

I48 Scott McMillan

I48-1 The comment provides an introductory statement requesting the comment letter be accepted, states the author's place of residence, and states that the Boulder Brush Project and Campo Wind Project should be considered as an entire project. The Draft Environmental Impact Report (EIR) analyzes the Campo Wind Project with Boulder Brush Facilities (Project), which includes both the Boulder Brush Facilities and Campo Wind Facilities. The comment also states the Draft EIR fails for a lack of adequacy, completeness, and a good faith effort at full disclosure.

In response, the County of San Diego (County), as Lead Agency under the California Environmental Quality Act, is analyzing the Project as a whole; however, the County's land use jurisdiction is limited to the private lease lands within the Boulder Brush Boundary (i.e., the Boulder Brush Facilities). The Bureau of Indian Affairs has jurisdiction over the portion of the Project within the Campo Band of Diegueño Mission Indians Reservation Boundary (i.e., Campo Wind Facilities), and has prepared an Environmental Impact Statement (EIS) to evaluate the impacts of the Project, as a whole, under the National Environmental Policy Act. In regard to the general statement that the Draft EIR lacks adequacy, completeness, and disclosure, the comment does not provide any substantive or specific comments regarding the adequacy of the Draft EIR. Therefore, no further response can be provided.

I48-2 The comment states that there was a lack of notice of this Project to the Federal Aviation Administration (FAA) and U.S. Customs and Border Patrol. The comment also states there are risks to U.S. Customs and Border Patrol helicopters due to wind turbine construction near the border patrol area. The comment also states that there is no discussion of air operations in the Draft EIR.

In response, as discussed in Draft EIR Chapter 2.5, Section 2.5.3.2, Airports Hazards, the Developer would be required to submit form FAA7460-1 to the FAA 45 days prior to start of construction. This would ensure the Project is in compliance with all applicable FAA regulations. Title 14 of the Code of Federal Regulations Section 77.9, which requires submittal of form FAA7460-1, includes analysis of nearby heliports and federal agency or Department of Defense facilities. Please also refer to Global Response GR-9, Aviation.

I48-3 This comment states that the Draft EIR is inadequate because it failed to include a discussion of the environmental impact of travel on Shockey Truck Trail and Tierra Del Sol Road. As shown in Figure 1-9A of the Draft EIR, these roadways are not designated as Project Access Roads; thus, no analysis of impacts to these roads is warranted. No revisions to the Draft EIR are required.

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I48-4 The comment states that the Draft EIR fails to identify a spring located west of the road on Shockey Truck Trail but does not provide a specific location. The comment expresses concern that the elimination of the spring threatens habitat for large mammals. In response, since the Shockey Truck Trail is outside of the Project boundaries and specifically outside of the Campo Corridor study area, this spring would also be located outside of the Campo Wind Facilities and the County has no information that the spring would be impacted by the Project. Additionally, the Project was not considered to interfere substantially with the movement of wildlife because many of the Project components (i.e., transmission lines, access roads, turbine strings) were considered to be permeable to wildlife movement and therefore would continue to allow access to water sources within the Campo Wind Facilities and the surrounding areas (see Chapter 2.3, Section 2.3.3.5, Wildlife Movement and Nursery Sites, of the Draft EIR). While construction of the Project may create some temporary constraints, most of the species occurring in the Project Area are relatively common and not typically constrained by human activities, provided there is enough unconstrained room to move in and around the Project Area.

I48-5 The comment states the EIR fails to identify and discuss archaeological landmarks nearby the Project on Walker Ranch. Chapter 2.4, Cultural Resources, in the Draft EIR identifies the area of potential affect and locations of surveys and provides a thorough analysis of all potential impacts to cultural resources as a result of the Project.

I48-6 The comment states that the groundwater evaluation in the Draft EIR should account for the groundwater demands from development on the Mexico side of the international border. Developed (or developing) uses on the other side of the border do not increase the demand on groundwater wells that are the subject of the evaluation in the Draft EIR (i.e., the Campo Band of Diegueño Mission Indians Reservation wellfield and Jacumba Community Services District [JCSD] wells). However, Appendix J-3 of the Draft EIR, which included groundwater investigation of the Flat Creek watershed, includes land south of the Mexican border within Compartment D of the study area. As stated in Appendix J-3, the historical water use of the area south of the Mexican border (around Jacume, Mexico) was estimated to be approximately 24 acre-feet per year.

JCSD currently serves some water to part of the community in Mexico. Data obtained from JCSD indicates that between January 2004 and August 2020, JCSD served 419,900 cubic feet (approximately 9.6 acre-feet) of water to Mexico, for an average of roughly 0.6 acre-feet per year.¹ In addition to water served by JCSD, it

¹ Gonzalez, E. 2020. Water usage. Personal communication between E. Gonzalez (Jacumba Community Services District) and T. Driscoll (Dudek). August 2020.

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is unknown how many wells currently operate in the alluvial aquifer in Mexico. Given the sparse population of the area and the known amount of water served by JCSD, the historical estimate of water use in Jacume of 24 acre-feet per year presented in Appendix J-3 of the Draft EIR is a conservative estimate of current use in the aquifer in Mexico. Adding this amount to the projected water use does not impact the results of the analysis presented in the Groundwater Resources Evaluation (Appendix J-1 of the Draft EIR). Finally, there is no evidence from groundwater monitoring currently being performed in the border area that groundwater levels are declining due to pumping of wells in Mexico.

I48-7 The comment states the Draft EIR fails to address the outdoor ambient noise level of homes along Tierra del Sol Road. The comment expresses concern that the blasting operations would terrify animals, including horses. In response, outdoor ambient sound level measurements were performed in 2018 in the vicinity of Tierra del Sol Road, and the data were used to assess impacts with respect to predicted wind turbine operation noise levels, as discussed in Chapter 2.6, Noise, and the Acoustic Analysis Report (Appendix G) of the Draft EIR. Noise from blasting operations noise was studied and expected to comply with the County noise ordinance.

I48-8 The comment states that the Project would impact stargazing activities, and that the Draft EIR does not address such impacts or how to mitigate such impacts. Chapter 2.1, Aesthetics, of the Draft EIR determined that impacts associated with the operation of FAA obstruction lighting on Project wind turbines would adversely affect existing night views in the surrounding area. No mitigation was identified that would lessen FAA obstruction lighting effects on night skies. As a result, impacts were determined to be significant and unavoidable.

Use of lighting during construction of the Boulder Brush Facilities would occur during the County's allowable hours of operation (i.e., 7:00 a.m. to 7:00 p.m.), 6 days per week (Monday through Saturday). Due to the anticipated limited frequency of night construction lighting use and through the use of hooded and downward directed lighting and compliance with the lamp type and shielding requirements of the County Light Pollution Code (i.e., for Boulder Brush Facilities), short-term construction lighting impacts were found to be less than significant. Operational lighting would not be installed on gen-tie poles and operational night lighting at the high-voltage substation and switchyard would be limited; therefore, impacts relative to light and glare during construction and operation of the Boulder Brush Facilities were found to be less than significant. The Boulder Brush Facilities were analyzed in accordance with the County's Guidelines for Determining Significance: Dark Skies and Glare.

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