

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Executive Summary

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Executive Summary	ES-2	“Tule Wind Project, as proposed by Pacific Wind Development <u>Tule Wind, LLC</u> ”	Global Comment: Tule Wind, LLC now is the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Executive Summary	ES-4-5 Table ES-1	Please see updated table to reflect the Modified Project Layout.	Please update table to reflect the Modified Project Layout as presented in Section A, Introduction.
3.	Executive Summary	ES-6	<p><u>The Tule Wind Project’s objective is to maximize the capture and transformation of wind energy to electricity in the project area to reduce greenhouse gas emissions and meet federal and state renewable energy mandates. The project area has been determined to be part of the nation’s limited wind energy resources.</u></p> <p><u>Tule Wind, LLC Development lists the following objectives for the Tule Wind Project (Iberdrola Renewables, Inc. 2010a):</u></p> <p><u>TULE-1 Provide energy supply to help meet the state’s planned population growth and future generations’ needs.</u></p> <p><u>TULE-2 Provide renewable energy to contribute to the goals of the California RPS Program and Energy Report Update and contribute to the state’s goal of increasing the renewable energy electricity mix to 33% by the year 2020.</u></p>	Please include a full description of the Tule Wind Project Objectives.

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			<p><u>TULE-3 Assist the BLM and other agencies within the U.S. Department of the Interior to increase the renewable energy production on federal lands as directed by the Energy Policy Act of 2005.</u></p> <p><u>TULE-4 Assist the County of San Diego to accomplish its renewable energy goals and achieving the primary energy objectives of maximizing the development of renewable alternative sources of energy, as prescribed within the Energy Element of the General Plan.</u></p>	
4.	Executive Summary	ES-6	<p>The Tule Wind Project, as proposed by <u>Tule Wind, LLC Pacific Wind Development</u>, would include the following major components:”</p> <ul style="list-style-type: none"> • “Up to 434 <u>128</u> wind turbines, ranging in size <u>generating capacity</u> between 1.5-megawatt (MW) (328 feet in height) and 3.0 MW (492 feet in height), and <u>ranging in height from 226 to 328 feet to the wind turbine hub (or nacelle), and 327 feet to 492 feet to the top-most blade tip, generating up to 201 MW of electricity...</u> • Two-Three permanent meteorological towers and one sonic detecting and ranging (SODAR) unit <u>or one light detecting and ranging (LIDAR) unit...</u> <p>The proposed Tule Wind Project would generate <u>up to 200</u> 1 MW of electricity and would connect to the proposed Boulevard Substation rebuild component of SDG&E’s ECO Substation Project where the electricity generated would feed into the existing SWPL 500 kV transmission line.”</p>	<p>It is important to clarify that the generating capacity of the wind turbine is not necessarily correlated to its height. It is also important to clarify the range in height to the wind turbine hub or nacelle, and to the top-most blade tip. See pgs. ES-11-12 where this clarification is employed for the Campo Wind Project and Jordan Wind Project. See also Figure B-24, Tule Wind Project Typical Turbine Tower Design, pg. B-101.</p> <p>1.5 MW * 134 turbines = 201 MW of electricity. See Letter from Dave Glenn, Iberdrola Renewables, to California ISO, dated May 1, 2009.</p>
5.	Executive Summary	ES-9 Figure ES-2	Please update Figure ES-2 to reflect the Modified Project Layout.	GIS shape files have been provided to assist in updating Figures in the DEIR/EIS.

