

MEMORANDUM

The County has received a late comment letter and attachments submitted by Backcountry Against Dumps after the Board of Supervisor's docketing of the Campo Wind Project with Boulder Brush Facilities (the "Project") on March 3, 2021, consideration of which was postponed to the Board's regularly scheduled meeting on March 17, 2021.

Under CEQA Guidelines Section 15105, the County was legally required to provide a 45-day review period on the Draft EIR. The public comment period for the Draft EIR began on December 12, 2019 and ended on February 3, 2020. Following expiration of the public review and comment period, the County responded to all written comments received on the Draft EIR and published those responses in a Final EIR, dated September 2020, for the Project. All comment letters received after expiration of the public review and comment period ending on February 3, 2020 are considered late comments. A lead agency is required to consider comments on the Draft EIR and to prepare written responses if a comment is received within the public comment period. (Pub. Res. Code § 21091(d); CEQA Guidelines § 15088.) When a comment letter is received after the close of the public comment period, however, a lead agency does not have an obligation to respond. (Pub. Res. Code § 21091(d)(1); Pub. Res. Code § 21092.5(c).)

Accordingly, the County is not required to provide a written response to late comment letters. (See CEQA Guidelines § 15088(a)). Nonetheless, for informational purposes, the County has elected to respond to the late letter, but it does so without waiving its position that written responses to late comment letters are not required by law. For purposes of the EIR, the Project includes the wind energy generation facilities and associated infrastructure on the Campo Band of Diegueño Mission Indians Reservation (i.e., the Campo Wind Facilities), as well as the portion of the 230-kV gen-tie line and related facilities on private lands within the County (i.e., the Boulder Brush Facilities). The County's land use jurisdiction, however, is limited to the private lands within the Boulder Brush Boundary. The Bureau of Indian Affairs has jurisdiction over the portion of the Project within the Reservation Boundary.

Responses

Backcountry's February 26, 2021 comment letter and the attached exhibits are substantially identical to Backcountry's comment letter on the Final EIR, dated November 11, 2020, and its comment letter on the Draft

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EIR, dated February 3, 2020. The February 26, 2021 comment letter does not raise any new issues that have not already been addressed by the County.

I. Project Approval is Not Premature

The commenter states that the Board may not approve the Project until the pending litigation against the Bureau of Indian Affairs is resolved and the Federal Aviation Administration’s (“FAA”) review is complete. This comment does not raise an issue regarding the analysis contained within the Final EIR. Further, it was entirely proper for the Final EIR to assume compliance with FAA regulations because, at the time the Final EIR was prepared, the Project had been issued Determinations of No Hazard to Air Navigation (“DNH”) for the turbines. A petition was subsequently submitted which pointed out an administrative oversight by the FAA. Based on information provided by the Applicant, it is the County’s understanding that the FAA’s decision to re-visit the aeronautical study was due to the perception that the distribution list for public notice should have been broader.

Additionally, the County is not required to wait for the re-issuance of the Campo Wind Facilities’ DNHs before it may certify the Final EIR and approve the Boulder Brush Facilities’ Major Use Permit. It is common for the FAA to issue DNHs after project approval by local agencies and similarly common for lead agencies to condition implementation of project approvals on obtaining additional permits from other agencies. CEQA also requires that environmental review be conducted prior to the lead agency’s earliest commitment to issue a discretionary approval; CEQA therefore assumes that a project may receive additional permits after the project is initially approved.

The Major Use Permit includes a condition that the Boulder Brush Facilities receive DNHs from the FAA prior to issuance of building permits. The Project applicant has informed the County that it would support an amendment to this condition requiring that the Campo Wind turbines also receive DNHs prior to any construction of the Boulder Brush Facilities. Issuance of the DNHs ensure that safety and efficiency of air traffic operations throughout the Project area will be maintained after the Project is constructed and during the Project's operation.

