

O6 Backcountry Against Dumps

O6-1 This is an introductory comment requesting this comment letter and associated attachments be included into the public record on behalf of Backcountry Against Dumps and the commenter. Four attachments are included as part of this comment letter, including BPG Boulder Brush Draft EIR Final 2-3-20, Campo Wind Noise Review dBF 2-3-20, CadnaA-The Lie Behind Turbine Noise Models 10-7-11, and Campo Wind Draft EIS 3rd Party Expert Summaries. These listed attachments to Comment Letter O6 have been included into the public record and are addressed herein (Responses to Comments O6-2 through O6-96). This comment does not raise specific concerns related to the adequacy of the Draft Environmental Impact Report (EIR); therefore, no further response is required.

O6-2 This comment states the Boulevard Planning Group (BPG) voted unanimously (6 yes, 0 no, Seat 1 vacant) to authorize the Chair to submit this comment letter of opposition to the Campo Wind Project with Boulder Brush Facilities (Project). Additionally, this comment outlines BPG's preferred order of alternatives, which is (1) EIR Alternative 1: No Project Alternative; (2) EIR Alternative 2: No Boulder Brush Facilities on Private Lands Alternative; (3) EIR Alternative 4: Underground Gen-Tie Route within Boulder Brush Boundary Alternative; (4) EIR Alternative 3: Alternative Gen-Tie Route within Boulder Brush Boundary; and (5) commenter-suggested Alternative 5. In this comment BPG has included a suggested Alternative 5 that proposes the Boulder Brush Facilities be moved to the southwest corner of the Campo Band of Diegueño Mission Indians Reservation (Reservation) and connect to the existing San Diego Gas & Electric (SDG&E) 500-kilovolt Southwest Powerlink (SWPL), so that all Project facilities would be located on the Reservation. This comment also notes that the BPG voted on suggested Alternative 5 prior to a public announcement that the required number of Campo General Council members had signed a petition opposing the Project.

BPG's preferred order of alternatives is acknowledged by the County of San Diego (County), and this comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the Project. Related to BPG's proposed Alternative 5, this concept was preliminarily considered; however, the SWPL does not currently have sufficient capacity for the proposed Project. Locating a switchyard close to SWPL in order to connect would result in greater environmental impacts than the proposed Project because it would be located closer to residences and further impacts would result from necessary upgrades to ensure SWPL capacity.

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- O6-3** This comment refers to the County’s Planning & Development Services mission statement. The comment further states rural communities have been disproportionately overburdened, impacted, and discriminated against by energy infrastructure projects. The comment does not raise specific issues regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-4** This comment states that the California Environmental Quality Act (CEQA) specifically addresses the potential for conflicting expert discussions and mandates that all sides of the issue are considered. In response, lead agencies have discretion to design EIRs and to select EIR methodologies, as decided in *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 410 (courts to defer to lead agency on disputed methodology). A lead agency may reject criticism, even from another agency, as long as its reasons for doing so are supported by substantial evidence (*North Coast Rivers Alliance v. Marin Mun. Water Dist.* [2013] 216 Cal.App.4th 614, 642 [not following agency water sampling recommendations did not render EIR inadequate]; *California Native Plant Society v. City of Rancho Cordova* [2009] 172 Cal.App.4th 603, 625–626 [agency disagreement on biology impacts not a basis to set aside EIR]). Notably, in *California Native Plants Society v. City of Rancho Cordova*, the disagreeing agencies strongly objected to the EIR and had “requisite expertise and jurisdiction” over the subject matter, but the court rejected a challenge based on the agency comments, noting that “evidence of a disagreement with other agencies is not enough to carry the burden of showing a lack of substantial evidence to support the [EIR] finding” (172 Cal.App.4th 626). In this instance whether the community members are experts does not incur additional weight to their comments, rather all public comment letters received were carefully considered by the County during the preparation of the Response to Comments. In the case of conflicting expert analyses, it is not a requisite that the lead agency alters the project analysis or conclusions. The findings of the environmental document are not required to align with expert comments in order for the lead agency to move forward.
- O6-5** This comment addresses concerns regarding County staff conduct at prior public meetings. This comment does not raise specific issues regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-6** This comment lists the previous BPG comment letters that were submitted to the County Project Manager for the Project, the Planning Commission Secretary, and others (not disclosed) related to the Boulder Brush Facilities Notice of Preparation (NOP), the Draft Environmental Impact Statement (EIS) prepared for the Project by the Bureau of Indian Affairs (BIA), Torrey Wind NOP and scoping meeting, and the County Public Health 2019 Position Statement. All BPG comment letters listed

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in this comment are included in Table O6-1, which outlines the BPG comment letter title, date submitted, associated project and/or document, and where the comment letter is addressed.

Table O6-1

BPG Comment Letter	Date and Page Count	Associated Project/Document	Addressed
Torrey Wind MUP scoping letter comments; PDS2018-18-014; HAROLDPDS2018-ER-21-001	July 10, 2018: 14-page letter	Torrey Wind Major Use Permit (MUP)	The Torrey Wind Project is a separate project. Please refer to Global Response GR-3, Piecemealing, of this document
PDS2018-MUP-18-014: Initial comments on Torrey Wind	July 22, 2018: 26-page letter	Torrey Wind MUP	The Torrey Wind Project is a separate project. Please refer to Global Response GR-3 of this document
Torrey Wind MUP scoping letter comments; PDS2018-18-014; PDS2018-ER-21-001	September 10, 2018: 14-page letter	Torrey Wind MUP	The Torrey Wind Project is a separate project. Please refer to Global Response G-3 of this document
Campo wind EIS scoping comments; request for 30-45 day comment extension and new scoping meeting; joint CEQA/NEPA review is required of terra-gen's connected action/whole of the project Campo Wind, Torrey Wind and Boulder Brush gen-tie projects—it is one project not three	December 20, 18: 28-page letter	Campo Wind Project with Boulder Brush Facilities Environmental Impact Statement (EIS) Scoping Comments	Please refer to Global Response GR-3 of this document
RE: Boulder Brush Gen-Tie Line & Substation Facilities: PDS2019-MUP-19-002; ER 19-16-001	February 12, 2019: 14-page letter	Boulder Brush Facilities MUP	This letter pre-dates the County's NOP comment period (February 14 – March 18, 2019). However, it has been included in Appendix A as part of the Final EIR and is part of the County record and considered by the County as part of the application for the MUP including development of the Draft EIR.
Boulder Brush: 15-wind turbine neighbor surveys	March 17, 2019: email	Campo Wind Project with Boulder Brush Facilities Environmental Impact Report (EIR) Notice of Preparation (NOP)	Comment letter taken into consideration during the preparation of the Draft EIR. See Appendix A of the EIR for NOP comment letters
BPG - Boulder Brush NOP comments with Stezter Electric Wind Turbine EMF letter	March 18, 2019: 33-page letter	Campo Wind Project with Boulder Brush Facilities EIR NOP	Comment letter taken into consideration during the preparation of the Draft EIR. See Appendix A of the EIR

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BPG Comment Letter	Date and Page Count	Associated Project/Document	Addressed
			for NOP comment letters. Please also refer to Global Response GR-2, Public Health, of this document
Re: March 22nd Presentation on Public Health Position Statement on Human Health Effects Of Wind Turbines	March 20, 2019: 14-page letter to Planning Commission	County Public Health 2019 Position Statement	Please refer to Global Response GR-2 of this document
Tisdale for BPG/Backcountry Against Dumps: Wind Turbine Health Effects (in response to "irresponsible" 2019 Public Health Position Statement: Human Health Effects of Wind Turbines)	March 22, 2019: 31-slide PowerPoint presentation to Planning Commission	County Public Health 2019 Position Statement	Please refer to Global Response GR-2 of this document
Boulder Brush - wind turbine surveys, petition & letters	March 25, 2019: email	Campo Wind Project with Boulder Brush Facilities EIR NOP	Comment letter taken into consideration during the preparation of the Draft EIR. Please see Appendix A of the EIR for NOP comment letters
Boulder Brush Gen-Tie facilities & Campo Wind PDS2019-MUP-19-002; PDS2019-ER-16-001	March 25, 2019: email	Boulder Brush MUP	The email and attached wind turbine neighbor surveys, petition signatures, and opposition form letters were taken into consideration during the preparation of the Draft EIR
Letter to Planning Commissioners and Planning & Development Services Director (4-24-19) with 5 attachments requesting revocation of the 2019 Public Health Position Statement on Human Health Effects from Wind Turbines.	April 25, 2019 email: 18-page letter	County Public Health 2019 Position Statement	Please refer to Global Response GR-2 of this document.
RE: Comments on Terra-Gen's Campo Wind & Boulder Brush Gen-Tie Scoping Letter (5-24-19); PDS2019-MUP-19-002; PDS2019-ER-19-16-001	June 24, 2019: 21-page letter	Boulder Brush Facilities Scoping Letter	The wind turbine neighbor surveys were taken into consideration during the preparation of the Draft EIR
Comments on Terra-Gen's Campo Wind & Boulder Brush Gen-Tie Scoping Letter (5-24-19); PDS2019-MUP-19-002; PDS2019-ER-19-16-001	June 24, 2019: email	Boulder Brush Facilities Scoping Letter	The wind turbine neighbor surveys were taken into consideration during the preparation of the Draft EIR
Re: Boulder Brush Gen-Tie Line and Switchyard Facilities for Campo Wind project: PDS2019-MUP-19-002; PDS2019E-ER-19-	March 18, 2019: 33-page letter	Boulder Brush Facilities MUP	Comment letter taken into consideration during the preparation of the Draft EIR.