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6.	Executive Summary	ES-15 – ES16	<p>Tule Wind Alternative 1, Gen-Tie Route 2 with Collector Substation/Operations and Maintenance (O&M) Facility on Rough Acres Ranch.</p> <p>Under this alternative, the proposed Tule Wind Project would be the same as proposed with the exception that the proposed O&M and collector substation facilities would be co-located on Rough Acres Ranch (T17S R7E Sec. 9), approximately 5 miles south of the originally proposed site. Moving the O&M and collector substation facilities to this alternative location would result in an <u>substantial</u> increase in the length of the 34.5 kV overhead collector lines to connect the wind turbines to the substation. <u>The overhead collector line system would increase by 7.7 miles</u> from <u>9.3 miles</u> (proposed) to <u>17 miles</u> and would also necessitate the construction of <u>202 extra collector line poles</u> from <u>250 to 452 poles</u>. However, <u>The underground collector lines would decrease in distance by 6.2 miles</u> from <u>approximately 35.1 miles (proposed)</u> to <u>28.9 miles,</u> (proposed) to 27 miles, <u>The 138 kV transmission line would decrease in distance as a result of this alternative by approximately 5.4 miles</u> from <u>9.2 miles (proposed)</u> to <u>4-3.8 miles</u>, and the number of transmission line poles would decrease from 126 <u>80</u> poles (proposed) to 49 <u>44</u> poles. Under this alternative, the 138 kV gen-tie transmission line would run from the alternative collector substation approximately 1 mile east, south along McCain Valley Road, and then west along Old Highway 80 until connecting to the proposed Boulevard Substation rebuild component of the ECO Substation Project. This alternative would increase the land disturbance by 12 <u>49.3</u> acres, from 712 <u>725.3</u> acres (proposed) to 724 <u>774.6</u> acres.</p>	Please revise language to reflect the changes to the number of poles and increased mileage of the overhead collector system as a result of utilizing the Alt #2 Transmission Line configuration. Please revise language to reflect corrected analysis per the Modified Project Layout.

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7.	Executive Summary	ES-16 2 nd paragraph	<p>Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch.</p> <p>This alternative would essentially be the same as described in Tule Alternative 1 for the Tule Wind Alternative 2, Gen-Tie Route 2 with Collector Substation/O&M Facility on Rough Acres Ranch, with the exception that the proposed 138 kV gen-tie transmission line would run underground from the alternative collector substation approximately 1 mile east, south underground along McCain Valley Road, and then west underground along Old Highway 80 until reaching the Boulevard Substation rebuild component of the ECO Substation Project. <u>Due to the undergrounding of the transmission line, this alternative would have greater permanent impacts to cultural resources and biological resources as opposed to overhead lines. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation. Additionally, this alternative would increase land disturbance due to the construction of 202 extra collector lines poles associated with the longer 34.5 collector line system.</u></p>	Consider adding language to the description of this alternative to give the reader an understanding that undergrounding of the transmission line will result in greater land disturbance than the proposed project. Increased land disturbance can equate to potential increased impacts to sensitive biological and cultural resources.
8.	Executive Summary	ES-16	<p>Tule Wind Alternative 3, Gen-Tie Route 3 with Collector Substation/O&M Facility on Rough Acres Ranch.</p> <p>This alternative would essentially be the same as described in Tule Wind Alternative 1, Gen-Tie</p>	Please revise language to reflect the changes to the number of poles and increased mileage of the overhead collector system as a result of utilizing the Alt #3 Transmission Line configuration. Please revise language to reflect corrected analysis per the Modified Project Layout.

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			<p>Route 2 with Collector Substation/O&M Facility on Rough Acres Ranch, with the exception that the proposed 138 kV gen-tie transmission line would run from the alternative collector substation approximately 3 miles west to Ribbonwood Road, continue south along Ribbonwood Road, and then east along Old Highway 80 until connecting to the proposed Boulevard Substation rebuild component of the ECO Substation Project. As a result of this alternative, the 138 kV gen-tie transmission line would decrease in distance by <u>approximately 3.8 miles</u> from <u>9.2 miles</u> (proposed) to <u>5.4 miles</u>. <u>However, the length of the overhead collector line system would increase in distance by 7.7 miles from 9.3 (proposed) to 17 miles.</u> Additionally, u Under this alternative, transmission line poles would decrease from 426 <u>80</u> poles (proposed) to 5960 poles, but would also necessitate the construction of <u>202 extra collector line poles, an increase from 250 to 452 poles</u>. This alternative would increase the land disturbance by 46 <u>54.7</u> acres, from 712 <u>725.3</u> acres (proposed) to 728 <u>780</u> acres.</p>	
9.	Executive Summary	ES-16	<p>Tule Wind Alternative 4, Gen-Tie Route 3 Underground with Collector Substation/O&M Facility on Rough Acres Ranch.</p> <p>This alternative would essentially be the same as described in Tule Alternative 3, Gen-Tie Route 3 with Collector Substation/O&M Facility on Rough Acres Ranch, with the exception that the proposed 138 kV transmission line would run underground from the alternative collector substation approximately 3 miles west to Ribbonwood Road, continue south along Ribbonwood Road, and then east underground along Old Highway 80 until reaching the Boulevard Substation. <u>Due to the undergrounding of the transmission line, this</u></p>	<p>Consider adding language to the description of this alternative to give the reader an understanding that undergrounding of the transmission line will result in greater land disturbance than the proposed project. Increased land disturbance can equate to potential increased impacts to sensitive biological and cultural resources.</p>

