

## Response to Document No. F1

**Dadla Ponizil**

**Dated December 23, 2010**

- F1-1** The commenter's support of the project is noted and will be included in the administrative record.
- F1-2** The comment is noted. Refer to response F1-1.
- F1-3** The comment is noted. Refer to response F1-1.

## **Response to Document No. F2**

**Greg Erdmann**

**Dated January 4, 2011**

- F2-1**           The commenter has been added to the distribution list.
- F2-2**           The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required. Please refer to common response VIS4 regarding inclusion of the obstacle collision avoidance system (OCAS) into the project.
- F2-3**           Comment noted regarding the Department of Interior’s request to lower the number of turbines as a mitigation strategy for golden eagles. The Draft EIR/EIS evaluated a reduced turbine alternative (see Section C.4.2.5, Tule Wind Alternative 5, Reduction in Turbines, for a description of this alternative). This alternative meets environmental screening criteria and has the potential to reduce impacts golden eagles as well as to the BLM’s designated Area of Critical Concern (ACEC) as compared with the proposed Tule Wind Project. EIR/EIS Sections D.2 through D.18 evaluate the reduced turbine alternative’s impacts to each environmental issue area.
- F2-4**           The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

## **Response to Document No. F3**

**Jeanne Bennett**

**Dated January 20, 2011**

**F3-1** The comment is noted and will be included in the administrative record. Please refer to common response ALT2.

## Response to Document No. F4

Mary Lu Brandwein  
Dated January 20, 2011

- F4-1** The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F4-2** The comment is noted and will be included in the administrative record. The EIR/EIS provided a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including noise (Section D.8), public health and safety (Section D.10), as well as economic impacts (Section D.16). Please also refer to the common responses on these topics (see Sections 2.7, Noise, 2.8 Public Health and Safety, and 2.11, Social and Economic Condition, in Volume 3 of this Final EIR/EIS).
- F4-3** The comment will be included in the administrative record. The EIR/EIS included a full evaluation of environmental impacts related to the potential to fire and fuels management (Section D.15). Please refer to common responses FIRE1 through FIRE6. Further, as part of the NEPA process, the EIR/EIS did evaluate the loss of property values under Section D.16, impact SOC-3. Please also refer to common response SOC1 regarding property values.

## Response to Document No. F5

**Ned Israelsen**

**Dated January 20, 2011**

- F5-1** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F5-2** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F6

Jeff Hamann

Dated January 21, 2011

- F6-1** The commenter's support of the project is noted and will be included in the administrative record.
- F6-2** This comment is noted. See response F6-1.

## Response to Document No. F7

**Dale Stokes**

**Dated January 23, 2011**

- F7-1** The commenter's support of the project is noted and will be included in the administrative record.
- F7-2** This comment is noted. Refer to response F7-1.
- F7-3** This comment is noted. Refer to response F7-1.

## Response to Document No. F8

Richard Warner  
Dated January 23, 2011

**F8-1** The commenter's support of the project is noted and will be included in the administrative record.

## **Response to Document No. F9**

**Mary Lu Brandwein**  
**Dated January 24, 2011**

**F9-1** These comments are noted and will be included in the administrative record.

The EIR/EIS includes a full evaluation of environmental impacts as they relate to noise. As discussed under Section D.8 Noise, mitigation will be in place to require, prior to construction, a site-specific noise mitigation plan to ensure that noise from turbines will not adversely impact surrounding residences. The noise mitigation plan will ensure that operation of the turbines will comply with County General Plan Policy 4b and County Noise Ordinance Section 34.404. Mitigation of the turbine noise may include revising the turbine layout, curtailment of nighttime use of selected turbines, utilization of an alternate turbine manufacturer, and implementation of additional noise reduction technology. The plan will also demonstrate how the project will maintain the turbines so that they will be kept in good running order throughout the operational life of the project and will not create noise levels due to deterioration that would violate County standards. Please also refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.

As discussed under Section A. Introduction/Overview, of the EIR/EIS the goals of the Proposed PROJECT includes compliance with a number of directives related to a reduction of greenhouse gasses and renewable energy and is an important element in developing additional renewable energy resources required to meet California Renewable Portfolio Standard (RPS) targets according to Senate Bill (SB) X1 2 and federal Energy Policy Act goals for developing renewable energy.

As part of the NEPA process, the EIS/EIR evaluated the loss of property values under Section D.16, Social and Economic Conditions, and specifically Impact SOC-3. Please also refer to common response SOC1.

**F9-2** The comment is noted and will be included in the administrative record. This section of comments is duplicative of a previous email forwarded from Ms. Mary Lu Brandwein, dated January 20, 2011 (Comment F4). Please refer to responses F4-2 and F4-3.

**F9-3** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIS/EIR; therefore, no additional response is provided or required. Please refer to common response FIRE3 regarding homeowner insurance.

## Response to Document No. F10

Gerry Hodge

Dated January 24, 2011

- F10-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## Response to Document No. F11

Ginger Bonamo

Dated January 25, 2011

- F11-1** The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F11-2** The comment is noted and will be included in the administrative record. The EIR/EIS includes a full evaluation of environmental impacts related to the potential to fire and fuels management (Section D.15 of the EIR/EIS). Please refer to common responses FIRE1 through FIRE6 regarding fire concerns.
- F11-3** The comment will be included in the administrative record. The EIR/EIS includes a full evaluation of environmental impacts related to noise impacts (Section D.8, Noise and Vibration of the EIR/EIS) and public health and safety issues (Section D.10, Public Health and Safety of the EIR/EIS). Please also refer to common responses NOI1 through NOI14 and PHS1 through PHS7 regarding noise and public health/safety concerns.
- F11-4** The comment is noted and will be included in the administrative record. The EIR/EIS has included a full evaluation of environmental impacts as they relate to noise caused by the proposed wind turbines. As discussed under Section D.8, Noise and Vibration, of the EIR/EIS, mitigation will be in place to require, prior to construction, a site-specific noise mitigation plan to ensure that noise from turbines will not adversely impact surrounding residences. The noise mitigation plan will ensure that operation of the turbines will comply with County General Plan Policy 4b and County Noise Ordinance Section 34.404. Mitigation of the turbine noise may include revising the turbine layout, curtailment of nighttime use of selected turbines, utilization of an alternate turbine manufacturer, and implementation of noise reduction technology. The plan will also demonstrate how the project will maintain the turbines so that they will be kept in good running order throughout the operational life of the project and will not create noise levels due to deterioration that would violate County standards.

Furthermore, Section D.10, Public Health and Safety, of the EIR/EIS, Subsection D.10.9, Other Related Public Concerns, addresses catastrophic effects from wind, fire, and lightning, as well as potential impacts related to blade throw and tower collapse. Considering the design of the wind turbines, braking mechanisms and

other safety controls described in the EIR/EIS, and implementation of appropriate safety zones and setbacks (Mitigation Measure HAZ-6), potential impacts related to blade throw would be mitigated. In addition, given the large distances between the proposed turbines and homes (2,407 feet or greater) and the Cottonwood and Lark Canyon campgrounds (2,356 feet and 1,123 feet or greater, respectively), the turbines are not anticipated to result in adverse effects at residences or campgrounds as a result of blade throw or tower collapse.

Lastly, Section F, Cumulative Scenario and Impact of the EIR/EIS included a full evaluation of potential cumulative impacts from surrounding and proposed developments in the impacted area, including the Acorn Casino.

**F11-5** The comment is noted and will be included in the administrative record. EIR/EIS Section A, Overview/Introduction, includes a wind resources map that identifies key wind resource areas in southeastern San Diego County (Figure A-1). According to the research, notable good-to-excellent wind resource regions in the state include the mountains east of San Diego near the Proposed PROJECT and the existing Southwest Powerlink 500 kV transmission line. The proposed location of the wind turbines is a viable location and area to develop wind energy based upon specific and rigorous testing and the Proposed PROJECT is an important element in developing additional renewable energy resources required to meet California Renewable Portfolio Standard (RPS) targets according to Senate Bill (SB) X1 2 and federal Energy Policy Act goals for developing renewable energy.

**F11-6** Section D.10, Public Health and Safety of the EIR/EIS includes an evaluation of potential health effects related to Electric Magnetic Fields (Section D.10.8) and is based on thresholds established by the appropriate agencies as of the date the EIR/EIS was published, including CPUC's current guidelines regarding EMF. Please also refer to common response PHS4 regarding EMF.

**F11-7** The commenter's opinion will be included in the administrative record. Please refer to response F11-5 regarding the project location.

## Response to Document No. F12

William Joyce  
Dated January 25, 2011

**F12-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F13

**Alvin and Margaret Stahlheber**  
**Dated January 25, 2011**

- F13-1** The commenter's support of the project is noted and will be included in the administrative record.
- F13-2** This comment is noted. See response F13-1.

## **Response to Document No. F14**

**Mary Lu Brandwein**  
**Dated January 26, 2011**

- F14-1**        The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIS/EIR; therefore, no additional response is provided or required.
- F14-2**        The comment is noted and will be included in the administrative record. This comment is duplicative of a previous email forwarded from Ms. Mary Lu Brandwein, dated January 24, 2011. Please refer to response F9-1.
- F14-3**        The comment is noted and will be included in the administrative record. This comment is duplicative of previous emails forwarded from Ms. Mary Lu Brandwein, dated January 20, 2011, and January 24, 2011. Please refer to responses F4-2, F4-3, and F9-2.
- F14-4**        The comment is noted and will be included in the administrative record. This comment is duplicative of a previous email forwarded from Ms. Mary Lu Brandwein, dated January 24, 2011. Please refer to response F9-9.

## Response to Document No. F15

**Jeanne Davies**

**Dated January 26, 2011**

- F15-1** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required. Please refer to common responses ALT1, describing the adequacy of alternatives discussed in the EIR/EIS, as well as ALT2, regarding distributed generation.

## Response to Document No. F16

**Edwin Fleming**  
**Dated January 26, 2011**

**F16-1** The commenter's support of the project is noted and will be included in the administrative record.

## **Response to Document No. F17**

**Desiderio Vela**

**Dated January 26, 2011**

**F17-1**           The commenter’s support of the project is noted and will be included in the administrative record.

Refer to EIR/EIS Section D.7, Cultural Resources, regarding monitoring during ground disturbance. As described in this EIR/EIS section, APMs ECO-CUL-1 through ECO-CUL-11, TULE-CUL-1 through TULE-CUL-5, and ESJ-CUL-1 include training and monitoring for cultural and paleontological resources to reduce impacts related to these resources. Furthermore, Mitigation Measure CUL-1D (Construction Monitoring) requires retaining a qualified archaeologist, paleontologist, and Native American observer to monitor ground-disturbing activities in culturally sensitive areas. These efforts are intended to minimize the potential for adverse effects to sacred cultural, historic, religious, and archaeological resources.

**F17-2**           The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

## Response to Document No. F18

**Nash Williams**

**Dated January 26, 2011**

**F18-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F19

**Clio Gatt**

**Dated January 28, 2011**

- F19-1** The commenter's support of the project is noted and will be included in the administrative record.
- F19-2** The comment is noted. Refer to response F19-1.
- F19-3** This comment is a duplicate of previous comments; refer to responses F19-1 and F19-2.

## Response to Document No. F20

**Brendan Hughes**

**Dated January 29, 2011**

**F20-1** This comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record.

The EIR/EIS provided a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT. This includes a number of Class I impact determinations (i.e., impacts that cannot be mitigated to a level that is less than significant). Despite the incorporation of all feasible mitigation, such Class I impact determinations included the following: visual resources, short-term construction noise and air quality emissions, biological resources, cultural resources, and cumulative impacts. It is important to note that the analysis regarding these potentially significant impacts was based upon a very conservative analysis.

**F20-2** Comment noted. EIR/EIS Section D.2, Biological Resources, includes an extensive biological analysis regarding any impacts to biological resources and habitat. This includes all species and habitats that are likely to be identified within the Proposed PROJECT boundaries, such as the Peninsular bighorn sheep, Quino checkerspot butterfly, spadefoot toads, and golden eagle. The document also evaluates the potential for impacts to avian and bat species as part of the analysis. The analysis incorporated numerous mitigation measures and determined Class I significant impacts would remain due to the direct loss of designated critical habitat for the Quino checkerspot butterfly. The EIR/EIS also determined that given the known bird use and identified nesting birds in the vicinity of the Proposed PROJECT, several special-status bird and bat species have a significant risk of mortality. The risk of mortality due to collision with operating turbines by golden eagle resulting from the Proposed PROJECT would be significant under CEQA despite implementation of mitigation. Moreover, the risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be significant but can be mitigated to a level that is less than significant under CEQA and would therefore not represent an adverse impact. The risk of mortality due to collision with operating turbines by other special-status bird species resulting from the Proposed PROJECT would not be adverse. Please refer to common responses BIO1 through BIO5 regarding impacts to wildlife and avian species.

- F20-3** As discussed within Section D.2, Biological Resources, of the EIR/EIS, the Proposed PROJECT area encompasses a largely undeveloped landscape with few barriers to movement, except for I-8; the U.S.–Mexico border fence; and, to a lesser extent, scattered rural development and property fencing. Given the permeable nature of a majority of the Proposed PROJECT, the effect of the construction and operation of the Proposed PROJECT on linkages or wildlife movement corridors would not represent an adverse impact and, under CEQA, would be less than significant. Please refer to common response BIO6 regarding wildlife corridors.
- F20-4** EIR/EIS Section D.7, Cultural Resources, included a full evaluation of potential impacts to cultural resources. While most impacts were deemed to be less than significant with mitigation incorporated, Impact CUL-3, related to the potential to cause an adverse change to Traditional Cultural Properties (TCPs), was deemed to remain significant despite mitigation. As described in Section D.7, the Proposed PROJECT would have a low potential to cause an adverse effect to the characteristics of a historic property or TCP as defined by federal guidelines. However, given the expansive geographic nature of some of these resources, impacts to TCPs would be adverse and potentially significant, and under CEQA would represent a significant impact. Please refer to common responses CUL1 through CUL3.
- F20-5** The commenter’s opinion will be included in the administrative record. EIR/EIS Section D.3, Visual Resources, included a full evaluation of environmental impacts to aesthetics and visual resources caused by the Proposed PROJECT.
- F20-6** The commenter’s opinion will be included in the administrative record. EIR/EIS Section D.5, Wilderness and Recreation, included a full evaluation of environmental impacts to wilderness areas caused by the Proposed PROJECT.

## Response to Document No. F21

Robert Maupin

Dated January 29, 2011

- F21-1** The comment is noted regarding review of Section D.10.8, regarding Electric Magnetic Fields (EMFs). As summarized in Section D.10.8 of the EIR/EIS, the CPUC does not evaluate electric or magnetic fields in its review of potential environmental impacts required by CEQA. This is because there is no agreement among scientists that EMF creates a potential health risk, nor are there defined or adopted standards under CEQA for defining health risk for EMF. While it is not clear whether or not EMF poses a health risk to human beings, the Commission practices a policy of prudent risk avoidance that requires applicants to implement “low cost” and “no cost” measures to avoid unnecessary new EMF exposures. The Commission opened a rulemaking on August 19, 2004 (R.04-08-020, which is available on the Commission’s website) to consider the results of the Commission’s current “low-cost/no-cost” mitigation policy, to explore improvement in the implementation of that policy, and to evaluate what changes, if any, to the Commission’s current policies and rules should be undertaken. In 2006, the Commission made a decision (Decision 06-01-042 January 26, 2006) that directs the Commission’s Energy Division to pursue and review all available studies regarding EMF, and to review scientific information and report on new findings. Should such studies indicate negative EMF health impacts, CPUC will reconsider their EMF policies, and open a new rulemaking if necessary.
- F21-2** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. The comment is noted and will be included in the administrative record.
- F21-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F21-4** The commenter’s opinion will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## Response to Document No. F22

**Barrance Zakar**

**Dated January 30, 2011**

- F22-1** The commenter's opposition to the project is noted and will be included in the administrative record.
- F22-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. EIR/EIS Section I, Public Participation, describes the scoping process and public participation program that was conducted for the ECO Substation, Tule Wind, ESJ Gen-Tie projects.
- F22-3** The commenter's opinion will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F22-4** The comment is noted. The EIR/EIS evaluates impacts to these resources in Sections D.2, Biological Resources, D.3, Visual Resources, D.4, Land Use, D.8, Noise and Vibration, D.15, Fire and Fuels Management, and D.16, Social and Economic Conditions. Please also refer to common responses on these topics in Section 2, Common Responses to Recurring Comments, in Volume 3 of this Final EIR/EIS.
- F22-5** The commenter's opinion will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## Response to Document No. F23

Helene Idels

Dated January 31, 2011

**F23-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F24

James Freeburn

Dated February 2, 2011

- F24-1** The comment is noted and will be included in the administrative record. Please refer to response D9-1 regarding the ECO Substation transmission line alternatives.
- F24-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F24-3** The comment is noted and will be included in the administrative record. Please refer to responses D9-1 regarding project transmission line routing and D9-4, D9-6, D9-10, and D9-16 regarding EMF.
- F24-4** The comment is noted and will be included in the administrative record. Please refer to response D9-1 regarding transmission line routing alternatives. EIR/EIS Section C.4, Alternatives Evaluated in this EIR/EIS, describes in detail the alternatives analyzed in the EIR/EIS. Section E, Comparison of Alternatives, summarizes and compares the environmental advantages and disadvantages of these alternatives. This comparison is based on the assessment of environmental impacts as identified in Sections D.2 through D.18 of the EIR/EIS.

## **Response to Document No. F25**

**Dan and Tammi Mannix**  
**Dated February 2, 2011**

**F25-1** The comment is noted and will be included in the administrative record. The EIR/EIS provided a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including visual resources (Section D.3) and public health and safety (Section D.10).

To address the commenters' concern regarding the increased number of wires in the project area, the EIR/EIS in Section C.4, Alternatives Evaluated in this EIR/EIS, describes various undergrounding alternatives for the ECO Substation, Tule Wind, and the ESJ Gen-Tie projects addressing undergrounding options of the proposed transmission lines. Section C.4.1 describes two alternatives for the ECO Substation Project (see EIR/EIS Sections C.4.1.2, ECO Partial Underground 138 kV Transmission Route Alternative and C.4.1.4, ECO Highway 80 Underground 138 kV Transmission Route Alternative); Section C.4.2 describes two alternatives for Tule Wind Project (Sections C.4.2.2, Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch, and C.4.2.4, Tule Wind Alternative 4, Gen-Tie Route 3 Underground with Collector Substation/O&M Facility on Rough Acres Ranch); and Section C.4.3 describes two alternatives for the ESJ Gen-Tie Project (Sections C.4.3.1, ESJ 230 kV Gen-Tie Underground Alternative, and C.4.3.3, ESJ Gen-Tie Underground Alternative Alignment (230 kV Only to Connect with ECO Substation Alternative Site)). Each environmental topic section of the EIR/EIS (Sections D.2 through D.18) discusses the impacts and mitigation of these alternatives.

## Response to Document No. F26

**Alan Ridley**

**Dated February 2, 2011**

- F26-1** The commenter's support of the project is noted and will be included in the administrative record.
- F26-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F26-3** This comment is noted. EIR/EIS Section I, Public Participation, provides a detailed discussion of the public scoping and public participation program, which included several public meetings. Two public informational meetings were also held on January 26, 2011, and February 2, 2011, after the Draft EIR/EIS was released for public review. The purpose of these meetings is to help understand the Proposed PROJECT and explain how the public can participate in the CPUC and BLM's decision-making process. For more information on these informational meetings, refer to the meeting presentation available online:  
  
<http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/ECO-InfoMeetingPresentation.pdf>.

## Response to Document No. F27

Desiderio Vela

Dated February 2, 2011

- F27-1** The commenter's support of the project is noted and will be included in the administrative record.
- F27-2** The comment is noted. As described in EIR/EIS Section D.7, Cultural Resources, APMs ECO-CUL-1 through ECO-CUL-11, TULE-CUL-1 through TULE-CUL-5, and ESJ-CUL-1 include training and monitoring for cultural and paleontological resources to reduce impacts related to these resources. Furthermore, Mitigation Measure CUL-1D (Construction Monitoring) requires retaining a qualified archaeologist, paleontologist, and Native American observer to monitor ground-disturbing activities in culturally sensitive areas. These efforts are intended to minimize the potential for adverse effects to sacred cultural, historic, religious, and archaeological resources.
- F27-3** The comment is noted. Please refer to response F27-1.

## Response to Document No. F28

Philip Villanueva  
Dated February 2, 2011

**F28-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F29

**Jim Wiegand**

**Dated February 2, 2011**

- F29-1** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F29-2** The comment is noted. Please refer to EIR/EIS Appendix 1, Special-Status Species Detected or Potentially Occurring on the Project Site. As noted in Table 1-2, arroyo toad and least Bell's vireo were determined to have low potential to occur on site on account of the lack of known occurrences of the species in the immediate project area as well as suitable habitat. As discussed in EIR/EIS Section D.2.1.1, special-status plant and wildlife species observed on site or those with a moderate to high potential to occur within 1 mile of the Proposed PROJECT were analyzed for potential impacts in Section D.2, Biological Resources.
- F29-3** The comment is noted. Please refer to EIR/EIS Section D.2, Biological Resources, Subsection D.2.3.3 (Impact BIO-10, Tule Wind Project), which assesses impacts pertaining to electrocution of, and/or collisions by sensitive bird or bat species with proposed transmission lines and wind turbines. Mitigation measures specific to the Tule Wind Project are proposed in the EIR/EIS to minimize impacts to bat and bird resources (see Mitigation Measures BIO-10c through BIO-10i). In addition, the EIR/EIS recognizes that potential impacts to golden eagle from the Tule Wind Project, as well as cumulative impacts to special-status avian and bat species, are significant and unmitigable (see Impact BIO-10 in EIR/EIS Section F.3.1). The comment regarding the tip speeds of proposed wind turbines is noted and will be included in the administrative record.
- F29-4** The comment regarding documents prepared for Iberdrola's Manzana project are noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F29-5** The comment regarding documents prepared for the Groton Wind project are noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

**F29-6** The comment is noted. Please refer to common response BIO2 regarding California condor. Section D.2, Biological Resources, of the Final EIR/EIS has been revised to include additional information to substantiate the low likelihood for occurrence of California condor in the project area and the not adverse and less-than-significant impact determination for this species.

These changes to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines, and under NEPA do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F29-7** The comment is noted. Please refer to response F29-6.

**F29-8** The comment is noted. Please refer to response F29-6.

**F29-9** The comment summarizing a 1980 paper titled “The California Condor in Baja California, Mexico” is noted and will be included in the administrative record. Please refer to common response BIO2 regarding California condor.

**F29-10** The comment is noted. Please refer to response F29-9.

**F29-11** The comment regarding wind farm transparency will be included in the administrative record.

**F29-12** The commenter’s opposition to the project is noted and will be included in the administrative record.

## **Response to Document No. F30**

**Barbara Ashbee**

**Dated February 3, 2011**

- F30-1** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project, common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise, common response NOI10 regarding the human response to noise generated from wind turbines, common response NOI11 regarding amplitude modulation (also known as blade thumping), and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.
- F30-2** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to response F30-1.
- F30-3** The commenter describes several personal accounts of health-related episodes, symptoms, and conditions. Please refer to response F30-1. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS and no additional response is required or provided.

## **Response to Document No. F31**

**William Vandivere**  
**Dated February 3, 2011**

**F31-1** The comment is noted and will be included in the administrative record. Please refer to responses to emails forwarded from James Freeburn, dated February 2, 2011 (comment letter F24), as well as the email from Rasayana/Luke Gordon dated February 5, 2011 (comment letter D9).

## Response to Document No. F32

Dana Chappell

Dated February 4, 2011

- F32-1** The CPUC and BLM have prepared a joint EIR/EIS to evaluate the environmental impacts of the Proposed PROJECT, including the Tule Wind Project. In accordance with CEQA and NEPA requirements, this EIR/EIS identifies alternatives to the Proposed PROJECT and evaluates the environmental impacts associated with these alternatives. Refer to EIR/EIS Section E.3, Comparison of Alternatives, to the Tule Wind Project.
- F32-2** The commenter's support of the project is noted and will be included in the administrative record.
- F32-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F32-4** The following EIR/EIS sections include a full evaluation of impacts mentioned by the commenter: Section D.16, Social and Economic Conditions (re: employment opportunities resulting from the Proposed PROEJCT); Section D.3, Visual Resources; Section D.18, Climate Change; Section D.2, Biological Resources; and Section B, Project Description.

## Response to Document No. F33

William Parks

Dated February 4, 2011

- F33-1** The commenter's support of the project is noted and will be included in the administrative record.
- F33-2** The comment is noted. Refer to response F33-1.

## Response to Document No. F34

William Pape

Dated February 6, 2011

**F34-1** The commenter's support of the project is noted and will be included in the administrative record.

## **Response to Document No. F35**

**Christopher Dunn and Kathryn Beeler**  
**Dated February 7, 2011**

- F35-1** This comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record. Please refer to common response INT2 regarding the adequacy of the EIR/EIS.
- F35-2** The comments are noted and will be included in the administrative record. As part of the NEPA process, the EIR/EIS did evaluate the loss of property values in EIR/EIS Section D.16, Social and Economic Conditions, Impact SOC-3. Please also refer to common response SOC1 regarding property values.
- F35-3** The comment is noted and will be included in the administrative record. EIR/EIS Section D.15, Fire and Fuels Management, included a full evaluation of potential risks related to fire and fuels management. Please refer to common responses FIRE1, FIRE2, FIRE4, and FIRE5 regarding fire impact classifications and information on fire agency-approved fire protection plans that provide for increased fire protection.
- F35-4** The comment is noted and will be included in the administrative record. Please refer to common response FIRE3 regarding the potential for insurance premium increases or denial of coverage.
- F35-5** The comment is noted and will be included in the administrative record. The EIR/EIS provides a conservative evaluation of all of the potential environmental impacts under CEQA and NEPA. This includes a full evaluation of public health and safety (Section D.10 of the EIR/EIS), biological resources (Section D.2 of the EIR/EIS), fire and fuels management (Section D.15 of the EIR/EIS), and property values (Section D.16 of the EIR/EIS).
- F35-6** The commenter's opinion is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F35-7** The commenter's opinion will be included in the administrative record.

## **Response to Document No. F36**

**Mary Anne Oppenheimer**  
**Dated February 7, 2011**

**F36-1** The comment is noted. All potentially significant impacts have been evaluated and are provided within the EIR/EIS. This includes a full evaluation of environmental impacts as they relate to biological resources (Section D.2 of the EIR/EIS), recreational impacts (Section D.5 of the EIR/EIS), and traffic (Section D.9 of the EIR/EIS), fire and fuels management (Section D.15 of the EIR/EIS), and property values (Section D.16 of the EIR/EIS).

