

Comment Set A0006, cont. Campo Kumeyaay Nation

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- The minority or low-income population percentage of the affected area is meaningfully greater (50 percent or greater per EPA Guidance Document) than the minority [or low-income]⁵ population percentage in the general population of the jurisdiction or other appropriate unit of geographic analysis (i.e., County or Native American⁶ Reservation) where the affected area is located.

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F-2 (referring to and relying upon the United States Environmental Protection Agency's ("EPA") Guidance Document on NEPA Compliance Analysis). The Draft EIR/EIS adopts the block census tract as the unit of analysis for measuring potential environmental justice impacts on minority and low-income populations. F.3. The following significance criteria are established in the Draft EIR/EIS for environmental justice impacts:

- More high-minority block groups are within one-half miles of the ROW than either medium-minority block groups or low-income block groups;
- More low-income block groups are within one-half miles of the ROW than either medium-income block groups or high-income block groups.

The Draft EIR/EIS then evaluates block groups within what the Lead Agencies have determined to be the "appropriate unit of geographic analysis," which, in the case of affected tribes, is the boundaries of the tribe's reservation.

As is evident from Table F-1, each of the Indian reservations affected by the Project has a substantially greater minority population than the County of San Diego. Many of the reservations, including the Band's reservation, also have significantly higher low-income populations. F-3. It makes sense to assess the impacts of the Project on reservation residents by comparing the on-reservation populations near the Project with on-reservation populations that are further away. The Band strongly suggests that the Lead Agencies reanalyze the environmental justice impacts of the Proposed Project and its Alternatives by comparing the affected populations with some larger population, the most obvious choice being the population of San Diego County.

The Band cannot help but note that while the Lead Agencies have made a practice in the Draft EIR/EIS of consistently ignoring tribal jurisdiction in matters of significant concern to the affected tribes, they have chosen to limit their environmental justice analysis to impacts within

⁵ Omission of this text appears to be a typographical error.

⁶ The Draft EIR/EIS reflects the input of different authors who rely on different terms. The Band suggests that the Lead Agencies edit the Draft EIR/EIS for consistency of usage. When referring to the race of Indian people, the Band prefers the term "Indian" to "Native American." When referring to jurisdictional matters, the term "tribal" should be used.

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tribal jurisdictions -- the one part of the Draft EIR/EIS where such reliance is clearly inappropriate. Again, the environmental justice impacts of the Proposed Project and Project Alternatives must be recalculated. The Band anticipates that a revised analysis will result in the identification of significant environmental justice impacts associated with the Proposed Project and may affect CPUC's environmental ranking of the Project Alternatives.

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III. Objections to the Interstate 8 Alternative

In discussions with the CPUC, the Band expressed a willingness to support the evaluation of the Interstate 8 Alternative in the Draft EIR/EIS. After carefully reviewing the Draft EIR/EIS's discussion of the Alternative's potential impacts and benefits, the Band has determined that the Interstate 8 Alternative is not viable. The Band appreciates the willingness of the Lead Agencies to consider and incorporate its proposal of the Campo North Option to the Interstate 8 Alternative. However, while relocating the transmission line to the north of I-8 slightly reduces both the length of the line and the impacts on tribal lands, the Band has determined the negative impacts -- particularly the impacts to the Band's tourism-based businesses -- to be significant and outweigh any potential benefits.

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The Band objects to the Interstate 8 Alternative because of the significant impacts to the Band, its lands, and its people that are documented in the Draft EIR/EIS. Specifically, the Band is concerned about the increased risk of fire associated with 500 kV transmission lines in an area that is already at extremely high risk resulting in a Class I impact that cannot be mitigated to insignificance. *See generally* Section E.1.15, and pp. E.15-20, E.15-29, and Figure E.15-17. The Band is also concerned about the potential risks to groundwater and the potential for even temporary reduced yield of local supply wells associated with construction of the Interstate 8 Alternative, given the extremely shallow aquifer. *See generally* Section E.1.12 and pp. E.1.12-1 and E.1.12-5. Finally, although there are no plans for underground transmission across the Band's lands, even the ground disturbance associated with construction and installation of transmission towers and related infrastructure has the potential to destroy cultural resources important to the Band and neighboring tribes.⁷ *See generally* Section E.1.7. Many of the potential economic impacts and impacts to cultural resources are incapable of mitigation.