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			<p><u>alternative would have greater permanent impacts to cultural resources and biological resources as opposed to overhead lines. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation. Additionally, this alternative would increase land disturbance due to the construction of 202 extra collector lines poles associated with the longer 34.5 collector line system.</u></p>	
10.	Executive Summary	ES-16 5 th paragraph	<p>Tule Wind Alternative 5, Reduction in Turbines.</p> <p>Under this alternative, the proposed Tule Wind Project would be the same as proposed with the exception that this alternative would remove 62 turbine locations out of the 134 turbines proposed. The proposed action would erect 44 <u>5</u> turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (ACEC) and 54 <u>57</u> turbines adjacent to wilderness areas on the western side of the project site. Under this alternative, these 62 turbines would be removed, <u>thereby greatly reducing renewable energy generation by the project and associate greenhouse gas emissions reductions.</u>”</p>	Please consider adding the supplemental information because this alternative is substantially different from the proposed project design of 134 turbines and the public would benefit from a complete explanation as to why this alternative was developed.
11.	Executive Summary	ES-18	<p>ES.6 Summary of Environmental Analysis</p> <p>“As shown in Table ES-2, the Proposed PROJECT, including the Campo, Manzanita, and Jordan wind energy projects, as a whole would have adverse impacts that cannot be mitigated and under CEQA would be significant and unmitigable (Class I)</p>	Please consider revising the text, as proposed, to recognize that the failure to build the Proposed Project would also have an environmental impact.

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			impacts to biological resources, visual resources, cultural resources, noise, air quality, water resources, and fire and fuels management; <u>however, the lost reduction in greenhouse gas emissions that would result from not building the Proposed Project would also be a significant environmental impact.</u>	
12.	Executive Summary	ES-20	<p>ES.6.2 Tule Wind Project (<i>third paragraph</i>)</p> <p>The proposed Tule Wind Project would have adverse impacts that cannot be mitigated and under CEQA would be significant and unmitigable (Class I) impacts in the following issue areas: biological resources (bird/golden eagle strikes with turbines), visual resources (impacts to scenic vistas, <u>and</u> existing visual character, light/glare, and inconsistency with policies/plans), cultural resources (potential adverse change to traditional cultural properties); <u>and</u> short-term construction noise and air emissions, and wildland fire and fuels management. Impacts to the remaining 44 <u>15</u> issue areas were either found to be not adverse and under CEQA less than significant (Class III) and/or following implementation of <u>applicant proposed measures (APMs) and</u> mitigation measures presented in this EIR/EIS to be mitigable and under CEQA less that <u>than</u> significant with mitigation implemented (Class II).</p>	Please consider revisions to Section ES.6.2 Tule Wind Project to reflect changes requested as part of this letter. Based on the comments provided within this letter and the corrected analysis provided in Sections D2 through D18 of the Draft EIR/EIS, Tule Wind, LLC does not agree that Class I impacts to visual resources, cultural resources, short-term construction noise and air emissions, and wildland fire and fuels management will occur as a result of construction and operation of the proposed project.
13.	Executive Summary	ES-20	<p><i>Fourth paragraph</i></p> <p>The Tule Wind Project and alternatives was <u>were</u> determined to be consistent with the County of San Diego Existing General Plan Land Use Element and Energy Element, Zoning Ordinance, and all applicable federal plans and policies. With implementation of mitigation measures identified in Section D of this EIR/EIS, the Tule Wind Project was determined to be consistent with the County of San Diego Existing General Plan <u>Land Use,</u></p>	Please revise language to reflect corrected analysis per the revisions made to Section D.4, Land Use.