Construction impacts related to traffic along Ribbonwood Road, as well as Interstate 8 and Old Highway 80, have the potential to cause impacts related to traffic flow. However, with implementation of Mitigation Measure TRA-1 requiring the preparation and implementation of a traffic control plan, impacts would be adverse but mitigated, and under CEQA would be mitigated to a less-than-significant level. Traffic impacts would remain less than significant once the Proposed PROJECT is operational.

As discussed in EIR/EIS Section D.5, the Proposed PROJECT would not result in the permanent closure of trails or recreation areas. Project facilities would be located on either private, undeveloped land or on BLM-managed land made available for wind energy development and where major modifications to the characteristic landscape are permitted. Facilities, structures, and transmission lines would not permanently preclude recreational activities at any of the identified wilderness and recreation areas in the vicinity. While the Proposed PROJECT and associated wind energy projects would clearly be visible from nearby recreation areas and would change the character of these areas by introducing multiple industrial elements to the existing visual landscape, operation of the Proposed PROJECT and the identified wind projects would not permanently preclude recreational activities, including hiking, horseback riding, and camping.

Please also refer to common responses in Volume 3, Chapter 2, of this Final EIR/EIS regarding wildlife (Section 2.4, Biological Resources), fire (Section 2.10, Fire and Fuels Management), and property values (Section 2.11, Social and Economic Conditions).

## Response to Document No. F37

Diane Smelser

Dated February 7, 2011

- F37-1** The commenter's support of the project is noted and will be included in the administrative record.
- F37-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F37-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F37-4** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F38

John Gibson

Dated February 8, 2011

**F38-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F39

**Julie Gibson**

**Dated February 8, 2011**

- F39-1** The commenter's support of the project is noted and will be included in the administrative record.
- F39-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## Response to Document No. F40

**Jim Collins**

**Dated February 9, 2011**

- F40-1** The commenter's opinion is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F40-2** This comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record. Please refer to common response INT1 regarding the extension on the public review period.
- F40-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## **Response to Document No. F41**

**Earl Goodnight**

**Dated February 10, 2011**

- F41-1** The commenter's concerns and opinions are noted and will be incorporated into the project record for consideration during project deliberation. EIR/EIS Section D.15, Fire and Fuels Management, included a full evaluation of potential risks related to fire and fuels management. Please refer to response F35-3, as well as common responses FIRE1, FIRE2, FIRE4, and FIRE5 regarding fire impact classifications and information on fire agency-approved fire protection plans that provide for increased fire protection.
- F41-2** The comment is noted and will be included in the administrative record. The EIR/EIS, in its evaluation of the potential impacts and environmental issues caused by the Proposed PROJECT, provides substantial research and evaluation, including specific project surveys and studies, to provide a conservative evaluation of the potential environmental impacts that may be caused. The comment lacks sufficient support or documentation as to the nature or the validity of the referenced information regarding health risks found on the internet. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F41-3** The comment is noted. The proposed Campo, Manzanita, and Jordan wind energy projects, including proposed gen-ties, are analyzed at a program level as project-level information has yet to be developed. As stated in the EIR/EIS, these projects will require separate environmental analysis and approval processes.
- F41-4** This comment is noted and will be included in the project record for consideration during project deliberation. Please refer to common response SOC1 regarding property values.
- As stated in the EIR/EIS, the Jordan wind project will require a separate environmental analysis and approval process when project-level information is available. This analysis will include project-specific analysis regarding the visual impacts of the Jordan Wind Project.

- F41-5**           The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR/EIS; therefore, no additional response is required. The Jordan wind energy project was evaluated as part of the cumulative impact analysis and included as much detail as could be ascertained at this potential stage of development. However, the Jordan wind energy project is not a component of the actual Proposed PROJECT at this time. Please also refer to response F41-2 above.
- F41-6**           Please refer to common response INT1 regarding information about the public review period as well as the extension of the public review period.
- F41-7**           The comment is noted. The comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record.

## **Response to Document No. F42**

**John and Iris Mauris**  
**Dated February 12, 2011**

- F42-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F42-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F42-3** The comment is noted. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.
- F42-4** The comment is noted. Please refer to EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). Please also refer to common response CUM1 regarding cumulative projects. The EIR/EIS includes a conservative analysis of all potential environmental impacts pursuant to CEQA and NEPA.
- F42-5** The comment summarizes the components of the Tule Wind Project and location of the Jordan Wind Project as analyzed in the EIR/EIS. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS, no further response is required or provided.
- F42-6** The comment is noted. The EIR/EIS evaluates impacts to visual resources in Sections D.3, Visual Resources, and F, Cumulative Scenario and Impacts. The EIR/EIS determines that Class I visual impacts (impacts that remain significant despite mitigation) would result due to the PROJECT and under the cumulative scenario.
- F42-7** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4, and FIRE5 for response to the comments on fire insurance rates, reduced firefighting effectiveness, limited ingress/egress, and limited firefighting availability and funding.

- F42-8** The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and to noise in Section D.8, Noise. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F42-9** The comment is noted. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.
- F42-10** Please refer to common response PHS2 regarding stray voltage. The comment is noted and will be included in the administrative record.
- F42-11** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker. The comment is noted and will be included in the administrative record.
- F42-12** The comment is noted. Please refer to common response SOC1 regarding property values.
- F42-13** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common response NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations; common response PHS6 regarding complaint resolution; common response PHS2 regarding stray voltage; and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment regarding binding agreements for noise monitoring is noted and will be included in the administrative record.
- F42-14** The comment is noted. Please refer to response F42-13 above; common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS. Also, please see the response to comment F42-8 regarding public health.

- F42-15** The comment is noted. Section D.12, Water Resources, in the EIR/EIS evaluates project impacts to both surface and groundwater quality and quantity. Please refer to common response WR1 regarding groundwater resources. The proposed Jordan (ENEL) as well as the Campo and Manzanita projects, including proposed gen-ties, are analyzed at a program level as project-level information has yet to be developed. As stated in the EIR/EIS, these projects will require separate environmental analysis and approval processes.
- F42-16** The comment is noted and will be included in the administrative record. Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views. As discussed in Section D.3, Visual Resources, of the EIR/EIS, the Proposed PROJECT would result in significant impacts associated with new sources of light and potential effects to the nighttime views in the project area. The EIR/EIS determines that the addition of wind turbines and required obstruction lighting to the McCain Valley area would likely result in a source of visual nuisance for area residents as obstruction lighting (flashing red and white lighting) which could trespass outside of the individual project boundaries and into residential areas and sensitive nighttime viewing areas.
- F42-17** The comment summarizes the issues raised previously in the letter. Please refer to the responses to comments above, notably response F42-8, F42-13, and F42-16. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## **Response to Document No. F43**

**Robert and Kathryn McCallister**

**Dated February 12, 2011**

- F43-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F43-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F43-3** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. This comment is noted and will be included in the Final EIR and administrative record.
- F43-4** The comment is noted. Please refer to EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). Please also refer to common response CUM1 regarding cumulative projects. The EIR/EIS includes a conservative analysis of all potential environmental impacts pursuant to CEQA and NEPA.
- F43-5** The comment is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIS/EIR; therefore, no additional response is provided or required.
- F43-6** The comment is noted. Please refer to EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The EIR/EIS includes a conservative analysis of all potential environmental impacts pursuant to CEQA and NEPA.
- F43-7** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. This comment is noted and will be included in the administrative record.

- F43-8** The comment is noted. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.
- F43-9** Please refer to common response PHS2 regarding stray voltage. This comment is noted and will be included in the administrative record.
- F43-10** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker. This comment is noted and will be included in the administrative record.
- F43-11** The comment is noted. Please refer to common response SOC1 regarding property values.
- F43-12** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common response NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations; common response PHS6 regarding complaint resolution; common response PHS2 regarding stray voltage; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. This comment is noted and will be included in the administrative record.
- F43-13** The comment is noted. Please refer to response F43-12 above; common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.
- F43-14** The comment is noted. Please refer to common response WR1 regarding groundwater resources.
- F43-15** The comment is noted. Please refer to response VIS4 regarding new sources of light and potential effects to the nighttime views. The EIR/EIS Section D.3, Visual Resources, determines that the addition of turbines and FAA-required obstruction lighting to the McCain Valley area would likely result in a source of visual nuisance for area residents as obstruction lighting (flashing red and white

lighting) could trespass outside of the individual project boundaries and into residential areas and sensitive nighttime viewing areas.

**F43-16**

The comment summarizes the issues raised previously in the letter. Please refer to the responses to comments above, notably response F43-7, F43-12, and F43-15. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## **Response to Document No. F44**

**Paul Thompson**

**Dated February 12, 2011**

- F44-1** The comment is introductory in nature and describes the commenter’s personal history living near a wind turbine facility in Ontario, Canada. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-2** The commenter describes his personal health condition and summary of treatments to date. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-3** The commenter provides a personal account of an incident involving transformers near his home in Ontario, Canada. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-4** The comment provides an introduction to several personal accounts of health-related episodes, symptoms, and conditions. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-5** The commenter describes several personal accounts of health-related episodes, symptoms, and conditions, written in the form of a daily diary. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; and common response NOI10 regarding the human response to noise generated from wind turbines. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-6** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, as well as common response NOI3 regarding the annoyance effects of various noise sources. Please also refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common response NOI10 regarding the human response to noise generated from wind

turbines; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.

**F44-7** Please refer to common response SOC1 regarding property values. This comment is noted and will be included in the administrative record.

**F44-8** The comment describes the noise assessment, methods, and resolution of noise impacts associated with certain transformers proposed for a wind turbine facility near his home in Ontario, Canada. Section D.8, Noise of the EIR/EIS describes the noise levels that would be generated by the Proposed PROJECT, including noise associated with proposed transformers.

As described on Page D.8-32 of the EIR/EIS:

“The primary source of operating noise at the ECO Substation would be the on-site transformers. The transformers located at the ECO Substation are modeled as National Electrical Manufacturers Association (NEMA)-rated 68/70/71 dBA. The 1-hour average 45 dBA noise contour would be located within the station property line; thus, no noise-sensitive areas would be exposed to noise levels above 45 dBA (SDG&E 2009).”

As described on Page D.8-33 of the EIR/EIS:

“The primary source of operating noise at the rebuilt Boulevard Substation would be the on-site transformers. The distribution transformers at the Boulevard Substation are modeled as NEMA-rated 68/70/71 dBA. The daytime operation 1-hour-average 50 dBA sound level and the nighttime operation 1-hour-average 45 dBA sound level would be within the station property. Thus, no noise-sensitive areas would be exposed to noise levels above 50 dBA during daytime hours or above 45 dBA during nighttime hours.”

As a result, operation of the rebuilt Boulevard Substation and proposed ECO Substation would comply with the County’s noise ordinance criteria and would not result in an adverse impact. Under CEQA, corona noise at the Boulevard and ECO substations would cause a less-than-significant noise impact (Class III).

**F44-9** Please refer to common response PHS2 regarding stray voltage.

**F44-10** Please refer to response F44-8 above. Routine and major maintenance activities would be required for all project components, and performed as described in Section B. Description of Proposed Project of the EIR/EIS.

- F44-11**      This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F44-12**      Please refer to common response SOC1 regarding property values. This comment is noted and will be included in the Final EIR and in the administrative record.

## Response to Document No. F45

Philip Villanueva  
Dated February 12, 2011

**F45-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F46

Howard Cook

Dated February 14, 2011

- F46-1** The comment provides background regarding the projects analyzed in the EIR/EIS. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-2** The comment provides detail regarding the components and location of the Tule Wind Project and ECO Substation Project and mentions the proposed interconnections of the Campo, Jordan, and other tribal wind projects. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-3** The comment regarding the informational project meetings held January 26, 2011 and February 2, 2011 in Jacumba and in Boulevard is noted. An agenda was provided at both of the public information meetings held in early 2011 which outlined the respective proceedings for the evening. The informational project hearings should not be confused with public hearings which present a more formal setting. Under CEQA, formal hearings are not required at any stage of the environmental review process and public comment during the review process may be restricted to written communication (Article 13, Section 15020(a) of the CEQA Guidelines). Under NEPA, public meetings may be held in a variety of formats and may be much more informal than hearings (the BLM NEPA Handbook does not require public hearings during the EIS review period; it only requires records of the public hearing/meeting be maintained) (Section 9.3.4 of the BLM NEPA Handbook H-1790-1). Moreover, the informational meetings permitted an open forum between interested parties and individuals directly involved with preparation of the EIR/EIS in order to facilitate focused discussion pertaining to the various environmental issues covered in the EIR/EIS. Opportunity was provided to interested parties to ask questions regarding the EIR/EIS and provide comment to the lead and co-lead agencies of the Project. For these reasons, the informational meetings were valid “public meetings” in accordance with CEQA and NEPA guidelines.
- F46-4** The comment is noted and will be included in the administrative record. This comment does not raise specific issues related to the project or adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

- F46-5** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-6** The commenter’s opposition to the project is noted and will be included in the administrative record.
- F46-7** The recreation areas identified by the commenter (Carrizo Gorge Wilderness, Sawtooth Mountains Wilderness, and Anza Borrego Desert State Park) are identified in EIR/EIS Section D.5.1.1 and components of the Tule Wind Project are described according to their proximity to recreational areas in EIR/EIS Section D.5.1.3. EIR/EIS Section D.5.3.3 discloses that construction could affect access to the Carrizo Gorge Wilderness and Sawtooth Mountains Wilderness. In addition, the recreation areas identified by the commenter are identified on Figures D.5-1 and D.5-4.
- F46-8** EIR/EIS Section D.5, Wilderness and Recreation, identifies both the Carrizo Gorge Wilderness and the Sawtooth Mountains Wilderness as recreational areas located in the project area. These areas are also identified on Figure D.5-1, Wilderness and Recreation Overview Map. Also, the EIR/EIS analysis concludes that construction of the Tule Wind Project would reduce access and visitation to wilderness and recreation areas within the McCain Valley area (including the Carrizo Gorge Wilderness and the Sawtooth Mountain Wilderness) and therefore, Mitigation Measure WR-2 has been provided to ensure that access is maintained along McCain Valley Road during construction (see EIR/EIS Section D.5, Wilderness and Recreation). In addition, EIR/EIS Section D.5.1.1 discloses that “due to private property around the border, there is no legal access to [the Sawtooth Mountain] wilderness area (the Pepperwood Trail at the end of northern terminus of McCain Valley Road provides the only access to the area).”
- F46-9** The biological resources and wilderness and recreation impacts of the Proposed Project (including the Tule Wind, Campo, Manzanita, and Jordan wind energy projects) are assessed in EIR/EIS Section D.2, Biological Resources, and Section D.5, Wilderness and Recreation. See EIR/EIS Section F.3.1 for cumulative impacts discussion as they relate to biological resources. Because the Proposed Project would not result in the permanent closure of scenic overlooks, campgrounds, trails, and trailheads, impacts to wilderness and recreation areas are assessed as less than significant. Impacts to existing visual resources (including views from scenic overlooks, campgrounds, and trails) are analyzed in EIR/EIS Section D.3, Visual Resources.

- F46-10** EIR/EIS Section D.5, Wilderness and Recreation, analyzes impacts to designated wilderness and recreation areas. While the escarpment mentioned by the commenter is not an officially designated wilderness and recreation area, impacts to existing visual resources including the Carrizo Overlook are analyzed in Section D.3, Visual Resources. In EIR/EIS Section D.5, Wilderness and Recreation, Mitigation Measure WR-2 has been included to ensure that access along McCain Valley Road is maintained during construction so that visitors are able to access recreation areas within the McCain Valley area.
- F46-11** Mitigation Measure WR-2 has been included to ensure that access along McCain Valley Road to recreation areas within the McCain Valley area is maintained during construction. Since the Tule Wind Project would not result in the permanent closure of wilderness and recreation areas, impacts are assessed as less than significant. Impacts to existing visual resources including views from campgrounds and wilderness areas are discussed in Section D.3, Visual Resources.
- F46-12** The comment is noted and will be included in the administrative record. Please refer to EIR/EIS Section D.3, Visual Resources, for discussion of impacts to existing visual resources. Figure D.3-2, Tule Wind Viewshed Analysis, depicts the anticipated visibility of the project and as shown in the figure, wind turbines would be visible from the wilderness and recreation areas identified by the commenter. EIR/EIS Section D.3, Visual Resources discusses visual impacts associated with Federal Aviation Administration (FAA) required obstruction lights and concludes that the impact would be significant and adverse. Also, please refer to common response VIS4 regarding proposed turbine lighting and impacts to visual resources.
- F46-13** The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record. Please refer to EIR/EIS Sections D.2, Biological Resources, and D.5, Wilderness and Recreation, for analysis of project impacts to biological resources and wilderness and recreation.
- F46-14** Final EIR/EIS Section B, Project Description, states that up to 128 wind turbines in the 1.5 to 3.0 MW range would be installed and operated as the Tule Wind Project. Figure B-24, Tule Wind Project Typical Turbine Tower Design, depicts the approximate dimensions of the proposed wind turbines.
- F46-15** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

- F46-16** The comment is noted and will be included in the administrative record. Please refer to EIR/EIS Section D.8, Noise, for analysis of potential noise impacts and Section D.3, Visual Resources, for analysis of potential visual impacts associated with operation of FAA warning lights.
- F46-17** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-18** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-19** Please refer to EIR/EIS Section D.2, Biological Resources, for analysis of impacts to biological resources, Section D.13, Geology, Minerals, and Soils, for analysis of impacts associated with increased erosion and Section D.3, Visual Resources, for analysis of impacts to existing visual resources.
- F46-20** As stated in EIR/EIS Section D.5, Wilderness and Recreation, the Tule Wind Project is not anticipated to result in the permanent closure of wilderness and recreation areas and therefore, wilderness and recreation impacts would be less than significant. Please refer to EIR/EIS Section D.8 for analysis of noise impacts and Section D.10 for analysis of public health and safety impacts.
- F46-21** EIR/EIS Section D.3, Visual Resources, concludes that the long-term visual contrasts attributed to operation of the Tule Wind Project would be a significant and adverse impact. Revisions to the use of the phrase “may be” would not change the impact determination as the EIR/EIS has already determined that the change to the existing visual character of the site would be significant and unmitigable and therefore, this suggested revision has not been incorporated into the Final EIR/EIS.
- F46-22** The comment pertaining to BLM publications is noted however the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. In addition, EIR/EIS Section D.5.1.1 discloses that the Pepperwood Trail at the end of northern terminus of McCain Valley Road provides the only access to the Sawtooth Mountains Wilderness.

- F46-23** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-24** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-25** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-26** The comment (which consists of an excerpt the Sierra Club’s Wild Heritage Campaign publication regarding the presence of Peninsular bighorn sheep within the Carrizo Gorge Wilderness) is noted. EIR/EIS Section D.2 Biological Resources (subsection D.2.1.1 Regional Overview) discusses the presence of USFWS designated critical habitat for the species in the Carrizo Gorge and portions of the In-Ko-Pah Mountains and also notes that the easternmost portion of the proposed Tule Wind Project would be located less than half a mile from designated critical habitat. No further response is required as the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS.
- F46-27** The comment consists of an excerpt from a Sierra Club publication and does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F46-28** The comment is noted. The EIR/EIS analyzes the environmental impacts (including impacts to biological resources) that would result from construction and operation of the Proposed PROJECT, which includes the Tule Wind Project. Impacts to individual wildlife species, species’ populations, species’ habitat, and species’ wildlife movement are all addressed in the EIR/EIS. The commenter’s opposition to the project is noted and will be included in the administrative record.
- F46-29** The comment is noted. Please refer to common response BIO4 and additional detail incorporated into the Final EIR/EIS related to the potential for bighorn sheep to use the Proposed PROJECT Area. Based on the EIR/EIS environmental analysis, the Proposed PROJECT would not result in an adverse impact and the impact would be less than significant to bighorn sheep.

- F46-30** EIR/EIS Section D.16, Social and Economic Conditions, Impact SOC-2 evaluates impacts on revenue for local businesses, tribes, and governments due to project construction and operation. Please also refer to common response SOC1 regarding property values.
- F46-31** The comment is noted and will be included in the administrative record. Please refer to common response INT2 regarding the purpose and adequacy of the EIR/EIS. EIR/EIS Section A.5, Agency Use of this Document and Permits Required, describes the approval process of the Proposed PROJECT for the CPUC, BLM, and other agencies with jurisdiction over the Proposed PROJECT.
- F46-32** The commenter’s opinion is noted and will be included in the administrative record. EIR/EIS Section F, Cumulative Scenario and Impacts, provides a full evaluation of known projects in the project area, including the Sunrise Powerlink Project and other large scale energy projects (see Table F-2, Cumulative Scenario – Approved and Pending Projects).
- F46-33** The commenter’s opinion is noted and will be included in the administrative record. EIR/EIS Section D.10, Public Health and Safety, Impact PS-5, concludes that intentional destructive acts would be considered very low, in line with or less than the risk to similar generation facilities in the United States.

## **Response to Document No. F47**

**Michael Hanna**

**Dated February 14, 2011**

- F47-1** The comment is noted and will be included in the administrative record. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including visual resources (Section D.3) and noise (Section D.8). Further, as part of the NEPA process, the EIR/EIS evaluates the loss of property values under Section D.16, Social and Economic Conditions, Impact SOC-3. Please also refer to common response SOC1 regarding property values.
- F47-2** The comment is noted. EIR/EIS Section D.10.8 evaluates Electric Magnetic Fields (EMFs). Please refer to response F21-1 regarding EMFs. Please refer to response F47-1 as well as common response SOC1 regarding property values.
- F47-3** The commenter's opinion is noted. This comment does not raise specific issues related to the project or adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts to biological resources (Section D.2). Please also refer to common responses in Section 2.4, Biological Resources, of Volume 3 of the Final EIR/EIS.

## Response to Document No. F48

**Dan and Tammi Mannix**  
**Dated February 14, 2011**

- F48-1** The commenter's opinion is noted and will be included in the administrative record. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts to visual resources (Section D.3). Please refer to common responses in Section 2.5, Visual Resources, in Volume 3 of the Final EIR/EIS. In addition, EIR/EIS Section C, Alternatives, discusses a Reduction in Turbines alternative (Section C.4.2.5), as well as the No Project Alternative 3—No Tule Wind Project (Section C.6.3). Each environmental topic section of the EIR/EIS (Sections D.2 through D.18) discusses the impacts and mitigation associated with these alternatives.

## Response to Document No. F49

Mark Meech

Dated February 14, 2011

- F49-1** The commenter's concerns and review of the EIR/EIS is noted.
- F49-2** The commenter's opinion is noted and will be included in the administrative record. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts to biological resources (Section D.2), visual resources (Section D.3), and cultural resources (Section D.7). Please also refer to the common responses on these topics (please see Sections 2.4, Biological Resources; 2.5, Visual Resources; and 2.6, Cultural Resources, in Volume 3 of the Final EIR/EIS), as well as common response ALT2 regarding distributed generation.

## Response to Document No. F50

**Donna Tisdale**

**Dated February 14, 2011**

- F50-1** The comment is noted. The hard copies of the attached letters referenced by the commenter were received and are included in Volume 4 (Comment Letters Received) of the Final EIR/EIS.
- F50-2** Please refer to responses to letters F42 (John and Iris Mauris) and F43 (Robert and Kathryn McCallister).

## **Response to Document No. F51**

**Harry and Tracy Backer**  
**Dated February 15, 2011**

- F51-1** The commenter’s opposition to the project is noted and will be included in the administrative record. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts to biological resources (Section D.2) and visual resources (Section D.3).
- F51-2** The comment is noted. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts related to nighttime lighting (Section D.3, Visual Resources). Please also refer to common response VIS4 regarding wind turbine nighttime lighting.
- F51-3** The comment is noted and will be included in the administrative record. The EIR/EIS provides a full and conservative evaluation of all potential environmental impacts caused by the Proposed PROJECT, including impacts to public health and safety (Section D.10) and fire (Section D.15).
- F51-4** As part of the NEPA process, the EIR/EIS evaluates the loss of property values in Section D.16, Social and Economic Conditions, Impact SOC-3. Please also refer to common response SOC1 regarding property values.
- F51-5** The comment is noted and will be included in the administrative record.
- F51-6** The commenter’s opinion is noted and will be included in the administrative record.
- F51-7** The commenter’s opinion is noted and will be included in the administrative record.
- F51-8** The comment is noted. Please refer to common response INT1 regarding the extension of the public review period and public participation process.

## **Response to Document No. F52**

**Tom Bartley**

**Dated February 16, 2011**

- F52-1** The commenter's support of the project is noted and will be included in the administrative record.
- F52-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F52-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F52-4** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F52-5** The commenter's support of the project is noted and will be included in the administrative record.
- F52-6** The comment is noted. Please refer to EIR/EIS Section D.2, Biological Resources, for a full evaluation of environmental impacts related to biological resources.
- F52-7** The commenter's support of the project is noted and will be included in the administrative record.

## **Response to Document No. F53**

**Michael Cuff**

**Dated February 16, 2011**

- F53-1** The comment regarding the format of public information meetings and the provision of project maps at public meetings is noted. CEQA and NEPA do not require that public meetings be held on weekends. The information meetings were held on weekdays a week apart in early 2011 (January 26, 2011 and February 2, 2011) during evening hours (both meetings started at 7 p.m. and lasted until 10 p.m.) so that residents living in the area but working elsewhere were provided time to attend in order to ask questions/submit comment. Multiple exhibits of the Proposed PROJECT (including the Tule Wind Project) were displayed during the information meetings.
- F53-2** The comment consists of an excerpt of the California Desert Conservation Area Plan and is noted. Please refer to response F53-15 regarding the redesignation of BLMs lands as available for wind energy development.
- F53-3** The comment consists of a quote taken from the front page of the Bureau of Land Management, California website and is noted. However, because the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS, no response is provided or required.
- F53-4** The revenue generated by the Proposed PROJECT for the jurisdictional agencies referenced (BLM, CSLC, County of San Diego) has yet to be determined and is not within the purview of the environmental analysis and therefore has not been included in the EIR/EIS.
- F53-5** Section D.10, Public Health and Safety of the EIR/EIS provides a full analysis of potential hazardous materials and public health and safety impacts associated with construction and operation of the Proposed PROJECT. D.10.3 includes an analysis and discussion of environmental contamination, hazardous materials, and impacts/environmental effects to public and worker health and safety resulting from the Proposed PROJECT, as well as mitigation for these impacts. Impact HAZ-1 addresses impacts resulting from accidental spill or release of hazardous materials during construction activities and provides Mitigation Measures HAZ-1a through HAZ-1d to reduce these impacts to public health and safety to less-than-significant levels. Impact HAZ-5 addresses impacts resulting from accidental spill or release of hazardous materials during operations and maintenance. Developing and implementing a site-specific Spill Prevention Control and

Countermeasure Plan (Mitigation Measure HAZ-5a) and an Hazardous Materials Business Plan (Mitigation Measure HAZ-5b) would reduce potential hazards to the public or the environment resulting from accidental spill or release of hazardous materials during operations and maintenance.