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BPG Comment Letter	Date and Page Count	Associated Project/Document	Addressed
16-001: Notice of Preparation and Initial Study		Campo Wind Project with Boulder Brush Facilities EIR NOP	Please see Appendix A of the EIR for NOP comment letters
Re: Campo Wind / Boulder Brush DEIS comments / request for recirculated or supplemental DEIS	July 8, 2019: 48-page letter	Campo Wind Project with Boulder Brush Facilities Draft EIS	Please refer to Appendix T of the Final EIS

The letter dated 2-12-2019, now added to Appendix A of the EIR is part of the County record and considered by the County as part of the application for the MUP including development of the Draft EIR. The 2-12-2019 letter states certain items that the County should consider in evaluating the MUP application, the majority of which are addressed in the EIR while others did not warrant evaluation under CEQA. The Walker Express Route is a historic alignment associated with the Old Highway 80/Campo Road/CA-94 alignment approximately 3.5 miles to the south and not impacted by the Boulder Brush Facilities. No height waiver is associated with the Boulder Brush Facilities, exceptions for heights of structures subject to an MUP is a component part of the MUP process. Furthermore, the Draft EIR fully evaluates the impacts of the Boulder Brush Facilities as proposed, including the height of the gen-tie poles. The McCain Valley National Cooperative Land and Wildlife Management Area is not a term used in the current BLM Resource Management Plan (RMP) for East San Diego but may have been associated with a prior RMP iteration and is identified on old topographical maps. While the area is not a Regional Park, the Draft EIR and notably Chapter 2.1 Aesthetics, and the Visual Resources Report provided as Appendix B to the Draft EIR includes a thorough evaluation of visual impacts within the McCain Valley Recreation Management Zone that generally overlays with the area. A secondary access route has not been deemed required in the County review for access, compliant with the General Plan Policy S-3.5 and County Fire review compliant with Fire Code Section 503.1. The term ‘off-gassing’ used in the letter, is related to materials not proposed to be used in the Boulder Brush Facilities and as such did not warrant further evaluation. EMF is discussed in the EIR as part of Public Health discussion within Section 2.5 Hazards and Hazardous Materials. The potential for DNA damage is raised in this letter as a potential element of EMF exposure, exposure to EMF as a result of the presence of wind turbines or the gen-tie lines has not been shown to result in adverse health impacts.

Comment letters outlined in Table O6-1 above that were received in response to the NOP for the Project EIR are included as part of Appendix A to the Draft EIR. These NOP comment letters include the following: March 17, 2019, email RE: 15-wind

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turbine neighbor surveys; March 18, 2019, 33-page letter RE: Boulder Brush NOP comments with Stezter Electric Wind Turbine EMF letter; March 25, 2019, email RE: Boulder Brush – wind turbine surveys, petition and letters. Comment letters received from the BPG in response to the NOP were taken into consideration during the preparation of the Draft EIR.

O6-7 This comment requests a revised and recirculated Draft EIR, stating that a Campo Wind opposition petition signed by 65 General Council Members (see Comment Letter T1) is significant new information that changes the Project’s relevance. In response, it should be noted that the opposition to the Project identified in Comment Letter T1 is the viewpoints of specific members of the Campo Band of Diegueño Mission Indians (Tribe), and is not the official position of the Tribe. Recirculation is required where new information is added to an EIR that is “significant.” If the new information is not significant within the meaning of CEQA Guidelines Section 15088.5, recirculation is not required. New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. The CEQA Guidelines provide examples of information that is considered significant, including the following:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

“Recirculation is not required where new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR” (14 CCR 15088.5[b]).

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New information alone is not sufficient to trigger recirculation. That information must be both new and significant within the meaning of CEQA Guidelines Section 15088.5. As described in Response to Comment Letter T1, opposition to the Project by Tribal members who have signed the petition is acknowledged. The petition, however, is not significant new information that requires recirculation of the Draft EIR.

Further, the leasing of Indian lands is subject to federal law. Leasing is authorized under Title 25 U.S. Code Section 415, which requires the approval of the Secretary of the Interior, as implemented by the BIA under regulations at Title 25 Code of Federal Regulations, Part 162. Those regulations require BIA approval of a lease of Indian land. The BIA has prepared an EIS to comply with the National Environmental Policy Act as part of its environmental review and approval of the Campo Lease between the Tribe and Developer. The validity of the Campo General Council resolution approving the Campo Lease is a matter of Tribal law and is unrelated to the adequacy of the environmental analysis in the Draft EIR.

- O6-8** Related to Comment O6-7, this comment provides text from Section 21166 of the CEQA Guidelines that is related to substantial change in a CEQA document. This comment is not applicable to the Project as the Tribal member opposition petition included in Comment Letter T1 does not change the Project’s objectives or Project description.
- O6-9** This comment states the Draft EIR fails to include Terra-Gen’s reasonably foreseeable Torrey Wind Project and “future NICAD [nickel–cadmium] footprint” for battery storage components, thus resulting in improper Project segmenting/piecemealing. This comment is an introductory statement for comments to follow (O6-10 through O6-12). Please refer to Global Response GR-3, Piecemealing. In regard to the commenter’s reference to “future NICAD footprint,” the Plot Plans for the Boulder Brush Facilities show a battery footprint on page 26. The batteries in the high-voltage substation control building would be used for two main reasons: to power equipment in the control building itself and to power equipment out in the high-voltage substation yard. This is standard equipment for electrical substations. The Project does not propose a battery energy storage system.
- O6-10** The Project would not include a battery energy storage system. Please see Response to Comment O6-9 for an explanation of the substation batteries.
- O6-11** This comment refers to additional comments specific to the Project Description. Please refer to Responses to Comments O6-40 through O6-47.

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O6-12 This comment states the Torrey Wind Project should be included as part of the Project's Draft EIR as a reasonably foreseeable project. Torrey Wind is included as a listed cumulative project in Table 1-4 of Chapter 1, Project Description, of the Draft EIR for the Project. Cumulative projects are analyzed as part of the environmental impact analysis throughout Chapters 2.1 through 3.1.9 of the Draft EIR. Please also see Response to Comment O6-9 and Global Response GR-3, Piecemealing.

O6-13 This comment states the Shadow Flicker Analysis prepared for the Draft EIR should have been based on 4.2-megawatt (MW) turbines, not 3.83 MW representative turbines. The comment states the Project Description for the Draft EIR and the EIS refer to wind turbines rated up to 4.2 MW that would be installed. In response, shadow flicker is calculated based on the turbine tip height and rotor diameter, not the turbine capacity. The Draft EIR indicates that since wind turbine technology is continually improving, and the cost and availability of specific types of turbines varies from year to year, exact turbine dimensions are not yet known. The Project Description therefore instead describes the maximum potential tip height (up to approximately 586 feet) and the maximum potential rotor diameter (up to approximately 460 feet). The tip height and the rotor diameter separately establish total height and total width of the structure respectively; these dimensions are not additive.

The Shadow Flicker Analysis (Appendix O to the Draft EIR) assumed the tallest approximate tip height for any turbine under consideration (regardless of capacity), to be 586 feet. The analysis then assumed a rotor diameter of up to approximately 449 feet. See Table 4.1 in the Shadow Flicker Analysis (Appendix O to the Draft EIR).

In response to comments received during public review of the Draft EIR, a Supplemental Shadow Flicker Analysis (see Attachment 1 to Appendix O of the Final EIR) was conducted using a rotor diameter of 460 feet, as described in Chapter 1, Project Description, of the Draft EIR. It should be noted there are no commercially available turbines at any capacity that have both a tip height of 586 and a rotor diameter of 460 feet; however, the analysis was conducted for informational purposes. Assuming a theoretical "maximum dimension" turbine, the supplemental analysis determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR.

Specifically, if the rotor diameter was 11 feet wider than the rotor analyzed in Appendix O of the Draft EIR, under the Baseline + Project Scenario, the analysis shows the following:

- There is a potential for 18 additional Off-Reservation receptors who may experience shadow flicker for more than 30 minutes in a given day or 30 hours in a given year.
- There are no additional On-Reservation receptors who may experience shadow flicker for more than 30 minutes in a given day or 30 hours in a given year.

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For the additional Off-Reservation receptors identified, the change from the previous model is de minimis and is no more than 2 minutes in any given day or 2 hours in any given year. The supplemental analysis also shows the following for those receptors who were already identified as having a potential to experience shadow flicker for more than 30 minutes in a given day or 30 hours in a given year:

- Off-Reservation receptors may experience between 0 and 5 additional hours of shadow flicker per year.
- On-Reservation receptors may experience between 0 and 7 additional hours of shadow flicker per year.

Even if this theoretical condition could occur, the same Project Design Features (PDF-AE-1 and PDF-AE-2) would be effective to reduce shadow flicker effects. In addition, as previously described, the Draft EIR overestimates shadow flicker impacts because it assumes a total of 76 turbine sites, even though a maximum of 60 turbines would ultimately be built. Thus, the assessments of potential shadow flicker are conservatively evaluated based on 16 more turbines than would ultimately be developed and are based on a maximum dimension turbine.

O6-14 The comment summarizes Draft EIS comments submitted by both Wilson Ihrig and dBF Associates Inc. commenting on the Acoustical Analysis Report prepared for the Draft EIS. The comment expresses concern with the adequacy of the noise monitoring equipment but does not offer any specific information relating to the adequacy of the analysis contained within the Draft EIR. Noise impacts analyzed as part of the Draft EIR are discussed in Chapter 2.6, Noise, of the Draft EIR, and the Acoustical Analysis Report (Appendix G to the Draft EIR). Also please see Global Response GR-4, Noise.

