

Attachment G.1 Revised Table G-1 (February 2011)

**Table G-1
Summary of Proposed Project Adverse and Unavoidable Impacts
(Revised to reflect Impact Determination Changes)**

Impact No.	General Impact Description	Project Specific Impact Description	Justification for Proposed Change
Tule-BIO-10	Presence of transmission lines and wind turbines may result in electrocution of, and/or collisions by, listed or sensitive bird or bat species.	With mitigation, turbines would cause adverse and under CEQA significant and unavoidable (Class I) impacts to sensitive bird species, such as golden eagles (<i>Aquila chrysaetos</i>).	Please consider changing Impact Tule-BIO-10 to a Class II impact and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.2, Biological Resources.
Tule-VIS-1	The project would have a substantial adverse effect on a scenic vista (County land only).	Adverse and under CEQA significant and unavoidable for County jurisdictional areas (Class I) impacts to scenic views resulting from the project would occur where portions of the wind turbine development would be visible from the Carrizo Overlook, Ribbonwood Trail, and the Ribbonwood Road Pathway.	Please consider changing Impact Tule-VIS-1 to a Class III impact for BLM land and a Class I impact for the County land only, based on Tule Wind, LLC's comments to Section D.3, Visual Resources.
Tule-VIS-3	The project would substantially degrade the existing visual character or quality of the site and its surroundings.	With mitigation the wind turbines and associated energy transmission lines would substantially degrade the visual character of the project site and surrounding area and would be adverse and under CEQA significant and unavoidable (Class I).	Please consider changing Impact Tule-VIS-3 to a less than significant impact (Class III) based on Tule Wind, LLC's comments to Section D.3, Visual Resources.
Tule-VIS-4	The project would create a substantial new source of light or glare that would adversely affect day or nighttime views in the area.	Nighttime lighting of the project would be visible in the area and would adversely impact the nighttime views of the site. No mitigation is available to reduce this impact and under CEQA would be significant and unavoidable (Class I).	Please consider changing Impact Tule-VIS-4 to a Class III impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.3, Visual Resources. The O&M/Substation facility is proposed to be located on BLM jurisdictional lands and would not be subject to County requirements. Nevertheless, the O&M/Substation will adhere to the County standard regarding lighting. The O&M/Substation would be classified under the Class II, Parking Lots and Security classification, Zone A (within 15 miles of Laguna or Palomar Observatory) to utilize fully shielded low pressure sodium lamp types not to exceed 4050 lumens

			output. The operation of the project would not affect the nighttime views (dark skies) in the Boulevard area. 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. The project does not propose lighting which would cause substantial lighting to affect day or nighttime views, thus impacts from lighting and glare are less than significant (Class III). Existing similar lighting exists in the local area.
Tule-VIS-5	Construction of the project or the presence of project components would result in an inconsistency with federal, state, or local regulations, plans, and standards applicable to the protection of visual resources.	The project would not be consistent with all applicable plans, policies, and regulations relevant to the project area, including the County of San Diego Draft General Plan Conservation and Open Space Element, and the Mountain Empire Subregional Plan. Since the project would conflict with identified policies, the resulting impact would be adverse and cannot be mitigated.	<p>Please consider changing Impact Tule-VIS-5 to a Class IV no impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.3, Visual Resources.</p> <p>The Draft County General Plan does not apply to the Tule Wind Project. The following goals and polices are considered consistent with the project; therefore, a less than significant impact is identified. Please consider changing the determination to reflect this information.</p>
Tule-CUL-3	Construction of the project would cause an adverse change to Traditional Cultural Properties.	With mitigation impacts would remain adverse and under CEQA significant and unavoidable (Class I) to Traditional Cultural Properties as 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.	<p>Please consider changing Impact Tule-CUL-3 to a Class III impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.7, Cultural and Paleontological Resources.</p> <p>With respect to impacts to potentially identified human remains and TCPs, please note that any Class I determinations are contingent upon discovery. To date, no TCPs or human remains have been found. Please change to a Class III impact. This section specifically deals with TCPs, but none has been identified or recorded. The excerpt discusses Native American cultural resources noted by the NAHC to occur in the Tule project area, and then refers to such NAHC sacred sites as TCPs. Sacred sites are not by default TCPs, and the two should not be linked in the same discussion of impacts. TCPs are formally recorded and evaluated for NRHP eligibility. According to Dave Singleton,</p>