Table D.10-13. Mitigation Monitoring Compliance and Reporting – ECO Substation, Tule Wind, and ESJ Gen-Tue Projects – Public Health and Safety, lists each mitigation measure and outlines procedures for successful implementation. Section H of the EIR/EIS provides the recommended framework for effective implementation of the mitigation monitoring compliance and reporting program (MMCRP) by the lead agencies.

- F53-6** BLM will prepare a compliance plan that will identify the terms, conditions, and stipulations of the right-of-way grant that will be monitored in accordance with Federal Land Policy and Management Act (FLPMA).
- F53-7** Please refer to common response FIRE1 regarding improvements in firefighting capabilities and FIRE5 regarding applicants providing assistance to fire agencies that will improve fire protection and response (also see EIR/EIS section D.15.3.3, Direct and Indirect Effects).
- F53-8** The comment regarding Native American consultation is noted. Please refer to common response CUL1 and CUL2 regarding sufficiency of the Native American consultation process and traditional cultural properties.
- F53-9** EIR/EIS Section B, Project Description, indicates that operation of the Tule Wind Project would require an O&M staff of up to 12 full-time employees. The residency of the full-time staff has not been determined at this time.
- F53-10** EIR/EIS Section D.13 Geology, Mineral Resources, and Soils discusses the proposed project site's existing topography, geology, soils, regional faulting and seismicity, liquefaction, landslide, subsidence, and mineral resources. Section D.13 includes a review of applicable regulations and standards that apply to the project. Section D.13.10 lists references that include California Code of Regulations, California Building Code, The County of San Diego Seismic Safety Element, and *Geologic Hazards Assessment for the Tule Wind Project, San Diego County, California*, prepared by HDR Engineering, Inc., January 2010, which is available on the internet at: [http://www.dudek.com/ECOSUB/AEDTule\\_ECOSUB.htm](http://www.dudek.com/ECOSUB/AEDTule_ECOSUB.htm). The EIR/EIS requires through Mitigation Measures GEO-2 and GEO-3 that prior to construction of the Tule Wind Project the BLM, San Diego County, CSLC, BIA and/or the Ewiiapaayp Band of Kumeyaay Indians, depending on the jurisdiction

where the construction activities are being completed, will have 60 days to review completed geotechnical studies for the final project design. The geotechnical studies will assess problematic soils, liquefaction, lateral spreading, seismic slope instability, and ground-shaking hazards and will include specific design measures that comply with all applicable laws and standards where appropriate such as excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill, ground-treatment processes, redirection of surface water and drainage away from expansive foundation soils, construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in underground cables to allow ground deformations without damage to structures. As stated in the DEIS/DEIS, with mitigation impacts due to geologic hazards and corrosive soils would be less than significant. The specifics of the referenced occurrence of a blade fastener falling are not known, and therefore cannot be specifically commented on. However, as stated in the EIR/EIS, the project will comply with all applicable laws, regulations, and building codes. In addition, Section D.10 Public Health and Safety, includes Mitigation Measure HAZ-1b, which requires that the project prepare and implement and Health and Safety Program to protect the safety of workers and the public during all project phases. Additionally, Mitigation Measure GEO-4 will require that the project applicant have the project facilities and soils inspected by licensed professionals after seismic events to ensure structural integrity.

**F53-11** The comment is noted. The potential conflicts between air traffic and proposed wind turbines is discussed in Section D.9, Transportation and Traffic. As mentioned in Section D.9, potential conflicts are assessed as potentially significant and adverse and therefore, Mitigation Measure TRA-3 has been included to ensure that pilots and the FAA, DOD and U.S. Customs and Border Protection are notified of the Tule Wind project location and components.

**F53-12** As stated in Section H.1.2, Bureau of Land Management, of the EIR /EIS, the BLM is the federal lead agency for preparation of this EIR/EIS, in compliance with the requirements of NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations (CFR) 1500 et seq.), and the BLM NEPA Handbook (H-1790-1) in the evaluation of SDG&E's proposed ECO Substation Project and Tule Wind, LLC's proposed Tule Wind Project. For portions of the project on federal lands owned or managed by the BIA and the Ewiiapaayp Band of Kumeyaay Indians, BLM will consult with the BIA and the Ewiiapaayp Band of Kumeyaay Indians in implementing mitigation requirements.

Title V of the Federal Land Policy and Management Act (FLPMA) addresses the issuance of ROW authorizations on public land (43 U.S.C. 1701 et seq.). The general terms and conditions for all public land ROW are described in FLPMA Section 505, and include measures to minimize damage and otherwise protect the environment, require compliance with air and water quality standards, and compliance with more stringent state standards for public health and safety, environmental protection, siting, construction, operation, and maintenance of ROWs. For these projects, terms and conditions will be incorporated into the ROW grants that are necessary to protect public safety, including security fencing and on-site personnel. The environmental effects analysis in the EIR/EIS identifies impacts and mitigation measures to reduce/eliminate impacts. The mitigation measures identified by the BLM will be incorporated as terms and conditions of the ROW grants and will provide those actions necessary to prevent unnecessary or undue degradation of the public lands as required by FLPMA Section 302. The additional mitigation measures identified in the mitigation monitoring program tables presented at the end of each issue area section (Sections D.2 through D.18) of this EIR/EIS will primarily be enforced by the other agencies, and will provide additional protection to public land resources.

All BLM ROW grants are approved subject to regulations contained at 43 CFR 2800 et seq. Those regulations specify that the BLM may, at any time, change the terms and conditions of a ROW grant “as a result of changes in legislation, regulations, or as otherwise necessary to protect public health or safety or the environment” (43 CFR 2805.15(e)).

The BLM will monitor conditions and review any ROW grants issued for the ECO Substation and Tule Wind projects to evaluate if future changes to the grant terms and conditions are necessary or justified under this provision of the regulations to further minimize or reduce impacts resulting from these projects.

**F53-13** The comment is noted. Impacts to biological resources resulting from construction and operation of the proposed Tule Wind Project are assessed in Section D.2, Biological Resources, and impacts associated with the use of hazardous materials (including lubricating oil) during construction and operation of the Proposed PROJECT are assessed in Section D.10, Public Health and Safety (see Impact HAZ-1 and Impact HAZ-5).

**F53-14** The comment does not address the proposed project or adequacy of the EIR/EIS. However, in accordance with the requirements of EIR/EIS Mitigation Measure PALEO-1C (see Section D.7 Cultural and Paleontological Resources), prior to the issuance of grading permits the project applicants will be required to retain a

qualified paleontologist, to monitor earth disturbances in all areas of paleontological sensitivity, per approval by the lead agency.

**F53-15** Visual Resource Management (VRM) classifications are applied to public lands managed by the BLM and are not applied to individual proposed projects. In the 2008 Eastern San Diego County Resource Management Plan, the BLM designated the land on which the proposed Tule Wind Project would be located as available for wind energy development and assigned a Class IV VRM designation (see Section D.3, Visual Resources, Figure D.3-5, BLM Visual Resource Management Classifications). The VRM designations applicable to lands within the Eastern San Diego County Planning Area are discussed in the Eastern San Diego County Resource Management Plan (RMP) and the visual resource inventory field work conducted for the RMP is included as Appendix 3b, Visual Resource Inventory Summary, to the EIR/EIS.

**F53-16** As stated in Section D.11 Air Quality (Subsection D.11.3.3, Impact AIR-1, Tule Wind Project) construction-related emissions generated by the Tule Wind Project is anticipated to exceed the applicable PM<sub>2.5</sub> and PM<sub>10</sub> significance thresholds (see Table D.11-9) and while mitigation measures would be implemented to reduce the anticipated impact, the impact would remain significant and cannot be reduce to a level that is considered less than significant. As shown in Table D.11-14, operational emissions of PM<sub>2.5</sub> and PM<sub>10</sub> are not anticipated to exceed the applicable significance thresholds and therefore, air quality monitoring during operations would not be required.

**F53-17** The comment is noted. Tule Wind LLC would be required to obtain the necessary transportation permits from Caltrans and the County of San Diego to facilitate transport of equipment and materials required for the project. On the permit applications Tule Wind LLC would be required to identify the duration of activities requiring the permit and therefore, the granting agencies would be notified of the start and stop dates pertaining to the transport of equipment and materials to the project site. BLM would be notified by Tule Wind LLC via phone and/or construction plan submittal as to when the transport of materials would commence.

**F53-18** The comment is noted. The BLM would hire an environmental consultant to conduct training for construction personnel and the BLM would certify that the archaeological monitors hired to prepare the Historic Properties-Cultural Resources Treatment Program and the Paleontological Monitoring and Treatment Plan are qualified. As required by Mitigation Measure PALEO-1B, the qualified paleontologist tasked with preparation of the Paleontological Monitoring and Treatment Plan would have an MA or PhD in paleontology, knowledge of the

local paleontology, and would be familiar with paleontological procedures and techniques (see Mitigation Measure PALEO-1B for additional detail regarding the parameters that would constitute a “qualified” paleontologist).

The comment pertaining to the completion of the BLM El Centro field office Wind Energy Protocol is noted however, the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F53-19** The commenter’s opposition to the project is noted and will be included in the administrative record.

## Response to Document No. F54

**Ron Dahlgren**  
**Dated February 16, 2011**

**F54-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F55

**Brock Prather**

**Dated February 17, 2011**

**F55-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F56

Sean Kilcoyne

Dated February 19, 2011

- F56-1** The comment is noted and will be included in the administrative record. As stated in EIR EIS Section D.5, Wilderness and Recreation, trails are spread throughout the Lark Canyon OHV area, are not generally confined to the proposed turbine locations, and the siting of wind turbines in the Lark Canyon OHV Area would not permanently preclude OHV use. Please refer to EIR/EIS Section D.5, Wilderness and Recreation, for analysis pertaining to wilderness and recreation areas and the Proposed PROJECT.
- F56-2** In their 2008 Eastern San Diego Planning Area Resource Management Plan, the BLM redesignated McCain Valley East and McCain Valley as available for wind energy development. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## **Response to Document No. F57**

**Robert and Cindy Clark**  
**Dated February 20, 2011**

- F57-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F57-2** The comment is noted and will be included in the administrative record. Please refer to response F42-16 regarding new sources of light and potential effects to nighttime views.
- F57-3** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE4, FIRE5, and FIRE6 regarding firefighting effectiveness, firefighting availability, and funding.
- F57-4** The comment is noted and will be included in the project record for consideration during project deliberation. Please refer to common response SOC1 regarding property values.

## **Response to Document No. F58**

**Edward Waldheim**  
**Dated February 21, 2011**

- F58-1** Impacts to wilderness and recreation are analyzed in EIR/EIS Section D.5, Wilderness and Recreation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F58-2** As stated in Section D.5, Wilderness and Recreation, trails are spread throughout the Lark Canyon OHV area, are not generally confined to the proposed turbine locations, and the siting of wind turbines in the Lark Canyon OHV Area would not permanently preclude OHV use.
- F58-3** The comment is noted and will be included in the administrative record.

## **Response to Document No. F59**

**Mary Stewart**

**Dated February 22, 2011**

- F59-1** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F59-2** The comment is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. EIR/EIS Section D.12, Water Resources, evaluates water use during construction and operation of the Proposed PROJECT. Please refer to common response WR1 regarding water use.
- F59-3** The comment is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F59-4** The comment is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. EIR/EIS Section D.8, Noise and Vibration, identifies significant noise effects due to construction and operation of the Proposed PROJECT and provides applicant proposed measures (APMs) and mitigation measures, along with alternatives that would substantially reduce these effects.
- F59-5** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. Please refer to common response SOC1 regarding property values.
- F59-6** The comment is noted and will be included in administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F59-7** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required. Please refer to common response SOC1 regarding property values.

## **Response to Document No. F60**

**Richard Volker**

**Dated February 22, 2011**

- F60-1**      The commenter's support of the project is noted and will be included in the administrative record.
- F60-2**      The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F60-3**      The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F60-4**      The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F60-5**      The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F61

**Ronald Dahlgren**

**Dated February 23, 2011**

- F61-1** The commenter provides a copy of the Notice of Extension of the Draft EIR/EIS. No further response is required.
- F61-2** The commenter's support of the project is noted and will be included in the administrative record.
- F61-3** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F62

Desi Vela

Dated February 23, 2011

**F62-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F63

Carmen Krogh

Dated February 24, 2011

- F63-1** The comment is noted and will be included in the administrative record. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F63-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy or accuracy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.
- F63-3** The comment is introductory in nature and provides a summary of the commenter's professional background. This comment is noted; however, as it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F63-4** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common response NOI6 regarding the levels of low frequency noise generated by the proposed wind turbine project; common response NOI10 regarding the human response to noise generated from wind turbines; and common response SOC1 regarding property values.
- F63-5** Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common response NOI10 regarding the human response to noise generated from wind turbines; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F63-6** Please refer to response F63-5.
- F63-7** Please refer to response F63-4.

- F63-8** Please refer to response F63-4.
- F63-9** Please refer to response F63-4.
- F63-10** Please refer to common response PHS2 regarding stray voltage.
- F63-11** Please refer to common response PHS6 regarding complaint resolution.
- F63-12** Please refer to common response PHS6 regarding health monitoring.
- F63-13** Please refer to common response PHS6 regarding health monitoring.
- F63-14** Please refer to common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI10 regarding the human response to noise generated from wind turbines.
- F63-15** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. As this comment does not raise specific issues related to the accuracy or adequacy of the EIR/EIS, no further response is warranted.
- F63-16** Please refer to common response PHS1 regarding the potential adverse health effects of the proposed wind turbines as a result of shadow flicker.
- F63-17** Please refer to response F63-4. Please also refer to common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise.
- F63-18** Please refer to response F63-17.
- F63-19** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; common response NOI10 regarding the human response to noise generated from wind turbines; and common response NOI11

regarding amplitude modulation (also known as blade thumping). The comment is noted and will be included in the administrative record.

**F63-20** Please refer to response F63-19. Please also refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.

**F63-21** This comment summarizes information from a published paper in an acoustical journal regarding wind turbine noise. In general, this comment indicates the journal's authors believe additional noise guidelines for wind turbines are needed to adequately address potential health and noise issues. Please refer to common response PHS3 and common response NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects, as well as common response NOI10 regarding the human response to noise generated from wind turbines. The comment is noted and will be included in the administrative record.

**F63-22** Please refer to common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise, as well as common response NOI10 regarding the human response to noise generated from wind turbines.

**F63-23** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.

**F63-24** Please refer to common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. The comment is noted and will be included in the administrative record.

**F63-25** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines.

**F63-26** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common response NOI3 regarding the annoyance effects of various noise sources including wind turbines.

- F63-27** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common response NOI3 regarding the annoyance effects of various noise sources including wind turbines.
- F63-28** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; and common response NOI10 regarding the human response to noise generated from wind turbines.
- F63-29** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, including shadow flicker. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines
- F63-30** Please refer to response F63-20 regarding setbacks from wind turbines.
- F63-31** Please refer to response F63-20 regarding setbacks from wind turbines.
- F63-32** Please refer to response F63-29.
- F63-33** These comments are duplicative of comments F63-24, F63-26, and F63-29. Please refer to the responses to these previous comments.
- F63-34** Please refer to response F63-4 regarding wind turbines and public health concerns.
- F63-35** Please refer to response F63-29.
- F63-36** Please refer to response F63-20 regarding setbacks from wind turbines.
- F63-37** Please refer to response F63-20 regarding setbacks from wind turbines.
- F63-38** Please refer to responses F63-14 and F63-19.
- F63-39** Please refer to response F63-38.
- F63-40** Please refer to response F63-19 regarding setbacks from wind turbines.
- F63-41** Please refer to response F63-19 regarding setbacks from wind turbines.
- F63-42** Please refer to response F63-19 regarding setbacks from wind turbines.
- F63-43** Please refer to response F63-19 regarding setbacks from wind turbines.

**F63-44** Please refer to response F63-19 regarding setbacks from wind turbines.

**F63-45** Please refer to common response PHS1 regarding the potential adverse health effects of the proposed wind turbines as a result of shadow flicker.

The frequency of occurrence and intensity of shadow flicker at a given receptor tends to decrease with increasing distance between turbine and receptor. While rotor diameter impacts the area affected by shadow flicker, the width of the blade is the more important parameter in creating a distinct flicker over a long distance, and therefore, it is illogical to base setbacks on a rotor diameter basis for purposes of controlling shadow flicker. Concerns related to flash frequency generally are rooted in a concern about triggers for photosensitive epilepsy. Assuming this, and as discussed common response PHS1, shadow flicker from wind turbines does not cause seizures in persons with photosensitive epilepsy. Generally, the frequency of flashing lights most likely to trigger seizures is between 5 and 30 Hz (flashes per second)<sup>1</sup>, rather than the 3 flashes per second stated in the comment. The rotation speed of modern wind turbines is much less than 5 Hz, or the lowest frequency of concern as cited by the Epilepsy Foundation.

The cumulative flash rate part of the comment also appears to be rooted in a concern about triggers for photosensitive epilepsy. Assuming a rotor speed of 20 revolutions per minute, which equates to a flash frequency of approximately 1 Hz, five turbines (1 Hz \* 5 = 5 Hz) would have to be aligned between the receptor and the sun to increase the frequency to something close to the 5 Hz identified by the Epilepsy Foundation as a level of interest for photosensitive epilepsy. Given that the proposed wind turbines are generally aligned on a north-south line for the majority of the proposed Tule Wind Project, and given that the vast majority of the turbines lie to the north of receptors, the occurrence of five or more turbines aligning between the receptor and sun would be virtually impossible. If five or more turbines did align, the spacing between the turbines themselves combined with the setback distance between receptor and turbines would create a situation where a shadow cast from the fifth turbine in a line would not be discernable at the receptor in a line with all five (or more) turbines. Therefore, cumulative flash rates are not an anticipated public health concern for the Tule Wind Project.

**F63-46** Please refer to response F63-19, as well as common response PHS1 regarding the potential adverse health effects of the proposed wind turbines as a result of shadow flicker.

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<sup>1</sup> American Epilepsy Foundation: <http://www.epilepsyfoundation.org/about/photosensitivity/>

**F63-47** Please refer to common response PHS1 regarding the potential adverse health effects of the proposed wind turbines as a result of shadow flicker.

**F63-48** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.

The frequency of occurrence and intensity of shadow flicker at a given receptor tends to decrease with increasing distance between turbine and receptor; however, to our knowledge, there is no mathematic or scientific method or empirical observation that supports the specific value of 10 rotor diameters recommended by the commenter as an appropriate setback or as an appropriate distance to include as part of a regulatory approach to shadow flicker. Further, as described in response F63-45, while rotor diameter impacts the area affected by shadow flicker, the width of the blade is the more important parameter in creating a distinct flicker over a long distance, and therefore, it is illogical to base setbacks on a rotor diameter basis for purposes of controlling shadow flicker. Please refer to response F63-45 for more detail on this issue.

**F63-49** Please refer to responses F63-45 and F63-48, as well as common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project and the potential health effects or safety concerns related to shadow flicker.

**F63-50** Please also refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; and common response NOI11 regarding amplitude modulation (also known as blade thumping).

**F63-51** Please refer to response F63-50.

**F63-52** Please refer to response F63-19.

**F63-53** Please refer to common response NOI11 regarding amplitude modulation (also known as blade thumping).

**F63-54** Please refer to response F63-19.

**F63-55** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both.

- F63-56** Please refer to responses F63-14 and F63-19.
- F63-57** Please refer to common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F63-58** Please refer to response F63-4.
- F63-59** Please refer to response F63-55.
- F63-60** Please refer to response F63-19.
- F63-61** Please refer to response F63-55.
- F63-62** Please refer to response F63-14.
- F63-63** Rime ice or glaze ice can form on a wind turbine given the right combination of temperature and moisture. Rime ice will occur when objects such as trees or wind turbines are exposed to low temperatures in combination with fog. Depending on the duration of the ice conditions, significant amounts of rime ice can collect on the turbines and increase static and dynamic loads. Glaze ice can occur when a warm front drifts above cold air. The falling rain can get cooled down to temperatures below the freezing point without actually freezing into solid ice. If the super-cooled rain hits the surface or objects with temperatures below 32 degrees Fahrenheit, it will instantly turn to a layer of solid ice. Both types of ice would only occur when the temperature is below freezing (32 degrees Fahrenheit). In the project area, the average low temperature is above freezing throughout the year, with the exception of December, which has an average low temperature of 32 degrees Fahrenheit. In general, the potential for ice would be limited to winter (late November-February), when overnight temperatures can dip into the 20s and lower 30s.
- With a non-operating turbine (stationary rotor), the ice will accumulate and eventually fall to the ground below the turbine in a pattern generally the width of the rotor diameter and downwind of the turbine. The lightest ice particles generally will be carried the farthest downwind, and the heavier pieces generally

will fall straight down, thus posing a potential hazard to objects and personnel in a relatively small area beneath the turbine<sup>2</sup>. With an operating turbine, ice will also accumulate and eventually be shed subject to the gravity forces (as with stationary turbines) and be thrown horizontally some distance from the turbine due to the centrifugal force developed by the rotating rotor. Ice thrown from operating turbines is anticipated to have the potential to travel greater distances, as opposed to ice shed from turbines in a stationary position<sup>3,4</sup>.

Potential safety hazards associated with the Tule Wind Project could therefore occur from ice throw during the infrequent nights in the winter when the temperature and weather conditions are conducive to icing and the turbines are in motion. Industry professionals have recognized and analyzed these risks and through various studies have developed siting setback recommendations which mitigate the risk to personnel and property. The recommendation provided in the literature and by specific turbine manufacturers indicates that the empirically derived most conservative setback distance for the turbine is 1.5 times (hub height + rotor diameter). This is a distance which can effectively be regarded as a “safe” distance beyond which there is negligible risk of injury from ice throw<sup>5,6,7</sup>. For the proposed turbines (100 meter hub height and 100 meter rotor) the most conservative safe distance would then be 300 meters (approximately 984 feet). The 984 feet should be considered a conservative distance for discussions of health and safety related to ice throw for the Tule Wind Project. The nearest occupied home to a turbine under the current layout is 2,407 feet; the nearest turbines to the Cottonwood and Lark Canyon campgrounds are at least 2,356 feet and 1,123 feet away, respectively. The likelihood of members of the public occupying the campgrounds during freezing conditions is very low. Therefore there is little anticipated risk from ice throw at residences or campgrounds.

There are points along McCain Valley Road (the only public road in the vicinity of the proposed turbines) that are located within 984 feet from the closest turbines (the closest location is approximately 496 feet). For areas within 984 feet of the turbines, there would be limited risk of potential safety hazards to people or

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<sup>2</sup> Recommendation for Risk Assessment of Ice Throw and Blade Throw Failure in Ontario. Prepared by Garrad Hassan for the Canadian Wind Association. May 31, 2007.

<sup>3</sup> Ibid.

<sup>4</sup> Risk Analysis of Ice Throw from Wind Turbines, Henry Seifert, Annette Westerhellweg, Jurgen Kroning. Paper presented at BOREAS 6. April 2003. Pyha, Finland.

<sup>5</sup> Setback Considerations for Wind Turbine Siting, GE Wind. 2009.

<sup>6</sup> Ice Shedding and Ice Throw – Risk and Mitigation, GE Energy/GER-4262. April 2006.

<sup>7</sup> Risk Analysis of Ice Throw from Wind Turbines, Henry Seifert, Annette Westerhellweg, Jurgen Kroning. Paper presented at BOREAS 6. April 2003. Pyha, Finland.

passing vehicles from ice throw. The likelihood of members of the public being within this area (either on McCain Valley Road or elsewhere in public areas) during potential ice throw events is extremely low, since the temperatures are only conducive to icing intermittently during winter nights (which would have low use of both the roads and the public areas), and the turbines would not necessarily be in operation during every potential ice event, thereby limiting the possibility for ice to be thrown any distance beyond the blade length.

Based on the low frequency and the anticipated low likelihood of icing conditions, the distance between the closest occupied residence to the proposed turbines (2,407 feet), and standard safety precautions and safety protocols, the risk to public health and safety from ice throw is anticipated to be insignificant.

Turbines sold in North America are generally adaptable to the extreme cold as accounted for in the design and certification process. Wind turbines are regularly found in northern climes of the US and in Canada and function in extreme cold. The International Standard IEC 61400-1 indicates that the extreme temperature range for the standard wind turbine is -20C to +50C (-4F to +122F)<sup>8</sup>. Based on historical weather data for the Jacumba area, record lows in the winter have been recorded at 20F and record highs in the summer have been recorded at 120F, within the standard wind turbine temperature range<sup>9</sup>. Therefore, no cold weather structurally-related problems are anticipated for the Tule Wind Project.

Furthermore, all turbines will be inspected by an independent engineering company (e.g., Germanischer Lloyd, DNV or other appropriate independent engineer) prior to commissioning of the project. This will require each turbine to have a statement of Compliance for Design Assessment that the turbine is in compliance with the IEC 61400-1 rules for safe design, including their ability to withstand the temperature range for the project area.

**F63-64** Please refer to response F63-63.

**F63-65** The references cited and provided by the commenter are noted. This comment will be included in the administrative record. The comment does not raise specific issues related to the adequacy or accuracy of the EIR/EIS; therefore, no further response is warranted.

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<sup>8</sup> International Standard IEC 61400-1.

<sup>9</sup> A History of Significant Weather Events in Southern California. Updated February 2010. Accessed April 11, 2011. National Weather Services Forecast Office, San Diego, CA.

## **Response to Document No. F64**

**Carmen Krogh**

**Dated February 24, 2011**

- F64-1** The comment is introductory in nature and offers appreciation for the opportunity to comment on the project. This comment is noted. As it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F64-2** The comment is introductory in nature, describing the following pages as self-reported health survey results from people living near wind turbines in Canada. This comment is noted. As it does not address the adequacy or accuracy of the EIR/EIS, no further response is warranted.
- F64-3** The comment is comprised of numerous personal accounts of symptoms and health-related conditions purported to be related to proximity to wind turbines. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; common response NOI10 regarding the human response to noise generated from wind turbines; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy or accuracy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.