The CPUC has identified a number of Project Alternatives that are environmentally superior to the Interstate 8 Alternative. The Band encourages the Lead Agencies to pursue one of these less damaging options. Indeed, the Band is convinced that even those alternatives deemed environmentally inferior in the Draft EIR/EIS may turn out to be superior if properly and fairly evaluated. We look forward to a continuing dialogue in the form of government-to-

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⁷ The Band appreciates the Lead Agencies' efforts during preparation of the Draft EIR/EIS to keep the Campo Executive Committee informed of the status of work to determine the potential cultural resource impacts of the Proposed Project and Project Alternatives. The Band requests that the Lead Agencies continue to consult with the Band with regard to such impacts as the environmental review moves forward.

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government consultation as analysis of the Proposed Project and its Alternatives progresses. We appreciate this opportunity to comment on the work of the Lead Agencies at this preliminary stage in the process.

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Sincerely,



Samuel D. Gollis

cc: H. Paul Cuero, Jr., Chairman
Campo Band of Mission Indians

Members of the Executive Committee
Campo Band of Mission Indians

Lisa Gover, Director
Campo Environmental Protection Agency

Responses to Comment Set A0006

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A0006-1 Most of the undergrounding that has been proposed for transmission line alternatives to the Sunrise Powerlink Project would occur within existing roadways where the ground has already been disturbed, and so there would be a reduced potential to encounter cultural resources. Appendix 12 lists all of the cultural resources mitigation measures that would be required to help protect cultural resources with construction and operation of the project. Underground installation of the transmission line has been considered in highly populated areas, such as in Alpine Boulevard, Ramona, and San Diego, as well as in rural areas, such as the Santa Ysabel and San Felipe Valleys and in ABDSP to avoid direct impacts to State-designated Wilderness. The income levels of surrounding residents did not factor in the analysis of aesthetic impacts. Please refer to Response to Comment A0006-3 for a discussion of Environmental Justice.

A0006-2 The BCD Alternative, which would be north of the La Posta, Manzanita, and northern Campo Reservations, was fully evaluated in the Draft EIR/EIS under every issue area in Section E.2. The BCD Alternative was revised in Section 3.3.2 of the Recirculated Draft EIR/Supplemental Draft EIS based on input from the U.S. Forest Service and the BCD Alternative Revision was found to be Environmentally Superior in the Final EIR/EIS for this segment of the Southern Alternative (see Section H.4.2).

In addition, the BCD South Option was developed to avoid impacts to tribal lands (which would be affected by the Interstate 8 Alternative) and National Forest lands (affected by the western end of the BCD Alternative). This option is shown on Figure E.2.1-2 of the Draft EIR/EIS and was fully evaluated in Section E.2 as well. The BCD South Option was revised following the Draft EIR/EIS and was included in the Recirculated Draft EIR/Supplemental Draft EIR/EIS in Section 3 (see also Response E0004-70) and this BCD South Option Revision route was found to be Environmentally Superior in the Final EIR/EIS for this segment of the Southern Alternative (see Section H.4.2).

A0006-3 The commenter requests the Environmental Justice analysis be redone. Section F.1 Environmental Justice (Volume 5) provides information on the minority and low-income communities that have the potential to be affected by the Proposed Project and alternatives. The analysis considers all minority and low-income populations within 0.5 miles of the Proposed Project and alternative alignments. The analysis involved a three-step process that meets the letter and spirit of Executive Order 12898. As described in Section F.1, the three steps included a screening level analysis to determine general areas for potential environmental justice impacts, review of comments received at public meetings and agency consultations to determine other unidentified areas, and performance of a detailed environmental justice analysis for each area identified in prior steps. For further information on the Environmental Justice evaluation conducted for the Proposed Project, please refer to Response to Comment A0006-17.