O6-15 This comment states the Draft EIR did not disclose the use of eminent domain by SDG&E to expand Ribbonwood Road onto private property and believes that it should have. The comment further states the commenter only learned about eminent domain by SDG&E from a County staff response at the January 23, 2020, Draft EIR public meeting. In response, as described in Chapter 1 of the Draft EIR, an approximately 1-mile segment of Ribbonwood Road from the Opalocka Road/Ribbonwood Road intersection to the Boulder Brush Facilities site entrance off Ribbonwood Road would be improved. This existing, unpaved roadway segment ranges from 12 feet wide to 40 feet wide and would be widened up to 30 feet and paved. A 20-foot-wide fuel modification zone on either side of this road would be provided where feasible. Subject to County approval, the width of the fuel modification zone along either side of Ribbonwood Road outside of the Boulder Brush Boundary (between Opalocka Road

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and the Boulder Brush Boundary) would depend upon the final width of the improved, paved access road and its placement relative to the access easements that it would be located within.

A detailed description of on- and off-site roadway improvements proposed as part of the Project is included in Chapter 1 of the Draft EIR. Further, eminent domain would not be required for Project access along Ribbonwood Road nor for widening the road. The private property within the Boulder Brush Boundary has legal access through both public and private access easements that begin at the intersection of Opalocka Road and Ribbonwood Road and end at the Boulder Brush Boundary. South of this intersection, Ribbonwood Road is a public road maintained by the County. The Draft EIR fully evaluates potential impacts associated with use and widening of Ribbonwood Road for the Project.

- O6-16** The comment states that an inappropriate wind turbine model was analyzed in the noise analysis and that 4.2 MW turbines are disclosed in the Draft EIS and the Draft EIR. In response, although a specific model turbine has not yet been selected for the Project, the Acoustical Analysis Report (Appendix G to the Draft EIR) used the GE 2.X-127 model in assessing noise. Using the GE 2.X-127 wind turbine data for modeling operational sound emissions from the proposed Project wind turbine generator is conservative because the sound curve for this model is representative of the high end for sound curves compared to other Project wind turbine generators under consideration. This is due to its overall sound power of 110 A-weighted decibels (dBA) (without a 2 decibel [dB] upward adjustment) for an individual wind turbine operating at hub height wind speed of 10 meters per second (mps) (or higher, up to cut-off).

This noise level is greater than that of other commercially available models under consideration. For instance, at 10 mps hub-height wind speed, the GE 2.X-127 is rated at 110 dBA while other wind turbine generators under consideration are rated between 106.9 dBA and 103.9 dBA (depending on whether or not it has serrated trailing edges on the blades). That is a 3–6 dBA difference. Wind turbine sound data is manufacturer proprietary information and subject to its permission for release to the public, which GE agreed the County could do with respect to the GE 2.X-127 model. Therefore, the analysis included in the Draft EIR provides a conservative and adequate analysis of noise generated by proposed wind turbines. No edits to the Draft EIR are required. Please also refer to Global Response GR-4.

- O6-17** This comment states the Executive Summary confirms the Campo/Lake Morena, Pine Valley, and Mountain Empire Planning Areas would be impacted by the Project. The commenter then questions if the relevant planning groups were noticed, and if not,

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states that the DEIR should be revised and recirculated. In response, the Executive Summary of the Draft EIR describes the location of the Project as follows: “In the Project Vicinity, Community Plan areas (designated by the County’s General Plan) include the Pine Valley Community Plan area, the Campo/Lake Morena Community Plan area, the Boulevard Subregional Planning Area, and the Mountain Empire Subregional Planning area.”

Chapter 3.1.6, Land Use and Planning, of the Draft EIR, outlines land use regulations applicable to the Project. The Boulder Brush Boundary is located within the Boulevard Subregional Planning Area, which is a part of the Mountain Empire Subregional Plan. As part of the General Plan, the Mountain Empire Subregional Plan is consistent with all other parts of the County’s General Plan. As shown in Table 3.1.6-1 and Table 3.1.6-2 (within Chapter 3.1.6 of the Draft EIR), the Boulder Brush Facilities would be consistent with applicable County Board of Supervisors policies and County ordinances. Table 3.1.6-3 shows the Boulder Brush Facilities’ compliance with applicable policies of the County General Plan. Table 3.1.6-4 shows the Boulder Brush Facilities’ consistency with the Mountain Empire Subregional Plan. Table 3.1.6-5 shows the Boulder Brush Facilities’ consistency with the Boulevard Community Plan.

Thus, BPG was the only planning group included on the County’s public review distribution list for the Project, as the Boulder Brush Facilities are located within the BPG area within the Mountain Empire Subregional Planning area. This comment does not offer any specific information relating to the adequacy of the analysis contained within the Draft EIR, and this comment does not require revisions to, or recirculation of, the Draft EIR.

- O6-18** This comment states the County can and should make recommendations for Terra-Gen to move or eliminate the proposed turbine sites and operations and maintenance facilities closest to Off-Reservation County residents, which would be subjected to highest levels of noise, shadow flicker, and flashing red night lights. The comment also references a list of wind turbine setbacks and noise restrictions. In response, the County acknowledges the comment; however, the County does not have jurisdiction over the placement of the wind turbines or the operations and maintenance facilities, which are proposed to be located within the Reservation. Noise impacts are analyzed in Chapter 2.6 and Appendix G of the Draft EIR. Also please refer to Global Response GR-4. A Shadow Flicker Analysis is included as Appendix O to the Draft EIR and analyzed in Chapter 2.1, Aesthetics, of the Draft EIR. Lighting is also analyzed in Chapter 2.1. Also please refer to Chapter 2.5, Section 2.5.3.5, Public Concerns of Health Effects, of the Draft EIR, and Global Response GR-2, Public Health.

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O6-19 This comment acknowledges the 14 significant and unavoidable effects related to aesthetics, biological resources, and noise. The commenter states that these significant and unavoidable impacts could be fully mitigated through implementation of the No Project Alternative (Alternative 1) analyzed in Chapter 4 of the Draft EIR, or impacts could be further reduced by repositioning or eliminating the most offending wind turbines to private non-participating properties. In response, the comment does not raise an issue with the analysis provided in the Draft EIR regarding Project Alternative 1; thus, no edits to the Draft EIR are required. CEQA does not require selection of the No Project Alternative when a Project will result in significant and unavoidable effects. If the Project is approved, the County would be required to make appropriate findings of overriding considerations with respect to any significant and unavoidable impacts.

In regard to repositioning or eliminating some of the turbines to reduce impacts for shadow flicker and noise, the County acknowledges this comment; however, the County does not have jurisdiction to require a change in the layout or location of turbines within the Reservation.

O6-20 This comment states that wildfire, environment justice, and other impacts are ignored, dismissed, or not fully analyzed or mitigated in the Draft EIR. In response, Chapter 2.9, Wildfire, of the Draft EIR analyzes the Project's impacts regarding wildfire. A Boulder Brush Facilities Fire Protection Plan (FPP) (Appendix I to the Draft EIR) has also been prepared. An FPP will also be prepared for the Campo Wind Facilities. Please refer to Global Response GR-1, Socioeconomic Impacts, for a discussion of environmental justice.

O6-21 The comment refers to wildfire risks associated with the wind turbines, high-voltage power line, substation, switchyard, and battery storage. The comment further states allowing these facilities disproportionately affects predominantly low-income communities/neighborhoods. The comment also describes fires in other areas that were started by Pacific Gas & Electric high-voltage lines. In response, for clarification, the Project does not propose a battery storage system. Please refer to Response to Comment O6-9 regarding the NICAD battery. Wildfire risks and impacts are analyzed in Chapter 2.9 of the Draft EIR. An FPP has also been prepared for the Boulder Brush Facilities (Appendix I to the Draft EIR) to address wildfire risks and impacts of the gen-tie line, high-voltage substation, and switchyard. An FPP will also be prepared for the Campo Wind Facilities. Please refer to Global Response GR-7, Fire Protection Services and Wildfire Impacts. Please also refer to Global Response GR-1 regarding environmental justice.

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- O6-22** The comment restates language from CEQA Section 15065. Please refer to Global Response GR-1 for a discussion of environmental justice.
- O6-23** The comment states that the Boulder Brush Facilities would be growth inducing, in that it could serve additional industrial-scale wind or solar projects, which could further alter and degrade local landscapes, soundscapes, and biological, visual, and cultural resources, and adversely impact public health and safety, property values, and quality of life. The growth-inducing effects of the Project are analyzed in Chapter 8 of the Draft EIR. CEQA Guidelines Section 15126.2[d] identifies a project as growth inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. As discussed in Chapter 8, the Project would not induce substantial population growth, nor would it directly induce growth related to the provision of additional electric power, since energy demand drives generation procurement, and procurement does not drive an increase in either utility customers or energy consumption. Additionally, implementation of the Project would not permit SDG&E or any other investor-owned utility to expand its service territory; thus, the Project would not be directly or indirectly growth inducing. Refer to Chapter 8 of the Draft EIR for further discussion related to growth inducement.
- O6-24** The comment identifies two properties that were for sale, but the potential buyers pulled out of the sale upon learning of the Torrey Wind and Campo Wind turbine projects. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR. Please refer to Global Response GR-1.
- O6-25** The comment states that adverse economic impacts should be considered as adverse effects on human beings, and that attempting to dismiss the detrimental effects of a project through Statements of Overriding Considerations without any compensation or actual mitigation for impacted neighbors to a project is detrimental to the private landowners and benefits the developers. The commenter then suggests that developers should offer to buy out impacted neighbors within a designated radius of their facilities, and that the circumstances are more complicated for impacted Tribal members. Please refer to Global Response GR-1.
- O6-26** The comment states that no amount of mitigation measures proposed could make the identified significant impacts for the Project acceptable. The comment also includes a definition of “feasible” and states only the No Project Alternative can eliminate all Project-related effects. In response, the Draft EIR identified mitigation measures for the following issue areas that would reduce significant impacts to a less-than-significant level: air quality, biological resources, cultural resources, noise, tribal cultural resources, transportation, and wildfire. These mitigation measures have been

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determined to be feasible and are included within a Mitigation and Monitoring Program prepared for the Final EIR. The comment does not offer information that would call into question the feasibility of the identified mitigation measures; thus, no edits to the Draft EIR or mitigation measures are warranted.