## **Response to Document No. F65**

**Jeffrey and Paula Byrd**  
**Dated February 28, 2011**

- F65-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.
- F65-2** The comment regarding the existing Kumeyaay Wind Project is noted and will be included in the administrative record; however, the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no further response is warranted.
- F65-3** The comment is noted. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. Please also refer to common response CUM1 regarding cumulative projects and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The comment is noted and will be included in the administrative record.
- F65-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.9, Transportation and Traffic, analyzes impacts to traffic flow and roadway surfaces resulting from construction of the Tule Wind Project. In Section D.9.3.3 (Impact TRA-1), the EIR/EIS determined that construction of the project would cause temporary road and lane closures that would temporarily disrupt traffic flow and that implementation of a traffic control plan (Mitigation Measure TRA-1) would effectively reduce this impact to a level less than significant. In addition, the EIR/EIS, Section D.9.3.3, Impact TRA-7, states that unexpected damage to roadways by construction vehicles and equipment (overhead line trucks, crew trucks, concrete trucks, etc.) along the project site could occur from vehicles entering and leaving roadways and construction of the project. Implementation of Mitigation Measure TRA-2, which requires that damaged roadways be adequately repaired at the applicant's expense, would ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- Impacts pertaining to noise generated during construction of the Tule Wind Project are analyzed in Section D.8, Noise, of the EIR/EIS.

- F65-5** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4 and FIRE5, regarding fire concerns.
- F65-6** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F65-7** The comment is noted. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F65-8** The comment is noted. Please refer to common response PHS2 regarding stray voltage. The comment is noted and will be included in the administrative record.
- F65-9** The comment is noted. Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.
- F65-10** The comment is noted. Please refer to common responses SOC1 regarding property values.
- F65-11** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations; common response PHS6 regarding complaint resolution; common response PHS2 regarding stray voltage; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F65-12** The comment is noted. Please refer to response F65-11 above; common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.

- F65-13** The comment is noted. Please refer to common response WR1 regarding groundwater resources. Please refer to EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project).
- F65-14** The comment is noted. Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views. The EIR/EIS Section D.3, Visual Resources, determines that the introduction of required obstruction lighting to the McCain Valley area would likely result in visual nuisance for area residents as obstruction lighting (flashing red and white lighting) could trespass outside of the project boundary and into residential areas and sensitive nighttime viewing areas.
- F65-15** The comment summarizes the issues raised previously in the letter. Please refer to the responses to comments above, notably response F65-6, F65-11, and F65-14. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## Response to Document No. F66

Lorrie Ostrander

Dated February 28, 2011

- F66-1** The commenter's opposition to the project is noted and will be included in the administrative record.
- F66-2** The comment is noted. EIR/EIS Section D.2, Biological Resources, includes a full evaluation of environmental impacts to biological resources. In addition, the EIR/EIS analyzes physical impacts to roadways resulting from construction equipment and vehicles (see Section D.9 Transportation and Traffic). As noted in Section D.9.3.3 (Impact TRA-7), the EIR/EIS determined that the large construction vehicles associated with the ECO Substation Project and Tule Wind Project could potentially result in damage to existing roadway surface and therefore, Mitigation Measure TRA-2 has been provided to ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- F66-3** The comment is noted. EIR/EIS Sections D.3, Visual Resources, and D.16, Social and Economic Conditions, includes a full evaluation of impacts to views and property values. Also, see common response SOC1 regarding property values. This comment is noted and will be included in the administrative record.
- F66-4** The comment is noted. EIR/EIS, Section D.14, Public Services, identifies the applicable service providers including Fire Services, Police Services, and Emergency Medical Services, operating in the project area. The availability of water resources is briefly discussed in Section D.14 which states that Jacumba Community Services District provides limited water service in the community of Jacumba and that remaining service is provided via private wells and groundwater. More detailed information regarding the availability of groundwater resources is discussed in EIR/EIS Section D.12, Water Resources. In addition, please refer to common responses in Section 2.9, Water Resources, and Section 2.10, Fire and Fuels Management, in Volume 3 of the Final EIR/EIS regarding water quantity and fire issues.
- F66-5** The comment is noted. EIR/EIS Section D.14, Public Services (see subsection D.14.1.1 General Overview) states that the Jacumba Fire Station is an all-volunteer fire station. Section D.14.1.1 of the Final EIR/EIS has been revised to identify McCain Valley Camp as a prison camp however; this information does not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines.

The comment regarding the high fire danger and the proposed project is noted and will be included in the administrative record. Please refer to Section D.15 Fire and Fuels Management, for analysis regarding fire impacts anticipated to occur during construction and operation of the Proposed PROJECT. In addition, please refer to common responses FIRE1 regarding fire station staffing and capability as well as FIRE5 regarding project applicant fire protection plans.

- F66-6** In response to comments received on emergency services in the area, Section D.14.1.1 in the Final EIR/EIS has been modified in the Final EIR/EIS in accordance with 40 CFR 1502.9(b). These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).
- F66-7** The comment is noted. Please refer to Section D.14, Public Services, of the EIR/EIS. Section D.14.1.1 discloses that residents in the Mountain Empire subregion rely on private wells for water supply. Section D.12, Water Resources, discusses groundwater resources in the project area and provides information associated with depth to groundwater resources. In addition, please refer to common response WR1 regarding construction water demand.
- F66-8** The comment is noted. Please refer to common response CC2 regarding climate change.
- F66-9** The comment is noted. EIR/EIS Section D.8, Noise and Vibration, evaluates impacts associated with noise generated during construction and operation of the Proposed PROJECT. Please refer to Section 2.7, Noise and Vibration, and 2.8, Public Health and Safety, of Volume 3 of the Final EIR/EIS regarding noise and health effects of the proposed wind turbines.
- F66-10** The comment is noted. EIR/EIS Section D.2, Biological Resources, evaluates impacts to biological resources including plant and wildlife species determined to have potential to occur in the Proposed PROJECT area.
- F66-11** The comment is noted and will be included in the administrative record. Section B, Project Description, discloses the number of jobs anticipated to be generated by the construction and operation of the ECO Substation, Tule Wind, and ESJ Gen-Tie Projects. EIR/EIS Section D.16, Social and Economic Conditions,

Impact SOC-2 evaluates impacts on revenue for local businesses, tribes, and governments due to project construction and operation.

- F66-12** The comment is noted and will be included in the administrative record. The wind resources of the project area are discussed in EIR/EIS Section A, Introduction/Overview. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no further response is provided or required.
- F66-13** This comment is noted and will be included in the administrative record. Please refer to response F66-10 regarding biological resources.
- F66-14** This comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no further response is provided or required.
- F66-15** The comment is noted. Please refer to response F66-10 regarding biological resources.
- F66-16** The comment is noted. EIR/EIS EIR/EIS Section D.2, Biological Resources, evaluates impacts to golden eagle. In addition, please refer to common response BIO1 regarding golden eagle.
- F66-17** The comment is noted. EIR/EIS Section D.2, Biological Resources, evaluates impacts to peninsular bighorn sheep. In addition, please refer to common response BIO4 regarding peninsular bighorn sheep.
- F66-18** This comment is noted and will be included in the administrative record. EIR/EIS Section F, Cumulative Scenario and Impacts, Subsection F.2, Applicable Cumulative Projects and Projections, evaluates cumulative impacts associated with the Proposed PROJECT in association with the 53 projects listed in Table F-2, including the proposed Boulevard Border Patrol Station.
- F66-19** The comment is noted. EIR/EIS Section D.14, Public Services (see Section D.14.3.3, Impact PSU-2) evaluates impacts to public services, including police services and response times.
- F66-20** The comment is noted. Please refer to comment F66-6 regarding revisions to EIR/EIS Section D.14 Public Services. In addition, please refer to common responses FIRE1, FIRE2, and FIRE4 regarding fire services in the project area.

- F66-21** The comment is noted. Please refer to common response FIRE3 regarding increases to fire insurance premiums and/or denial of coverage.
- F66-22** This comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no further response is provided or required.
- F66-23** This commenter' opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no further response is provided or required.
- F66-24** The comment is noted. Please refer to EIR/EIS Section E, Comparison of Alternatives, which determined that the BLM agency preferred alternative and the environmentally superior project alternative would consist of underground segments of the proposed ECO Substation Project 138 kV transmission line (between MP 0.3 and 2.4 (this segment of the proposed transmission line would be rerouted and installed underground along Old Highway 80 and Carrizo Gorge Road) and between MP 9 and the rebuilt Boulevard substation) and underground installation of the Tule Wind Project alternative 138 kV transmission line from the alternative collector substation location. In addition, a portion of the Tule Wind Project collector cable system would be installed underground.
- F66-25** The comment is noted and will be included in the administrative record. Please refer to the common responses in Volume 3 of the Final EIR/EIS regarding property values (Section 2.11), public health and safety (Section 2.8), noise (Section 2.7), and fire and fuels management (Section 2.10). Please refer to response F97-11 regarding a BLM requirement that bonds for decommissioning be in place prior to begin of construction.

## **Response to Document No. F67**

**Mark Ostrander**

**Dated February 28, 2011**

**F67-1** The ESJ Project would result in the installation of approximately 1 mile of either a 500 or 230 kV transmission line with five towers, as described in Section B. As described previously for the ECO Substation Project, special-status bird species have the potential to collide with towers and transmission lines and have the potential to be electrocuted by the transmission towers associated with the ESJ Project, resulting in injury or mortality (see Impact BIO-10, ESJ Gen-Tie Project). Without implementation of APM ESJ-BIO-13, which specifies that the design of all transmission towers and lines for the ESJ Project would comply with APLIC standards, the project would have the potential to result in a significant impact of electrocution of, and/or collision by, listed or special-status bird or bat species. This impact would be considered adverse and therefore, Mitigation Measures BIO-10a and BIO-10b (these measures provide further clarification and supersede APM ESJ-BIO-13) have been provided to mitigate this impact.

The Proposed PROJECT including the proposed ECO Substation, Tule Wind, ESJ Gen-Tie and Campo, Manzanita, and Jordan wind energy projects would present a significant risk of collision to sensitive birds that cannot be mitigated and under CEQA would be significant and unmitigable.

**F67-2** The comment is noted. In EIR/EIS Section D.2, Biological Resources, under Section D.2.1, Regional Wildlife Corridors, migration routes and stopover areas are discussed in relation to the Proposed PROJECT. The EIR/EIS describes the use of avian and bat species throughout the Proposed PROJECT area based on the available information, including avian surveys conducted by Tetra Tech EC, Inc. from March 2005 to March 2006 and September 2007 to September 2008 (Tetra Tech EC, Inc. 2008, 2009) at point count stations within the Tule Wind Project site, aerial golden eagle surveys within 10 miles of the Tule Wind Project site, and bat surveys conducted between 2008 and 2010 (WEST 2009, 2010a; Gruver et al. 2011) at the Tule Wind Project site. Wildlife surveys were also conducted within the ECO Substation and ESJ Gen-Tie project sites (Insignia Environmental 2010a; EDAW 2010, respectively). Also, please refer to common response BIO6 regarding wildlife corridors.

**F67-3** The comment is noted. Please see response F67-2.

**F67-4** The comment is noted. Please refer to common response BIO3 regarding bats. The EIR/EIS has been revised to reflect additional survey results on bats associated with the Tule Wind Project. Additionally, the Final EIR/EIS has been revised to acknowledge barotrauma as a potential effect of wind farms. The analysis in the Draft EIR/EIS assumed the “collision” effects included mortality and lesser effects such as injuries and barotrauma. Additionally, the following statement has been included in the Final EIR/EIS in Section D.2, Biological Resources (under Impact BIO-10, Tule Wind Project):

The effects of wind farms may be underestimated by post-construction monitoring due to detection and searcher efficiencies. Additionally, partial collision and non-collision impacts including injuries or barotrauma effects are not detected by monitoring.

The significance determination in the Final EIR/EIS has not been revised in response to this comment.

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-5** The comment is noted. EIR/EIS Section D.2, Biological Resources (under Impact BIO-9, Tule Wind Project), has been revised to include the following analysis and discussion:

There is literature that describes wind project areas as creating a behavioral avoidance area, thereby establishing a barrier in the aerial habitat used by birds and bats (Drewitt and Langston 2006). Typical avian usage of the site relative to the turbine heights is provided below that suggests a majority of the bird usage on the site is below the direct rotor swept area of the turbines. Avoidance of aerial habitat by bird and bat species would be a species-specific behavior response to the Tule Wind Project for which sufficient data is not available to evaluate. Avoidance of turbine rotor swept areas by bird or bat species using the aerial habitat at the height of the rotor swept area has the potential to result in movement effects for these specific species; however, such avoidance behavior would reduce the potential effects of collision to those species as assessed under BIO-10. Overall based on the information available and based on a significance criteria that specifically relates to

effects on “linkages or wildlife movement corridors”, the Tule Wind Project would not have an adverse impact on linkages or wildlife movement corridors. Under CEQA, this impact would be less than significant (Class III).

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-6** The comment is noted. The EIR/EIS discusses impacts from habitat loss and compensation for loss of native habitat in Section D.2, Biological Resources, under Impact BIO-1 and Mitigation Measures BIO-1a through BIO-1g.

**F67-7** The comment is noted. The effects of the Proposed PROJECT on wildlife species and their habitat are addressed under Impact BIO-7. The effects of the Proposed PROJECT on wildlife movement are addressed under Impact BIO-9. Habitat fragmentation is typically considered a landscape level analysis considering habitat blocks and it is particularly important for species requiring larger movement areas. Aside from the substations and accessory facilities, the proposed project is comprised of transmission lines, wind turbines, and roads. These project features are relatively permeable to wildlife movement and have habitat within and/or immediately surrounding the facilities; therefore, habitat fragmentation is not considered to result from the Proposed PROJECT.

Landscape-level considerations, like habitat fragmentation, are considered at the cumulative level and the cumulative analysis in Section F.3.1 of the EIR/EIS states the following:

In order for a cumulative impact to special-status wildlife species to occur, the cumulative projects would have to result in the loss of the same special-status plant species or their habitat as the Proposed PROJECT such that those species become more limited in their distribution, population size, or available suitable habitat within the analysis area.

...The Proposed PROJECT and the reasonably foreseeable cumulative projects are situated in a transition zone between the Peninsular Ranges subregion in the west and the Sonoran Desert subregion in the east. As such, the cumulative analysis area is located near or at the edge of the

known range of several special-status wildlife species. The Proposed PROJECT combined with the reasonably foreseeable cumulative projects, despite species avoidance, minimization, and mitigation measures that would likely be implemented by each project, would have the potential to reduce the distribution and/or the overall population size of one or more special-status wildlife species (in particular, Quino checkerspot butterfly and barefoot banded gecko) such that they are vulnerable to environmental variability and are at a higher risk of becoming imperiled. For Quino checkerspot butterfly, the cumulative projects in southeastern San Diego County occur in the easternmost extent of the species known range and implementation of the cumulative projects in this portion of the analysis area could result in a contraction of the species' range. For barefoot banded gecko, the species is narrowly restricted to the area considered in the cumulative analysis (but it should be noted that habitat for the species does not occur within the Proposed PROJECT area) and implementation of the cumulative projects could result in further restrictions of the species' range. The Proposed PROJECT combined with the reasonably foreseeable cumulative projects would, therefore, result in an unavoidable adverse cumulative impact under NEPA and, under CEQA, a direct significant and unmitigable cumulative impact to special-status wildlife species due to the potential reduction in the distribution and reduction in overall species populations in the cumulative analysis area (Class I).

**F67-8** The comment is noted. The referenced information regarding noise effects will be included in the administrative record. Please refer to EIR/EIS Section D.8, Noise, Impact NOI-3 - Tule Wind Project, which discusses the noise impacts from the proposed turbines. Also, refer to Mitigation Measure BIO-7j in Section D.2, Biological Resources, which has been clarified in regards to construction-related noise impacts.

The effects of noise on wildlife are addressed as a potential indirect effect of the Tule Wind Project on special-status wildlife species in Section D.2, Biological Resources, under Impact BIO-7. Effects on special-status species would only be significant if these species was considered especially sensitive to noise resulting in behavioral changes, physiological effects or masking of breeding vocalizations. Bird are the primary group of with the potential to be affected by construction or operational noise. Mitigation Measures BIO-7j and BIO-10b address nest buffers and other avoidance and minimization measures required to address potential construction and operational noise on wildlife.

- F67-9** The comment is noted. EIR/EIS Section D.2, Biological Resources, discusses indirect impacts to vegetation communities, plant species, and wildlife species under Impacts BIO-1, BIO-7, and BIO-8. Mitigation measures are provided under each of these impacts to mitigate for both direct and indirect impacts to these resources.
- F67-10** The comment is noted. EIR/EIS Section D.2, Biological Resources, Impact BIO-10 has been updated to include a discussion of the ESJ Wind Farm. Please refer to response F67-1 regarding ESJ project impacts.
- F67-11** The comment is noted. EIR/EIS Section D.2, Biological Resources, Impact BIO-10d has been updated to clarify that FAA-required wind turbine obstruction lighting with the minimum number of flashes per minute and the briefest flash duration shall be used pursuant to FAA approval. In addition, EIR/EIS Section D.3, Visual Resources (Subsection D.3.3.3, Impact VIS-4, Tule Wind Project, 1<sup>st</sup> paragraph) has been revised to clarify that the proposed turbine configuration would require each turbine positioned at each end of the line or string of turbines to have a standard flashing red (L864) or white (L-865) light visible from 360 degrees, with placement at the beginning and end of a turbine string and no more than one-half mile spacing.
- These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).
- F67-12** The comment is noted and will be included in the administrative record. Please refer to common response SOC1 regarding property values. Impacts to wilderness and recreation are analyzed in EIR/EIS Section D.5, Wilderness and Recreation, separate for impacts to visual resources in EIR/EIS Section D.3, Visual Resources.
- F67-13** Impacts to the dark sky environment in the Boulevard area are analyzed in Section D.3, Visual Resources. In this section the document concludes that the project's impacts associated with nighttime wind turbine obstruction lighting would be adverse and even with mitigation the impact would remain adverse and significant (Class I). Boulevard's pending application for dark skies and the project's impact on said permit is outside of the purview of CEQA and therefore, no response is required.
- F67-14** The comment is noted and will be included in the administrative record. Please refer to common response SOC1 regarding property values.

**F67-15** The simulations prepared for KOPs 1, 2, and 5 depict components of the Proposed PROJECT. The Sunrise Powerlink Project is considered a cumulative project and therefore is not depicted in simulations prepared for the Proposed PROJECT (see Section F, Cumulative Scenario and Impacts, for discussion of the cumulative impacts). Also, please refer to common response VIS2 regarding consideration of the Sunrise Powerlink Project. Although vegetation removal around the substation has not been rendered in the simulations prepared for KOP 1 and 2, vegetation removal would not affect the severity of the anticipated visual impact (the impact has been assessed as adverse and significant, Class I). KOP 5 does not include a view of the ECO Substation.

The removal of oak trees from the Boulevard Substation rebuild site is analyzed under ECO-VIS-3. As stated in the document, the removal of mature oak trees from the site is considered to be a significant impact and therefore, Mitigation Measure VIS-3m has been included to reduce visual impacts resulting native tree removal.

Depicting additional vegetation removal in simulations prepared for KOP 10 would not affect the severity of the anticipated visual impact (the impact has been assessed as adverse and significant, Class I). Visual simulations prepared for KOPs 19, 20, 21, and 22 are conceptual representations of turbine locations only however, the document concludes that the Proposed PROJECT (including the Campo, Manzanita, and Jordan wind energy projects which are conceptually depicted in simulations prepared for KOPs 19, 20, 21, and 22) would substantially degrade the existing visual character or quality of the site and its surroundings. The anticipated impact to the existing visual character of the area is assessed as adverse and significant, Class I.

**F67-16** The comment is noted and will be included in the administrative record. Please refer to common response CUL3 regarding the assessment of cumulative impacts on cultural resources. EIR/EIS Mitigation Measure CUL-1A identifies the components of the proposed Historic Properties Treatment Plan. The Final EIR/EIS includes supplemental intensive surveys by professional archaeologists of the entire project Area of Potential Effect (APE). In addition, EIR/EIS Mitigation Measure CUL-1A requires avoidance of significant cultural resources or if unavoidable, proper mitigation through data recovery. Project refinements to the ECO Substation and Tule Wind projects have occurred to successfully avoid most of these resources.

**F67-17** The comment is noted and will be included in the administrative record. After the Draft EIR/EIS was released for public review in December 2010, Tule Wind, LLC modified the Tule Wind Project layout to reduce the overall size of the project. The

modified project as presented and analyzed in the Final EIR/EIS reduces the number of turbines and adjusts the transmission line route and access roads, as well as slightly modifies the layout of some of the turbine locations, as depicted in the Draft EIR/EIS. In addition to the modified Tule Wind Project layout, the noise analysis prepared by HDR and referenced in the Draft EIR/EIS has been updated (please refer to Final EIR/EIS, Section D.8 (Section D.8.3.3, Impact NOI-3 for the Tule Wind Project). According to HDR, the revised noise analysis presents a conservative calculation of operational project noise as the Gamesa 2.0 MW turbines would generate greater noise levels than would a Gamesa 1.5 or 3.0 MW wind turbine and because fewer turbines would be used and greater setbacks would be required, use of 3.0 MW turbines are not anticipated to impact additional residents (when compared to use of 2.0 MW turbines).

Please refer to common response INT3 regarding implementation of mitigation established in the EIR/EIS. As stated previously, the revised noise analysis prepared for the Tule Wind Project modeled operational noise from Gamesa G87 2.0 MW turbines. Please refer to Section F, Cumulative Scenario and Impacts, of the Final EIR/EIS (Section F.3.7, Noise and Vibration) which considers and analyzes impacts associated noise generated by the Proposed PROJECT in addition to projects considered in the cumulative scenario. Lastly, impacts to wilderness and recreation are discussed in Section D.5, Wilderness and Recreation (please refer to Section D.5.3.3 Direct and Indirect Effects and Table D.5-1 which lists the impacts considered in the EIR/EIS wilderness and recreation impact analysis). Similarly, Section D.8, Noise, contains an assessment of noise impacts associated with the Proposed PROJECT (Section D.8.3.3 Direct and Indirect Effects and Table D.8-6 lists the impacts considered in the EIR/EIS noise impact analysis).

**F67-18** Please refer to common responses PHS4 and PHS5 regarding the evaluation of EMF and associated public health effects. Please also refer to common response PHS6 regarding long-term health monitoring. The comment is noted and will be included in the administrative record.

**F67-19** In response to this comment, Section D.14, Public Services and Utilities, (specifically Sections D.14.1.1, General Overview; D.14.2.3, Existing General Plan Facilities Element; and D.14.3.3 (Impact PSU-2)) has been modified in the Final EIR/EIS in accordance with 40 CFR 1502.9(b). Although project area landfills are not identified on Figure D.14-2, Table D.14-1 in Section D.14, Public Services, has been revised to identify the applicable private waste hauling companies operating in the project area. In addition, the Final EIR/EIS identifies American Medical Response (AMR) San Diego as the contracted emergency

services provider to the San Diego Rural Fire Protection District in the project area and discusses services provided within AMR San Diego's Rural East Zone 2 Service Area and the average response time for AMR San Diego within the Rural East 2 Zone service area.

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-20**

In response to this comment, the identification of the CALFIRE McCain Valley Camp Station in Section D.14.1.1 has been modified in the Final EIR/EIS in accordance with 40 CFR1502.9(b).

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

As stated in Section D.14.3.3, fire and fuel impacts (including impacts concerning the resulting effectiveness of local firefighting capabilities with implementation of the Proposed PROJECT) are analyzed in Section D.15, Fire and Fuels Management. Please refer to common response FIRE1 regarding fire station staffing and capability.

**F67-21**

In response to this comment, the identification of San Diego Local Agency Formation Commission (LAFCO) Community Service Area No. 111 as a fire service provider in the project area (as identified in Section D.14, Public Services and Utilities) has been modified in the Final EIR/EIS in accordance with 40 CFR 1502.9(b).

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-22** In response to this comment, the address of the Jacumba/Boulevard substation as identified in Section D.14, Public Services and Utilities, has been modified in the Final EIR/EIS in accordance with 40 CFR 1502.9(b).

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-23** In response to this comment, the discussion pertaining to rural bin sites in Section D.14.1.1 has been modified in the Final EIR/EIS in accordance with 40 CFR 1502.9(b)).

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F67-24** The comment is noted. As stated in EIR/EIS Section D.14, Public Services (see Section D.14.3.3, Impact PSU-1, ECO Substation Project and Tule Wind Project), although unlikely construction activities could disrupt underground and overhead utilities during excavation and other land disturbances. To minimize the risk of impacting existing utilities, in accordance with state law SDG&E would contact Underground Services Alert to ensure that existing utilities are marked in the field and avoided and while the proposed 138 kV transmission line would be constructed parallel to the existing 500 kV SWPL, the location of the proposed 138 kV transmission line (approximately 150 feet from SWPL) would ensure that existing lines would not be directly contacted or disrupted during construction. Lastly, SDG&E has indicated that there would be no service interruptions to the existing distribution line (Circuit 445) and that the proposed 138 kV transmission line would be co-located with between MP 11.9 and 12.5 or to existing transmission line 6931 (the existing transmission line currently connected to the existing Boulevard Substation) during construction activities. Similar to SDG&E, Tule Wind LLC would be required to contact Underground Services Alert to ensure that existing utilities are marked and avoid during construction activities associated with the proposed 138 kV transmission line. While the potential for service interruptions was determined to be low in the EIR/EIS, accidental interruptions could occur and therefore Mitigation Measures PSU-1a, PSU-1b, and PSU-1c have been provided to ensure that any interruptions remain less than significant.

Impacts to emergency service providers during construction activities are assessed in EIR/EIS Section D.9, Transportation and Traffic (see Section D.9.3.3, Impact TRA-1 and TRA-2). The EIR/EIS determined that construction activities would cause temporary road and lane closures that would temporarily disrupt traffic flow (which would in turn affect emergency service providers in the project area). To minimize this impact, Mitigation Measure TRA-1 requires that (among other individual measures) project applicants coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. This process would be facilitated through notification of the County by the project applicants regarding the proposed locations, nature, timing, and duration of any construction activities, as well as whether construction activities would result in any access restrictions that could impact the effectiveness of emergency service providers. The County would then notify respective police, fire, ambulance, and paramedic services in the project area of potential access restrictions.