In addition, the commenter asks why there is no comparative socioeconomic information in the EIR/EIS. The socioeconomic characteristics of the Proposed Project and alternative alignments are presented in Section D.14, Socioeconomics, Services, and Utilities (Volume 3). This section includes comprehensive baseline population, housing, and employment data for each of the project links. While the evaluation does not present education data or a comparative evaluation as identified in the comment, it is consistent with the requirements of NEPA and CEQA (see Section D.14.3, Applicable Regulations,

Plans, and Standards). Section F.1, as described in the previous paragraph, includes the racial minority population data identified in the comment.

However, to address the commenter's request for a comparative evaluation of income, education and population data, the table below was prepared to supplement the information presented in Section F.1 (Environmental Justice), and the socioeconomic data presented in Section D.14 (Socioeconomics, Services, and Utilities). The table presents population and education data for San Diego County and for the Indian Reservations identified within 0.5 miles of the project route.

**Year 2000 Data¹ – San Diego County and Indian Reservations within 0.5 Miles
and with $\geq$ 50% Low-Income and Minority Populations²**

	Total Population (% of County)	Minority Population (%) (% of County)	Low-Income Popula- tion (%) (% of County) ³	Highest Education Level	
				⁴ High School Graduate (%)	⁴ Bachelor Degree or Higher (%)
Proposed Project and Link Alternatives					
San Diego County (ABDSP Link)	2,813,833	941,994 (33.5%)	348,915 (12.4%)	82.6%	29.5%
Santa Ysabel Reservation (Central Link)	250 (0.009%)	228 (91.2%) (0.024%)	58 (23.3%) (0.017%)	70.9%	3.4%
Barona Reservation (Inland Link)	536 (0.019%)	434 (81.0%) (0.046%)	90 (16.8%) (0.026%)	70.9%	4.0%
I-8, BCD, and Route D Alternatives					
Campo Reservation (I-8 Alternative)	351 (0.012%)	273 (77.7%) (0.029%)	146 (41.6%) (0.042%)	59.1%	7.4%
La Posta Reservation (I-8 Alternative)	18 (0.001%)	16 (88.9%) (0.002%)	9 (48.6%) (0.003%)	52.9%	0.0%
Viejas Reservation (I-8 Alternative)	394 (0.014%)	188 (47.7%) (0.020%)	51 (13.0%) (0.013%)	73.2%	14.6%
Manzanita Reservation (BCD Alternative)	69 (0.002%)	59 (85.5%) (0.006%)	4 (5.9%) (0.001%)	71.4%	20.0%
Other Alternatives Considered in EIR/EIS					
Future Transmission System Expansion					
Pala Reservation	1,573 (0.056%)	1,054 (67.0%) (0.112%)	639 (40.6%) (0.183%)	52.3%	8.4%
Pauma Reservation	186 (0.007%)	173 (93.0%) (0.018%)	40 (21.5%) (0.011%)	97.1%	18.6%
LEAPS					
La Jolla Reservation	390 (0.014%)	345 (88.5%) (0.037%)	64 (16.3%) (0.018%)	68.6%	8.4%
Pechanga Reservation	467 (0.017%)	384 (82.2%) 0.041%)	138 (29.5%) (0.040%)	64.8%	3.7%

	Total Population (% of County)	Minority Population (%) (% of County)	Low-Income Popula- tion (%) (% of County) ³	Highest Education Level	
				⁴ High School Graduate (%)	⁴ Bachelor Degree or Higher (%)
Rincon Reservation	1,495 (0.053%)	1,082 (72.4%) (0.115%)	441 (29.5%) (0.126%)	56.6%	4.8%

Source: U.S. Census Bureau. 2008. Year 2000 Census Lookup. <http://factfinder.census.gov/servlet/BasicFactsServlet> accessed May 22.