Finally, the County is not required to wait for resolution of the pending litigation against the Bureau of Indian Affairs regarding the Campo Wind Facilities. The Bureau of Indian Affairs approved the Campo Wind Facilities, and that determination has not been overruled or set aside by any court at this time.

II. The Final EIR Analyzes the Whole Project

The commenter discusses concern about piecemeal environmental review. The commenter raised the same concern during the public review process, which the County adequately addressed. Please refer to Global Response 3 – Piecemealing and Responses O5-3 to O5-6 for a discussion regarding piecemeal environmental analysis and the relationship of the Torrey Wind Project to the Project.

The proposed Torrey Wind project is structurally, legally, and financially independent from the Campo Wind Project with Boulder Brush Facilities and may or may not be pursued by this applicant. Further, the Campo Wind Project with Boulder Brush Facilities is not needed in order for the Torrey Wind project to proceed or vice versa. Thus, the Final EIR is not impermissibly “piecemealing” a single project. They are separate projects.

III. The Final EIR Analyzes Project Impacts to Aviation

The commenter states that the Final EIR fails to meaningfully analyze the Project's impacts on aviation. The commenter raised the same concern during the public review process, which the County adequately addressed. Please refer to Final EIR Section 2.5 – Hazards and Hazardous Materials; Global Response 9 – Aviation; and Response O5-30.

Please also refer to the responses in Section I, above. Regarding FAA Southern California TRACON's (SCT) concerns about certain turbine locations, as noted in Exhibit 2 to Backcountry's letter, those comments address a minor subset of considerations taken into account by the FAA during its review. The FAA's aeronautical study process is a multi-layered assessment intended to identify potential safety impacts of proposed structures. Just because a wind turbine or other structure has some aeronautical effects does not necessarily mean that the FAA will decide the structure poses a substantial risk to aviation. The Project applicant eliminated four turbine locations affecting one particular SCT procedure that was adversely affected. Four other proposed turbine locations affecting certain other SCT procedures received No Hazard Determinations from the FAA on July 16, 2020 because the FAA determined that they would not have a substantial adverse effect on air traffic operations.

IV. The Final EIR Analyzes Project Impacts to Wildfire

The commenter states that the Final EIR fails to analyze how the Project will impact the risk of fire ignition and firefighting efforts. Similar comments, including those raised by Mr. Ostrander in Exhibit 3 of Backcountry's letter, were raised during the public review process, which the County adequately addressed. Please refer to Final EIR, Section 2.5 – Hazards and Hazardous Materials, Final EIR, Section 2.9 – Wildfire, and Global Response 7 – Fire Protection Services and Wildfire Impacts.

The Final EIR concludes that impacts to fire protection services and wildfire will be less than significant. A Fire Protection Plan and Fire Services Agreement must be approved by the County as part of the Project's permitting process, which would adequately protect against fire risk and wildfire impacts of the Project. Additionally, and as with any vertical construction in San Diego County that could impact fire aviation, standard procedures exist to mitigate any potential hazards to CAL FIRE helicopters and planes. The Project will provide the heights and exact locations of turbines and other Project facilities to CAL FIRE to update an Aviation Hazard Map and facilitate aerial firefighting planning.

Finally, regarding potential state budget cuts and the closure of the McCain Valley Conservation Camp, the County and CAL FIRE have confirmed that these actions will not impact their ability to provide adequate fire services. McCain Valley Conservation Camp responders would not have been deployed to a facility fire associated with the project and substantial firefighting resources remain available for responding to wildfires in the area (personal communication with Dave Sibbet, Deputy Fire Marshal, on 03/09/2021). As provided in the Final EIR, there are an estimated 2,800 firefighters currently responsible for fire protection in the County's unincorporated areas. Fire emergencies at the Project site, if they occur, would be serviced by a variety of agencies and stations, including the Campo Reservation Fire Protection District, San Diego County Fire Authority's Boulevard Fire Station, CAL FIRE, and through other mutual and automatic aid agreements throughout the County and state, when necessary.