- F67-25** The comment is noted and will be included in the administrative record. The fire and emergency related factors described in the comment are considered in the impact analysis and mitigation measure formulation in EIR/EIS Section D.15, Fire and Fuels Management. Please refer to common responses FIRE1 through FIRE6 regarding fire issues. Please refer to common response FIRE5 for details of updated fire impact classifications.
- F67-26** The comment is noted and will be included in the administrative record. EIR/EIS Section D.12, Water Resources, analyzes impacts to groundwater resources. Impacts to groundwater resources are assessed within the Impact HYD-3 and HYD-4 discussions (see Section D.12.3.3, Direct and Indirect Effects). Also, please refer to common response WR1 regarding groundwater resources.
- F67-27** The comment is noted. Please refer to common response SOC1 regarding property values.
- F67-28** The comment regarding the Chris Luxemburger study is noted. Please refer to common response SOC1 regarding property values.
- F67-29** The comment regarding property value guarantees is noted. Please refer to common response SOC1 regarding property values.
- F67-30** The comment regarding property value guarantees is noted. Please refer to common response SOC1 regarding property values.

- F67-31** The comment is noted. The document referenced is the Applicant’s Environmental Document which is accessible via the CPUC ECO Substation website. Please refer to common response SOC1 regarding property values.
- F67-32** Census 2010 block group level data was not available at the time the environmental justice section was written. The Census 2010 data utilized in other sections of the EIR/EIS (i.e. Socioeconomics) was subregional and countywide data, which is why these other sections were able to utilize more updated information while the environmental justice analysis relied on Census 2000 data.
- F67-33** The comment is noted and will be included in the administrative record. In addition, the comment regarding support for the No Project Alternative is noted and will be included in the administrative record.
- F67-34** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F67-35** The comment is noted and will be included in the administrative record. Please refer to response D26-18, regarding socioeconomics with regard to renewable projects in the United States and Mexico.
- F67-36** The comment regarding impacts to project area roadways is noted. Implementation of Mitigation Measure TRA-2 (repair roadways damaged by construction activities) requires that roadways affected by construction traffic be repaired by the project applicant and this measure would be incorporated into an access agreement/easement with the applicable governing agency prior to construction). This measure has been incorporated into the mitigation, monitoring, compliance, and reporting program (MMCRP) (Table D.9-8, Mitigation Monitoring Compliance and Reporting–ECO Substation, Tule Wind, and ESJ Gen-Tie Projects–Transportation and Traffic) for the proposed ECO Substation and Tule Wind Projects and monitoring responsibility would fall to the applicable governing agency (i.e., the agency with jurisdiction over the impacted roadway). The MMCRP table for the Proposed PROJECT is provided at the end of each issue area in Section D of the EIR/EIS that lists each mitigation measure and outlines procedures for successful implementation. Section H of the EIR/EIS provides the recommended framework for effective implementation of the MMCRP by the affected public agency.
- F67-37** The commenter’s opposition to the project is noted and will be included in the administrative record.

**F67-38**            The commenter’s opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F67-39**            The commenter’s opposition to the project is noted and will be included in the administrative record. Please refer to common response ALT2 for response to comments received regarding distributed generation, including rooftop solar.

## Response to Document No. F68

**Michael Villandre**  
**Dated February 28, 2011**

**F68-1**      The commenter's support of the project is noted and will be included in the administrative record.

## **Response to Document No. F69**

**Mary Lu Brandwein**

**Dated March 1, 2011**

- F69-1** The comment is introductory in nature and provides a description of the commenter's interest in the project. This comment is noted; however, as it does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS, no additional response is provided or required.
- F69-2** Please refer to the common responses regarding noise issues raised in Section 2.7, Noise, of Volume 3 of the Final EIR/EIS. The comment expresses an opinion regarding the preparers of figures and technical studies used in the EIR/EIS. This comment is noted and will be included in the administrative record.
- F69-3** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; common response NOI10 regarding the human response to noise generated from wind turbines; and common response NOI11 regarding amplitude modulation (also known as blade thumping). This comment is noted and will be included in the administrative record.
- F69-4** Please refer to response F69-3 above.
- F69-5** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to response F69-3 above.
- F69-6** Please refer to common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common response NOI10 regarding the human response to noise generated from wind turbines; and common response SOC1 regarding property values. Please also refer to the common responses referenced in responses F69-3 and F69-5 above.
- F69-7** Please refer to response F69-3 above.

- F69-8** Please refer to responses F69-3, F69-5, and F69-6 above.
- F69-9** The comment describes actions taken in Japan in regard to wind development projects. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please also refer to common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F69-10** Please refer to response F69-9 above, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F69-11** The comment describes actions taken in Japan in regard to wind development projects. Please see response F69-9 above. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F69-12** Please see response F69-9 above. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F69-13** Please refer to common response NOI14 regarding contingency planning and common response PHS7 regarding decommissioning activities.
- F69-14** The comment introduces a sound experiment that was performed in the UK in 2003. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F69-15** Please refer to common response NOI11 regarding amplitude modulation (also known as blade thumping).
- F69-16** Please refer to common response NOI11 regarding amplitude modulation (also known as blade thumping).
- F69-17** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F69-18** Please refer to common responses PHS2, PHS4, and PHS5 regarding EMF.

- F69-19** Please refer to response F69-17 above.
- F69-20** The comment is noted. Please refer to common response INT3 regarding implementation of mitigation measures.
- F69-21** Please refer to common responses PHS5 and NOI14.
- F69-22** The comment is noted. Please refer to common responses PHS3 and NOI5.
- F69-23** Please refer to response F69-3 above.
- F69-24** Please refer to responses F69-3 and F69-15 above.
- F69-25** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please also refer to common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects
- F69-26** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F69-27** Section D.2, Biological Resources, of the EIR/EIS evaluates the direct and indirect impacts to wildlife, specifically in Impacts BIO-6 through BIO-7. The direct and indirect impacts to numerous special-status wildlife species resulting from the Proposed PROJECT, including the proposed Campo, Manzanita, and Jordan energy projects, would be adverse, and therefore, mitigation has been provided. Under CEQA, direct and indirect impacts to numerous special-status wildlife species would be significant but can be mitigated to a level less than significant (Class II) with implementation of Mitigation Measures BIO-1a through BIO-1g, BIO-3a, BIO-4a, and BIO-7a through BIO-7j. The direct and indirect impacts to several other special-status wildlife species resulting from the Proposed PROJECT, and Campo, Manzanita, and Jordan energy projects, would not be adverse and would be less than significant (Class III), under CEQA, or would have no effect (No Impact).
- F69-28** Please refer to response F69-25 above. Please also refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F69-29** Please refer to response F69-28 above. Please also refer to common response PHS6 regarding health monitoring.

- F69-30** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors, as well as common response SOC1 regarding buyouts.
- F69-31** Please refer to response F69-20 above.
- F69-32** Please refer to response F69-21 above.
- F69-33** Comment recommends that applicant should resurrect abandoned, but already approved, wind turbines in California, rather than constructing new wind projects. This comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F69-34** The comment is noted; however, as it does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS, no additional response is provided or required.
- F69-35** The commenter includes notes related to a symposium held in Canada on wind energy and several statements related to the sound characteristics and health effects of wind turbines. Please refer to the common responses regarding noise issues raised in Section 2.7, Noise, and common responses regarding public health and safety in Section 2.8, Public Health and Safety, of Volume 3 of the Final EIR/EIS.

## Response to Document No. F70

**Marie and Scott Morgan**  
**Dated March 1, 2011**

- F70-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.
- F70-2** The EIR/EIS evaluates the impacts to sensitive receptors near the proposed Tule Wind Project. The EIR/EIS analyzes impacts to views, property values, and public health (see Section D.3, Visual Resources, Section D.16, Social and Economic Conditions, and D.10, Public Health and Safety of the EIR/EIS). The methodology pertaining to the key observation point selection process and limitation of visual simulations is described in EIR/EIS Section D.3 Visual Resources. While the visual simulations prepared for Iberdrola's Environmental Document were utilized in the EIR/EIS, impact determinations were made independently of that document and the EIR/EIS determines that the resulting visual change attributed to the Tule Wind Project as viewed from the residential area adjacent to Ribbonwood Road would be significant and unmitigable (see Section D.3 Visual Resources and Figure D.3-15B). Also, please refer to common response SOC1 regarding property values. This comment is noted and will be included in the administrative record.
- F70-3** The comment is noted. The socio-economic impacts resulting from the Proposed PROJECT (including impacts to property values) are analyzed in EIR/EIS Section D.16, Social and Economic Conditions. Please refer to common response SOC1 regarding property values.
- F70-4** The comment is noted. Please refer to common Responses PHS1 through PHS4 regarding public health concerns related to wind turbines. Please refer to common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common response NOI10 regarding the human response to noise generated from wind turbines; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and impacts related to noise in Section D.8, Noise.

- F70-5** The comment regarding reduction in turbines and related transmission lines is noted and will be included in the administrative record. The 1 EIR/EIS in Sections C, Alternatives, and E, Comparison of Alternatives, discusses Tule Wind Alternative 5, Reduction in Turbines that would eliminate a total of 65 turbines (57 in the northwestern portion of the project and 8 turbines in the southeastern portion of the project – see EIR/EIS Figure E-1). This alternative is evaluated under each environmental topic in EIR/EIS Sections D.2 through D.18.
- F70-6** The comment is noted and will be included in the administrative record. Please refer to common responses SOC1 regarding property values, as well as common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects.
- F70-7** The commenter’s opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.

## **Response to Document No. F71**

**Mrs. Ken Oppenheimer**

**Dated March 1, 2011**

- F71-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F71-2** The comment regarding the existing Kumeyaay Wind Project is noted and will be included in the administrative record; however, the comment does not raise specific issues related to the adequacy of the of the environmental analysis in the EIR/EIS and therefore, no additional response is required or provided.
- F71-3** The comment is noted. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. Please also refer to common response CUM1 regarding cumulative projects; and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The comment is noted and will be included in the administrative record.
- F71-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.9, Transportation and Traffic, analyzes impacts to traffic flow and roadway surfaces resulting from construction of the Tule Wind Project. In Section D.9.3.3 (Impact TRA-1), the EIR/EIS determined that construction of the project would cause temporary road and lane closures that would temporarily disrupt traffic flow and that implementation of a traffic control plan (Mitigation Measure TRA-1) would effectively reduce this impact to a level less than significant. In addition, the EIR/EIS, Section D.9.3.3, Impact TRA-7, states that unexpected damage to roadways by construction vehicles and equipment (overhead line trucks, crew trucks, concrete trucks, etc.) along the project site could occur from vehicles entering and leaving roadways and construction of the project. Implementation of Mitigation Measure TRA-2, which requires that damaged roadways be adequately repaired at the applicant's expense, would ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- F71-5** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4 and FIRE5, regarding fire concerns.

- F71-6** The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and to noise in Section D.8, Noise. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F71-7** The comment is noted. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F71-8** The comment is noted. Please refer to common response PHS2 regarding stray voltage. The comment is noted and will be included in the administrative record.
- F71-9** The comment is noted. Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.
- F71-10** The comment is noted. Please refer to common responses SOC1 regarding property values.
- F71-11** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations; common response PHS6 regarding complaint resolution; common response PHS2 regarding stray voltage; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F71-12** The comment is noted. Please refer to response F71-11 above; common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.

- F71-13**      The comment is noted. Please refer to common response WR1 regarding groundwater resources.
- F71-14**      The comment is noted. Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views. Please also refer to common response PHS1 regarding shadow flicker.
- F71-15**      The comment summarizes the issues raised previously in the letter. Please refer to the responses to comments above, notably response F71-6, F71-11, and F71-14. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## **Response to Document No. F72**

**Michele Strand**

**Dated March 1, 2011**

- F72-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.
- F72-2** The comment regarding the existing Kumeyaay Wind Project is noted and will be included in the administrative record; however, the comment does not raise specific issues related to the adequacy of the of the environmental analysis in the EIR/EIS and therefore, no further response is warranted.
- F72-3** The comment is noted. Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. Please also refer to common response CUM1, regarding cumulative projects; and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The comment is noted and will be included in the administrative record.
- F72-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.9, Transportation and Traffic, analyzes impacts to traffic flow and roadway surfaces resulting from construction of the Tule Wind Project. In Section D.9.3.3 (Impact TRA-1), the EIR/EIS determines that construction of the project would cause temporary road and lane closures that would temporarily disrupt traffic flow and that implementation of a traffic control plan (Mitigation Measure TRA-1) would effectively reduce this impact to a level less than significant. In addition, the EIR/EIS, Section D.9.3.3, Impact TRA-7, states that unexpected damage to roadways by construction vehicles and equipment (overhead line trucks, crew trucks, concrete trucks, etc.) along the project site could occur from vehicles entering and leaving roadways and construction of the project. Implementation of Mitigation Measure TRA-2, which requires that damaged roadways be adequately repaired at the applicant's expense, would ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- F72-5** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4 and FIRE5, regarding fire concerns.

- F72-6** The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and impacts related to noise in Section D.8, Noise. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.
- F72-7** The comment regarding concerns over long-commute time and evacuation of animals in the event of a firestorm is noted and will be included in the administrative record. Please refer to common response FIRE4, regarding location of the project in a high fire hazard area
- F72-8** The comment is noted. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- F72-9** Please refer to common response PHS2 regarding stray voltage. The comment is noted. The comment is noted and will be included in the administrative record.
- F72-10** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker. The comment is noted and will be included in the administrative record.
- F72-11** The comment is noted. Please refer to common response SOC1 regarding property values.
- F72-12** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common response NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations; common response PHS6 regarding complaint resolution; common response PHS2 regarding stray voltage; and common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors. The comment is noted and will be included in the administrative record.

- F72-13** The comment is noted. Please refer to response F72-12 above; common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.
- F72-14** The comment is noted. Please refer to common response WR1 regarding groundwater resources.
- F72-15** The comment is noted. Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views. Please also refer to common response PHS1 regarding shadow flicker.
- F72-16** The comment summarizes the issues raised previously in the letter. Please refer to the responses to comments above, notably response F72-6, F72-12, and F72-15. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## Response to Document No. F73

Charles and Laurie Baker  
Dated March 2, 2011

- F73-1** This comment, regarding support for the No Project Alternative, is noted. The commenter's opposition to the PROJECT and Tule Wind Alternative 5 – Reduction in Turbines, is also noted. These comments will be included in the administrative record.
- F73-2** Significance thresholds utilized to determine impacts to recreation and wilderness are identified in the EIR/EIS Section D.5.3.3. Because the Proposed PROJECT would not permanently preclude recreational activities in the McCain Valley area, WR-2 impacts were determined to be less than significant. As stated in EIR/EIS Section D.5 (2nd paragraph of the section), impacts pertaining to the anticipated change in visual character of the project area resulting from the Proposed PROJECT (including impacts to scenic overlooks and other recreation areas in the McCain Valley area) are analyzed in Section D.3, Visual Resources.
- F73-3** Please refer to response F73-2. In addition, the methodology utilized in the key observation point (KOP) process is discussed in the EIR/EIS Section D.3.1 Environmental Setting/Affected Environment (Methodology and Assumptions).
- F73-4** Please refer to response F73-2. The EIR/EIS Section D.3 Visual Resources determines that construction and operation of proposed wind turbines would result in significant and unmitigable impacts to the existing character and/or quality of the site and its surroundings (see Section D.3, subsection D.3.3.3, Impact VIS-3 – Tule Wind Project).
- F73-5** Please refer to response F73-2. Impacts associated with substantial new sources of light and glare are analyzed in Section D.3, Visual Resources.
- F73-6** The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record.
- F73-7** The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record.
- F73-8** Please refer to response F73-2. The commenter's opposition to the project is noted. The commenter's opinion will be included in the administrative record.

- F73-9** The comment is noted. Potential impacts associated with increased unauthorized access to specially designated or restricted areas (including wilderness areas) are analyzed in the EIR/EIS Section D.5, Wilderness and Recreation (see subsection D.5.3.3, Impact WR-4). Additionally, mitigation measure BIO-1a (see Section D.2, Biological Resources) has been revised to include the following language:
- In addition, to control unauthorized use of project access roads by off-road vehicle enthusiasts, the applicants shall provide funding to land management entities responsible for areas set aside for habitat conservation to provide for off-road vehicle enforcement patrols. The responsible land management entities will formulate what funding is reasonable to control unauthorized use of project access roads.
- F73-10** Please refer to response F73-2 regarding impacts to wilderness and recreation and impacts to visual resources.
- F73-11** As discussed in the EIR/EIS Section D.4 Land Use (subsection D.4.2.1), the project area was made available for wind energy development by the BLM in the 2008 Eastern San Diego County Resource Management Plan. The BLM processes wind right-of-way application for lands in accordance with its Wind Energy Policy (Instructional Memorandum No. 2006-216) and the BLM will consider the ROW grant application for the proposed Tule Wind Project on its own merits.
- F73-12** Please refer to response F73-2 regarding impacts to wilderness and recreation and impacts to visual resources response F73-11.
- F73-13** Please refer to response F73-9.
- F73-14** Please refer to response F73-2 regarding impacts to wilderness and recreation and impacts to visual resources and response F73-11.
- F73-15** This comment refers to a comment located elsewhere in the letter. As a specific comment regarding the adequacy of the EIR/EIS is not made, no response is required.
- F73-16** The visual impacts associated with construction and operation of the Tule Wind Project are assessed in EIR/EIS Section D.3, Visual Resources. The EIR/EIS concludes that the Tule wind turbines would result in adverse and significant (Class I) visual impacts to the existing visual character of the project area (see Section D.3, Visual Resource for additional analysis). The comment regarding VRM designations in the Eastern San Diego County Planning Area will be included in the administrative record; however, the comment does not raise

specific issues related to the adequacy of the environmental analysis in the EIR/EIS, and therefore no additional response is provided or required.

**F73-17** Multiple key observation points (KOPs) were selected from which to evaluate the anticipated visual impacts of the Tule Wind Project. The selected KOPs evaluated the proposed Tule Wind Project from both foreground (0.25 to 0.5 miles away) and middleground (0.5 to 3 miles away) viewing distances, inferior and normal viewing angles, viewpoints providing short (i.e., roadways) and long-term (i.e., residential areas) viewing durations, lighting conditions, and atmospheric conditions. The relative size and scale of wind turbines, and well as the circular movement of wind turbine blades, is analyzed and discussed in Section D.3, Visual Resources (see Impact Tule-VIS-3). The spatial relationship between proposed wind turbines and existing vegetation, landforms, and other natural features is also analyzed and discussed in Section D.3, Visual Analysis.

Please refer to response F73-11 for discussion regarding the BLM's decision making process. The commenter's opposition to the project is noted and will be included in the administrative record.

**F73-18** The anticipated visual impacts of the Tule Wind Project are analyzed and discussed in Section D.3, Visual Resources of the EIR/EIS. The comment is noted and will be included in the administrative record.

**F73-19** The establishment of wilderness area buffer zones is not proposed in the EIR/EIS and therefore, analysis regarding their implementation has not been included. However, the comment is noted and will be included in the administrative record.

**F73-20** The comment is noted. Please refer to common response BIO4 regarding Peninsular bighorn sheep. Additional discussion has been added in the Final EIR/EIS to substantiate the conclusions regarding bighorn sheep, which remain unchanged from the Draft EIR/EIS.

**F73-21** The comment regarding bald eagle observations at Cuyamaca Rancho State Park and Cleveland National Forest is noted. Please refer to common response BIO1 regarding golden eagle.

**F73-22** The comment is noted. Please refer to common response BIO1 regarding golden eagle and Mitigation Measure BIO-10i (see EIR/EIS Section D.2 Biological Resources) regarding compliance with the Bald and Golden Eagle Protection Act. In addition, the Bald and Golden Eagle Protection Act is discussed in EIR/EIS Section D.2 Biological Resources, subsection D.2.2.1 Federal Regulations.

- F73-23** The comment is noted. Please refer to common response BIO1 regarding golden eagle and common response BIO8 regarding biological resources mitigation. Also, please refer to Mitigation Measure BIO-10g (see EIR/EIS Section D.2 Biological Resources), regarding golden eagle nest monitoring and annual surveys.
- F73-24** The comment is noted. Please refer to EIR/EIS Section D.2, Biological Resources (subsection D.2.3.3, Impact BIO-10, Tule Wind Project) which, in addition to golden eagle, discusses impacts to other raptors (including red-tailed hawks and turkey vultures) known to use the project site.
- F73-25** The comment regarding the ESJ Transmission Project DEIS is noted however; the same minor beneficial impact claim made in regards to transmission structure roosting opportunities by the DEIS are not stated in the EIR/EIS. In the EIR/EIS, mitigation measure BIO-10a requires implementation of recommendations by the Avian Power Line Committee to protect raptors and other birds that may perch on structures and lines from electrocution.
- F73-26** The comment is noted. The EIR/EIS analyzes impacts associated with wind turbine collisions and avian species resulting from operation of the Proposed PROJECT (see Section D.2, Biological Resources, subsection D.2.3.3, Impact BIO-10). In additional, biological resources impacts anticipated during the cumulative scenario (which includes operation of the Sunrise Powerlink Project) are assessed in Section F, Cumulative Scenario and Impacts.
- F73-27** The comment is noted. Please refer to common response BIO4 regarding peninsular bighorn sheep. Additional discussion has been added in the Final EIR/EIS to substantiate the conclusions regarding bighorn sheep, which remain unchanged from the Draft EIR/EIS.
- F73-28** Please refer to response F73-9 regarding potential impacts associated with increased unauthorized access.
- F73-29** The commenter quotes from the EIR/EIS, Section D.15 Fire and Fuel Management, subsection D.15.1.1 through D.15.3.3, reiterating details regarding impact classifications and fire risks, especially with regard to the Tule Wind Project. The EIR/EIS provides a thorough evaluation of wind turbine fire conditions and provides for wind turbine fire suppression systems in MM FF-5 along with other mitigation measures and applicant proposed measures that have been accepted by San Diego County Fire Authority and San Diego Rural Fire Protection District as appropriate mitigation for the potential fire risk. Please refer to common response FIRE5 regarding impact classification updates for the Tule Wind Project.

- F73-30**      The commenter’s opinion is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F73-31**      The photographs provided in this comment are noted and will be included in the administrative record.

## Response to Document No. F74

**Carol Cockerham**  
**Dated March 2, 2011**

- F74-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagles. EIR/EIS Section D.2, Biological Resources, under environmental setting, describes the surveys and existing setting regarding golden eagles. Section D.3.3 of the EIR/EIS, under environmental effects, evaluates the direct or indirect effects the Proposed PROJECT could have on the golden eagle. Mitigation Measures BIO-10b and BIO-10h require an Avian Protection Plan. In addition, Mitigation Measure BIO-10b in Table D.2-12 has been updated in the Final EIR/EIS to reflect that the applicant for the Tule Wind Project is currently in consultation with USFWS regarding an Avian and Bat Protection Plan.
- F74-2** The commenter's opinion is noted and will be included in the administrative record. The EIR/EIS includes a full evaluation of environmental impacts related to potential cultural resources (Section D.7, Cultural and Paleontological Resources). EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried National Register of Historic Places (NRHP)- and California Register of Historical Resources (CRHR)-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F74-3** The commenter's opposition to the project is noted and will be included in the administrative record.

## **Response to Document No. F75**

**Marissa Cuero**

**Dated March 2, 2011**

- F75-1**           The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F75-2**           The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F76**

**Judy Elliott**

**Dated March 2, 2011**

- F76-1**           The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F76-2**           The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles. Please also refer to response F74-2 regarding cultural resources.

## **Response to Document No. F77**

**Nick Elliott**

**Dated March 2, 2011**

- F77-1**           The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F77-2**           The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F78**

**Toni Lee Elliott**  
**Dated March 2, 2011**

- F78-1** The commenter’s opinion is noted and will be included in the administrative record. The EIR/EIS includes a full evaluation of environmental impacts related to the potential to cultural resources (Section D.7, Cultural and Paleontological Resources). EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F78-2** The commenter’s opinion is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding the golden eagle.
- F78-3** The commenter’s opinion is noted and will be included in the administrative record. Please refer to response D21-2.
- F78-4** The commenter’s opposition to the project is noted and will be included in the administrative record.

## **Response to Document No. F79**

**Yolanda Elliott**

**Dated March 2, 2011**

- F79-1** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F79-2** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to response F71-1 regarding cultural resources. Please also refer to common response BIO1 and response F74-1 regarding golden eagles.

## **Response to Document No. F80**

**Lio Estrada**

**Dated March 2, 2011**

- F80-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F80-2** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F81**

**Michael and Debbie Moran**  
**Dated March 2, 2011**

- F81-1** The commenter’s opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is provided or required.
- F81-2** The comment regarding the existing Kumeyaay Wind Project is noted and will be included in the administrative record. However, the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is warranted.
- F81-3** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. Please also refer to common response CUM1, regarding cumulative projects, and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The comment is noted and will be included in the administrative record.
- F81-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.9, Transportation and Traffic, analyzes impacts to traffic flow and roadway surfaces resulting from construction of the Tule Wind Project. In Section D.9.3.3 (Impact TRA-1), the EIR/EIS determined that construction of the project would cause temporary road and lane closures that would temporarily disrupt traffic flow and that implementation of a traffic control plan (Mitigation Measure TRA-1) would effectively reduce this impact to a level that is not adverse and less than significant. In addition, EIR/EIS Section D.9.3.3, Impact TRA-7, states that unexpected damage to roadways by construction vehicles and equipment (e.g., overhead line trucks, crew trucks, concrete trucks) along the project site could occur from vehicles entering and leaving roadways and construction of the project. Implementation of Mitigation Measure TRA-2, which requires that damaged roadways be adequately repaired at the applicant’s cost, would ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- F81-5** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4, and FIRE5 regarding fire concerns.

- F81-6** Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.
- F81-7** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.
- F81-8** Please refer to common response PHS2 regarding stray voltage. The comment is noted and will be included in the administrative record.
- F81-9** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.
- F81-10** Please refer to common response SOC1 regarding property values.
- F81-11** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations, common response PHS6 regarding complaint resolution, common response PHS2 regarding stray voltage, and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.
- F81-12** Please refer to response F81-11, common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.
- F81-13** Please refer to common response WR1 regarding groundwater resources.
- F81-14** Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views.

**F81-15**      The comment summarizes the issues raised previously in the commenter’s letter. Please refer to the responses to comments above, notably response F81-6, F81-11, and F81-14. The commenter’s opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## **Response to Document No. F82**

**Veronica Santos**

**Dated March 2, 2011**

**F82-1** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding the golden eagle.

The EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project description refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys.

**F82-2** The commenter's opinion is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding the golden eagle. Please also refer to response D21-2 regarding cultural landscapes/properties.

Please refer to common responses addressing public health in Section 2.8 of the Volume 3 of the Final EIR/EIS.

## **Response to Document No. F83**

**Jeanie Sepin**

**Dated March 2, 2011**

- F83-1**           The commenter’s opinion and opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F83-2**           The comment is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagles. Please also refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys.

## **Response to Document No. F84**

**Alexa Adkins**

**Dated March 3, 2011**

- F84-1**           The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F84-2**           The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.