1 - Year 2000 data was used because detailed demographic sets are not available for census data updates.

2 - The jurisdictions presented in this table are those jurisdictions in San Diego County that were identified in Section F.1, Environmental Justice, of the Draft EIR/EIS as having 50 percent or greater of low-income or minority populations and were within 0.5 miles of the Proposed Project and alternative alignments.

3 - Data was provided in percentage format. Therefore, number of individuals was derived from percentage of total population.

4 - Percentages are based on total population over the age of 25.

A0006-4 Please refer to Response to Comment A0006-2 for a discussion of the revised BCD Alternative and revised BCD South Option, which would avoid the northern Campo Reservation and have been found to be Environmentally Superior for the Southern Alternative in this segment.

A0006-5 The Draft EIR/EIS did not intend to exclude tribal governments in any way. Where noted in the comments, the Draft EIR/EIS has been changed to more clearly acknowledge tribal government authority over Reservation lands.

A0006-6 As requested in the comment, the first sentence in the Land Use Section D.4.1 (Regional Setting and Approach to Data Collection) has been revised as follows:

The Proposed Project ~~and alternatives~~ are is located within, or passes adjacent to, or near the boundaries of various federal, State, tribal, and local jurisdictions, including the U.S. Bureau of Land Management (BLM), U.S. Forest Service, National Park Service (NPS), Department of Defense (DOD), California State Parks, California Department of Fish and Game (CDFG), California Department of Transportation (Caltrans), San Diego and Imperial Counties, Vista and Imperial Irrigation Districts, Ramona Municipal Water District, Santa Ysabel Band of Diegueño Mission Indians, and the Cities of Poway and San Diego.

The commenter also requested that this change include reference to all tribes affected by the Proposed Project. Reference to all tribes has not been added here because this section addresses the Proposed Project route only. The alternative discussions include reference to tribal jurisdictions in the discussion of the environmental setting.

The comment regarding using government-to-government consultation to access information about tribal land is acknowledged.

A0006-7 The Classification or Land Use Types identified on Table D.4.1, Land Use Classifications, are meant to illustrate the different land uses that have the potential to be impacted by the Proposed Project. The table does not show jurisdiction or authority of any kind on tribal lands. The reference to “tribal” as a land use classification has been changed to “Indian Reservation” to better identify the land use. In addition, the information on this table is not plan-specific and only shows the general land uses in the project area. Reference was changed in all land use discussions as noted in the comment.

Tribal <u>Indian Reservation</u>	All Uses on Reservation Lands (e.g., Rural Residential, Casinos, Miscellaneous Open Space)
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Change to Section E.1, page 4-9, as an example of how the text was changed throughout the report. (First paragraph under Impact L-1)

This alternative would traverse land used for agriculture, commercial and office, industrial, parks and recreation/open space, public facilities and utilities, residential, and ~~tribal~~ Indian Reservation ~~uses~~. Sensitive land uses in the area include community uses (including those on ~~tribal~~ Indian Reservation land), educational uses, religious uses, and residential uses (including those on ~~tribal~~ Indian Reservation land).

Lastly, the commenter requested that a new section be added in Appendix 2, Policy Screening Report to include tribal government land use plans and documents. The discussion below presents the new text added to Appendix 2, Policy Screening Report.

5. Tribal Government Documents

This section presents information on tribal government land use plans or documents for those reservations that have the potential to be directly impacted by the Proposed Project or its alternatives. The Interstate 8 and Route D alternative alignments will traverse the Campo Indian Reservation and the La Posta Indian Reservation. Therefore, these tribal documents are included in the Policy Screening Report. The Proposed Project and alternative alignments will go near but not within the Santa Ysabel Reservation, Barona Reservation, Pauma Reservation, Pala Reservation, Viejas Reservation, Manzanita Reservation, Pechanga Reservation, La Jolla Reservation, and Rincon Reservation. The planning documents for these reservations are not discussed in this report. However, it is acknowledged that tribal governments must be consulted and that a permit or approval must be obtained from the tribal government for construction and operation of the Proposed Project or alternative alignments on reservation land.

