

### **O7 Boulevard Planning Group**

- O7-1** This is an introductory comment requesting the attached comments on the Campo Wind Project with Boulder Brush Facilities (Project) Draft Environmental Impact Statement (EIS) prepared by the Bureau of Indian Affairs (BIA) be included as part of the formal record for the Draft Environmental Impact Report (EIR) for the Project. The commenter explains the Draft EIS comments were also previously submitted to the BIA and the County of San Diego (County). In response, the Draft EIS comments have been included as a comment letter to the Draft EIR prepared for the Project. This comment does not raise any specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O7-2** The comment states that the Draft EIS comments previously submitted to the County on July 8, 2019, were not considered in preparation of the Draft EIR, nor included as part of Appendix A (Notice of Preparation, Initial Study, and Comment Letters) of the Draft EIR. The Notice of Preparation review period began on February 12, 2019 and ran for 30 days. Thus, the July 8, 2019, Draft EIS comments were submitted substantially later and are therefore not included in Appendix A of the Draft EIR.
- O7-3** The comment requests confirmation of receipt of the Draft EIS comments, and that they will be included in the Draft EIR record. As requested, the County previously confirmed receipt and the comment is included as Comment Letter O7 in the Public Response to Comments for the Final EIR.
- O7-4** This is an introductory comment submitted by the commenter to the BIA and the County on July 8, 2019, in response to the Draft EIS. The comment requests confirmation of receipt of the email and the three attachments. This comment is specific to the Draft EIS, and no concerns regarding the Draft EIR are raised. Therefore, no further response is required.
- O7-5** This comment encompasses the entire 2007 report from the Bethany Wind Turbine Study Committee for a town in upstate New York. Please also see Section 3.6, Response to Comment Letter F, in Appendix T to the Final EIS for the Project for the response to this comment. The report consists of a review of future turbine siting with recommendations to their town council. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O7-6** This comment, dated February 3, 2014, was submitted in response to the Soitec Solar Project Program Environmental Impact Report and addresses groundwater. The commenter expressed concerns related to groundwater and summarized groundwater

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impact findings from the Sunroad Madera Golf Club project in Poway, California. This summary compares the groundwater findings of Dudek and Dr. V.M. Ponce for the Madera Golf Club, used in support of opposition to the Soitec Solar Project. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further analysis is required.

**O7-7** This comment encompasses the entire 2019 Boulevard Planning Group comment letter, dated July 8, 2019, submitted in response to the public review for the Draft EIS prepared by the BIA for the Project under the National Environmental Policy Act. Please refer to Section 3.9, Response to Comment Letter I, in Appendix T to the Final EIR. This comment letter is specific to the Draft EIS and does not raise concerns specific to the adequacy of the Draft EIR. However, Global Responses GR-1 through GR-9 in this Final EIR address issue areas raised in this letter, including socioeconomic impacts (GR-1), public health (GR-2), piecemealing (GR-3), noise (GR-4), biological resources (GR-5), groundwater (GR-6), fire protection and wildfire risk (GR-7), visual impacts (GR-8), and aviation (GR-9).

The commenter raises a concern about power leakage, sometimes referred to as ground current, stray voltage, or “dirty electricity” (which is a form of electromagnetic field [EMF] exposure) and states that there are adverse human health impacts associated with it. In response, the County understands that dirty electricity is a term which refers to a form of EMF. The commenter cites a handful of papers, abstracts, and summaries, many of which relate to exposure to cellular telephones, dimmer light switches, and fluorescent lightbulbs (and are therefore not relevant to a proposed wind energy project), which, in the County’s view, do not provide persuasive evidence that health hazards are associated with exposure to EMF in the extremely-low frequency to radio-frequency frequency ranges.

On the topic of EMF, the County’s 2019 Public Health Position Statement concludes that “there is a significant body of research (6, 46-50) on the electromagnetic field impacts on public health. For this issue, research shows no direct pathological impacts on human health pertaining to emissions from wind turbines (18, 51-52).” The statement concludes, “based on the weight of evidence, it is not expected that EMF from wind turbines is likely to be a causative agent for negative health effects in the community (6).” The County acknowledges there is other miscellaneous data available on the Internet; however, the County can only rely on scientific data from credible sources to reach conclusions in the EIR. The County has reviewed available credible science and literature on the topic of health effects from renewable energy, including concepts related to dirty electricity and wind turbine health effects, and repeatedly

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determined that there are no epidemiological evidence-based studies to support pathological effects.<sup>1,2,3</sup>

Additionally, other issues raised in the 2019 Boulevard Planning Group comment letter on the Draft EIS prepared by the BIA under the National Environmental Policy Act included impacts related to a variety of topics. These comments are not comments on the adequacy of the Draft EIR prepared by the County, they are comments on the adequacy of the Draft EIS. The BIA has provided responses to these comments in the Final EIS, which is available for public review on the BIA website.

**O7-8** This comment encompasses the entire 2013 Amended Construction Water Supply Plan for the San Diego Gas & Electric Company East County Substation Project. This comment does not address the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

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<sup>1</sup> County of San Diego Public Health Services. 2012. *Position Statement on Health Effects of Wind Turbines*. July 10, 2012.

<sup>2</sup> County of San Diego. 2013. *Wind Energy Zoning Ordinance Amendment and General Plan Amendment to the Mountain Empire Subregional Plan (Boulevard Subregional Planning Area) and Borrego Springs Community Plan to Allow Wind Energy Development, POD 10-007 (Districts: All)*. Final. May 8, 2013. <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/POD10-007/BOSMay8ReportPOD10-007.pdf>.

<sup>3</sup> County of San Diego Health and Human Services Agency. 2019. *Public Health Position Statement: Human Health Effects of Wind Turbines*. February 25, 2019. <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/2019%20Public%20Health%20Position%20Statement%20on%20Human%20Health%20Effects%20of%20Wind%20Turbines.pdf>.

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