V. The Final EIR Analyzes Project Impacts to Golden Eagles

The comment states that, based on the County’s Guidelines for Determining Significance for Biological Resources, the Final EIR improperly analyzes impacts to Golden Eagles because the analysis anticipates that three eagles may be killed over the life of the project and nonetheless concludes that impacts to Golden eagles will be less than significant. The comment mischaracterizes the County’s thresholds of significance for impacts to biological resources. The applicable threshold of significance is whether the project would have a substantial adverse impact on a special-status species. The County’s Guidelines for Determining Significance for Biological Resources directs that one factor in that analysis is whether the project would impact one or more individuals of a species listed as federally or state endangered or threatened. In addition, the County’s Guidelines state that “it is important to note that quantification standards are provided as a guidance tool only and specific conditions may vary based on specific site conditions and/or circumstances...” Further, the factor calling for consideration of whether there will be impacts to one or more individuals of a species that is federally or state threatened or endangered does not apply in this instance. While Golden Eagles are fully protected under the California Fish and Game Code and protected under the federal Bald and Golden Eagle Protection Act, Golden Eagle is not listed as threatened or endangered under either the state or federal Endangered Species Acts.

In all events, the Final EIR determined, based on substantial evidence including biological surveys, lack of suitable nesting sites, and United States Geological Survey biotelemetry data, that impacts to Golden Eagles are anticipated to be very low because of the low incidence of eagle use of the project site. It is true that the nearby Tule Wind Project found significant and unavoidable impacts to Golden Eagles based on projected mortality; however, post-construction monitoring has shown that the Tule project has actually resulted in zero mortality for Golden Eagles, further supporting the conclusion that impacts will be less than significant.

VI. The Final EIR Analyzes Project Impacts to Bats

The commenter states that the Final EIR fails to meaningfully analyze impacts to bats. The commenter raised the same concern during the public review process, which the County adequately addressed. Please refer to Final EIR Section 2.2 – Biological Resources, Global Response 5 – Biological Resources, and Responses O5-9 to O5-13.

Additional research into barotrauma determined that barotrauma is only a minor cause of bat injury at wind farms. (Rollins, et al. [“Forensic pathology examination of the data strongly suggests that traumatic injury is the major cause of bat mortality at wind farms and, at best, barotrauma is a minor etiology.”].)¹ The Final EIR’s conclusions regarding barotrauma are also supported by Lawson, et al., the results from which show that the potential to cause barotrauma exists only at a point so close to the blade surface that a bat would almost certainly have to collide with the blade to be exposed to the harmful pressure, and thus barotrauma appears unlikely.²

¹ Rollins KE, Meyerholz DK, Johnson GD, Capparella AP, Loew SS. A Forensic Investigation Into the Etiology of Bat Mortality at a Wind Farm: Barotrauma or Traumatic Injury? *Veterinary Pathology*. 2012; 49(2):362-371.

² Lawson, Michael J, Jenne, Dale S, and Thresher, Robert W. Estimating the Likelihood of Bat Barotrauma using Computational Simulations and Analytical Calculations. United States: N. p., 2018. Web.

Further, the abundance of bats within and adjacent to the Campo Corridor is low when compared to other habitat types and regions. For example, actual bat mortality was generally less than what was predicted for Tule Wind operations in the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects EIR/EIS (Tule EIR/EIS). The Tule EIR/EIS found that predicted mortality to bats would be less than significant with mitigation, and post-construction monitoring at the Tule Wind Project found fewer mortalities of bats than predicted. Thus, because barotrauma has been determined to be a relatively minor cause of bat injury and further because bats are expected to occur infrequently in the Project area and because actual bat mortalities were lower than predicted at the neighboring Tule Wind project, impacts to bats are expected to be less than significant as determined in the Final EIR.