## Response to Document No. F85

**Don Bonfiglio**  
**Dated March 3, 2011**

- F85-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.
- F85-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

## **Response to Document No. F86**

**Danielle Cook**

**Dated March 3, 2011**

- F86-1** The comment is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F86-2** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F86-3** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F86-4** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F86-5** The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F86-6** The comment is noted and will be included in the administrative record. Please refer to common responses BIO1, BIO2, and BIO3 regarding golden eagle, California condor, and bats.
- F86-7** Please refer to common response WR1 regarding water resources.
- F86-8** Please refer to common response SOC1 regarding property values.
- F86-9** EIR/EIS Section D.16, Social and Economic Conditions, analyzes impacts on the social well-being and economic conditions resulting from construction and operation of the Proposed PROJECT.
- F86-10** The economic feasibility of the proposed project is outside the scope of the EIR/EIS analysis and is not required under CEQA or NEPA. Furthermore, implying that the economic impact of wind turbines in Southern California will resemble that of Germany is entirely speculative and not supported by factual evidence.
- F86-11** Please refer to common responses in Section 2.8 (Public Health and Safety) of Volume 3 of the Final EIR/EIS.

**F86-12** The comment is noted. EIR/EIS Section D.5, Wilderness and Recreation, analyzes impacts to wilderness and recreation areas in the project area resulting from construction and operation of the Proposed PROJECT. The visual impacts of the Proposed PROJECT are assessed in Section D.3, Visual Resources.

The wilderness and recreation section of the EIR/EIS under Section D.5.1, General Overview, identifies wilderness and recreational facilities/destinations located in the project area, including, but not limited to, the McCain Valley area, In-Ko-Pah Mountains ACEC, Carrizo Gorge Wilderness, Lark Canyon OHV Area, Cottonwood Campground, and the Sawtooth Mountain Wilderness. Figures D.5-1 and D.5-4 also identify the above listed wilderness and recreational areas; therefore, the EIR/EIS has not ignored identification of these areas as stated in the comment letter.

The direct and indirect effects anticipated to occur to wilderness and recreational areas during construction and operation of the Proposed PROJECT are assessed in EIR/EIS Section D.5, Wilderness and Recreation, subsection D.5.3.3. Within the Tule Wind Project Impact WR-1 analysis, the document discloses that McCain Valley Road is the primary access road for visitors to the McCain Valley area and that the roadway is also the primary access road to the Carrizo Gorge Wilderness and the Sawtooth Mountain Wilderness. Although visitors can access the higher elevation areas of the western side of Anza Borrego Desert State Park via McCain Valley Road, the Sombrero Peak Wilderness, Carrizo Canyon Wilderness, and Aqua Caliente Wilderness are also accessible from the east. In addition, as discussed in Section D.5 (Impact WR-1), Mitigation Measure WR-1 requires that access be maintained along McCain Valley Road during construction to ensure that visitors would be able to access wilderness and recreation areas during construction.

**F86-13** The comment is noted. Please refer to common responses BIO1, BIO3, and BIO 4 regarding golden eagle, bats, and peninsular bighorn sheep. The comment regarding impacts to recreational resources is noted and will be included in the administrative record.

**F86-14** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required. Please refer to response D28-17 regarding the project description.

**F86-15** The comment is noted and will be include in the administrative record. Please refer to common response INT2 regarding adequacy of the EIR/EIS.

- F86-16** The commenter’s opinion regarding fire risk increases with construction of the PROJECT will be included in the administrative record. The comment provides no new information or issues that have not been analyzed in the EIR/EIS, which included a full evaluation of environmental impacts related to the potential to fire and fuels management. EIR/EIS Section D.15, Fire and Fuels Management, evaluates the potential for the Proposed PROJECT to not only cause fires, but to also hinder fire-fighting capabilities. Please refer to common responses FIRE1 through FIRE6 regarding additional information on fire.
- F86-17** The comment is noted. The EIR/EIS has been prepared pursuant to CEQA Public Resources Code 21000 et seq. and the CEQA Guidelines (California Code of Regulations, Section 15000 et seq.) as well as the requirements of NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 CFR 1500 et seq.), and the BLM NEPA Handbook (H-1790-1). The EIR/EIS identifies significant effects due to construction and operation of the proposed PROJECT and provides applicant proposed measures (APMs) and mitigation measures and alternatives which would substantially reduce these effects.
- F86-18** The comment is noted. Please refer to common response WR1 regarding water resources.
- F86-19** The comment is noted. Please refer to response F86-17 regarding the impact analysis.
- F86-20** The comment is noted and will be include in the administrative record.
- F86-21** The comment is noted. Please refer to response F65-4 regarding traffic concerns.
- F86-22** Refer to Section D.5, Wilderness and Recreation, for analysis of impacts to wilderness and recreation areas resulting from construction and operation Proposed PROJECT. In analyzing impacts, Section D.5 considers the functionality of wilderness and recreation areas and assesses the project according to four significance thresholds including, but not limited to, whether construction activities would limit or restrict access to wilderness and recreation areas and whether the project would result in the permanent preclusion of recreational activities (see Table D.5-1, Wilderness and Recreation Impacts, for complete list of significance thresholds utilized to determine impacts to wilderness and recreation areas in the EIR/EIS). Impacts to the existing character or quality of the site and its surroundings, which would include the existing tranquility of wilderness and recreation areas, are addressed in Section D.3; Visual Resources (subsection D.3.3.3, Impact VIS-3).

**F86-23**

The comment is noted and will be included in the administrative record. Please refer to common response ALT1 regarding the extensive alternatives analysis conducted for the Proposed PROJECT. As recommended by the commenter, EIR/EIS Section E.5, Environmentally Superior Alternative / Agency Preferred Alternative, describes undergrounding portions of the 138 kV transmission lines for both the ECO Substation and Tule Wind Projects as they approach the Boulevard Substation. This includes undergrounding the Tule Wind 138 kV line along Old Highway 80. Under this alternative, the ECO Substation transmission line would be undergrounded south of the proposed Boulevard Substation site (from approximately milepost 9 – see EIR/EIS figure C-1).

The Final EIR/EIS Section C.4.2.5, Tule Wind Alternative 5, Reduction in Turbines, indicates that a total of 65 turbines (57 in the northwestern portion of the project and 8 turbines in the southeastern portion of the project – see EIR/EIS Figure E-1) would be not be constructed under this alternative. Based on the modified project layout (see Section B of the Final EIR/EIS), 63 remaining turbines would be constructed under this alternative. This reduced turbine alternative is also part of the environmentally superior alternative as discussed in EIR/EIS Section E.5.

Mitigation measures provided in the EIR/EIS will provide mechanisms to curtail wind turbine operations when determined to be necessary. EIR/EIS Section D.2, Biological Resources, provides mitigation measure BIO-1a which states that the towers and power lines conform to recommendations by the Avian Power Line Interaction Committee (2006), which will protect raptors and other birds from electrocution; BIO-10h that implements an adaptive management program that provides triggers for required operational modifications (seasonality, radar, turbine-specific modifications, cut-in speed). In addition, mitigation measure BIO-10b requires Tule Wind, LLC to develop and implement an Avian Protection Plan related to wire, transmission tower, and facilities impacts from electrocution and collision of bird species.

EIR/EIS Section C, Alternatives, subsection C.5.1.9, ECO Alternative Boulevard Substation Site, describes a Boulevard Substation alternative. This alternative would move the substation nearer to the Tule Wind Project on BLM property to facilitate interconnection of the Tule Wind Project. This alternative was eliminated from further analysis due to the potential need to rearrange portions of the existing distribution system and or need to upgrade the existing Boulevard site to meet the local reliability criteria.

Based on new SDG&E design criteria for high wind and high fire areas, the proposed 138 kV transmission line will use steel poles (SDG&E 2010). In addition, SDG&E will also be required to implement mitigation measure BIO-10B that required them to develop and implement an Avian Protection Plan.

The EIR/EIS includes a mitigation monitoring, compliance, and reporting program (MMCRP) for the mitigation measures proposed for the PROJECT. Section H of the EIR/EIS provides the recommended framework for effective implementation of the MMCRP. Please refer to common response INT3 regarding implementation of mitigation measures and responsible agencies.

Please refer to common response FIRE6 regarding funding for community wildfire protection plan and evacuation plan.

**F86-24**      The commenter's opposition to the project is noted and will be included in the administrative record.

**Reference**

SDG&E, Revised East County Substation Footprint Project Description for the East County Substation Project, April, 30, 2010

## **Response to Document No. F87**

**Johnny Eagle Spirit Elliot**  
**Dated March 3, 2011**

**F87-1** The commenter's opinion and opposition to the project is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagle. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Please refer to common responses CUL1 and CUL2 regarding the efforts made to consult with Native American tribes and individuals to identify Traditional Cultural Properties (TCPs) such that they can be considered as part of project avoidance redesigns. Project transmission lines and access roads have been redesigned to avoid important cultural deposits associated with villages and burial areas identified during a review of previous archaeological investigations, revisiting those sites during current intensive archaeological surveys, and identification of new sites during supplemental intensive surveys. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F88**

**Jon Isaacs**

**March 3, 2011**

**F88-1** The comment is noted. The EIR/EIS addresses impacts associated with noise (see Section D.8, Noise), visual resources (see Section D.3, Visual Resources), wildfire (see Section D.15, Fire and Fuels Management), and property values (see Section D.16, Social and Economic Conditions) resulting from implementation of the Proposed PROJECT.

The EIR/EIS also discusses funds for salvage and dismantling of turbines. As stated in Section B, Project Description (Section B.4.3, Tule Wind Project Operations and Maintenance and Decommissioning (decommissioning), BLM Instructional Memorandum 2009-043 requires a bond for all development (ROW) grants to ensure compliance with the terms and conditions of the ROW authorization and the amount of the bond includes potential reclamation and administrative costs to BLM. The comment regarding the number of abandoned wind turbines in California is noted however the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS and therefore, no response is provided or required.

Section D.3, Visual Resources, analyzes the Proposed PROJECT for impacts to visual resources including impacts to dark skies and scenic vistas (see Section D.3.3.3). As summarized in Table D.3.2, Visual Resources Impacts, the EIR/EIS determined that implementation of the Proposed PROJECT would result in significant and unmitigable impacts to nighttime views in the area and to scenic vistas.

**F88-2** The commenter's opposition to the project us noted and will be included in the administrative record.

**F88-3** The comment regarding the number of abandoned wind turbines in California is noted however the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS however; the comment will be included in the administrative record.

**F88-4** The comment is noted. The EIR/EIS analyzes impacts to dark skies resulting from construction and operation of the Proposed PROJECT and as stated in Section D.3.3.3 (Impact VIS-4), the EIR/EIS determined that significant and unmitigable impacts to nighttime views in the area would occur.

- F88-5** The comment is noted. Please refer to response F88-1 regarding decommissioning.
- F88-6** Section D.8, Noise of the EIR/EIS analyzes the potential for noise impacts generated during construction and operation of the Proposed PROJECT. Please refer to common response INT2 regarding general adequacy of the Draft EIR/EIS and common response INT4 regarding applicant prepared studies. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; common responses NOI3 and NOI6 regarding the effects of noise from wind turbines as compared to other sources of noise; and common response NOI10 regarding the human response to noise generated from wind turbines. Please also refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. This comment is noted and will be included in the administrative record.
- F88-7** The comment regarding use of a spectrum analyzer for noise measurements is noted and will be included in the administrative record. Please refer to comment F88-6 above.
- F88-8** The comment regarding use of a spectrum analyzer for noise measurements is noted and will be included in the administrative record. Please refer to comment F88-6 above.
- F88-9** The project description presented in Section B of the EIR/EIS provides sufficient information needed for the evaluation and review of environmental effects of constructing, operating, and decommissioning the Proposed PROJECT pursuant to Section 15124 of the CEQA Guidelines and Section 6.5.1, Description of the Proposed Action of the BLM NEPA Handbook (p. 43). The Final EIR/EIS in Section B, Project Description, describes the turbine heights for each wind energy project including Tule Wind (492 feet), Campo (500 feet), Manzanita (414 feet), and Jordan (450 feet).
- The proposed Campo, Manzanita, and Jordan wind energy projects, including proposed gen-ties, are analyzed at a program level in this EIR/EIS as project-level information has yet to be developed. As stated in the EIR/EIS, these projects will require separate environmental analysis and approval processes.

- F88-10** The commenter summarizes findings within Section D.15.3.3 in Table D.15-9 regarding fire impact classifications and provides opinions regarding past fires and SDG&E, all of which are analyzed within the Draft EIR/EIS. Because the Final EIR/EIS is no longer consistent with the comments, please refer to common response FIRE5 for details regarding updated fire impact classifications.
- F88-11** The commenter provides opinions regarding fire risk associated with the PROJECT and measures to provide for appropriate property owner fire protection. The opinions are noted and will be incorporated into the administrative record, although they offer no new information or issues that were not analyzed in Section D.15 of the Draft EIR/EIS, except that of insurance premium increases. Please refer to common response FIRE3 regarding insurance rate increases.
- F88-12** The comment is noted and will be included in the administrative record. Please refer to common response SOC1 regarding property values.
- F88-13** EIR/EIS Section D.3, Visual Resources, analyzes impacts to visual resources including change in the character of the site and its surroundings (see Section D.3.3.3, Impact VIS-3). The comment regarding the number of abandoned wind turbines in California is noted but the use of abandoned sites for wind turbine development is outside of the purview of this EIR/EIS. Rather, the EIR/EIS analyzes the Proposed PROJECT which is located in Eastern San Diego County and includes wind turbines that (as proposed) would be installed primarily on lands designated by the BLM as available for wind energy development.
- F88-14** Please refer to response F88-1 regarding decommissioning.
- F88-15** Please refer to response F88-6. The comment is noted and will be included in the administrative record.
- F88-16** The commenter repeats fire concerns and opinions from comment F88-10 and F88-11. The opinions expressed are noted and will be incorporated into the administrative record. The commenter further expresses concern that not one new fire station is proposed with construction of the PROJECT. Please refer to common response FIRE1 regarding fire staffing and capability.
- F88-17** Please refer to common response SOC1 regarding property values.
- F88-18** Please refer to comment F88-1 and F88-13 regarding abandoned wind farms.
- F88-19** The commenter's opposition to the project is noted and will be included in the administrative record.

## **Response to Document No. F89**

**Derik Martin**

**Dated March 3, 2011**

**F89-1**

The comment is noted and will be included in the administrative record. Please refer to common response INT2 regarding the adequacy of the EIR/EIS. In addition, each section of the EIR/EIS lists references used in the preparation of that section, including the studies used to support the analysis and conclusions presented in the EIR/EIS. The referenced sections provide all studies used as reference and background material within the analysis of each applicable section of the EIR/EIS. All important data or material was incorporated directly into the analysis of the EIR/EIS. No additional information from the reports is relied upon for the analysis or conclusions aside from the specific discussion within the Draft EIR/EIS or what was included within the appendices. The EIR/EIS includes summarized technical data pursuant to Section 15147 of the CEQA Guidelines, and provides sufficient material “to permit full assessment of significant environmental impacts by reviewing agencies and members of the public.” Any reports associated with highly technical analysis were made available for public review as described in Section A.6.1, Incorporation by Reference, of the EIR/EIS. As indicated in Section A.6.1, these documents are available on the CPUC’s project websites:

<http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/ECOSUB.htm>

<http://www.cpuc.ca.gov/environment/info/aspensunrise/sunrise.htm>

<http://www.cpuc.ca.gov/Environment/info/aspensunrise/toc-rdeir.htm>.

In addition, the BLM’s project website provides a link to the CPUC’s website, which includes project documentation:

<http://www.blm.gov/ca/st/en/fo/elcentro/nepa/tule.html>

Material that is not of such a nature and could be summarized in the EIR/EIS was not included in the appendices. Additional material cited in the reference section at the end of each impact category included material utilized as source documents, which can be cited pursuant to CEQA Guidelines, Section 15148, and are not required to be included in the EIR/EIS.

EIR/EIS Section D.2, Biological Resources, evaluates impacts and provides mitigation measures for wildlife resources. In addition, Section F, Cumulative Scenario and Impacts, of the EIR/EIS, Subsection F.3.1, Biological Resources, addresses cumulative biological impacts. Please also refer to common response

BIO7. Regarding project impacts to bighorn sheep, please refer to common response BIO4.

**F89-2** The comment is noted. Please refer to common response BIO6 regarding wildlife corridors.

**F89-3** The comment is noted. The Draft EIR/EIS prepared for the Proposed PROJECT contains information pertaining to regional wildlife corridors in the project area (see Section D.2, Biological Resources, subsection D.2.1, Regional Wildlife Corridors). Refer to common response BIO6 regarding wildlife corridors. The comment regarding bald and golden eagles is noted. The identification of eagle nests in the project area was determined by helicopter surveys of the project area conducted by WRI for the Tule Wind Project. Refer to common response BIO1 regarding golden eagle.

**F89-4** The comment is noted. In Section D.4, Land Use, the EIR/EIS makes the following statement regarding existing land uses in the project area: “existing land uses in the study area can be characterized as predominately rural, large-lot ranches and single-family homes with a mixture of small-scale agriculture, recreational, and open space, with the exception of the Ewiiapaayp Band of Kumeyaay Indians Reservation that has land uses zoned for commercial economic development and specifically renewable wind and solar energy development.” Please refer to Key Observation Point (KOP) 18 of the EIR/EIS (Section D.3, Visual Resources, Figures D.3-23A and D.3-23B), which presents an elevated observation point located within the Table Mountain ACEC. The commenter is referring to a statement made in the ESJ Gen-Tie Project EIS; a similar statement was not made in the Draft EIR/EIS.

The comment regarding devaluation of property is noted. Refer to common response SOC1 regarding property values.

**F89-5** The comment is noted. The annual average daily traffic range of 13,900 to 17,300 vehicles was obtained from Caltrans’ Traffic and Vehicle Systems Data Unit (see EIR/EIS Section D.9.10, References, for full citation). The average daily traffic range for I-8 presented in Tables D.9-1 and D.9-3 considers the high and low reported average daily traffic on I-8 between the Buckman Springs Road Interchange (exit 51) and the San Diego–Imperial County Line. The annual average daily traffic reported by Caltrans is the total volume for the year divided by 365 days and the results are adjusted to an estimate of annual average daily traffic by compensating for seasonal influence, weekly variations, and other variables. According to Caltrans, very few locations in California are counted continuously;

therefore, the annual average daily traffic was utilized in the EIR/EIS to provide an average range of traffic volume occurring on I-8 throughout the year.

**F89-6** The commenter summarizes analysis and conclusions in the Draft EIR/EIS and provides opinions regarding firefighting resource availability in the area. Please refer to common response FIRE1 regarding firefighter capability improvements and common response FIRE5 for information regarding applicants providing assistance to fire agencies that will improve fire response.

**F89-7** The comment is noted. Please refer to common response WR1 regarding water resources.

**F89-8** The commenter's opinion will be included in the administrative record. Please refer to response F89-1 regarding adequacy of the EIR/EIS and references used.

## **Response to Document No. F90**

**Jeffrey and Laura McKernan**

**Dated March 3, 2011**

**F90-1**           The commenter's opposition and to the project and support for the No Project Alternative is noted and will be included in the administrative record.

**F90-2**           The comment is noted and will be included in the administrative record. The EIR/EIS provides a conservative evaluation of all of the potential environmental impacts associated with construction and operation of the Proposed PROJECT under CEQA and NEPA. EIR/EIS Section D.3, Visual Resources, analyzes project impacts to existing visual resources in the project area and considers the visual impacts of the proposed Tule Wind Project resulting from the bulk and scale of proposed wind turbines, movement of wind turbine blades, and the introduction of FAA-required obstruction lighting. As summarized in Table D.3.2, Visual Resource Impacts, the EIR/EIS determined that implementation of the Proposed PROJECT would result in significant and unmitigable impacts to scenic vistas and to the existing character or quality of the site and its surroundings. As described in EIR/EIS Section A.1, Background, the proposed Campo, Manzanita, and Jordan wind energy projects are analyzed at a program level as project-level information has yet to be developed. As stated in the EIR/EIS, these projects will require separate environmental analysis and approval processes.

Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors and common response VIS4 regarding new sources of light and potential effects to the nighttime views. Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.

Section D.10, Public Health and Safety of the EIR/EIS (subsection D.10.3.3, Impact HAZ-1) includes a full evaluation of the potential for accidental spills of hazardous materials and provides applicant proposed measures and mitigation measures that reduce this impact to less than significant (Class II).

- F90-3** The comment is noted and will be included in the administrative record. EIR/EIS Section D.2, Biological Resources, includes an extensive biological analysis regarding any impacts to biological resources and habitat. This includes all species and habitats that are likely to be identified within the Proposed PROJECT boundaries such as the Peninsular bighorn sheep, Quino checkerspot butterfly, spadefoot toads, and golden eagle. Please refer to common responses in Section 2.4, Biological Resources, of Volume 3 of the Final EIR/EIS regarding wildlife in the project area. Specifically, please refer to common responses BIO1, BIO4, and BIO5 regarding golden eagle, bighorn sheep, and Quino checkerspot butterfly. Section D.10, Public Health and Safety, Section D.8, Noise, and Section D.2, Biological Resources, of the EIR/EIS, address project impacts to human health and wildlife and provide appropriate mitigation to reduce impacts. Impact NOI-3, Tule Wind Project in Section D.8, Noise discusses the noise impacts from the proposed turbines. Also, refer to mitigation measure BIO-7j which has been updated to include language to mitigate for construction-related noise impacts.
- F90-4** The comment is noted. EIR/EIS Section D.11, Air Quality, includes a conservative evaluation of the potential air quality impacts associated with construction and operation of the Proposed PROJECT (see subsection D.11.3.3, Impact AIR-1, AIR-3, AIR-4, AIR-5, and AIR-6).
- F90-5** The comment is noted. EIR/EIS Section D.3, Visual Resources, determined that impacts to scenic vistas resulting from the Proposed PROJECT would be significant and unmitigable (see Table D.3-2, Visual Resource Impacts, for summary of impacts to visual resources). Impacts to property values are discussed in Section D.16, Social and Economic Conditions. Please also refer to common response SOC1, regarding property values. The comment regarding the recent Boulevard Planning Group Meeting with Enel Energy is noted however the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F90-6** The comment is noted. EIR/EIS Section D.12, Water Resources, includes a full evaluation of impacts regarding water quantity and degradation of water quality by spills of potential harmful materials during construction activities (see subsection D.12.3.3, Impact HYD-2). Please refer to common response WR1, regarding groundwater resources.
- F90-7** The comment is noted. EIR/EIS Section D.8, Noise, addresses noise impacts related to both construction and operation for all project components described in Section B, Project Description, including the ECO Substation, Tule Wind, and ESJ Gen-Tie, as well as programmatic-level analysis for the Campo, Manzanita, and Jordan

wind energy projects, including all turbines, transmission lines, substation, and traffic. The EIR/EIS concludes that operational noise impacts would be significant and provides mitigation measures to reduce operational noise impacts to less than significant. Section F, Cumulative Scenario and Impacts, of the EIR/EIS, Subsection F.3.7, Noise and Vibration, addresses cumulative noise impacts.

**F90-8** Please refer to response F90-1. As noted in Section D.3, Visual Resources, the EIR/EIS determined that operation of the Proposed PROJECT would result in significant and unmitigable impacts to scenic vistas, the existing character or quality of the site and its surroundings, and nighttime views in the area (see Table D.3-2, Visual Resource Impacts, for summary of impacts to visual resources). The EIR/EIS has utilized visual simulations prepared by the project applicants and; in order to clarify issues associated with atypical lighting conditions and project components that are not represented in the simulation, notes have been added to Section D.3 visual simulation figures (see Figure D.3-15C for example). In Figure D.3-15C (which includes cloudy atmospheric conditions and a representation of an alternative transmission line which seems to blend in with the background vegetation) notes have been added to clarify that under typical sunny conditions the resulting visual contrast of project components viewed from the KOP 10 vantage point would be increased and text has been added to the figure to clearly identify the alternative transmission line. Despite the cloudy atmospheric conditions and representation of the transmission line, the EIR/EIS determined that these project components would result in significant and unmitigable impacts to the existing character of the site.

The comment regarding the limitation of using visual simulations to accurately depict the visual contrast of project components throughout the day (taking into consideration changes in sun angle, movement of wind turbines, and shading) is noted. Please refer to common response VIS1 regarding adequacy of visual simulations.

**F90-9** The comment is noted and will be included in the administrative record. Please refer to common responses regarding fire in Section 2.10, Fire and Fuels Management, in Volume 3 of the Final EIR/EIS.

**F90-10** Please refer to common responses regarding fire in Section 2.10, Fire and Fuels Management, in Volume 3 of the Final EIR/EIS.

**F90-11** EIR/EIS Section F, Cumulative Scenario and Impacts, includes SDG&E's 500 kV Sunrise Powerlink Project as a cumulative project.

**F90-12**      The commenter’s opposition to the project is noted and will be included in the administrative record. Refer to common response PD3, regarding the full build out of the SDG&E ECO Substation Project.

## Response to Document No. F91

**Crosby Milne**

**Dated March 3, 2011**

- F91-1** The commenter's opposition to the project is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is provided or required.
- F91-2** The comment regarding the existing Kumeyaay Wind Project is noted and will be included in the administrative record. However, the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no further response is provided or required.
- F91-3** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. Please also refer to common response CUM1 regarding cumulative projects and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). The comment is noted and will be included in the administrative record.
- F91-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.9, Transportation and Traffic, analyzes impacts to traffic flow and roadway surfaces resulting from construction of the Tule Wind Project. In Section D.9.3.3 (Impact TRA-1), the EIR/EIS determined that construction of the project would cause temporary road and lane closures that would temporarily disrupt traffic flow and that implementation of a traffic control plan (Mitigation Measure TRA-1) would effectively reduce this impact to a level that is not adverse and less than significant. In addition, EIR/EIS Section D.9.3.3, Impact TRA-7, states that unexpected damage to roadways by construction vehicles and equipment (e.g., overhead line trucks, crew trucks, concrete trucks) along the project site could occur from vehicles entering and leaving roadways and construction of the project. Implementation of Mitigation Measure TRA-2, which requires that damaged roadways be adequately repaired at the applicant's costs, would ensure that damaged roadways are restored to previous conditions and/or improved conditions.
- Impacts pertaining to noise generated during construction of the Tule Wind Project is analyzed in Section D.8, Noise, of the EIR/EIS.

- F91-5** The comment is noted and will be included in the administrative record. Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4, and FIRE5 regarding response to the comments on fire insurance rates, reduced firefighting effectiveness, limited ingress/egress, and limited firefighting availability and funding.
- F91-6** The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and to noise in Section D.8, Noise. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects, and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.
- F91-7** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.
- F91-8** Please refer to common response PHS2 regarding stray voltage. This comment and associated responses will be included in the administrative record.
- F91-9** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.
- F91-10** The comment is noted. Please refer to common response SOC1 regarding property values.
- F91-11** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations, common response PHS6 regarding complaint resolution, common response PHS2 regarding stray voltage, and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.