In regard to Alternative 1, CEQA does not require adoption of a No Project Alternative when a project may result in environmental impacts. This statement does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

- O6-27** The comment states that the Boulder Brush Facilities, including the gen-tie, are proposed on private land under County jurisdiction to support the Campo Wind Facilities on Tribal land under federal jurisdiction, and the Torrey Wind Project on private lands. This statement does not raise an issue with the adequacy of the analysis contained in the Draft EIR.

The comment then provides a number of statements regarding a different project, the Tule Wind Project, and also references a complaint filed by an attorney regarding a 37-turbine wind power project in New York. The author of the comment then mentions that documents provided by Wilson Ihrig and dBF Associates Inc. that document noise and acoustic pressure waves at impacted homes in relation to the Tule Wind Project have been submitted to the County and BIA. These statements do not raise an issue with the adequacy of the analysis contained in the Draft EIR.

The comment concludes with a statement that the private property owners would be adversely impacted by the wind turbines that are proposed to be constructed on federal land, outside of County jurisdiction, through County approval of related high-voltage substations, and that the County should approve Alternative 1 or Alternative 2. While the comment states that adverse impacts would be experienced by private landowners, no specific information or mention of adverse impacts that have not been identified or analyzed in the Draft EIR is included in this comment. Please see Global Responses GR-1 and GR-4.

- O6-28** This comment states that environmental justice is an issue area that must be fully analyzed and mitigated. The comment then states SDG&E previously identified Boulevard as an environmental justice disadvantaged community. The comment also includes several definitions of environmental justice, excerpts regarding CEQA, and a discussion of Statements of Overriding Consideration. Please see Global Response GR-1, which discusses environmental justice.

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- O6-29** The comment provides information on three other wind turbine projects that were denied by their respective jurisdictional supervising authority. The information contained within the comment does not address an inadequacy within the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-30** The comment states that there is an attached list with dozens of various County and township decisions/regulations made between 2010 and January 13, 2020, related to wind turbine height, setbacks, noise, and other restrictions gathered by Kirby Mountain Blogspot. This comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-31** The comment provides an excerpt from a news article detailing an announcement by Terra-Gen related to a different project. This comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-32** The comment states that Objectives 1 thru 7 are self-serving and void due to a petition submitted by General Council members. CEQA Guidelines Section 15124(b) requires an EIR to contain a statement of objectives sought by the proposed project, which should include the underlying purpose of the project and may discuss the project benefits. The Project Objectives outlined in the Draft EIR comply with the requirements of CEQA Guidelines Section 15124(b). In regard to the petition, the validity of the Campo Executive Committee resolution approving the Campo Lease is a matter of Tribal law and is unrelated to the adequacy of the environmental analysis in the Draft EIR under CEQA.
- O6-33** The comment restates Project Objective 1. The comment then states there are other alternative energy sources and carbon reduction/sequestration projects that would not overburden disadvantaged communities with environmental justice impacts. While the comment suggests there are other alternative energy sources, no specific details are offered. The Draft EIR considered four alternatives, which can be found in Chapter 4 of the Draft EIR. Refer to Chapter 4 for a discussion of feasible Project alternatives. Please also refer to Response to Comment O6-32 and Global Response GR-1 for a discussion of environmental justice.
- O6-34** The comment restates Project Objective 2 and then states this Project Objective is outdated. In response, the comment does not offer information that would result in this Project Objective being outdated. Please refer to Response to Comment O6-32.

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- O6-35** The comment restates Project Objective 3 and then states there are other options that do not overburden “EJ Communities.” The comment does not offer a suggestion or information that would warrant further discussion or consideration within the analysis contained in the Draft EIR. Please refer to Response to Comment O6-32 regarding Project Objectives and also to Global Response GR-1 for a discussion of environmental justice.
- O6-36** The comment restates Project Objective 4. The comment then states SDG&E Southwest Powerlink crosses the southern section of the Reservation and if the Project connected to it, it would eliminate the need for the Boulder Brush Facilities. In response, the existing SDG&E Southwest Powerlink located along the southwest corner of the Reservation does not currently have sufficient capacity to accommodate the output of the Project; thus, this scenario presented by the commenter was not analyzed as an alternative in the Draft EIR because connecting to the existing SWPL would not be feasible. In addition, locating a switchyard to connect to SWPL would result in greater impacts related to construction activities as the switchyard would be closer to residences. Finally, the Draft EIR analyzes a reasonable range of alternatives.
- O6-37** The comment restates Project Objective 5 and then states the objective is now void based on the more than required number of Camp General Council’s voting members who signed the petition strongly opposing the Project. In response, the validity of the Campo Executive Committee resolution approving the Campo Lease is a matter of Tribal law and is unrelated to the adequacy of the environmental analysis in the Draft EIR under CEQA.
- O6-38** The comment refers to Project Objective 6 and then states the economic feasibility of the Project is questionable and commercial financing may not be available when significant Tribal opposition is publicized. The commenter provides no support for the assertion that the Project may not be economically feasible. The comment does not raise an issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-39** The comment restates Project Objective 7 and then states there are alternative energy sources and carbon reduction/sequestration projects that could support displacement of carbon dioxide without further burdening disadvantaged communities. While the comment suggests there are other alternative energy sources, no specific details are offered. The Draft EIR considered four alternatives, which can be found in Chapter 4 of the Draft EIR. Refer to this chapter for a discussion of feasible Project alternatives. Refer to Global Response GR-1 for a discussion of environmental justice.

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- O6-40** The comment states that the Project Plot Plan depicts future NICAD battery storage components. In response, the Project does not include a battery energy storage system. Batteries in the high-voltage substation control building, identified on Page 26 of the Plot Plan, would be used for two main reasons, to power equipment in the control building itself and to power equipment out in the substation yard. Such battery components are standard equipment for electrical substations.
- O6-41** The comment states that the Project Description mentions that the switchyard facilities, constructed by SDG&E, would be under the jurisdiction of the California Public Utilities Commission, out of County jurisdiction and not included in the Project's Major Use Permit. In response, Chapter 1 of the Draft EIR states that upon completion, the approximately 16-acre parcel and the switchyard would be transferred to SDG&E, who would then own, operate, and maintain the switchyard. The Draft EIR analyzes the whole Project, including facilities that would be owned, operated, and maintained by SDG&E. For purposes of development of the switchyard, the switchyard is included in the County's Major Use Permit; however, after construction the switchyard would be transferred to SDG&E and the County would no longer have jurisdiction over the SDG&E switchyard. The comment does not raise any issues about the adequacy of the environmental analysis in the Draft EIR.
- O6-42** The comment suggests that the future NICAD battery system should be fully disclosed, analyzed, and mitigated in the Draft EIR. Refer to Responses to Comments O6-40 and O6-41.
- O6-43** The comment states that the Torrey Wind Project should have been included as a reasonably foreseeable project along with all of its adverse cumulative impacts. In response, the Torrey Wind Project is a separate project and was analyzed as one of the cumulative projects in the Draft EIR (see Table 1-4 in the Draft EIR). Also please refer to Global Response GR-3.
- O6-44** The comment references an attached page 26 with highlighted NICAD battery-related components. Please refer to Response to Comment O6-40.
- O6-45** The comment refers to the Boulder Brush Facilities Fire Protection Plan and states plans do not actually stop fires. The comment also states project components increase fire risk in a high fire hazard severity zone. In response, the Project would be required to implement a Boulder Brush Facilities Fire Protection Plan (FPP), which is included as Appendix I to the EIR. The Boulder Brush Facilities FPP includes required fire protection measures and features, as identified in Section 7 of the FPP. These include fuel modification zones, an up-to-30-footwide access road to the substation and

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switchyard, 16-foot-wide roads to provide access to gen-tie structures, participation in a Fire Services Agreement with the San Diego County Fire Authority, three 10,000-gallon water tanks, and other required and exceeding measures. Mitigation measure M-WF-1 requires implementation of the Boulder Brush Facilities FPP and the fire protection measures and features contained within it. With implementation of the Boulder Brush Facilities FPP and the fire protection measures, the impacts associated with wildfire risks would be less than significant.