VII. The Final EIR Analyzes Project Noise Impacts, including Infrasound and Low-Frequency Noise

The February 26, 2021 comment letter attaches letters from experts regarding the County’s noise analysis that were either already submitted into the record and for which responses have already been provided or which raise the same issues already raised and responded to. The claims about noise represent a disagreement among experts about technical issues involving measurement methodologies, instrumentation and modeling techniques. A disagreement among experts does not make an EIR inadequate. Supplemental Noise Responses are provided as Attachment 1 to this memorandum, providing additional details and responses from the noise expert who prepared the analysis for the EIR. Here, the Final EIR has adequately explained and summarized the main points of disagreement among the experts about the EIR’s conclusions on the significance of noise impacts. CEQA does not require more. See CEQA Guidelines section 15151.

The commenter provides an opinion about the technical adequacy of the acoustical analysis relied on by the Final EIR based on alleged “errors and omissions.” In other instances, the claims are directed to alleged inadequacies regarding the noise analysis in the Final EIS prepared by the Bureau of Indian Affairs. These alleged errors and omissions have already raised and responded to in the Final EIR, or in the case of allegations about the Final EIS, are not addressed to the adequacy of the Final EIR.

- Exhibit 7 is a letter prepared by dBF Associates, Inc. on the County’s Draft EIR, dated February 3, 2020 – the County has already reviewed and responded to this letter in the Final EIR at O5-38.
- Exhibit 8 is a new letter prepared by dBF Associates, Inc., dated February 3, 2021 on the Bureau of Indian Affairs’ EIS. The EIS was approved in April 2020, making this new letter both untimely and submitted to the wrong lead agency. The arguments raised in this letter are not new and, in all events, have been addressed in the Final EIR which contains additional and updated information compared to what was presented in the Final EIS.
 - Claim that use of a GE 2.X-127 model under-predicts noise for 4.2 MW turbines is addressed in Global Response 4 (at p. GR4-9) of the Final EIR, which explains the justification for using the GE 2.x-127 model data—it’s louder than sound data for larger and/or more powerful WTG models under consideration for the project.
 - Claim that that Acoustical Assessment Report (“AAR”) doesn’t address pure tones is addressed in Global Response 4 (at p. GR4-10 through GR4-12) of the Final EIR, which illustrates the pure tone

definitions (Figure GR-4-D) and provides supplemental analyses showing that pure tone conditions are not expected to occur.

- Claim that inadequate instrumentation used is addressed in Global Response 4 (at p. GR4-3) of the Final EIR, which explains that Dudek re-sampled the baseline sound environment in 2019 with ANSI Type 1 instruments that were capable of lower measured sound pressure levels.
- Claim that Piccolo SLM windscreens were inadequate is addressed in Global Response 4 (at p. GR4-2), which describes microphone windscreens used during the 2019 baseline outdoor ambient sound level sampling survey.
- Claim that CadnaA and Excel-based techniques were inadequate is addressed in Global Response 4 (at p. GR4-9) which provides support, via the cited RSG report and Datakustik website, for the ISO 9613-2 sound propagation modeling technique used by both the CadnaA software and Excel-based modeling techniques.
- Claim of failure to use wind turbine noise frequency spectrums for each wind speed condition was addressed in Response O6-81 of the Final EIR.
- Claim that location of On-Reservation sensitive receptors should have been disclosed in the EIR is addressed in Response O6-82 of the Final EIR.
- Claim that baseline measurement locations and collected data was inadequate is addressed in Response O6-09 and O6-103 of the Final EIR.
- Claim that AAR, Draft EIS and Final EIS should have evaluated the Project noise levels at the estimated hundreds of potential NSLUs, not just at thirteen single locations in a roughly 24-square mile area is addressed by fact that the Final EIR includes figures displaying quantified evaluation of predicted aggregate Project WTG operation across the Project area and its surroundings.
- Claims that the Project “poses a significant risk of harm...” is a statement of opinion with which the County disagrees. Impacts to public health are comprehensively addressed at Global Response 2 (Public Health) in the Final EIR.
- Exhibit 9 is a new Wilson Ihrig letter dated February 4, 2021 on the Bureau of Indian Affairs’ EIS. The EIS was approved in April 2020, making this new letter both untimely and submitted to the wrong lead agency. In addition, the arguments raised in this letter are not new.
 - Wilson Ihrig argues that the Draft EIS should have used the Federal Transportation Administration impact assessment criteria for operational noise. This is not a critique of the County’s EIR. In all events, this issue was raised in comment O6-118 and was addressed in Response O6-84. In addition, the County’s analysis does incorporate increase-over-ambient thresholds such as its GP-based 60 dBA CNEL (or up to 10 dB over existing ambient) and the Residual Background Sound Criterion (RBSC) in its wind turbine ordinance.