5.1 Campo Band of Mission Indians Land Use Code (1992)

The Campo Band of Mission Indians Land Use Code (Code) guides development and land use on the Reservation. Section 102 states that the Campo Band shall be guided by the goals of the Code including protection of the environment and retaining wilderness areas. The Code identifies 15 goals including safety, adequate housing, protection of natural resources (cultural, biological), adequate infrastructure (roads, water, light, parks, fire, police, and others), protecting aesthetic resources, and controlling noise. The Code defines the land uses allowed in the residential/grazing/agricultural, civic, tribal enterprise, commercial, industrial, and wilderness designations. Section 302 of the Code identifies the need to map the land use designations, however, a map was not provided with the Code. The Code also establishes a process for re-designation of an area and consideration of proposed development on Reservation land, which includes review of beneficial and adverse impacts on the physical environment, consistency with the Land Use Code, public hearing for redesignation of land or variance, and approval by the Campo Band's chartered corporation, Muht-Hei, Inc. The Code describes building permit requirements and land use and terrain management standards.

5.2 Final Tribal Environmental Assessment of Off-Reservation Impacts for the La Posta Band of Mission Indians Gaming Facility (2005)

For the La Posta Reservation, the Final Tribal Environmental Assessment of Off-Reservation Impacts for gaming was provided by the La Posta Band of Mission

Indians for use in this report. The Tribal Environmental Assessment (TEA) assesses the off-reservation impacts of a 20,000-square-foot casino facility. The report states that a Comprehensive Plan with a Land Use Plan has been completed, but the TEA does not go into detail about the components of the Land Use Plan. Any proposed development on the Reservation would need to be consistent with the adopted Land Use Plan.

A0006-8 The commenter noted an inconsistency in the text. The inconsistency in how the jurisdictions were presented on the land use tables has been corrected in this Final EIR/EIS, see the example below:

18-44-45	BIA, <u>Campo Band of Mission Indians</u> , Caltrans, County of San Diego	Parks and Recreation/ Open Space, Public Facilities and Utilities, <u>Tribal, Reservation**</u>	Open Space, Interstate 8, Campo Reservation* (includes residences)
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** Land use within reservation lands may include the following classifications: residential/grazing/agricultural; civic; tribal enterprise, commercial, industrial, and wilderness.

With regard to the additional comment on Table E.1.4-1 and the Campo North Option, the analysis did take into consideration the Campo Reservation. The introduction to the analysis in Section E.1.4.4 (Interstate Route Options) specifically states that the route was identified by the Campo Tribe and describes its location. The table has been corrected as noted below to address this comment.

Campo North Option			
CN 0-1.4	County of San Diego, <u>Campo Band of Mission Indians</u>	Agriculture, Parks and Recreation/Open Space, Residential, <u>Reservation**</u>	Grazing Operations, Open Space, <u>Campo Reservation</u> , Interstate 8, Rural Residential

A0006-9 The only reference to the San Diego General Plan in addressing the site of wind turbines is on page E.5-25 in the Draft EIR/EIS under Wind Component Area Siting. This section states that the wind component would be located on “the Campo, La Posta and Manzanita Reservations and BLM lands, and are designated in the San Diego County General Plan as Tribal Lands, Rural, and Open Space (recreation). The Rural designated areas are located within reservation lands.” Section E.5.4, Figure E.5.1-5, and Table E.5.1-3 (Ownership of Land in Wind Classes 3, 4, 5, 6, and 7 in the San Diego Region) in the Draft EIR/EIS also illustrate and/or describe the wind component as being located on tribal lands.

The siting of the turbines did not depend on the San Diego General Plan. The San Diego County area, including tribal lands, was studied and classified depending on relative availability of wind. The areas designated as available for wind farm development (shown on Figure E.5.1-6b in the Draft EIR/EIS) were determined based on a review of the Wind Classes, topography, resource sensitivity, and land ownership.