- O6-46** This comment states the Project’s “Future NICAD” battery storage is not included in the Project Description. Please refer to Response to Comment O6-40.
- O6-47** This comment consists of an excerpt taken from the Boulder Brush Facilities FPP, which is included as Appendix I to the Draft EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-48** The comment provides an excerpt from the Boulder Brush Facilities FPP, Appendix I to the Draft EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-49** The comment provides an excerpt from the Boulder Brush Facilities FPP, Appendix I to the Draft EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-50** The comment restates language from the Boulder Brush Facilities FPP, Appendix I to the Draft EIR, and requests that the Fire and Emergency Services Agreement be made available during the Draft EIR public review period. An agency may defer committing to specific mitigation measures and rely on subsequent implementation plans if the measures that will be considered subsequently are described and performance criteria are identified (*Sacramento Old City Ass’n v. City Council* [1991] 229 Cal.App.3d 1011). Mitigation Measure M-WF-1 requires implementation of an FPP for the Boulder Brush Facilities and provides a detailed list of measures that would be implemented. The Fire and Emergency Protection Services Agreement prepared for the Project is included as Appendix Q to the Final EIR. Under the Agreement, the San Diego County Fire Authority agrees to use the funds received under the Agreement to improve local fire and emergency response capabilities.
- O6-51** The comment requests that funding be made available for the life of the Project with specialized equipment and trained personnel to remain stationed at the Boulevard Fire Station and not transferred to other stations that are located out of the area. As described

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in the Draft EIR Chapter 3.1.8, Public Services, with implementation of the FPPs and funding contributions to local fire and emergency response capabilities, the Project is not expected to cause a substantial decline in emergency response times or necessitate the need for new fire protection facilities.

- O6-52** The comment states that no references within the FPP were included regarding battery fires or the resulting toxic emissions, hazmat situation, or impacts to groundwater resources. In response, the Project does not include a battery energy storage system. Because on-site battery storage of generated electricity is not proposed, the FPP does not address specific firefighting measures, equipment, and training for this type of activity. For a detailed response on wildfire impacts and groundwater-related impacts, please refer to Global Response GR-7 and Global Response GR-6, Groundwater.
- O6-53** The comment states that Appendix A to the Boulder Brush Facilities FPP omits a reference to batteries as part of the Project components. In response, the Project does not include a battery energy storage system. Batteries in the substation control building would be used for two main reasons, to power equipment in the control building itself and to power equipment out in the substation yard. Such battery components are standard equipment for electrical substations and are accounted for as such in the FPP.
- O6-54** The comment states that the Project Facility Availability Forms from both the Jacumba Community Services District and Padre Dam Municipal Water District are made out to two different GM Gabrych family entity names, not under Boulder Brush LLC or another Project entity. In response, the names used for these Project Facility Availability Forms are reflective of the owners of the property. In addition, the Project does not require a Project Facility Availability Form for use of the Reservation water resources, as the County does not have authority over water resources within Tribal lands. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-55** The comment states that Appendix A (specifically referencing Common Fire Ignition Sources and Fire Prevention Measures) to Appendix A (Construction Fire Prevention Plan) of the Boulder Brush Facilities FPP (Appendix I to the Draft EIR) fails to include batteries and the special Class-D fire-fighting measures, equipment, and ongoing training for rotating firefighters. In response, the Project does not include a battery energy storage system. Because on-site battery storage of generated electricity is not proposed, the Construction Fire Prevention Plan does not address specific firefighting measures, equipment, and training for this type of activity.

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- O6-56** This comment contains excerpts taken from a website discussing NICAD battery safety and associated hazards. The excerpts contained in this comment do not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- O6-57** The comment summarizes the Spill Containment Systems High Density Polyethylene Pans and Neutralizing Pillows, as described in a media report. As described in Chapter 2.5, Hazards and Hazardous Materials, of the Draft EIR, all storage, handling, transport, emission, and disposal of hazardous substances associated with the Boulder Brush Facilities would be in full compliance with applicable regulations. The information provided does not raise a specific issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-58** The comment states that wind turbine facilities are negligently allowed to operate during dangerous red flag high wind Public Safety Power Shut-Off events. The comment also states that the County needs to ensure the protection of its citizens by mandating that these fire-ignition sources be shut off during Public Safety Power Shut-Off events.

As discussed in Chapter 2.9 of the Draft EIR, the Project could increase the potential for a wildfire and could impact the public and environment through exposure to wildfire due to installation of a wind energy generation facility and associated infrastructure. However, the Project would also include fuel modification zones and would include 24-hour surveillance by a combination of on-site workers and existing webcams proposed around the high-voltage substation and switchyard, anticipated to aid in earlier observation and reporting of wildfires. In addition, as noted in the Project Description, wind turbines are designed to operate in wind speeds up to approximately 56 miles per hour, referred to as the cut-out speed. At wind speeds faster than 56 miles per hour, blades rotate parallel to the wind and the wind turbine stops producing electricity. This braking system is linked to the wind turbine control system used to prevent over-speeding of the rotor. Turbines can withstand sustained wind speeds of more than approximately 100 miles per hour. However, in the case of a red flag warning, the Project would not automatically shut down. Also, the County does not have jurisdiction over the wind turbines, which would be located on the Reservation. Please refer to Global Response GR-7 for a detailed response to wildfire-related impacts, and Response to Comment O9-7.

- O6-59** The comment provides details of a fire that broke out on a wind farm in Germany on January 18, 2020. The information provided does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-60** The comment provides details of 10 instances where wind turbines caught fire, and provides excerpts of news articles covering the instances, as well as photographs and details of the locations of the fires and estimated acreage burned. For a detailed response to wildfire impacts specific to the Project, please refer to Global Response GR-7, Fire Protection Services and Wildfire Impacts. The information provided in this comment does not raise a specific issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-61** The comment provides excerpts and photos from a 2014 report titled Overview of Problems and Solutions in Fire Protection Engineering of Wind Turbines. The excerpts do not directly raise an issue with the adequacy of the analysis contained within the Draft EIR. However, in response to this comment, the potential for a burning turbine to cause a wildfire depends on a variety of factors, including the origin of the fire and its severity, whether there is a suppression system inside the turbine, how strong winds are, and how wide fuel modification zones are around the turbines. For a detailed response to wildfire impacts specific to the Project, please refer to Global Response GR-7, Fire Protection Services and Wildfire Impacts.
- O6-62** The comment states that the Shadow Flicker Analysis (Appendix O to the Draft EIR) prepared for the Project states that there are no federal, state, or local regulations applicable to shadow flicker. The comment also states that decision makers keep approving turbine projects too close to homes and families while they continue to deny that impacts from shadow flicker are real, specifically to people, pets, livestock, and wildlife. In addition, the comment summarizes information regarding the design of the turbines as noted in the Draft EIS prepared for the Project, and notes that the height of the turbines at the highest point could reach approximately 586 feet. The comment also includes a reference to Appendix O of the Draft EIR, stating that Figure C2 in this document shows many homes within the shadow flicker area of more than 100 to 200 hours per year. Refer also to Response to Comment O6-13.

These comments express concern with the adequacy of the analysis contained within the Draft EIR related to shadow flicker. As noted in both Chapter 2.1 Aesthetics, and Section 2.5.3.5, Public Health Concerns, there are no local, state or federal regulations applicable to shadow flicker. Nonetheless, a Shadow Flicker Analysis was prepared for the Project to address concerns raised in response to the NOP for the Project. As discussed in Chapter 2.1, the Project would implement Project Design Features PDF-AE-1 and PDF-AE-2 in order to ensure exposure to shadow flicker can be minimized. In addition, as discussed in Section 2.5.3.5 of the Draft EIR, although some receptors may experience shadow flicker, it is not anticipated that shadow flicker would result in

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- adverse health effects due to the projected slow rate of rotation of the Project's turbine blades. Please also refer to Global Response GR-2 Public Health.
- O6-63** The comment calls into question the turbine modeling used to complete the Shadow Flicker Analysis, which is included as Appendix O to the Draft EIR. The comment states that analysis uses a turbine model that would reach a height of 360.89 feet (GE 3.83-137 110 m HH). However, as shown in Table 4.1 of the Shadow Flicker Analysis, a turbine model/type GE 3.83-137, with a noted total turbine height of 586 feet, was used to conduct the Shadow Flicker Analysis, which is consistent with the proposed turbines to be installed as part of the Project. Thus, no edits to the Shadow Flicker Analysis are warranted, since the turbine model type and height used to complete the analysis are representative of the proposed turbines. Refer also to Response to Comment O6-13.
- O6-64** The comment provides links to six video clips demonstrating wind turbine noise, shadow flicker, and red lights flashing at night from various other facilities. For detailed response to noise impacts, shadow flicker, and visual impacts specific to the Project, please refer to Global Responses GR-4 Noise, GR-2 Public Health, and GR-8 Visual Impacts. This comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-65** The comment consists of excerpts quoted directly from the Shadow Flicker Analysis, including the Notice to Third Parties provided at the beginning of the document, as well as an excerpt from Section 5, Results, of the analysis, discussing the results of the Scenario 3 analysis. The inclusion of these excerpts does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- Additionally, the comment includes a statement that "757 Off-Reservation receptors are only identified by numbers." This comment is assumed to reference the 757 Off-Reservation receptors identified in Appendix B to the Shadow Flicker Analysis (see Table B.1). The comment, however, does not offer any further information that would warrant revisions to this table.
- O6-66** The comment discusses electromagnetic radiation, starting with the statement that electrical interference is a common complaint related to wind turbines and that it is known that they discharge electricity into the ground to protect their own electronics. The information provided within these statements does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

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The comment also states that the San Diego Astronomy Association’s Tierra Del Sol Observatory is located just beyond the alleged shadow flicker area for the Project. As stated, the Observatory is not within the shadow flicker area for the Project, and no impacts would result.

The comment then provides references to expert opinion/reports that have been previously provided to the County by Samuel Milham, MC, MPH, and Environmental Assay Inc. The author of the comment letter states that both reports “found evidence of unusual and dangerous levels of electrical pollution at the homes tested that was attributed to the operation of industrial wind turbines.” This statement does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR. For a discussion of studies related to electromagnetic fields, please refer to Global Response GR-2 and Chapter 2.5, Section 2.5.3.5, within the Draft EIR.