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			<p>Conservation, Public Facility, and Seismic Elements, and the Mountain Empire Subregional Plan, and the Zoning Ordinance. <u>It should be noted that the policies determined to be inconsistent with the Tule Wind Project identified within the County of San Diego General Plan Regional Land Use Element (Policy (18) Multiple Rural Use) and the Mountain Empire Subregional Plan (Industrial Policy/Recommendation 11) are proposed to be deleted in the most recent version of the Draft General Plan Update (Recommended Project, October 2010). Furthermore, it should also be noted that the County’s Draft Wind Ordinance (currently under development and environmental review) will amend the current and antiquated definition and height and setback regulations for “large wind turbines” in the County’s jurisdiction within the Zoning Ordinance. A project feature of the Tule Wind Project is the processing of a General Plan Amendment to amend General Plan Policy (18) Multiple Rural Use and the Mountain Empire Subregional Plan (Industrial Policy/Recommendation 11) to be consistent with the Project. The Tule Wind Project is also processing a Project specific change to Ordinance 6951 that will eliminate the inconsistency between the Ordinance and the Project. These Amendments are integral Project features; and therefore, the Project would be consistent with all adopted and applicable local land use plans and policies.</u></p>	

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14.	Executive Summary	ES-21	<p><i>Second paragraph</i></p> <p>As summarized in Table ES-4, the Tule Wind Alternative 5, Reduction in Turbines, combined with Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch, would cause the least environmental impact was selected as the <u>Environmentally Superior Alternative</u>. This alternative would reduce the overall length of the proposed 138 kV gen-tie transmission line by <u>approximately 5.4 miles</u>, from 9.62 miles to 4 3.8 miles and would develop the O&M and collector substation on a more disturbed site. Similar to the proposed Tule Wind Project, this alternative would have adverse and unmitigable (Class I) impacts in the following issue areas: short-term construction noise and air emissions, cultural resources, and long-term visual impacts, fire and fuels management, and biological impacts (golden eagle/bird collisions with turbines). Class I impacts to golden eagles would <u>not</u> be reduced with the removal of turbines <u>because the risk of collision for golden eagle is already low based on golden eagle use of the area within areas considered high risk of any known active golden eagle nest. Although this alternative would substantially reduce t</u>The risk of golden eagle mortality, the risk of mortality due to collision with operating turbines by golden eagle remains adverse, but can be mitigated to a less than significant level with implementation of the proposed mitigation measures and unmitigable due to the fact that the remaining turbines would continue to present risk, albeit with lower risk of collision to golden eagles foraging in the vicinity of the project. Impacts in the remaining 11 <u>15</u> issue areas would be either not adverse and under CEQA less than significant (Class III) and/or following implementation of mitigation measures presented in this EIR/EIS, would be mitigable and under CEQA</p>	<p>Please revise language to reflect corrected analysis per the Modified project layout. Based on the comments provided within this letter and the corrected analysis provided in Sections D2 through D18 of the Draft EIR/EIS, Tule Wind, LLC does not agree that Class I impacts to visual resources, cultural resources, short-term construction noise and air emissions, and wildland fire and fuels management will occur as a result of construction and operation of the proposed project. Furthermore, Alternative 2 or Alternative 5 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS, and further consideration of the proposed project should be evaluated.</p>