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- Wilson Ihrig critiques the use of noise measurement instrumentation in the EIS. This is not a critique of the County's EIR. In all events, in Global Response 4 (at p. GR4-3) of the Final EIR, it is explained that Dudek re-sampled the baseline sound environment in 2019 with ANSI Type 1 instruments that were capable of lower measured sound pressure levels.
 - Wilson Ihrig critiques the Draft EIS' noise assessment methods. This is not a critique of the County's EIR. In all events, a similar comment was addressed in Response O6-84 of the Final EIR.
 - Wilson Ihrig critiques the low-frequency analysis and omni-directional noise prediction in the EIS. This is not a critique of the County's EIR. In all events, this issue is addressed in Global Response 4 (at p. GR4-10), explaining that ISO 9613-2 conservatively assumes downwind conditions in all directions.
 - Wilson Ihrig challenges the reliance of the noise analysis on the turbine manufacturer data. An explanation of reliance upon and justification for reliance on the GE 2.X-127 data is contained in Global Response 4 (at pp. GR4-9 and GR4-10) of the Final EIR.
 - Allegations concerning low-frequency noise, mention of Salt research and impact of on outer hair cells (OHC) is not new. Low-frequency noise and infrasound is discussed in Global Response 2 (at pp. GR2-8 through GR2-14) of the Final EIR, including an explanation for why the County believes that the Wilson Ihrig data is misleading and that its measured levels are less than the Salt-suggested inaudible 60 dBG OHC stimulation threshold.
 - Critique of amplitude modulation conclusions are not new and are discussed in Global Response 4 (at pp. GR4-14 through GR4-16) of the Final EIR.
 - Claims that use of the CadnaA model is not appropriate are not new and are responded to in Global Response 4 (at p. GR4-9), which provides support, via the cited RSG report and Datakustik website, for the ISO 9613-2 sound propagation modeling technique used by both the CadnaA software and Excel-based modeling techniques.
 - The County disagrees that the noise impacts are understated for all of the reasons in the Draft EIR and Final EIR and these responses.
- The commenter again raises the issue of amplitude modulation (AM) and cites Pohl, Schaffer, and Hansen studies. Claims regarding AM have already been reviewed and responded to in the EIR.
 - Experts for the County explain that audible amplitude modulation from the wind turbines would be "a very rare event." (AAR at p. 35.) Claims by commenter's experts that there is in fact excessive audible AM created by nearby existing turbines is disputed as unreliable by the County's experts for reasons explained in Global Response 4 (Noise). The County did not ignore the issue of AM and adequately summarized a disagreement among experts.
 - The EIR has an extensive and adequate discussion of noise effects on health, stress and well-being. See Global Response 2 of the Final EIR.