This comment also states that a local Tribe member, who spoke at a January 23rd Draft EIR meeting, expressed concerns over adverse health and safety issues related to the existing wind turbines in the local area, including cancer. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. Please refer to Global Response GR-2 and Chapter 2.5, Section 2.5.3.5, within the Draft EIR.

The comment concludes with an excerpt taken from an article written by Tommie Clark in Winterset, Iowa, regarding an Iowa cardiologist who has spoken out regarding wind turbines, stating that there are health effects associated with living near wind turbines. Please refer to Global Response GR-2 and Chapter 2.5, Section 2.5.3.5, within the Draft EIR.

- O6-67** The comment consists of an entire article published on the U.S. Department of Energy website, entitled Addressing Wind Energy Innovation Challenges. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required. Please refer to Global Response GR-2 and Chapter 2.5, Section 2.5.3.5, within the Draft EIR.
- O6-68** The comment asks why massive wind turbines are being allowed without doing actual studies instead of less-than-accurate literature reviews and asks whether that is unethical. The comment also asks where the legitimate research is with actual on-site field studies conducted on human health effects of wind turbines. These questions do not raise a specific issue regarding the analysis contained within the Draft EIR. Please refer to Global Response GR-2 and Chapter 2.5, Section 2.5.3.5, within the Draft EIR.

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- O6-69** The comment states there is bias and misrepresentation in the Department of Energy–funded studies on wind turbine 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.
- O6-70** The comment details information regarding the California Energy Commission (CEC) Public Health Research document, drafted in 2017, discussing a public health research roadmap on emerging electricity systems, specifically mentioning research needs that should be conducted. The author states that this study was cited in a formal presentation by Dr. Wooten and staff during the Planning Commission meetings on the County Public Health 2019 Position Statement: Human Health Effects of Wind Turbines, but that critical information was excluded and not referenced in the formal presentation and in responses to the Commission by either Dr. Wooten or staff. The comment further states that a follow-up Public Records Acts Request was conducted to determine whether the CEC had conducted any follow-up research recommended by their own researchers and that none had been conducted. The comment includes a copy of the formal response given by the CEC given as a result of the Public Records Act Request. This comment does not address the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-71** The comment consists of a concluding remark summarizing the information contained in comment O6-70, stating that “The CEC’s organizational objectives do not currently include funding the recommended research into the real world impacts of the industrial wind turbines they are promoting and supporting regardless of the significant adverse impacts they inflict on impacted residents, communities, public health and safety, quality of life, life-time investments in properties, environmental resources, community character, and much more. And yet, wind turbines keep getting bigger and bigger and approved closer and closer to homes and families.” This comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-72** The comment restates language from CEQA Section 15277 and asks whether the section applies to noise emissions that impact Off-Reservation subjects. In response, as stated in Section 15277, “Any emissions or discharges that would have a significant effect on the environment in the State of California are subject to CEQA where a California public agency has authority over the emissions or discharges.” The County would not have jurisdiction over the noise emissions generated from wind turbines located on the Reservation lands. However, a noise analysis was conducted for the entire Project, including the wind turbines. The Project’s noise impacts are analyzed in the Acoustical Analysis Report (Appendix G) and Chapter 2.6 of the Draft EIR. Please also refer to Global Response GR-4.

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- O6-73** The comment provides information from a news article from September 13, 2019, regarding wind turbine failure. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-74** The comment expresses concern regarding blade disposal. The comment asks where the currently unrecyclable blades would be disposed. The comment also refers to blade disposal in a landfill in Casper, Wyoming. In response, as discussed in Chapter 1, Section 1.2.2.3, Decommissioning, the Developer would be responsible for decommissioning of the Campo Wind Facilities, which includes the Project wind turbines. Prior to decommissioning, a decommissioning plan will be prepared consistent with the requirements of the Campo Lease. The decommissioning plan would be implemented after the Campo Lease term. The anticipated sequence for removal of components is outlined in Section 1.2.2.3 in Chapter 1 of the Draft EIR. Section 1.2.2.3 of the Draft EIR also explains that turbines would be refurbished and sold or recycled as scrap material. All material that could not be salvaged would be appropriately disposed of at an authorized site in accordance with applicable laws and regulations. A detailed analysis of solid waste generated by the Project is provided in Chapter 3.1.9, Utilities and Service Systems, of the Draft EIR.
- The news clip from Casper, Wyoming, that the commenter refers to is not applicable to the Project and does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR. Therefore, no further response is required.
- O6-75** The comment states that Appendix B to Appendix F-2, Phase I Environmental Site Assessment, of the Draft EIR refers to the Torrey Wind Project, rather than the Project. In response, this appendix provides historical topographic maps of the area analyzed under the Phase I Environmental Site Assessment. The Boulder Brush Boundary includes common parcels with the Torrey Wind project site; thus, the Phase I Environmental Site Assessment maps are applicable. No edits to the titles of the graphics included in Appendix B to Appendix F-2 of the Draft EIR are required.
- O6-76** The comment states that the Rugged Solar Project, identified as a cumulative project in Table 1-4 of the Draft EIR, was incorrectly identified as “UC” or “Under Construction.” The County acknowledges this correction. The status of the Rugged Solar Project in Chapter 1, Table 1-4 within the Final EIR has been revised to clarify that the original application for the Rugged Solar Project was approved (A), but a revised application is under review (UR).

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- O6-77** The comment states that under “Preparer” on the cover sheet for Appendix B to the Draft EIR, the employer (i.e., Dudek) of the primary author is omitted. The cover sheet of the final version of this report to be included in the Final EIR will be updated to include both report preparer and the employer.
- O6-78** The comment states that Figure 28, Cumulative Projects, of the Visual Resources Report (Appendix B to the Draft EIR), fails to show the 60 proposed Campo Wind turbine locations. Only the Boulder Brush Boundary and Reservation Boundary are depicted on Figure 28 (i.e., Project details are not included on the figure). The intent of this figure is to depict the location of cumulative projects in the Project Area that, in addition to the Project, were considered in the cumulative impacts analysis for visual resources. Because the majority of the Visual Resources Report and related figures are focused on the Project (e.g., Figure 2, Project Layout, identifies the locations of wind turbines proposed on the Reservation), the individual components and location of the Project have been established and are not re-depicted on Figure 28. All components of the Project are considered in Section 5.4.3, Cumulative Impact Analysis, of the Visual Resources Report (Appendix B to the Draft EIR). Because the components of the Project have been previously established and assessed in the Visual Resources Report, no revisions to Figure 28 of the Visual Resources Report have been made in the Final EIR in response to this comment.
- O6-79** The comment requests clarification concerning where in the Visual Resources Report (Appendix B to the Draft EIR) the height of proposed wind turbines used in the visual simulations is disclosed. The methodology used is included in Section 5.1, Methodology, of the Visual Resources Report. While the height of the proposed wind turbines (i.e., 586 feet from tower base to fully extended blade tip) is disclosed in the methodology discussion for the Project viewshed (see Section 5.1.2, Project Viewshed, of the Visual Resources Report), proposed wind turbine height assumptions for the visual simulations are not expressly disclosed in Section 5.1.4, Visual Simulations. In response to this comment, Section 5.1.4, Visual Simulations, of the Visual Resources Report has been revised to disclose the height of proposed wind turbine assumptions (586 feet from base to blade tip) used in the development of Project visual simulations.
- O6-80** The comment provides concluding remarks. The comment does not raise any issues concerning the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-81** This comment introduces a review conducted by dBF Associates Inc. of the Draft EIR Chapter 2.6, the Acoustical Analysis Report (Appendix G to the Draft EIR), and the Addendum to Appendix G.

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- 06-82** The comment states that the Acoustical Analysis Report for the Draft EIS identified a turbine capacity of up to 4.2 MW, but a capacity is not identified in the Acoustical Analysis Report for the Draft EIR. The comment also states the Draft EIR used the GE 2.X-127 model with capacity between 2.0 and 2.9 MW. In response, although a specific model turbine has not yet been selected for the Project, the Draft EIR used the GE 2.X-127 model in assessing noise. Using the GE 2.X-127 wind turbine data for modeling operational sound emissions from the proposed Project wind turbine generator is conservative because the sound curve for this model is representative of the high end for sound curves compared to other Project wind turbine generators under consideration. This is due to its overall A-weighted sound power of 110 dBA (without a 2 dB upward adjustment) for an individual wind turbine operating at hub height wind speed of 10 meters per second (mps) (or higher, up to cut-off). This is greater than that of other commercially available models under consideration. For instance, at 10 mps hub-height wind speed, the GE 2.X-127 is rated at 110 dBA while other wind turbine generators under consideration are rated between 106.9 dBA and 103.9 dBA. That is a 3–6 dBA difference, which could offset a 3 dBA error margin in predicted levels. Wind turbine sound data is manufacturer proprietary information and subject to permission for release to the public. The analysis included in the Draft EIR provides a conservative and adequate analysis of noise generated by proposed wind turbines. No edits to the Draft EIR are required. Please also refer to Global Response GR-4, Noise.
- 06-83** The comment is an extension of Comment O6-82. Please refer to Response to Comment O6-82. Please also refer to Global Response GR-4. In regard to the Project Draft EIS, please refer to Responses to Comments NROX-1 and 1-95 in Appendix T to the Final EIS.
- 06-84** The commenter states that GE source documentation for data on the model used should be included in the Draft EIR Acoustical Analysis Report. In response, the wind turbine sound data is manufacturer proprietary information and subject to permission for release to the public. The applicant provided the County with some noise data from the manufacturer to allow the noise assessment to take place. CEQA doesn't require such proprietary data to be made public. Please refer Response to Comment O6-82 and Global Response GR-4. In regard to the Project Draft EIS, please refer also to Response to Comment 1-95 in Appendix T to the Final EIS.
- 06-85** The comment includes an excerpt from the County Zoning Ordinance Section 6952(f)(3) regarding pure tone. The comment also states that the equipment manufacturer for the Project should provide one-third octave band sound data. In response, available wind turbine sound data, at octave band or one-third octave band resolution, is dependent on the wind turbine manufacturer and considered proprietary information and subject to permission for release to the public. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR.