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			<p>less than significant with mitigation implemented (Class II).</p> <p><i>Third paragraph</i></p> <p>While † This alternative would increase <u>long term permanent impacts to biological and cultural resources</u> and short-term construction-related impacts to air, noise, water, and erosion due to trenching and boring of the 138 kV gen-tie, s₂. <u>Short-term impacts to these resources would occur within the same area as the Proposed Tule Wind Project and can be mitigated to less than significant; however long-term permanent impacts would remain adverse. This alternative would reduce</u> Potential <u>impacts to golden eagles are not quantifiable, and there is no support that a reduced turbine alternative would substantially lessen that unquantifiable risk. by siting turbines farther away from nesting eagles and</u> This alternative would reduce long-term visual and fire impacts associated with the <u>undergrounding of the</u> 138 kV gen-tie project component from significant and unavoidable (Class I) to less than significant (Class III) and, therefore, from a strictly environmental perspective, ranks as the environmentally superior alternative. However, † This alternative would <u>also</u> remove the 47 <u>18</u> turbines proposed on the Ewiiapaayp Indian Reservation; thereby affecting the Ewiiapaayp Band of Kumeyaay Indians' wind and solar energy resources policies to develop renewable energy projects to serve economic and social needs of the reservation. In addition, 27 <u>32</u> turbines would be removed from lands administered by the BLM, 7 turbines would be removed from lands administered by the CSLC, and 11 <u>7</u> from lands under the jurisdiction of the County of San Diego.</p>	

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15.	Executive Summary	ES-21	<p><i>Fourth paragraph</i></p> <p>The Tule Wind Alternatives 3 and 4 (aboveground and underground Gen-Tie Route 3) would reduce the overall length of the proposed 138 kV transmission line <u>by approximately 3.8 miles</u> from 9.6-9.2 to 5.4 miles when compared to the proposed Tule Wind Project and would potentially reduce some of the Proposed Tule Project impacts, as described previously. These alternatives would also create more impacts due to the increased length of the gen-tie required when compared to Tule <u>Wind</u> Alternatives 1 and 2 (Gen-Tie Route 2); therefore, these alternatives were not determined to be environmentally superior or preferable.</p>	Please consider adding a description of the reduced length of the transmission line associated with this alternative. Alternative 3 and 4 would actually increase temporary and permanent impacts due to substation being located further south of project facilities and the undergrounding of the transmission line.
16.	Executive Summary	ES-22	<p>Under the No Project Alternative 3, No Tule Wind Project, the Tule Wind Project would not be built and the existing conditions on the project site would remain. However, the ECO Substation Project and ESJ Gen-Tie Project would be developed. Without the Tule Wind Project, approximately 200 <u>201</u> MW of proposed renewable energy production would not be developed on lands in the southeastern portion of San Diego County. While the construction and operations impacts would be reduced under this alternative, the Class I impacts associated with the ECO Substation and ESJ Gen-Tie projects would occur under this alternative. Given that the No Project Alternative 3, No Tule Wind Project, would not reduce impacts associated with the ECO Substation and ESJ Gen-Tie projects and would not realize the proposed 200 <u>201</u> MW of renewable energy production, thereby negatively affecting the region's ability to meet California's renewable portfolio standard (RPS) program and associated Executive Order requirements to increase renewable energy and reduce greenhouse emissions, it was determined not to be environmentally superior or preferable.</p>	Please update language to reflect 201 MW of energy associated with the Tule Wind Project.