- The EIR more than adequately analyzes infrasound and low-frequency noise impacts in both the Draft EIR, the Final EIR and the technical appendices and adequately summarizes the County’s disagreement with the expert opinions on these topics by dbF Associates and Wilson Ihrig.
- Exhibit 10 of Backcountry’s letter is the Pohl study, which was already cited in comment letter O5 and for which Global Response 2 (at p. GR2-14) of the Final EIR already provides responses. On the last page (p. “127” of the Energy Policy journal in which it was published) of the Pohl study, it includes (bold emphasis added):

“The present study provides insight into the mechanisms causing noise annoyance. However, replication studies are needed to further explore why some residents are strongly annoyed by WT noise and others are not, especially in comparison to traffic noise. Furthermore, the long-term effects are to be probed, e.g., whether or not and under what conditions habituation or sensitization occurs. To explore the influence of WT noise on sleep the method of ambulatory sleep monitoring would be useful. In this respect, first steps were made in the Health Canada study (2014) and in a study by Jalali et al. (2016). **Both field studies did not find any relation between objective sleep parameters and WT noise exposure.**”
- Exhibit 11 of Backcountry’s letter is the Schaffer study, which was already cited in comment letter O5 and for which Global Response 2 (at p. GR2-15) of the Final EIR already provides responses. The study showed amplitude modulation (AM) has the same least effect as playback order of the samples as an annoyance parameter. In fact, AM is ignored in the final conclusory paragraph.
- Exhibit 12 of Backcountry’s letter is the Hansen study on AM, which was already cited in comment letter O5 and for which Global Response 2 (at pp. GR2-15 and GR2-16) of the Final EIR already provides responses. In addition, the study only provides one 24-hour window of the actual measured SPL at one position (H5) for a narrow 40-50Hz band of spectrum, making it impossible to know the background sound level of the environment used in the study. In the conclusions, ambient noise levels in rural South Australia are stated to be “as low as 15 and 5 dBA, outdoors and indoors”. Even the lowest measurements from Dudek’s 2019 survey of the Project vicinity did not get this very low outdoor background sound level, nor did the dbF Associates or Wilson Ihrig surveys. Hence, if the Hansen study’s AM quantities are based on such a 15-dBA outdoor environment, they would be of little or no value/relevance for applicability to the Campo Boulder Brush vicinity—that is, higher background sound levels would reduce the claimed AM dB magnitudes.
- Exhibit 13 of the commenter’s letter is dbF Associates’ December 16, 2019 ILFN report. The Final EIR has already responded to these claims at Response O5-42.
- Exhibit 14 is the Morsing study. The study’s conclusions state (emphasis added in **bold**):

“There were some indications that WTN led to objective sleep disruption, reflected by an increased frequency of awakenings, a reduced proportion of deep sleep and reduced continuous N2 sleep. This corresponded with increased self-reported disturbance. **However, there was a high degree of heterogeneity between the two studies presented, precluding firm conclusions regarding effects of WTN on sleep.** Furthermore, there was some limited evidence from the second study that wakefulness

increase with strong amplitude modulation and lower rotational frequency, the deepest sleep was adversely affected by higher rotational frequency and strong amplitude modulation, and light sleep increased with high rotational frequency and acoustic beating. These findings will be used in the development of noise exposures for a larger-scale sleep study that will implement more naturalistic WTN and use a more representative study population.”

- Exhibit 15 of the commenter’s letter is the Poulsen study, which was already cited in comment letter O5 (as Exhibit 10) and for which Global Response 2 and Responses O5-23 and O5-44 in the Final EIR already provides responses. Noteworthy excerpts from the study are as follows:

“Furthermore, our reliance on prescription data reduced specificity towards sleep and depressive conditions because some of the included drugs, particularly the antidepressants, also have other indications, primarily for anxiety-related conditions. Any bias resulting from this will depend on both the prevalence of these conditions among our cases and their association with WTN.”

And from the Conclusions... (emphasis added in **bold**):

“In conclusion, in a large nationwide population, we found suggestions of an association between exposure to high levels of outdoor nighttime WTN and increased risk of first-time redemption of sleep medication and antidepressants. This association was strongest among the elderly. **We found no consistent associations for indoor nighttime LF WTN.** Given that this was the first prospective study on this topic and that we had only a few cases for many of the groups, independent replication is desirable.”