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- 06-86** This comment states the Acoustical Analysis Report (Appendix G to the Draft EIR) should evaluate pure tone noise, as required by the County’s 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 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 County Noise Ordinance. The Acoustical Analysis Report was prepared in accordance with County standards and CEQA; therefore, no further analysis is required. However, Global Response GR-4 provides information that demonstrates pure tone noise–related impacts attributed to wind turbine operation are not expected to occur. No edits to the Draft EIR are required as a result of this comment.
- 06-87** The comment is an extension of Comment O6-86 indicating that pure tone noise should have been evaluated in the Draft EIR. The Acoustical Analysis Report (Appendix G to the Draft EIR) does acknowledge pure tone noise and Section 6952(f)(3) as part of the relevant County wind turbine noise regulations (Ordinance 10262). Also refer to Response to Comment O6-86 for more details regarding pure tone noise effects.
- 06-88** The comment states that Soft dB Piccolo ANSI Type 2 sound meters are not capable of accurately measuring sound levels below 37 dB. In response, the 2018 baseline field survey utilized both Piccolo I and Piccolo II models, the latter of which is, according to manufacturer information, capable of measuring as low as 30 dB.
- 06-89** The comment states that at several locations at the Project Site the updated ambient measurements were reported at higher noise levels than those reported from the 2018 Dudek field survey. In response, Table I-3 of the Acoustical Analysis Report Addendum to Appendix G of the Draft EIR indeed reports higher day/night average sound level (Ldn) and community noise equivalent level (CNEL) values at the commenter’s noted locations. However, Table I-3 also discloses that the 2019 Residual Background Sound Criterion (RBSC) values, which are based on measured A-weighted L₉₀, at LT-3, LT-6, LT-8 and LT-10 are lower than those reported from the Dudek 2018 field survey.
- 06-90** The comment states that the Acoustical Analysis Report (Appendix G to the Draft EIR) incorrectly bases impact findings on the higher ambient noise levels. In response, the Acoustical Analysis Report Addendum provided in Appendix G of the Draft EIR explains that the 2019 Dudek baseline data collection updates the ambient sound levels at previously surveyed locations using even more sensitive equipment than was used

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- in the 2018 baseline sound level data collection survey. At some locations, some of the Dudek 2019 metrics are higher than the Dudek 2018 results, and at other locations they are lower. And as noted in Response to Comment O6-89, at some locations calculated Ldn and CNEL may be higher, but the RBSC is lower. The 2019 Dudek data collected with ANSI Type I instruments and their associated metrics, whether higher or lower than the previously collected 2018 Dudek data, is considered representative of ambient environmental conditions and provides a reasonable basis for the noise impact assessment. Please also refer to Global Response GR-4.
- O6-91** The comment states that Dudek’s 2019 survey found that noise levels at LT-9 and LT-11 were 13 dBA higher than 2018. The comment also states these both of these deployments experienced technical difficulties and therefore these data should be discarded, and the measurements repeated. In response, data collected during the exhibited periods, although shorter in total duration than the other surveyed locations, were still considered accurate and measured environmental conditions that were louder than conditions measured in 2018 by Dudek. The 2019 Dudek data collected with ANSI Type I instruments and their associated metrics, whether higher or lower than the previously collected 2018 Dudek data, were considered representative of ambient environmental conditions and used to support the noise impact assessment.
- O6-92** The comment states site photographs of the measurement locations were not included in the Acoustical Analysis Report (Appendix G to the Draft EIR). In response, photographs of the noise level measurement locations are not required to be included in the acoustical noise analysis completed for the Project.
- O6-93** The comment states that microphone positions were not representative of ambient noise levels near noise-sensitive land uses (NSLUs). The selection of locations for the placement of the microphones to measure ambient noise followed standard practices. Please refer also to Response to Comment O6-103 and Global Response GR-4.
- O6-94** The comment states that at LT-1 the meter was placed approximately 50 feet from BIA Route 10, one of two primary roadways on the Reservation. The comment further states homes in this area are generally over 500 feet from roadways. Please refer to Response to Comment O6-103.
- O6-95** This comment describes the microphone placement of LT-2 and notes it is 130 feet from a rail line. The mentioned rail line is understood to be part of the San Diego & Arizona Eastern Railway, which does not currently support operations in the vicinity of the Project. Please refer to Responses to Comment O6-103.

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- O6-96** This comment states that at LT-3 the meter was placed less than 10 feet from BIA Route 15. The comment further states homes in this area are over 200 feet from roadways, and often over 500 feet away. Please refer to Response to Comment O6-103.
- O6-97** This comment states that at LT-6 the meter was placed less than 15 feet from Miller Valley Road. The comment then states homes in this area are generally 250 feet away from roadways. Please refer to Response to Comment O6-103.
- O6-98** This comment states that at LT-7 the meter was placed 55 feet from the centerline of Old Highway 80. The comment then states that while several NSLUs are at a similar distance, many more are much further. Refer to Response to Comment O6-103.
- O6-99** This comment states that at LT-8 the meter was placed 15 feet from Tusil Road. The comment then states homes in this area are generally 100 feet from roadways. Please refer to Response to Comment O6-103.
- O6-100** This comment states that at LT-11 the meter was placed 55 feet from BIA Route 10. The comment further states homes in this area are over 200 feet from roadways, and often over 500 feet away. Please refer to Response to Comment O6-103.
- O6-101** This comment states that at LT-12 the meter was placed 25 feet from Manzanita Road. The comment then states homes in this area are generally 500 feet from roadways. Please refer to Response to Comment O6-103.
- O6-102** This comment states that at LT-13 the meter was placed less than 5 feet from Tierra del Sol Road. The comment then states homes in this area are generally 100 feet away from roadways. Please refer to Response to Comment O6-103.
- O6-103** The comment states these microphone placements overstate the ambient noise environment and consequently underreport project noise impacts. The comment further states the Acoustical Analysis Report (Appendix G to the Draft EIR) should repeat these measurements at locations acoustically equivalent to NSLUs and sufficiently removed from known transportation sources. In response, roads that may abut or are nearby to property lines of residences are intermittent sources of outdoor noise and thus part of the ambient sound environment to be quantified.

Regardless of proximity to roadways, the measurement locations accurately monitor relatively continuous ambient sound that is evaluated with the L_{90} statistical value and thus represents the aggregate or composite din of many nearby and distant natural and human-caused acoustical contributors. These human-made sounds include, in combination and even in rural areas, children playing outdoors; recreational activities;

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usage of audio equipment (radios, televisions); operation of heating, ventilation, and air conditioning and other electro-mechanical systems (e.g., air-conditioners, evaporative coolers, compressors, pumps, generators, machine tools, landscaping equipment) at homes and businesses; and concurrent traffic on local roads, trails, and highways. The resulting collected A-weighted L_{90} , which is the basis for the County's Residual Background Sound Criterion (RBSC) value derivation and its comparison with predicted aggregate C-weighted wind turbine noise as presented in the Acoustical Analysis Report, are therefore considered representative of the outdoor ambient sound environment and constitute part of the reasonable basis on which to conclude the County's noise analysis.

Further, if outdoor ambient noise level monitoring locations are located too close to occupied noise-sensitive land uses (NSLUs), they may be unduly affected (i.e., measure elevated sound levels and thus higher calculated metrics) by frequent intermittent (e.g., sudden door closures or elevated speech) or even relatively continuous sources of human-caused noise, such as the aforementioned heating, ventilation, and air conditioning and other electro-mechanical systems, as well interior-to-exterior sounds of operating televisions and other audio equipment. While some of these sound sources common to an NSLU may be less frequent or evident outdoors during nighttime hours, the background sound (i.e., associated with the combination of distant natural and human-made acoustical contributions), which is less sensitive to such localized sound environment changes would remain and could be measured just as accurately at a property line or comparable survey position, such as several of those performed for the baseline field surveys to support the impact assessment as described in the Draft EIR. Please also refer to Global Response GR-4.

- O6-104** The comment includes an excerpt from the Acoustical Analysis Report (Appendix G to the Draft EIR). The comment also states that underprediction of Project noise levels by 3 dB, while barely perceptible, is meaningful, and that impacts would occur during several more conditions than reported in the Acoustical Analysis Report. The comment further states the Acoustical Analysis Report should use multiple CadnaA models rather than spreadsheets or include the spreadsheets as an appendix to the Acoustical Analysis Report. In response, the noise analysis is ground-truthed based on the application of two reliable modeling techniques that result in similar conclusions. Both methods utilize algorithms and reference data from International Organization for Standardization 9613-2 (Acoustics – Attenuation of Sound During Propagation Outdoors – Part 2: General Method of Calculation) and produced similar prediction results.

