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.