A new section has been added in Appendix 2, Policy Screening Report to include tribal government land use plans and documents. Please refer to Response to Comment A0006-7.

The text in Section E.5.1.4 (page E.5-28) of the Draft EIR/EIS has been revised to refer to approval by the affected tribe’s government rather than approval by a “reservation,” as follows:

...would be required to be approved by San Diego County, BLM, and/or Campo Band, Manzanita, or La Posta General Councils ~~Reservations~~.

- A0006-10 The commenter states that the County Zoning Administrator has no authority to approve siting of improvements on tribal lands. The County Zoning Administrator would review the overall project improvements to ensure compliance with the mitigation measures, but would not be responsible for approval of siting on tribal lands. Tribes retain sovereign rights to determine whether they would negotiate easements for SDG&E to construct and operate transmission lines across their lands. The Applicant would be required to coordinate with the Campo Band of Mission Indians for all such approvals and would not be able to proceed on tribal lands without tribal approval.
- A0006-11 The purpose of the Visual Resources analysis presented in Section E.5.3 for Wind is to document the impacts that would occur under the Wind component of the Renewable Generation Alternative. This analysis discusses the visual impact that would be experienced from I-8 (which is appropriate) but makes no statement as to the County's jurisdiction or lack thereof over tribal lands. Therefore, the finding is considered relevant within the context of the identification of visual impacts resulting from wind development in the vicinity of I-8, regardless of whose land the impact originates from.
- A0006-12 The commenter states that the Agricultural Setting for Wind on page E.5-141 does not make reference to tribal planning documents. The following sentence has been modified to address this comment:
- In addition, the San Diego County General Plan, ~~and~~ the San Diego Associations of Governments Regional Comprehensive Plan, and tribal land use plans would apply to this component as well (See Section D.6.3 for details on these local and regional agency plans and Appendix 2, Section 5 for information on tribal land use plans and codes).
- A0006-13 The comment notes that noise limits in the San Diego County Code and Regulatory Ordinances and the San Diego Mountain Plan do not apply on the reservation. The noise ordinances and thresholds are used to characterize the significance of impacts in the EIR/EIS, but enforcement of such limits remains in the jurisdiction of the local agency or the tribe. It is within the discretion of the lead agencies to establish the thresholds of significance for the EIR/EIS. The thresholds are set by the CPUC and BLM to be protective of public health and to avoid nuisance conditions for noise-sensitive land uses anywhere, whether they be on the reservation or not.
- A0006-14 The Final EIR/EIS (Section E.5.8) clarifies Mitigation Measure N-3b to show that the tribal authority or other applicable local land use approval authority would implement the measure for any wind development that could be on tribal land.

N-3b Perform Operational Noise Study. [...] The Operational Noise Study shall be reviewed and approved by ~~San Diego County~~ the local land use or tribal authority prior to land use clearance. If the siting of turbines results in reservation residence(s) being located within a 65 dB noise contour for the wind component turbines or the sound level exceeds 65 dB at the property boundaries, the turbine(s) at this location(s) shall be moved until the residence(s) and/or property lines fall outside of the 65 dB noise contour. Final siting of wind component turbines shall be subject to approval by the local land use or tribal authority ~~San Diego County~~.

- A0006-15 The Final EIR/EIS clarifies the Air Quality Setting for Wind in Section E.5.11 (Draft EIR/EIS, p. E.5-215) to show that the tribal authority has jurisdiction over air quality on tribal land.

The air quality setting for the wind component, including the potential substation, is similar to that of the Anza-Borrego Link, which is described in Section D.11.2.2. The wind component is ~~wholly~~ within San Diego County and partially on tribal land. Within the county, air quality is administered by the SDAPCD, except for sources and activities on tribal lands, which are the jurisdiction of the tribal authority.