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As explained in “Difference Notes” at the bottom of sheet 7 of 7 in Appendix B of the Acoustical Analysis Report (Appendix G to the Draft EIR), the correlations between the predicted levels with the CadnaA and Excel-based models range from 0 to 2 dBA at all but 2 of the 13 studied locations, meaning that the differences are actually less than +/-3 dB. Note that 3 dB is a barely detectable difference by the average healthy human ear. At the other two positions, LT-6 and LT-7, deviation in predicted results was due to different a different receptor location (for LT-6) and a suspected difference in location topography (LT-7). Among the 11 positions where there was agreement of 2 dB or less, the statistics are as follows: three demonstrated complete agreement (0 dB difference), five differed by 1 dBA, and three differed by 2 dBA. Any of these differences could be offset by either the 2 dB margin applied to the manufacturer’s reference sound power data, as noted on sheet 1 of 7 in the same Appendix B of the Acoustical Analysis Report, or the conservative usage of GE 2.X-127 reference sound power data in the modeling. Please also refer to Response to Comment O6-82 and Global Response GR-4.

O6-105 The comment states that the Acoustical Analysis Report (Appendix G to the Draft EIR) does not discuss wind turbine noise frequency over the range of wind speeds. In response, the Acoustical Analysis Report used A-weighted overall sound levels that vary with received wind speed at hub height. This is an adequate method for assessing predicted noise impacts and meets the County’s requirements. Additionally, it is not necessary to use noise frequency spectrums for each wind speed condition. This is not necessary because the overall A-weighted level is adequate for showing wind turbine noise as wind speed changes. The overall sound level includes acoustical contribution from all composite frequencies as reported by the wind turbine manufacturer, and thus for purposes of impact assessment can be compared directly with the County’s standards, which are also overall sound levels. While the County does consider one-third octave band center frequency sound levels for the purposes of defining conditions where pure tone may exist, per County Ordinance 10262 Section 6952(f)(3), such conditions are not expected to occur at different hub-height wind speeds for the studied wind turbines. Please also refer to Global Response GR-4, Noise.

O6-106 The comment states that the noise analysis does not report the amounts or percentages of time that exceedances (of the County’s noise limits) would occur. The comment further states the Acoustical Analysis Report (Appendix G to the Draft EIR) should include, in unambiguous terms, how often impacts would occur. In response, Figures 3 to 7 in the Acoustical Analysis Report show the predicted aggregate wind turbine operation noise contours associated with each modeled average hub-height wind speed and the annual percentage of days when that wind speed occurs. As stated in the

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Acoustical Analysis Report, these figures refer to Tables 10, 12, 13, and 14, which also contain information about average hub-height wind speeds that are predicted to result in exceedances of the County's noise standards. By way of example, if a predicted noise level at 8 meters per second (mps) wind speed was predicted to exceed regulatory limits, the associated figure would indicate how many days per year that such an exceedance might occur. The reader could also refer to Table 9, which presents the same detail of wind speed occurrence. Please refer to Figure GR-4-F in Global Response GR-4, which includes a graphical presentation of expected noise limit exceedances for three representative receptor positions (LT-1, LT-10, and LT-13) over a typical year's time.

At receptor locations LT-1 and LT-10, it is estimated that the County's nighttime hourly threshold (45 dBA sound equivalent level) would be exceeded during 14 days (out of 365 for a single year) when average hub-height wind speeds are 10 mps or more (up to approximately 15 mps, a typical wind turbine operations cap), 15 days per year when average wind speeds are 9–10 mps, and 12 days per year when average wind speeds are 8–9 mps. At LT-1, estimated exceedances of the nighttime limit would also occur on 25 days per year when average wind speeds are 7–8 mps. Therefore, in a worst-case scenario, night-time exceedances would occur a total of 66 days per year at LT-1 and 41 days per year at LT-10.

Also at LT-1 and LT-10, it is estimated that the daytime hourly threshold (50 dBA sound equivalent level) would be exceeded during 14 days per year when average wind speeds are 10–15 mps. And at LT-1, an additional 15 days per year of daytime exceedance would occur when average wind speeds are 9-10 mps.

- O6-107** The comment states that the location of On-Reservation residences should be disclosed. Tribal information regarding individual residences is confidential to the Tribe and not available for public release.
- O6-108** The comment states that some of the measurement positions are not appropriate, specifically LT-3, LT-4, and LT-6. The comment states there are homes closer to the wind turbines than these positions. In response, the measurement positions were selected because they are representative of the areas in which the turbines are proposed to be installed and because they are near multiple residences. Please also refer to Response to Comment O6-103.
- O6-109** The comment states that there are dozens of homes markedly closer to proposed wind turbines than measurement position LT-7. The comment also refers to homes in the Live Oaks Springs area that would be closer. In response, the measurement positions

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were selected because they are representative of the areas in which the turbines are proposed to be installed and because they are near multiple residences. Please also refer to Response to Comment O6-103.

- O6-110** The comment states that there are least two homes closer to proposed wind turbine locations than measurement position LT-8 and nine homes closer to proposed turbine locations than LT-11. The measurement positions were selected because they are representative of the areas in which the turbines are proposed to be installed and because they are near multiple residences. Please also refer to Response to Comment O6-103.
- O6-111** The comment states that the analysis should evaluate the noise levels at the closest potential NSLUs. The measurement positions were selected because they are representative of the areas in which the turbines are proposed to be installed and because they are near multiple residences. Please also refer to Response to Comment O6-103.
- O6-112** The comment states that the analysis under-predicts noise levels and impacts. Please see Response to Comment O6-104 and Global Response GR-4.
- O6-113** The comment consists of an editorial letter written on October 17, 2011, regarding Herkimer County wind turbine noise. This comment does not specifically raise an issue related to the analysis contained within the Draft EIR. Please refer to Global Response GR-4.
- O6-114** This comment is a continuation of Comment O6-113 regarding the editorial letter dated October 17, 2011. This comment does not specifically raise an issue related to the analysis contained within the Draft EIR. Please refer to Global Response GR-4.
- O6-115** The comment raises issues regarding the Campo Wind Project with Boulder Brush Facilities Draft Environmental Impact Statement (EIS), which was prepared for the Project by the Bureau of Indian Affairs (BIA) under the National Environmental Policy Act (NEPA). Specifically, the comment addresses a letter drafted by Stephan C. Volker regarding the Draft EIS. However, since it discusses issues with the Draft EIS, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR prepared by the County under the California Environmental Quality Act (CEQA). No further response is required.
- O6-116** The comment raises issues regarding the Draft EIS prepared by the BIA for the Project. Specifically, the comments address Scott Snyder's (from Snyder Geologic Inc.) third party opinion on groundwater impacts. However, since it discusses issues with the

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- Draft EIS, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR prepared by the County. Please refer to Responses to Comments J-103 through J-129 in Appendix T to the Final EIS.
- O6-117** The comment raises issues regarding the Draft EIS prepared by the BIA for the Project. The comments specifically address Dr. Carman's (from Wilson Ihrig) third-party opinion on the Draft EIS 2019 noise analysis. The noise related issues raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments 1-64 through 1-91 included in Appendix T to the Final EIS. As the comment does not raise concerns regarding the adequacy of the analysis in the Draft EIR prepared by the County, no further response is required.
- O6-118** The comment states that impacts of increased ambient noise considering Federal Transit Administration guidelines were not addressed in the Draft EIS prepared by the BIA for the Project. The noise-related issues raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments I-15, J-48, J-53, and J-54 in Appendix T to the Final EIS.
- O6-119** The comment states that Draft EIS prepared by the BIA for the Project fails to address the impacts to sleep from wind turbine noise that contains substantial low frequency components. The noise-related issues raised in this comment are specific to the Draft EIS. Please refer to Response to Comment LF-1 in Appendix T to the Final EIS.
- O6-120** The comment states that existing noise was not accurately characterized in the Draft EIS prepared by the BIA for the Project as a result of noise measuring instruments and the inadequacy of measuring for only one 24-hour period. The noise-related issues raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments J-66, 9-3, and 9-5 in Appendix T to the Final EIS.
- O6-121** The comment states that the Draft EIS prepared by the BIA for the Project fails to accurately predict noise by using a computer program that has not been validated for wind turbines. The noise modelling issues raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments I-16 and J-61 in Appendix T to the Final EIS.
- O6-122** The comment states that noise data was inaccurate in the Draft EIS prepared by the BIA for the Project. The noise-related issues raised in this comment are specific to the Draft EIS. Please refer to Response to Comment J-66 in Appendix T to the Final EIS.
- O6-123** The comment states that low frequency noise predictions are inaccurate in the Draft EIS prepared for the Project by the BIA. The noise issues raised in this comment are specific to the Draft EIS. Please refer to Response to Comment LF-1 in Appendix T to the Final EIS.

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- O6-124** The comment states that amplitude modulation and its potential for sleep disturbance are not accurately addressed in the Draft EIS prepared by the BIA for the Project. The noise and sleep disturbance issues raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments I-64 through I-91 and J-68 in Appendix T to the Final EIS.
- O6-125** The comment states that infrasound and its potential physiology impacts were not adequately addressed in the Draft EIS prepared by the BIA for the Project. The noise and physiologic impacts raised in this comment are specific to the Draft EIS. Please refer to Responses to Comments NPROX-1 and LF-1 in Appendix T to the Final EIS.
- O6-126** The comment states that noise equipment used to evaluate noise impacts in the Draft EIS prepared by the BIA for the Project was improper. The noise measuring equipment issue raised in this comment is specific to the Draft EIS. Please refer to Response to Comment I-16 in Appendix T to the Final EIS.
- O6-127** This comment summarizes dBF Associates Inc.'s (July 2019) review of the noise analysis in the Draft EIS prepared by the BIA for the Project. The noise issue raised in this comment is specific to the Draft EIS. Please refer to Responses to Comments NPROX-1 and LF-1 in Appendix T to the Final EIS.