- Exhibit 16 of the commenter’s letter is the Volker letter, dated April 15, 2019, critiquing the County’s February 2019 Public Health Position Statement (PHPS). Global Response 2 and Response O5-21 already address this letter.
- Exhibit 17 of the commenter’s letter is the Carlile study, which was already cited in comment letter O5 (as Exhibit 11) and for which Global Response 2 and Response O5-25 in the Final EIR already provides responses. The study concludes more research should be done. A noteworthy excerpt from the study is as follows (“IS” = infrasound):

“Interestingly, Tonin et al. (2016) also report in their double-blind study that the presence of IS increased concern about health effects of WTN-exposed postexposure although subjects reported not hearing the IS stimulus.”

VIII. Lifecycle Greenhouse Gas Emissions Analysis is not Required

The commenter states that the Final EIR fails to analyze the Project’s lifecycle greenhouse gas emissions. The commenter raised the same concern during the public review process, which the County adequately addressed. As previously noted in the Final EIR, the California Supreme Court has determined that a lifecycle analysis is not required under CEQA. (*Save the Plastic Bag Coalition v. City of Manhattan Beach* [2011] 52 Cal.4th 155.) That determination applies with equal if not greater force here, where the Project’s turbine parts are only periodically manufactured, distributed and disposed. Further, the Project is expected to result in substantial

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energy benefits over its useful life and is expected to displace 58,000 Metric tons of CO₂e per year. Please also refer to Responses O5-28 to O5-29.

IX. The Final EIR Analyzes Project Impacts to Groundwater Supply

The commenter states that the Final EIR fails to analyze impacts on groundwater supply. The commenter raised the same concern during the public review process, which the County adequately addressed. The County also previously addressed the comments raised by Snyder Geologic. Please refer to Final EIR Section 3.1.5 – Hydrology and Water Quality and Global Response 6 – Groundwater.

The claims about groundwater supply represent a disagreement among experts about technical issues. A disagreement among experts does not make an EIR inadequate. The groundwater analysis included as an appendix to the Final EIR reasonably is based on available data and the use of accepted scientific methods, prepared by a consultant listed on the County’s list of qualified consultants and to the County’s satisfaction. Additionally, the Final EIR requires groundwater monitoring of on-site wells and mitigation (reduced or cessation of pumping) should on-site groundwater levels decline greater than what is expected based on the Project’s technical analysis.

X. The Project Does Not Include Battery Storage

The commenter states that the Final EIR must analyze the impacts of any planned battery storage. Please refer to Response O6-9. The Project does not propose a battery energy storage system.

XI. The Project Will Comply with General Order 131-D

The commenter states that the Project must comply with California Public Utilities Commission General Order 131-D. Please refer to Response O5-33. The Project will comply with all applicable California Public Utilities Commission requirements, including General Order 131-D.

XII. Exhibits to Backcountry Comment Letter

The exhibits attached to Backcountry’s comment letter are, in most cases, identical to exhibits previously provided and addressed by the County. New exhibits have been addressed in this Response, as noted below.

1. Exhibit 1, letter from Stephan Volker to Federal Aviation Administration, dated January 29, 2020, and related attachments	Please refer to Final EIR, Section 2.5 – Hazards and Hazardous Materials, Global Response 9 – Aviation, and Responses O5-47 to O5-74. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
2. Exhibit 2, emails from Southern California TRACON to FAA regarding the Campo Project	Please refer to Final EIR Section 2.5 – Hazards and Hazardous Materials and Global Response 9 – Aviation. Please also refer to Sections I and III of this Response, above.