- F91-12** The comment is noted. Please refer to response F91-11, common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.
- F91-13** The comment is noted. Please refer to common response WR1 regarding groundwater resources.
- F91-14** The comment is noted. Please refer to common response VIS4 regarding new sources of light and potential effects to nighttime views. Impacts associated with new sources of night lighting are also described in EIR/EIS Section D.3, Visual Resources (Section D.3.3.3, Impact VIS-4).
- F91-15** The comment summarizes the issues raised previously in the commenter’s letter. Please refer to the responses to comments above, notably responses F91-6, F91-11, and F91-14. The commenter’s opposition to the Proposed PROJECT is noted and will be included in the administrative record.

## **Response to Document No. F92**

**Chris Noland**

**Dated March 3, 2011**

- F92-1** This comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record.
- F92-2** The comment regarding noise from turbines is noted and will be included in the administrative record. Please refer to common responses NOI1 through NOI16 in Section 2.7 of Volume 3 of the Final EIR/EIS.
- F92-3** The commenter references KOPs 19, 20, 21, and 22 and the fact that they represent conceptual locations only. EIR/EIS Section A.1, Background, indicates that the proposed Campo, Manzanita, and Jordan wind energy projects, including proposed gen-ties, are analyzed at a program level as project-level information has yet to be developed. As stated in the EIR/EIS, these projects will require separate environmental analysis and approval processes, where visual simulations will be provided at the project level of information.
- F92-4** The comment regarding a nighttime visual simulation is noted. While the Draft EIR/EIS did not include a visual simulation depicting the effects of nighttime lighting associated with proposed wind turbines, Section D.3, Visual Resources, analyzes the anticipated impact resulting from the introduction of required wind turbine obstruction lighting. As noted in Subsection D.3.2.2 (Impact VIS-4, Tule Wind Project), the height of the turbines and the repetitive flashing of obstruction lighting would create a strong, highly visible constant source of nighttime lighting for residents in the McCain Valley and Boulevard areas and nighttime views for these residents would be affected. The EIR/EIS determined that this impact would be significant and unmitigable. While a static visual simulation of obstruction lighting would depict the anticipated visual change to the nighttime sky in the area, it would not adequately characterize the anticipated impact discussed in the EIR/EIS associated with repetitive flashing of lights during nighttime hours.
- F92-5** The comment is noted. Please refer to common response SOC1 regarding property values.
- F92-6** Please refer to common response WR1 regarding water resources. In addition, EIR/EIS Section D.12, Water Resources, provides a full evaluation of impacts related to water resources for the Proposed PROJECT (see Section D.12.3.3, Direct and Indirect Effects). Further, the discussion under Impact HYD-4

provides a discussion of water supplies needed for the ECO Substation, Tule Wind, and ESJ Gen-Tie projects construction, operation, and maintenance.

**F92-7**

The commenter provides opinions on the Proposed PROJECT's impact on firefighting capability, increased ignition sources, and fire hazard. EIR/EIS Section D.15, Fire and Fuels Management, analyzes potential fire impacts associated with the Proposed PROJECT and provides mitigation measures for reducing those impacts. The Final EIR/EIS clarifies mitigation measures that reduce impacts to adverse but mitigable for the Tule Wind and ESJ Gen-Tie projects (refer to common response FIRE5 for details). With regard to the firefighting manpower issue that currently exists in southeast San Diego County, it should be noted that due to the volunteer and reserve status of many of the rural fire stations, firefighting manpower will be enhanced with approval of the Proposed PROJECT. Refer to common responses FIRE1 and FIRE5 for details.

## Response to Document No. F93

Ken Venable

Dated March 3, 2011

**F93-1** The commenter's support of the project is noted and will be included in the administrative record.

## Response to Document No. F94

**Daniella Adkins**

**Dated March 4, 2011**

- F94-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F94-2** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 through CUL2 regarding cultural resources. Please also refer to response D21-2 regarding cultural landscapes and properties.

## Response to Document No. F95

Keith Adkins

Dated March 4, 2011

- F95-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F95-2** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding cultural resources. Please also refer to response D21-2 regarding cultural landscapes and properties.

## Response to Document No. F96

Theresa Angotti and David Thompson  
Dated March 4, 2011

- F96-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F96-2** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding cultural resources. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F96-3** Please refer to responses F96-1 and F96-2.

## **Response to Document No. F97**

**Mary Lu Brandwein**

**Dated March 4, 2011**

- F97-1** The commenter's support of the No Project Alternative is noted and will be included in the administrative record.
- F97-2** The comment is noted and will be included in the administrative record. The commenter states that taken as a whole, the cumulative impacts of the Proposed PROJECT would transform both the environment and the communities in the project area. The EIR/EIS provides a thorough evaluation of cumulative impacts associated with the Proposed PROJECT in addition to anticipated impacts resulting from 53 additional planned projects in the area (see Section F, Cumulative Impacts, Table F-2 for complete list of projects considered in the cumulative impacts analysis). In addition, the EIR/EIS assessed the visual impact associated with changes to the existing character of the site and its surroundings resulting from the Proposed PROJECT (see Section D.3, subsection D.3.3.3, Impact VIS-3), as well as from all projects considered in the cumulative scenario (see Section F, subsection F.3.2).
- F97-3** The comment lists significance thresholds utilized in the agricultural resources, wilderness and recreation, social and economic conditions, visual resources, and biological resources sections of the Draft EIR/EIS. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F97-4** Please refer to response F97-2. In addition, EIR/EIS Section D.3, Visual Resources, analyzes visual resource impacts to scenic vistas in the project area resulting from the Proposed PROJECT (see subsection D.3.3.3, Impact VIS-1) and impacts resulting from the Proposed PROJECT and all other projects considered in the cumulative impact analysis (see Section F, subsection F.3.2, Impact VIS-1). In Section D.3, Visual Resources, and Section F, Cumulative Scenario and Impacts, the EIR/EIS determined that impacts to scenic vistas would be significant and unmitigable (Class I).
- F97-5** Please refer to common responses regarding noise issues raised in Section 2.7, Noise, of Volume 3 of the Final EIR/EIS, and specifically common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; common response NOI4 regarding the levels of low frequency noise generated by the proposed wind turbine project; and common response NOI10 regarding the human response to noise generated from wind turbines.

- F97-6** The commenter quotes from the Draft EIR/EIS, Section D.18.3.3 reiterating details regarding estimated operational GHG emissions and contribution of those emissions to current levels. The EIR/EIS provides a thorough evaluation of PROJECT related GHG emissions and adequate mitigation measures which would reduce potential impacts to levels below significance during project operation. Additionally, the Proposed PROJECT's contribution to California's renewable energy portfolio would further reduce state-wide GHG emission levels. Please refer to common response CC1 and CC2, regarding climate change. For additional information regarding EIR/EIS adequacy, please refer to common response INT2.
- F97-7** The significance thresholds referenced by the commenter (HYD-2, HYD-3, HYD-4, and HYD-8 from Section D.12, Water Resources and PSU-4 and PSU-5 from Section D.14, Public Services and Utilities of the EIR/EIS) are not assessed in the context of "certain legal limits" and the Draft EIR/EIS does not rely on operations within legal limits to determine the anticipated impact. Rather, each individual project (as well as the Proposed PROJECT) is analyzed in the context of the significance threshold, an impact determination is made, and mitigation (if appropriate) is then applied in order to minimize the anticipate impact to the extent feasible.
- F97-8** The comment regarding nighttime light impacts resulting from proposed wind turbines of the ESJ Wind Phase I project in Mexico is noted. As stated in Section D.3, Visual Resources (subsection D.3.3.3, Impact VIS-4, ESJ Gen-Tie Project) the ESJ Phase 1 Wind Project would produce nighttime lighting impacts similar to the Tule Wind Project and would affect nighttime views in the area. Due to a lack of intervening landforms, generally open visibility conditions, and the bulk and scale of proposed wind turbines, the EIR/EIS determined that the ESJ Wind Phase I project in Mexico would result in significant and unmitigable impacts to nighttime views. While the visual impacts of the ESJ Wind Phase I project in Mexico are discussed in the EIR/EIS, the project would be located in Mexico and outside of the jurisdiction of the County of San Diego, Bureau of Land Management, and California Public Utilities Commission and therefore, mitigation measures have not been proposed for the project.
- F97-9** Please refer to common response SOC1, regarding property values.
- F97-10** The commenter quotes from the Draft EIR/EIS, Section D.15.1.1, reiterating details regarding wind turbine fire impact and risk assessments and provides opinions regarding SDG&E, fire return intervals, and fire station availability. The EIR/EIS provides a thorough evaluation of PROJECT related fire risk and provides mitigation measures accepted by the fire agencies having jurisdiction as mitigating the potential risk to levels below significance for the Tule Wind and

ESJ Gen-Tie projects. Because SDG&Es Fire Protection Plan (Mitigation Measure FF-4) has yet to be received and assistance to SDRFPD and SDCFA in supporting fire code specialist positions (Mitigation Measure FF-3) has yet to be provided by SDG&E to SDRFPD and SDCFA, mitigation effectiveness for the ECO Substation project is not known and therefore, Impacts FF-2 and FF-3 are considered unavoidable (Class I) for purposes of the analysis conducted in the EIR/EIS. Please refer to common response FIRE1 for details regarding firefighting capability. Please also refer to common response FIRE3 for details regarding insurance provisions.

**F97-11** As discussed in Section B.4.3, a bond is required for all development (ROW) grants to ensure compliance with the terms and conditions of the ROW authorization and the requirements of applicable regulatory requirements. As the ROW grant in question has yet to be authorized, the associated bond required by the BLM has yet to be identified. According to BLM Instruction Memorandum 2009-043, a minimum bond amount, considering salvage values of turbines and towers, is required for all wind energy development projects on public lands and since ROW authorization would occur prior to initiation of construction, the bond would be in place prior to construction.

**F97-12** As discussed in Section D.1, Introduction to the Environmental Analysis, the EIR/EIS addresses potential biological, visual resources, and fire impacts to the United States associated with the proposed ESJ Wind Phase I projects constructed in Mexico. As this project would be constructed and would operate in Mexico, it would not likely be subject to the same lighting, air quality, and noise regulations governing the construction and operation of wind farms in the United States.

**F97-13** The comment summarizes the project impacts determined in the Draft EIR/EIS. The impacts of the Proposed PROJECT (which considers the proposed ECO Substation Project, Tule Wind Project, and ESJ Gen-Tie Projects) are assessed in sections D.2 through D.18 of the EIR/EIS. The commenter's opposition is noted and will be included in the administrative record.

**F97-14** The comment is noted and will be included in the administrative record. The comment references the No Project Alternative and suggests a wind turbine setback of between 2 and 2.5 miles from residential areas and schools. Please refer to common response PHS3 and NOI12, regarding setbacks from wind turbines to sensitive receptors.

## Response to Document No. F98

**Cindy Buxton**

**Dated March 4, 2011**

**F98-1** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F98-2** The comment and attached photos are noted and will be included in the administrative record. In their 2008 Eastern San Diego County Resource Management Plan, the BLM designated portions of the San Diego County Planning Area (including McCain Valley East (in which the Tule Wind Project would primarily be located) and McCain Valley West) as available for wind energy development. As discussed in Section D.5 Wilderness and Recreation (subsection D.5.3.3, Impact WR-2, Tule Wind Project), visitors at the Cottonwood Campground would be provided close-proximity views of the proposed wind turbines however, wind turbines would not result in the removal of campsites or in the permanent closure of camping grounds. In addition, the BLM has no current plans to close the Cottonwood Campground or build new campgrounds on account of the Tule Wind Project. While impacts regarding the accessibility of wilderness and recreation area during construction and operation and the permanent preclusion of recreation activities was determined to be less than significant in Section D.5, Wilderness and Recreation, the EIR/EIS determined that the introduction of proposed wind turbines would result in significant and unmitigable impacts to the existing character of the site and its surroundings (see Section D.3.3, Environmental Effects, in the visual resources section of the EIR/EIS).

Section D.3 Visual Resources also analyzes impacts to scenic vistas in the McCain Valley area resulting from construction and operation of the Tule Wind Project. Due to their massive scale and bulk, striking white color, and blade movement, the EIR/EIS determined that proposed wind turbines would result in significant and unmitigable impacts to scenic vistas (see Section D.3.3.3, Impact VIS-1, Tule Wind Project).

The comments pertaining to the cost of the land, what BLM will use the ROW lease monies for, cost-benefit of no development, and financial terms of government leases are noted however, the comments do not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F98-3** The comment is noted. EIR/EIS Section D.2, Biological Resources, includes a full evaluation of the environmental impacts related to vegetation communities, special-status plant and wildlife species, and jurisdictional wetlands and waters. A discussion of special-status plant and wildlife species with the potential to occur in the region as well as wildlife movement and special management areas are described in Section D.2.2.1 of the EIR/EIS. Please refer to common responses for biological resources in Section 2.4, Biological Resources, of Volume 3 of this Final EIR/EIS, for additional information on specific wildlife species. EIR/EIS Section D.7, Cultural and Paleontological Resources (subsection D.7.3.3, Impact CUL-3), discusses traditional cultural properties (TCPs), which includes traditional landscapes. Please also refer to common responses CUL 1 through CUL3, regarding TCPs.

**F98-4** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F98-5** EIR/EIS Section F, Cumulative Scenario and Impacts, describes all known projects in the study area that have a potential to create cumulatively considerable physical impacts when combined with the Proposed PROJECT. No known pump stations and/ or other energy storage projects are being proposed to support the complex of wind project in the study area.

The commenter requested that an explanation of what type of generation is placed into the grid. Virtually all generation (including modern wind driven generation) entering the California grid (including Sunrise) is in the form of Alternating Current (AC). All large electric transmission systems are of the AC type since the equipment connected to it is designed to operate on AC. Given the physical nature of AC and Direct Current (DC) systems it is not possible to mix the two on the same wires. However it is possible to connect a wire operating as DC with one operating as AC through a complex and expensive “Convertor Station”.

While in most applications the additional cost of convertor equipment outweighs any benefits associated with the use of DC transmission in California there are two long DC transmission lines connecting Southern California with the Pacific Northwest. These lines connect the AC grid in the north with the AC grid in California via large “convertor facilities” at each end. The DC nature of these lines allows for a more economic transfer of energy across the large distances involved. However use of DC is not generally economic for the relatively shorter distances involved for in State transmission lines. In addition a submarine cable from Pittsburg to San Francisco routed under the San Pablo and San Francisco

Bays was recently installed. The unique nature of the line led the designers to use the DC cable technology but as with the previously mentioned long aerial lines the line connects into the AC grid via converter stations at each end.

- F98-6** Please refer to common response ALT1, regarding alternatives to the proposed project including alternative locations as well as project objectives.
- F98-7** The commenter's opinion is noted and will be included in the administrative record.
- F98-8** The comment is noted. As stated in Section D.4, Land Use (subsection D.4.1.3 Tule Wind Project) and depicted on Figure D.4-3, the BLM-jurisdictional land on which proposed turbines would be located was made available by the BLM for wind energy development in their 2008 Eastern San Diego County Resource Management Plan. The EIR/EIS addresses impacts to biological resources and cultural and paleontological resources (see Section D.2, Biological Resources and Section D.7, Cultural and Paleontological Resources).
- F98-9** The commenter's opinion is noted and will be included in the administrative record. As described in the Final EIR/EIS Executive Summary and evaluated in throughout the Final EIR/EIS, not all impacts could be fully mitigated as Class I unmitigable impacts, or residual impacts, remain for Air Quality, Noise, Biological Resources, Visual Character, and Cultural Resources (due to the Section 106 consultation process not being complete for the TCPs).
- F98-10** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.
- F98-11** The comment is noted. Please refer to Section 2.12, Climate Change, of Volume 3 of the Final EIR/EIS, which provides common responses to climate change as it relates to this project analyzed in this EIR/EIS.
- F98-12** The comment regarding the Ocotillo Express Project is noted however, as this project is not considered part of the Proposed PROJECT that was analyzed in the EIR/EIS and since the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS, no response is provided or required.
- F98-13** The commenter's opinion will be included in the administrative record. Please refer to common response PD1 regarding the adequacy of the project description and inclusion of connected actions. The EIR/EIS also addresses cumulative impacts (see Section F, Cumulative Impacts, of the EIR/EIS), including those

associated with the Sunrise Powerlink and other known large-scale energy projects within the study area.

**F98-14** The comment is noted and will be included in the administrative record. EIR/EIS Section D.18, Climate Change, provides a full evaluation of impacts related to climate change. Please also refer to Section 2.12, Climate Change, of Volume 3 of the Final EIR/EIS, which provides common responses to climate change as it relates to this project analyzed in this EIR/EIS.

**F98-15** The comment is noted and will be included in the administrative record. As requested, the commenter has been added to the EIR/EIS distribution list. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

## Response to Document No. F99

**Ken, Tammy, Michelle, Kristy, and Sherry Daubach**

**Dated March 4. 2011**

- F99-1** The general introduction to the comment letter is noted and no further response is provided or required.
- F99-2** The commenter's opinions regarding measures that should be provided by the PROJECT applicants for emergency shelters in the Boulevard Community are noted and will be incorporated into the administrative record. EIR/EIS Section D.15 Fire and Fuels Management, under Section D.15.3.3, Direct and Indirect Effects, provides applicant proposed measures along with mitigation measures (MM FF-1 through MM FF-7), which specify measures that will be enacted with the PROJECT to counter the potential fire risks. Please refer to common responses FIRE1 and FIRE5, regarding improvements in firefighting capabilities and applicants providing local fire agencies with assistance that will improve fire protection and response. Also refer to common response FIRE6, regarding preparation of a community wildfire protection plan and evacuation plan.
- F99-3** The comment is noted. Refer to Section D.16, Social and Economic Analysis, for assessment of impacts to socioeconomics resulting from implementation of the Proposed PROJECT. Also, refer to common response SOC1 for response to comments received on impacts to property values.
- F99-4** The comment regarding relocation of affected residents during construction blasting activities is noted. As provided for in Mitigation Measure NOI-1, the requirements of the blasting plan would ensure that potentially impacted residents (those residences located within 300 feet of the project) are notified by mail at least 1 week prior to the start of construction activities. Mitigation Measure NOI-1 has been revised in the Final EIR/EIS to stipulate that the project applicant would be responsible for temporary relocation expenses (i.e., expenses for temporary housing) incurred by impacted residents. These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines, and under NEPA do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).
- F99-5** The comment is noted. In Table ES-2, the EIR/EIS states that residual impacts associated with temporary road and lane closures (Impact TRA-1) would not be

adverse, meaning that the impacts would be mitigated to a level that is less than significant (Class II) with implementation of Mitigation Measure TRA-1. In Section D.9 Transportation and Traffic, the EIR/EIS determined that the construction of Tule Wind components would cause temporary road and lane closures that would temporarily disrupt traffic flow in the project area (see Section D.9, subsection D.9.3.3, Impact TRA-1, Tule Wind Project). In order to facilitate construction of the Tule Wind Project (to ensure adequate road width for large construction deliveries to the site) temporary widening of existing roadways and the construction of additional dirt roadways would be necessary. Where existing roadway widths are insufficient for the operation of delivery vehicles, temporary widening of the roadway with gravel or full depth widening of the pavement structure would be necessary. Large-scale closure of regional transportation facilities that would occur during natural disasters (such as the closure of sections of I-8 during wildfire events) are not anticipated to be required during construction of the Tule Wind Project. Large trailer trucks would be used during construction however, the width of the vehicles and the load are not anticipated to require closure of I-8 during delivery activities. Rather, truck operators would obtain necessary transportation permits from Caltrans and would mark vehicles with the appropriate warning signs.

**F99-6**

The comment is noted. In Table ES-2, the EIR/EIS states that residual impacts (impacts after mitigation) associated with deterioration of roadway surface (Impact TRA-7) as a result of the operation of heavy construction vehicles would not be adverse, meaning that the impacts would be mitigated to a level that is less than significant (Class II) with implementation of mitigation measure TRA-2. Mitigation Measure TRA-2 (Repair roadways damaged by construction activities) would require project applicants to coordinate (and pay for) repairs to roadways damaged by construction vehicles with the affected public agencies (i.e., County of San Diego Department of the Public Works) to ensure the long-term protection and restoration of road surfaces.

The EIR/EIS contains construction traffic information for the proposed ECO Substation Project, Tule Wind Project, and ESJ Gen-Tie Project (see Section D.9.3.3, Impact TRA-1). The EIR/EIS analyzes construction traffic associated with the ECO Substation Project in addition to the construction traffic associated with the Tule Wind Project, The ESJ Gen-Tie Project, as well as the Campo, Manzanita, and Jordan wind energy projects (albeit at a programmatic-level as specific data is not available for the renewable energy projects). In addition, Section F, Cumulative Scenario and Impacts, analyzes the cumulative impact of the construction traffic associated with the Proposed PROJECT in association with the 53 projects listed in Table F-2.

The comment regarding the location of Boulevard between two U.S. Customs and Border Protection checkpoints is noted however, the comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no response is provided or required.

**F99-7** The comment regarding impacts/benefits to the local economy is noted and will be included in the administrative record. EIR/EIS Section D.16, Social and Economic Conditions, discusses the local employment scenario (see Section D.16.3.3, Impact SOC-2).

**F99-8** The comment is noted. Please refer to common response SOC1 for response to comments received on impacts to property values and common response FIRE3 or response to comments received on insurance premium increases or denial of coverage resulting from implementation of the Proposed PROJECT.

**F99-9** The comment is noted. As stated in Section D.3, Visual Resources (subsection D.3.3.3, Impact VIS-2), there are no officially designated state scenic highways in the immediate project area and therefore, the EIR/EIS determined that no impacts to officially designated state scenic highways (Impact VIS-2) would occur and no mitigation is required. Therefore, the impact determination for Impact VIS-2 does not contradict the findings for Impact VIS-1 and Impact VIS-3. Throughout the EIR/EIS the significance thresholds used to analyze the Proposed PROJECT for environmental impacts are posed as statements (for example, “the project would...”) rather than questions (for example, “would the project...”). The significance thresholds for various environmental resource areas listed in Table ES-2 are not intended to imply whether or not an impact would result from the Project; rather they are provided as a statement which focuses and allows the analysis to ultimately make an impact determination (in Table ES-2, impact determinations are listed in the cells pertaining to CEQA Impact Class).

Impacts to property values resulting from construction and operation of the Proposed PROJECT are discussed in EIR/EIS Section D.16, Social and Economic Impacts.

**F99-10** The comment is noted. EIR/EIS Section D.3, Visual Resources, analyzes visual impacts associated with new sources of lighting that would affect nighttime views in the project area (see Section D.3.3.3, Impact VIS-4). Please refer to common response VIS4, regarding nighttime lighting.

**F99-11** Please refer to response F99-4.

- F99-12** The comment regarding interference with radio and satellite reception resulting from operation of the Proposed PROJECT is noted. The EIR/EIS analyzes project impacts related to electromagnetic interference (see Section D.10, Public Health and Safety). As stated in subsection D.10.9.2 (Impact PS-1), interference with radio, television, and electrical equipment could occur during operation of the Proposed PROJECT and therefore, Mitigation Measure PS-1 through PS-3 would be implemented to ensure that potential interference with public safety communications systems (e.g., radio traffic related to emergency activities) is avoided.
- F99-13** Please refer to common responses FIRE1, FIRE2, FIRE4, and FIRE5, regarding improvements in firefighting capabilities and applicants providing local fire agencies with assistance that will improve fire protection and response. EIR/EIS Section D.15, Fire and Fuels Management (subsection Section D.15.3.3) provides a full evaluation of impacts discussed in this comment. Community planning for emergency conditions, whether fire, or other, and related evacuations are provided funding as detailed in mitigation measure FF-6. Further, refer to common response FIRE6 for details regarding FireSafe Council funding toward community wildfire protection plan and evacuation plan preparation.
- F99-14** The commenter summarizes the significant and unmitigable impacts to visual resource policies and plans, biological resources (the Migratory Bird Treaty Act), and noise standards determined in the EIR/EIS and that exceptions to violations of policies/acts/standards should not be permitted. The comment is noted and will be included in the administrative record.
- F99-15** The comment is noted.
- F99-16** The comment regarding the designation of the McCain Valley as available for wind energy development is noted and will be included in the administrative record. Please refer to common responses BIO4 and BIO6, regarding bighorn sheep and wildlife corridors.
- F99-17** The comment is noted. Please refer to common response BIO1, regarding golden eagles.
- F99-18** The comment regarding impacts to birds resulting from operation of wind turbines and power lines is noted. EIR/EIS Section D.2, Biological Resources, analyzes impacts to birds resulting from collision and/or electrocution resulting from proposed transmission lines and wind turbines. As noted in subsection D.2.3.3 (Impact BIO-10) impacts resulting from electrocution with power lines were determined to be adverse and significant and mitigation measures BIO-10a

and BIO-10b would be implemented to reduce the impact to less than significant levels. The EIR/EIS determines that impacts resulting from collision with wind turbines would be significant and unmitigable even after implementation of Mitigation Measures BIO-10a through BIO-10i (refer to Section D.2.3.3 for additional detail regarding referenced mitigation measures).

- F99-19** The comment regarding recent observations of dead foxes in the project area is noted. Appendix 1, Special-Status Species Detected or Potentially Occurring on the Project Site, utilizes data from general biological surveys conducted for the ECO Substation, Tule Wind, and ESJ Gen-Tie Projects and data from the California Natural Diversity Database (CNNDDB) to determine a range of species that have been detected (or could potentially occur) on the project site(s). Special-status fox species were not observed on site during general biological surveys and none were identified in the CNDDDB searches conducted for the ECO Substation, Tule Wind, and ESJ Gen-Tie Projects.
- F99-20** The comment is noted and will be included in the administrative record. EIR/EIS Section B, Project Description, under subsection B.4.3, indicates that a site reclamation plan and monitoring program would be included as components of the decommissioning plan for the Tule Wind Project. Requirements in effect at the time of decommissioning are anticipated to require that all turbines and ancillary structures be removed from the site. The final decommissioning plan would be developed in compliance with the standards and requirements for closing a site at the time decommissioning occurs.
- F99-21** The comment is noted and will be included in the administrative record. Please refer to common response ALT2 regarding distributed generation.
- F99-22** The commenter's opinion is noted and will be included in the administrative record. Please refer to common response PD2 regarding importing only renewable energy on ESJ Gen-Tie line.
- F99-23** The commenter's opinion is noted and will be included in the administrative record.
- F99-24** The comment is noted. Please refer to common response ALT2 regarding distributed generation.
- F99-25** The comment is noted and will be included in the administrative record. Please refer to Section 2.7, Noise, and 2.8, Public Health and Safety, of Volume 3 of the Final EIR/EIS regarding low frequency noise and health concerns. EIR/EIS Section F, Cumulative Scenario and Impacts, evaluates cumulative impacts associated with the Proposed PROJECT in association with the 53 projects listed in Table F-2. The commenter's support for the No Project Alternative is noted.