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17.	Executive Summary	ES-25 Environmentally Superior Alternative Table	<p>This table was not numbered, but should be Table ES-2.</p> <p>Tule Wind Alternative 5, Reduction in Turbines, combine with...</p> <p>Jurisdiction column – CPUC County, BLM, BIA, CSLC, and Ewiiapaayp Band of Kumeyaay Indians to consider reduction of turbines on County, BLM, CSLC, and tribal lands</p>	<p>The CPUC is the CEQA Lead Agency. The County of San Diego is a Responsible Agency under CEQA and does not have the authority for this project to “consider” a reduction of turbines or otherwise modify the project as it relates to the CEQA process. Although the BLM is the Lead Agency for NEPA, NEPA does not require a determination regarding an environmentally superior alternative.</p>
18.	Executive Summary	ES-25 Environmentally Superior Alternative	<p>This table was not numbered, but should be Table ES-2.</p> <p>Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch</p> <p>Jurisdiction column – CPUC County of San Diego to consider in consultation with BLM, CSLC, and BIA</p>	<p>The CPUC is the CEQA Lead Agency. The County of San Diego is a Responsible Agency under CEQA and does not have the authority for this project to “consider” undergrounding the transmission line or moving the collector substation and O&M facility to Rough Acres Ranch or otherwise modifying the project as it relates to the CEQA process.</p>
19.	Executive Summary	ES-25	<p>Air Quality: Short-term construction VOE, NOx, and PM₁₀ dust emissions associated with the Tule Wind Project (although like the Proposed Project, these short-term impacts would be offset by reductions in criteria air pollutants from fossil fuel generation replaced by Tule Wind Project’s renewable generation), short-term construction NOx and dust emissions associated with the ECO Substation Project, and short-term construction dust emissions associated with the ESJ Gen-Tie Project.</p> <p>Noise: Short-term construction noise associated with the ECO Substation Project and Tule Wind Project.</p> <p>Biological Resources: Direct loss of quino checkerspot butterfly habitat associated with the ECO Substation Project and bird/golden eagle</p>	<p>There is a contradiction between the level of impact reduction provided by the combination of Alternatives 2 and 5 on page ES-21, ES-25, and ES-26.</p> <p>Please consider revising pages ES-25 and ES-26 to be consistent with the Summary of Environmental Impact provided in Section ES.6.2 on page ES-21.</p> <p>As is stated in the specific comment section on Fire and Fuels, the Fire Protection Plan (FPP) that was incorporated into the Draft EIR/EIS (September 2010) has been superseded by the November 2010 version. This version of the FPP was approved by the San Diego Rural Fire Protection District on November 2, 2010. It includes more detailed existing conditions information and impact analysis. A primary addition to the November 2010 version</p>

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			<p>strikes from wind turbines.</p> <p>Visual Character: Scenic vistas, and visual character, and new sources of light associated with the ECO Substation, Tule Wind, and ESJ Wind Phase I projects.</p> <p>Fire Fuels: Possibility of fire ignition from transmission lines and interference with firefighting associated with the ECO Substation Project, Tule Wind Project, and ESJ Gen-Tie Project.</p> <p>Cultural Resources: Without confirmation that that Traditional Cultural Properties are not in the project area, impacts to cultural resources would remain adverse and unavoidable for the ECO Substation, Tule Wind, and ESJ Gen-Tie projects.</p>	<p>of the FPP is a mitigation measure that requires installation of a fire suppression system within each nacelle of each wing turbine. Tule Wind LLC agreed to incorporate this mitigation measure into the FPP at the request of the fire agencies.</p>
20.	Executive Summary	ES-26	<p><i>First paragraph</i></p> <p>The environmentally superior alternative would result in greater short-term and temporary air quality emissions and noise effects compared to the Proposed PROJECT, but these would be during construction and would be only short term. This alternative's long-term reduction in visual resource impacts and fire and fuels impacts (for the Tule Wind Project extending 25 years until project decommissioning), while still unmitigable, would result in a greater overall reduction in impacts would not be of any significant manner when <u>considering the visual effects of the Sunrise 500 kV transmission line currently under construction in the adjacent and overlapping Tule Wind ROW compared to the Proposed PROJECT.</u> This alternative would <u>not</u> reduce adverse unmitigable Class I impacts associated with bird/golden eagle strikes from wind turbines <u>because potential impacts to golden eagles are not quantifiable, and therefore a reduced turbine alternative would not</u></p>	

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			<p><u>substantially lessen that unquantifiable risk or reduce the risk of eagle mortality from collisions with turbines when compared to the Proposed PROJECT. Furthermore, and would reduce avian collision and electrocution risk, and, therefore, from a strictly environmental perspective, ranks as the environmentally superior alternative would be reduced to a level of less than significant through appropriate mitigation measures outlined in Section D.2, Biological Resources. However, †</u>This alternative would remove the 187 wind turbines proposed on the Ewiiapaayp Indian Reservation, thereby affecting the Ewiiapaayp Band of Kumeyaay Indians wind and solar energy resources policies to develop renewable energy projects to serve economic and social needs of their reservation. In addition, 2732 turbines would be removed from lands administered by the BLM, 7 turbines would be removed from lands administered by the CSLC, and 447 from lands under the jurisdiction of the County of San Diego.</p>	
21.	Executive Summary	ES-26	<p><i>Third paragraph</i></p> <p>The BLM’s preferred alternative per NEPA requirements and pending public comment on the Draft EIS for the ECO Substation project component is ECO Substation Alternative Site, combined with ECO Partial Underground 138 kV Transmission Route Alternative, combined with Boulevard Substation Rebuild, and for the Tule Wind Project component is the Tule Wind Alternative 5, Reduction in Turbines, combined with Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch. This conclusion is based on the analysis presented in Sections D.2 through D.18.</p>	<p>GENERAL COMMENT - The BLM Preferred Alternative includes a combination of Tule Wind Alternative #2 and Tule Wind Alternative #5. The combination of such alternatives can not be considered “environmentally superior” for the following reasons.</p> <p>Reasons why Alternative 2 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p><i>Increased Collector Line System</i> - The analysis provided for Alternative #2 fails to recognize the tradeoff of impacts associated with a longer collector line system. The collector line system</p>