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<p>3. Exhibit 3, titled “Review of the Wildfire Impacts from the Campo Wind Project”</p>	<p>Please refer to Final EIR, Section 2.5 – Hazards and Hazardous Materials, Final EIR, Section 2.9 – Wildfire, and Global Response 7 – Fire Protection Services and Wildfire Impacts. Please also refer to Section IV of this Response, above.</p>
<p>4. Exhibit 4, titled “Impact of Renewable Energy Sources on Birds of Prey”</p>	<p>Please refer to Final EIR Section 2.3 – Biological Resources, Global Response 5 – Biological Resources, and Response O5-35. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.</p>
<p>5. Exhibit 5, titled “The Management Utility of Large-Scale Environmental Drivers of Bat Mortality at Wind Energy Facilities”</p>	<p>Please refer to Final EIR, Section 2.2 – Biological Resources, Global Response 5 – Biological Resources, and Response O5-36. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.</p>
<p>6. Exhibit 6, titled “When the Excrement Hits the Fan: Fecal Surveys Reveal Species-Specific Bat Activity at Wind Turbines.</p>	<p>Please refer to Final EIR, Section 2.2 – Biological Resources, Global Response 5 – Biological Resources, and Response O5-37. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.</p>
<p>7. Exhibit 7, titled “Campo Wind Project Noise/Acoustical Review” (Feb. 3, 2020)</p>	<p>Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, and Response O5-38. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.</p>
<p>8. Exhibit 8, titled “Noise/Acoustical Review for the Campo Wind Project” (Feb. 3, 2021)</p>	<p>Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, and Response O5-38. Please also refer to Section VII of this Response, above.</p>
<p>9. Exhibit 9, titled “Review of the Noise Analysis in the DEIS for the Campo Wind Project” (Feb. 4, 2021)</p>	<p>Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-38. Please also refer to Section VII of this Response, above.</p>
<p>10. Exhibit 10, titled “Understanding Stress Effects of Wind Turbine Noise – The Integrated Approach”</p>	<p>Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-39. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.</p>
<p>11. Exhibit 11, titled “Influence of Visibility of Wind Farms on Noise Annoyance”</p>	<p>Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 –</p>

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	Public Health, and Response O5-40. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
12. Exhibit 12, titled “Prevalence of Wind Farm Amplitude Modulation at Long-Range Residential Locations”	Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-41. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
13. Exhibit 13, titled “Wind Turbine Infrasound and Low-Frequency Noise Survey in Boulevard, CA”	Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-42. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
14. Exhibit 14, titled “Wind Turbine Noise and Sleep”	Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-43. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
15. Exhibit 15, titled “Impact of Long-Term Exposure to Wind Turbine Noise on Redemption of Sleep Medication and Antidepressants”	Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-44. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
16. Exhibit 16, letter from Stephan Volker to the County, dated April 15, 2019, requesting that the County rescind or revise its Public Health Position Statement on the Human Health Effects of Wind Turbines.	The text included in this exhibit does not raise an issue regarding the analysis contained within the Final EIR. For a discussion of anticipated impacts regarding noise, please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, and Global Response 2 – Public Health.
17. Exhibit 17, titled “A Review of the Possible Perceptual and Physiological Effects of Wind Turbine Noise”	Please refer to Final EIR, Section 2.6 – Noise, Global Response 4 – Noise, Global Response 2 – Public Health, and Response O5-45. This exhibit was included in Backcountry’s February 3 and 11, 2020 comment letters and has been adequately addressed.
18. Exhibit 18, titled “Life Cycle Greenhouse Gas Emissions of Utility-Scale Wind Power”	Please refer to Final EIR, Section 3.1.4 – Greenhouse Gas Emissions and Response O5-46. This exhibit was included in Backcountry’s

Memorandum

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	February 3 and 11, 2020 comment letters and has been adequately addressed.
19. Exhibit 19, titled “Groundwater Impacts of Campo Wind Project” (Feb. 1, 2021)	Please refer to Final EIR Section 3.1.5 – Hydrology and Water Quality and Global Response 6 – Groundwater. Please also refer to Section IX of this Response, above.