## **Response to Document No. F100**

**Santiago de Los Santos**  
**Dated March 4, 2011**

- F100-1**      The commenter’s opposition to the project is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project description refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding cultural resources and Section 106 consultation. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F100-2**      The commenter’s opposition to the project is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagles. Please refer to common responses CUL1 through CUL3 regarding cultural resources.

## Response to Document No. F101

**Angela Elliott Santos**

**Dated March 4, 2011**

- F101-1** The comment regarding impacts to traditional cultural properties is noted and will be included in the administrative record. Please refer to common responses CUL1 and CUL2 regarding Native American consultation and impacts to traditional cultural properties. Please also refer to response D21-2 regarding cultural landscapes and properties.
- F101-2** The comment regarding golden eagle is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagles.
- F101-3** The comment is noted and will be included in the administrative record. Please refer to common responses in Sections 2.7, Noise, and 2.8, Public Health and Safety, of Volume 3 of the Final EIR/EIS that address low frequency noise and health effects, as well as setbacks for these projects.
- F101-4** The comment regarding the informational project meetings held January 26, 2011, and February 2, 2011, in Jacumba and in Boulevard is noted. An agenda was provided at both of the public information meetings held in early 2011 that outlined the respective proceedings for the evening. The informational project hearings should not be confused with public hearings, which present a more formal setting. Under CEQA, formal hearings are not required at any stage of the environmental review process and public comment during the review process may be restricted to written communication (Article 13, Section 15020(a) of the CEQA Guidelines). Under NEPA, public meetings may be held in a variety of formats and may be much more informal than hearings (the BLM NEPA Handbook does not require public hearings during the EIS review period, it only requires records of the public hearing/meeting be maintained) (Section 9.3.4 of the BLM NEPA Handbook H-1790-1). Moreover, the informational meetings permitted an open forum between interested parties and individuals directly involved with preparation of the EIR/EIS in order to facilitate focused discussion pertaining to the various environmental issues covered in the EIR/EIS. Opportunity was provided to interested parties to ask questions regarding the EIR/EIS and provide comment to the lead and co-lead agencies of the Proposed PROJECT. For these reasons, the informational meetings were valid “public meetings” in accordance with CEQA and NEPA guidelines.

**F101-5**        The commenter’s opposition to the project is noted and will be included in the administrative record.

**F101-6**        The comment consists of an excerpt from Leslie Spier’s “San Diegueno Customs” and is noted. Please refer to common response BIO1 regarding golden eagles.

## Response to Document No. F102

**Ginette Gallego**

**Dated March 4, 2011**

- F102-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 as well as response F74-1 regarding golden eagles.
- F102-2** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding cultural resources. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F103**

**Mark Hass**

**Dated March 4, 2011**

**F103-1** The comment is noted and will be included in the administrative record. Please refer to common response PD1 regarding the adequacy of the project description presented in the EIR/EIS. Please refer to EIR/EIS Figures, B-19 through B-22, in Section B, Project Description, which depicts the proposed project layout of the proposed turbine strings and locations for the Tule Wind Project. The EIR/EIS provides a conservative evaluation of all potential environmental impacts under CEQA and NEPA including noise (Section D.8 of the EIR/EIS), public health and safety (communication interference – Section D10 of the EIR/EIS), biological resources (bird strikes – Section D.2 of the EIR/EIS). Please refer to common response INT2 regarding the adequacy of the EIR/EIS analysis.

Please refer to common responses in Section 2.7, Noise and Section 2.8, Public Health and Safety in Volume 3 of this Final EIR/EIS for information regarding low frequency noise, setbacks, and public health. The technical noise study used in preparation of the EIR/EIS analysis is available for review on the CPUC project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/ECOSUB.htm>

Please refer to common response CR7 regarding the sound measurement methods employed to calculate the noise levels generated by proposed Tule Wind Project turbines.

**F103-2** The comment is noted and will be included in the administrative record. Please refer to common response INT3 regarding the implementation of mitigation measures established in the EIR/EIS. Also, please refer to common response in Section 2.7, Noise in Volume 3 of this Final EIR/EIS for information regarding the sound measurement methods employed regarding operation of the Tule Wind Project. Lastly, please refer to response to comment D31-5 regarding noise studies and modeling conducted for the Tule Wind Project.

**F103-3** EIR/EIS Figure A-1, National Renewable Energy Laboratory (NREL) Wind Resources Map, shows that notable good-to-excellent wind resource regions in the state include the mountains east of San Diego near the Proposed PROJECT and the existing SWPL 500 kV transmission line. In addition, Tule Wind, LLC, holds a Type 2 Right-of-Way (ROW) for testing and monitoring wind energy on public

lands managed by BLM. In September 2004, an Environmental Assessment (EA) was prepared and approved for two meteorological (MET) stations within the ROW. Two MET stations were installed on the proposed Tule Wind Project site that collected meteorological data used to design the Proposed Project.

**F103-4** The comment is noted and will be included in the administrative record. EIR/EIS Section D.2, Biological Resources, provides a conservative evaluation of all potential environmental impacts to biological resources. Please refer to common responses BIO1, BIO2 and BIO3 regarding golden eagle, bats and other birds of prey such as the California condors.

**F103-5** The comment is noted and will be included in the administrative record. EIR/EIS Section D.15, Fire and Fuels Management, provides a conservative evaluation of all potential environmental impacts related to fire and fuels management. Please refer to common response FIRE1 and FIRE5 regarding improvements in firefighting capabilities and applicants providing local fire agencies with assistance that will improve fire protection and response, as well as fire mitigation that has been incorporated into the Tule Wind project design.

EIR/EIS Section D.13, Geology, Mineral Resources, and Soils, addresses potential geologic impacts resulting from construction and operation of the Proposed PROJECT. In addition, Section B, Project Description, provides details of the construction activities and methods used for construction of the Tule Wind Project.

As stated in Section B, Project Description, of the EIR/EIS, exterior lighting installed on turbines would be restricted and would only include FAA aviation warning lights and the minimum required number of lights would be installed and the minimum intensity of light would be used to meet FAA standards. The placement of obstruction lighting atop wind turbines would be consistent with FAA regulations (i.e., Advisory Circular (AC) 70-7460-1K) which permits unlighted/ separation gaps of lighting of up to half a mile. Please refer to common response VIS4 regarding turbine lighting and resulting visual impacts.

**F103-6** The comments regarding impacts to Border Patrol and the border region are noted and will be included in the administrative record. The EIR/EIS analyzes impacts to aviation activities (see Section D.9, Transportation and Traffic). As stated in Section D.9, proposed wind turbines and transmission lines (and structures) would represent a substantial obstacle to be avoided by aircraft operators. Implementation of Mitigation Measure TRA-3 would ensure that FAA, DOD, and U.S. Customs and Border Protection would be notified of the project location and components. In addition, EIR/EIS Section D.10, Public Health and Safety, subsection D.10.9.2,

Direct and Indirect Effects – Safety and Non-Magnetic Field Electric Power Field Issues, addresses interference with radar and communication systems. EIR/EIS mitigation measure PS-1a is provided to minimize electromagnetic impacts to public safety communications. In addition, the Department of Defense indicated that their initial assessment of the Tule Wind Project is that it is in the “green” area (Sections D.9.2.1, Federal Regulations, and D.10.9.2, Direct and Indirect Effects, under Tule Wind Project), meaning that there is no anticipated impact to air defense and homeland security radars in the project area (January 2011). EIR/EIS Sections D.9, Transportation and Traffic and D.10, Public Health and Safety, have been updated to reflect this determination.

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA, do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

**F103-7**

The comment regarding the Tule Wind project’s proximity to military training airports and training areas is noted. Please refer to response F103-6. EIR/EIS Sections, D.9, Transportation and Traffic (subsection D.9.2.1, Federal Regulations) and Section D.10 Public Health and Safety (subsection D.10.9.2, Impact PS-1, Tule Wind Project), has been updated to reflect that the DOD has determined in their initial assessment that Tule Wind Project is in the “green” area that signifies that no impact to air defense and homeland security radar are anticipated. Although the Tule Wind Project is located within the FAA and DOD’s preliminary screening tool “green” area, Tule Wind, LLC is required to prepare an aeronautical study in consultation with the FAA and DOD (EIR/EIS mitigation measure PS-1d). The study would make a final determine whether any of the proposed turbines would exceed obstruction standards for flight operations or result in a significant hazard to air navigation in the area during construction or operation and all conditions coordinated with the FAA and DOD for a determination of no hazard to air navigation would be incorporated into the final design plans of the Tule Wind Project.

**F103-8**

The comment regarding the Tule Wind project’s impact to Doppler radar is noted. As noted in Section D.10 Public Health and Safety (subsection D.10.9.2, Impact PS-1, Tule Wind Project), the Tule Wind Project is located within the FAA and DOD’s preliminary screening tool “green” area which signifies minimal to no impact to Weather Surveillance Radar-1988 Doppler radar weather operation (National Telecommunication and Information Administration notification is

however, advised). Implementation of Mitigation Measure PS-1a would require design of the proposed project to minimize electromagnetic interference and comply with FCC regulations. In addition, Mitigation Measure PS-1a would also require the completion of signal strength studies prior to construction to ensure that potential interference with public safety communications systems (e.g., radio traffic related to emergency activities) is avoided.

**F103-9** The comment is noted. Please refer to common response SOC1 regarding property values.

**F103-10** The commenter's major concerns with and opposition to the Proposed PROJECT are noted and will be included in the administrative record. Please refer to responses F103-1 through F103-9 regarding key issues listed in this comment. Please refer to common responses provided in Sections 2.7, Noise and 2.8, Public Health and Safety, of the Volume 3 of the Final EIR/EIS regarding noise concerns, health issues, and shadow flicker. Please also refer to common response INT2 regarding the purpose and adequacy of the EIR/EIS.

**F103-11** The attachment titled "Effectiveness of Changing Wind Turbine Cut-in Speed to Reduce Bat Fatalities at Wind Facilities" will be included in the administrative record. While the referenced study did identify a correlation between curtailed turbines "treated" with a cut-in speed at between 5.0 and 6.5 meters/seconds, the authors conclude that "more studies are needed to test changes in the turbine cut-in speed among different sizes and types of turbines, wind regimes, and habitat conditions to fully evaluate the general effectiveness of this mitigation strategy". Mitigation Measure BIO-10h (Implement an Adaptive Management Program) suggests the use of modified turbine cut-in speeds as a potential management tool that could be implemented to address bat mortality depending on monitoring results. Also, please refer to common response BIO3 for additional detail related to the analysis of bat impacts.

## **Response to Document No. F104**

**Caroline Isaacs**  
**Dated March 4, 2011**

- F104-1** As requested by the commenter, the later document was reviewed and responses to the comments in that document follow. The commenter’s opposition to the project is noted and will be included in the administrative record.
- F104-2** The comment is noted and the subject of concern, impacts related to soil erosion from project operations and maintenance, is addressed in the EIR/EIS in Section D.12.3.3 under the discussion of Impact HYD-5 (creation of new impervious areas could cause increased runoff, resulting in flooding or increased erosion downstream). The EIR/EIS finds that impacts would be considered significant, and therefore requires that the PROJECT implement Mitigation Measure HYD-4, Preparation of a Stormwater Management Plan. The SWMP will include site design best management practices (BMPs) to prevent significantly altering drainage patterns or increasing erosion or siltation. In addition to the BMPs and low-impact development features required by the SWMP, the mitigation measures states: “The SWMP shall ensure that the project follows CDFG guidelines for culverts to minimize long-term maintenance and meet a 10-year rain event to minimize the trapping of sediment.” No change to the EIR/EIS is required.
- F104-3** The geology and soils section of the EIR/EIS, Section D.13.3.3, includes a discussion of decommissioning of the Tule Wind Project and states: “During the decommissioning phase of the project, impacts would be less than the construction phase of the project, as no water will be required for concrete mixing. However, water may be required for dust suppression throughout the decommissioning phase. Prior to termination of the ROW authorization, a decommissioning plan will be developed and approved by BLM and San Diego County. The decommissioning plan would require similar measures as described under Mitigation Measure HYD-3. Therefore, impacts would be considered adverse but mitigable, and under CEQA would be considered significant but can be mitigated to a level that is considered less than significant (Class II).” Therefore, no change to the EIR/EIS is required.
- F104-4** The comment argues that soil erosion would occur at the project site during construction, operation, maintenance, and decommissioning, and that mitigation measures in the EIR/EIS would not reduce these impacts to below a level of significance. Refer to common response INT2 and Mitigation Measures HYD-4 and GEO-1. No change to the EIR/EIS is necessary.

- F104-5** Please refer to common response VIS1 regarding adequacy of the Draft EIR/EIS visual simulations.
- F104-6** Please refer to common response INT2 regarding general adequacy of the EIR/EIS and Mitigation Measures HYD-4 and GEO-1. No changes to the Final EIR/EIS have been incorporated as a result of this comment.

## **Response to Document No. F105**

**Carmen Lucas**

**Dated March 4, 2011**

**F105-1** The comment is noted and will be included in the administrative record. Please refer to common response INT2, which describes that the California Public Utilities Commission (CPUC) acts as the Lead Agency for implementing the California Environmental Quality Act on this project. EIR/EIS Impact CUL-3 analyzes impacts to traditional cultural properties resulting from the Proposed PROJECT. EIR/EIS Subsection D.7.1 explains that traditional cultural properties (TCPs) may include places such as traditional landscapes, sacred mountains, or areas where Native Americans collect plants for food, medicine, and basket weaving. TCPs can include areas where ceremonial uses occur or have occurred, or parks neighborhoods, or community gathering areas where contemporary cultural traditions are maintained. The BLM Section 106 Native American consultation process has not yet been concluded for the ECO Substation and Tule Wind Projects, such that the nature, extent, and potential significance of TCPs in the McCain Valley area are still unknown. Section D.7.3.3, Impact CUL-3, states that while no TCPs have been identified in the McCain Valley, based on information provided in the applicant's environmental document for the ECO Substation or Tule Wind Projects, potential National Register of Historic Places (NRHP) eligibility of unknown TCPs must be assumed and that in some cases, avoiding direct and indirect impacts to TCPs (such as traditional landscapes, topographic elements including sacred mountains or use areas) may not be completely feasible given the geographic expanse of some of these resources. Therefore, the EIR/EIS determined that the residual impact on TCPs would be adverse and mitigation has been provided (see Section D.7.3.3, Impact CUL-3, ECO Substation and Tule Wind Projects, for a full list of mitigation measures). However, because the nature, extent, and potential significance of TCPs in the McCain Valley area has not yet been identified, the impact was conservatively determined to be significant and unavoidable (Class I). This comment will be taken into consideration by the BLM in completing their Native American consultation efforts to identify all TCPs in the Proposed PROJECT area.

Technical archaeological studies, including record searches and intensive field surveys in support of the Proposed PROJECT have been prepared consistent with National Historic Preservation Act (NHPA) Section 106 guidelines. These focus on the physical archaeological characteristics of the resource in determining whether there are resources that may be eligible for listing on the NRHP. These

studies, when they are finalized, will be filed with the South Coastal Information Center, San Diego State University.

**F105-2** Please see response F105-1. The NHPA Section 106 Native American consultation process will take into consideration concerns raised regarding the importance of the Jacumba Valley as it relates to a TCP.

**F105-3** As lead agencies under CEQA and NEPA, the CPUC and BLM do not apply the San Diego County Resource Protection Ordinance in determining the significance of cultural resources, and the determination of mitigation. Please refer to common response INT2. EIR/EIS Mitigation Measure CUL-1A provides for avoidance of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS.

These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines, and under NEPA do not result in new significant circumstances or information relevant to environmental concerns, or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

The commenter's opinion regarding well water use is noted and will be included in the administrative record.

## **Response to Document No. F106**

**Aaron Quintanar**  
**Dated March 4, 2011**

- F106-1** This comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record. Please refer to response D26-3 regarding the ESJ Gen-Tie and the Phase I ESJ Gen-Tie Wind Energy Project in Mexico, and how these projects are addressed in the EIR/EIS. As stated in response D33-4, energy projects built in Mexico do not need to comply with CEQA or NEPA. Federal, state, and local agencies do not have jurisdictional authority in Mexico and therefore would not be able to require and/or enforce conditions of approval for development in Mexico. As required and stated in the EIR/EIS in Section A, Introduction/Overview, the EIR/EIS for disclosure purposes evaluates potential impacts to biological resources, visual resources, and fire to the United States from the Phase I ESJ Gen-Tie Wind Energy Project in Mexico.
- F106-2** The comment is noted. The EIR/EIS considers impacts to federally listed species (including Golden Eagle, California condor, and Quino checkerspot butterfly) resulting from construction and operation of the Proposed PROJECT (see Section D.2, Biological Resources). As stated in subsection D.2.3.3 Direct and Indirect Effects (Impact BIO-7), construction of the Proposed PROJECT would result in the direct loss of designated critical habitat for Quino checkerspot butterfly and even with the implementation of mitigation the impact would remain significant and unmitigable (Class I). Impacts to Golden Eagles resulting from potential collision with operating wind turbines were also determined to be significant and unmitigable (Class I) after implementation of mitigation (see subsection D.2.3.3, Impact BIO-10). Regarding California condor, the Draft EIR/EIS determined that the potential for the species to occur in the project area was low and that impacts to the species during construction and operations would be less than significant (Class III). Please refer to Section D.2, Biological Resources, for detailed species-specific impact analysis as well as common response BIO1 (regarding golden eagle), BIO2 (regarding California condor), and BIO5 (regarding Quino checkerspot butterfly).
- F106-3** The comment regarding habitat fragmentation resulting from the Proposed PROJECT is noted. The effects of the Proposed PROJECT on wildlife movement are addressed under impact BIO-9. Habitat fragmentation is typically considered a landscape level analysis considering habitat blocks and it is particularly important for species requiring larger movement areas. Aside from the substations and accessory facilities, the proposed project is comprised of transmission lines, wind turbines, and roads.

These project features are relatively permeable to wildlife movement and have habitat within and/or immediately surrounding the facilities; therefore, habitat fragmentation is not considered to result from the Proposed PROJECT.

Landscape-level considerations, like habitat fragmentation, are considered at the cumulative level and the cumulative analysis in Section F.3.1 of the EIR/EIS states the following:

In order for a cumulative impact to special-status wildlife species to occur, the cumulative projects would have to result in the loss of the same special-status plant species or their habitat as the Proposed PROJECT such that those species become more limited in their distribution, population size, or available suitable habitat within the analysis area.

...The Proposed PROJECT and the reasonably foreseeable cumulative projects are situated in a transition zone between the Peninsular Ranges subregion in the west and the Sonoran Desert subregion in the east. As such, the cumulative analysis area is located near or at the edge of the known range of several special-status wildlife species. The Proposed PROJECT combined with the reasonably foreseeable cumulative projects, despite species avoidance, minimization, and mitigation measures that would likely be implemented by each project, would have the potential to reduce the distribution and/or the overall population size of one or more special-status wildlife species (in particular, Quino checkerspot butterfly and barefoot banded gecko) such that they are vulnerable to environmental variability and are at a higher risk of becoming imperiled. For Quino checkerspot butterfly, the cumulative projects in southeastern San Diego County occur in the easternmost extent of the species known range and implementation of the cumulative projects in this portion of the analysis area could result in a contraction of the species' range. For barefoot banded gecko, the species is narrowly restricted to the area considered in the cumulative analysis (but it should be noted that habitat for the species does not occur within the Proposed PROJECT area) and implementation of the cumulative projects could result in further restrictions of the species' range. The Proposed PROJECT combined with the reasonably foreseeable cumulative projects would, therefore, result in an unavoidable adverse cumulative impact under NEPA and, under CEQA, a direct significant and unmitigable cumulative impact to special-status wildlife species due to the potential reduction in the distribution and reduction in overall species populations in the cumulative analysis area (Class I).

## Response to Document No. F107

**Rafael Rubio**

**Dated March 4, 2011**

- F107-1** The comment is noted and will be included in the administrative record. Please refer to common response BIO1 regarding golden eagles as well as response F74-1.
- F107-2** The comment is noted and will be included in the administrative record. EIR/EIS Mitigation Measure CUL-1A provides for avoidance or mitigation of significant archaeological resources and areas of high sensitivity for discovery of buried NRHP- and CRHR-eligible historic properties, including burials, cremations, or sacred features. Several project refinements have occurred in the ECO Substation and Tule Wind Project transmission line and access road alignments to avoid these resources. These are discussed in the Final EIR/EIS. Please refer to common responses CUL1 and CUL2 regarding cultural resources. Please also refer to response D21-2 regarding cultural landscapes and properties.

## **Response to Document No. F108**

**Steven and Laurie Squillaci**

**Dated March 4, 2011**

**F108-1** The comments regarding operation of wind turbines and public safety are noted and will be included in the administrative record. The EIR/EIS analyzes public health and safety impacts (see Section D.10, Public Health and Safety of the EIR/EIS) and wildfire impacts (see Section D.15, Fire and Fuels Management of the EIR/EIS) pertaining to operation of proposed wind turbines. Section D.10.3.3 of the EIR/EIS (Impact HAZ-7 and HAZ-8, Tule Wind Project) specifically analyzes impacts resulting from blade throw and tower collapse and with implementation of wind turbine safety zones and setbacks (EIR/EIS Mitigation Measure HAZ-6), the EIR/EIS determined that impacts associated with blade throw would be less than significant (Class II) (impacts pertaining to wind turbine tower collapse were determined to be less than significant (Class III)). Please also refer to common responses PHS5 and NOI12 regarding setbacks from wind turbine to sensitive receptors.

The comment regarding the increased fire risks resulting from operation of wind turbines is noted. Please refer to common responses FIRE1 through FIRE6 regarding improvements in firefighting capabilities and applicants providing local fire agencies with assistance that will improve fire protection and response.

**F108-2** The comment regarding shadow flicker impacts on bighorn sheep is noted and will be included in the administrative record. Please refer to common response BIO4 regarding impacts to bighorn sheep and BIO2 regarding impacts to golden eagles. Bighorn sheep are not considered to occur in the project area; therefore, flicker would not result in indirect effects to this species. Effects on golden eagle are addressed in the document under Impact BIO-7 and BIO-10. The golden eagle is not federally listed, but is protected under the Bald and Golden Eagle Protection Act and through California Fish and Game Code. Please also refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.

**F108-3** Please refer to common responses PHS1 through PHS4 regarding public health concerns related to wind turbines, as well as common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects. Please also refer to common response NOI11

regarding amplitude modulation (also known as blade thumping); and common responses PHS2, PHS4, and PHS5 regarding EMF.

**F108-4**

The comment is noted. The EIR/EIS analyzes impacts to air quality, noise, wildlife, recreation, cultural resources, water and erosion (see Section D.11 Air Quality, Section D.8 Noise, Section D.2 Biological Resources, Section D.5 Wilderness and Recreation, Section D.7 Cultural and Paleontological Resources, and Section D.12 Water Resources). Impacts to Native American lands are assessed in Section D.7 Cultural and Paleontological Resources (see Table D.7-9 for summary of impacts to cultural and paleontological impacts resulting from implementation of the Proposed PROJECT). The EIR/EIS discloses that because the Section 106 Native American consultation process has not been completed for the ECO Substation Project and the Tule Wind Project, the location, extent, and nature of traditional cultural properties has not yet been identified and therefore, the EIR/EIS conservatively determines that impacts would be significant and unmitigable (Class I).

The EIR/EIS analyzes the removal of oak trees during construction activities (see Section D.3, Visual Resources of the EIR/EIS). In Section D.3.3.3 (Impact VIS-3), the EIR/EIS notes that construction of the Boulevard Substation rebuild would require the removal of three mature oak trees from the proposed substation rebuild site. To minimize this impact, SDG&E would implement Mitigation Measure VIS-3m which requires transplantation of existing trees during construction and, if transplantation is not successful, mitigation of lost oak trees at a 5:1 ratio (see Mitigation Measure VIS-3m for detail). The EIR/EIS also analyzes the visual impacts associated with operation of FAA-required wind turbine obstruction lighting (see Section D.3.3.3, Impact VIS-4) and the document determined that obstruction lighting would be a strong, highly visible constant source of nighttime lighting for area residents that would significantly impact nighttime views in the area. Similar significant and unmitigable nighttime view impacts were determined in the EIR/EIS for the proposed ESJ Wind Phase I Project in Mexico.

The EIR/EIS analyzes effects on property values resulting from construction and operation of the Proposed PROJECT (see Section D.16 Social and Economic Conditions of the EIR/EIS). Please also refer to common response SOC1.

**F108-5**

The commenter's opinion is noted and will be included in the administrative record. EIR/EIS Section C, Alternatives, provides an overview of the alternatives developed for the PROJECT and screening process used for determining which alternatives were carried forward for full analysis and which ones were eliminated from further consideration. EIR/EIS Section E, Comparison of Alternatives,

summarizes and compares the environmental advantages and disadvantages of alternatives that were carried forward for full analysis in the EIR/EIS.

Please refer to common response INT1 regarding extension of the public review period. An email was sent verifying receipt of comment letter on March 7, 2011.

## Response to Document No. F109

Patricia and Elliott Stuart  
March 4, 2011

- F109-1** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. Please refer to common responses BIO1, BIO4, and BIO5 regarding golden eagles, big horn sheep, and quino checkered butterfly.
- Regarding groundwater resources please refer to common response WR1. EIR/EIS Section D.12, Water Resources, appropriately states the potential water resources impacts applicable to the proposed PROJECT, objectively evaluates those potential impacts, provides appropriate mitigation and alternatives designed to lesson those potential impacts, and conservatively evaluate those impacts in light of the mitigation in order to make a final impact determination.
- F109-2** The comment is noted and will be included in the administrative record. EIR/EIS Section D.12, Water Resources, evaluates project impacts to both surface and groundwater quality and quantity. Please refer to common response WR1 and response F109-1 regarding the adequacy of the water resources analysis in the EIR/EIS.
- F109-3** The commenter's opposition to the project is noted. The comment, regarding support for the No Project Alternative, is noted and will be included in the administrative record.

## Response to Document No. F110

Gary Clasen  
Dated March 7, 2011

**F110-1** The commenter's support of the project is noted and will be included in the administrative record.