			NAHC director (personal communication, January 4, 2011) the NAHC records sacred sites and does not keep records consistent with the format required for submission to the NRHP for evaluation of eligibility as a TCP. The NAHC's goal is to record places of significance to Native peoples, not formally TCPs. Singleton confirmed that the Draft EIR/EIS should not confuse sacred sites and TCPs, and the consideration given to each with respect to impacts.
Tule-NOI-1	Construction noise would substantially disturb sensitive receptors and violate local rules, standards, and/or ordinances.	With mitigation incorporated construction noise would create adverse and under CEQA significant and unavoidable (Class I) temporary noise impacts.	Please consider changing Impact Tule-NOI-1 to a Class II impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.8, Noise, based on mitigated noise levels as presented in the Noise Technical Report (HDR, Feb. 2011). Mitigation of construction noise impacts has been proposed by introduction of time constraints on the construction activities, Best Management Practices (BMP's) and movable noise barriers which would bring the closest receptors in compliance with the noise ordinance.
Tule-NOI-2	Construction activity would temporarily cause groundborne vibration	Construction noise would create adverse and under CEQA significant and unavoidable (Class I) temporary groundborne vibration impact.	Please consider changing Impact Tule-NOI-2 to a Class III impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.8, Noise, based on the design considerations and mitigation measures outlined in the Noise Technical Report (HDR, Feb. 2011). Both blasting and construction noise would be mitigated to comply with San Diego County ordinances Sec. 96.1.3301.2 Explosives and Fireworks – Applicability, wherein monitoring and inspection procedures are required. No residential structures would be within 50 feet of construction activities; therefore, construction-related groundborne vibration would not result in an adverse impact, and under CEQA, impacts would be considered less than significant (Class III).
Tule-AIR-1	Construction would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants.	Short-term, construction-related VOC, NOx, PM10, and PM2.5 air emissions will remain adverse with mitigation and under	Please consider updating the list of short-term construction-related air emissions to exclude VOCs from the list of those that remain adverse with

		CEQA significant and unavoidable (Class I).	mitigation, based on Tule Wind, LLC's comments to Section D.11, Air Quality.
Tule FF 2	Presence of project facilities including overhead transmission line would increase the probability of a wildfire.	With partial mitigation, the possibility that a transmission line fault will occur and start a fire remains an adverse impact and under CEQA significant and unavoidable (Class I)	<p>Please consider changing Impact Tule-FF-2 to a Class II impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.15, Fire and Fuels Management.</p> <p>This impact has been reduced to a less than significant level based on the project design features and mitigation measures outlined in the Fire Protection Plans approved by the San Diego Rural Fire Protection District (Nov. 2010), and San Diego County Fire Authority (Feb. 2011).</p>
Tule FF 3	Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting.	With mitigation, the presence of the overhead transmission line will reduce aerial and ground firefighter effectiveness, and the impact would remain adverse and under CEQA significant and unavoidable (Class I)	<p>Please consider changing Impact Tule-FF-3 to a Class II impact, and removing it from Table G-1 based on Tule Wind, LLC's comments to Section D.15, Fire and Fuels Management.</p> <p>This impact has been reduced to a less than significant level based on the project design features and mitigation measures outlined in the Fire Protection Plans approved by the San Diego Rural Fire Protection District (Nov. 2010), and San Diego County Fire Authority (Feb. 2011).</p>