- A0006-16 The Campo Band notes that the text of Mitigation Measure B-3a appears to give discretion to non-tribal agencies over weed control on tribal land. As suggested, the text of Mitigation Measure B-3a has been revised to add reference to “the tribal government, as appropriate” with regards to authorization of weed control plans throughout the measure. Also, the term “land-holding public agencies” has been changed to instead say “land-holding government entities.” The entire text of the revised Mitigation Measure B-3a (Prepare and implement a Weed Control Plan) can be found in Appendix 12 of this Final EIR/EIS.

- A0006-17 The commenter requests revision of the Environmental Justice evaluation to address a larger population area, and states that this revision could change the environmental ranking of the alternatives. Section F.1.1, Screening Level Analysis (Volume 3), states:

The “affected area” may change depending on the types of impacts analyzed; however, using an affected area of 0.5 miles, rather than 1 or 2 miles identifies localized impacts of the project. By looking at the localized impacts rather than looking at impacts that would affect everyone residing in a region equally identifies disproportionate project specific impacts to minority and low-income populations. Impacts that affect areas outside of 0.5 miles, such as visual impacts and certain air and water quality impacts would affect the greater region and so looking at such a wide area would not identify any disproportionate impacts to minority of [or] low-income populations. By setting the “affected area” at 0.5 miles for environmental justice, the analysis will focus on the project impacts specific to the populations within the vicinity of the project route rather than the region as a whole.

The Environmental Justice evaluation considers whether localized impacts of the Proposed Project would have a disproportionate impact to minority or low-income populations. This evaluation did not identify a disproportionate impact to minority or low-income populations on the Campo Indian Reservation. If the “affected area” was expanded as suggested in the comment, additional minority and low-income populations would be identified. However, the localized nature of the Proposed Project does not warrant this expanded assessment as described in the above quoted text.

In addition, if the evaluation area for minority and low-income populations were expanded in response to this comment, this information might not change the selection of alternatives for consideration in the EIR/EIS or the environmentally superior alternative. The environmental ranking of Project Alternatives was based on a multi-step process that initially identified alternatives with regard to three criteria outlined in Appendix 1, Alternatives Screening Report (Volume 6). The three criteria included consideration of whether the alternatives could meet most of the project objectives/purpose and need, would be potentially feasible from an economic, environmental, legal, regulatory, social

and technical basis, and would avoid or substantially lessen the environmental impacts of the Proposed Project. Alternatives selected from this initial analysis were carried forward for further analysis in the EIR/EIS. Section H, Comparison of Alternatives (Volume 5), presents a comparative evaluation of alternatives based on environmental impacts. Therefore, the selection of alternatives and the Environmentally Superior Alternatives were based on multiple factors, and the expansion of the affected area for consideration of Environmental Justice impacts would not have a direct effect in the selection of the preferred alternative.

Footnote 5 in the comment letter identifies a typographical error. The following changes were made to Section F.1, Environmental Justice:

The minority or low-income population percentage of the affected area is meaningfully greater (50 percent or greater per EPA Guidance Document) than the minority or low-income population percentage in the general population of the jurisdiction or other appropriate unit of geographic analysis (i.e., County or ~~Native American Reservation~~ Tribal Government) where the affected area is located.

Footnote 6 in the comment letter mentions the preference for the use of the term “Indian” instead of “Native American,” and the use of the term “Tribal” to describe jurisdictional boundaries. These changes have been made in Environmental Justice, Section F.1, except when “Native American” was used to describe Census Tract data.

- A0006-18 The commenter’s opposition to the Interstate 8 Alternative and the Campo North Option is acknowledged. In addition to Section E.1.15, a discussion of fire risk related to the comparison of alternatives can be found in General Response GR-9. Section E.1.12 in the Draft EIR/EIS and Comment Set A0002 (Boulevard Planning Group) discuss impacts to groundwater from the Interstate 8 Alternative. Finally, as referenced by the commenter, impacts to cultural resources associated with the Interstate 8 Alternative and its options are discussed in Section E.1.7 of the Draft EIR/EIS.
- A0006-19 The Campo Band’s opposition to the Interstate 8 Alternative is acknowledged.

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