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				<p>would increase by 7.7 miles and would necessitate 202 extra poles than the Modified Project Layout; thereby increasing the project footprint and the potential for additional temporary and permanent environmental impacts.</p> <p><i>Undergrounding the 138 kV Transmission Line</i> - The analysis provided for Alternative #2 fails to recognize the increased potential for permanent biological and cultural impacts associated with open trenching and boring of an underground transmission line. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. The results of recent cultural resource surveys indicate that seven (7) sites known to have cultural resources would be permanently impacted from open trenching associated with the undergrounding of Transmission Line #2. Of the seven sites that would be permanently impacted from open trenching, one site is listed as a "Potentially Eligible Archaeological Site" under the National Historic Resource Preservation (NHRP) Assessment. Three of the remaining sites are classified as "Likely Ineligible Archeological Site," and the remaining three are classified as "Uncertain Eligibility Archaeological Site." Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation.</p> <p><i>Visual Characteristics</i> - The analysis provided for Alternative #2 fails to recognize that undergrounding the 138 kV transmission line would not reduce visual impacts to the surrounding area in any significant manner because the 500 kV Sunrise transmission line currently under construction in the</p>

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				<p>adjacent and overlapping ROW would be the predominant feature in the landscape. The most visible portions of the 138 kV transmission line would be from Interstate 8 at McCain Valley Road. As shown in Attachment D.3.2, Revised Visual Simulation with Sunrise 500 kV Line (February 2011), the proposed 138 kV transmission line would run parallel to the 500 kV transmission line. Visual impacts associated with the proposed 138 kV transmission line would be minimal relative to the 500 kV Sunrise transmission line.</p> <p><i>Non-Central Location</i> - Air pollution, dust, truck traffic, fossil fuel use would all increase throughout operations because the O&M building and substation facility would not be centrally located.</p> <p>Reasons why Alternative 5 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p><i>No reduced impacts to ACEC Areas</i> - Potential impacts to Areas of Critical Concern (ACEC) were not identified as a result of the proposed project; and therefore are not substantially lessened as a result of the Reduced Turbine Alternative. On June 9, 2010, a meeting conducted with biologists from Tule Wind LLC’s consultants (HDR) and the U.S. Fish and Wildlife Service (USFWS) concluded that the Tule Wind project (as proposed), including the 11 turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (Turbines R-1 through R-10 and R-13), is located outside of critical habitat areas and will not have any detrimental impacts on sheep, and available evidence indicates that detrimental impacts to</p>

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				<p>bighorn sheep are unlikely to occur. The Biological Assessment (August 2010) concluded that the project may affect, but is not likely to adversely affect Peninsular bighorn sheep. Furthermore, the portion of the project area on private land is not subject to ACEC restrictions and regulations set forth by the BLM because the Project facilities are not located within the ACEC.</p> <p><i>No reduced impacts to Golden Eagle</i> - Potential impacts to golden eagles are not quantifiable, and there is no support that a reduced turbine alternative would substantially lessen that unquantifiable risk or reduce the risk of eagle mortality from collisions with turbines when compared with the Tule Wind Project. .</p> <p>Similar to the proposed project (and Modified project Layout) Tule Wind LLC will maximize mitigation options to avoid, minimize, and mitigate potential impacts to the golden eagle through implementation of various measures, as deemed appropriate by the various agencies and/or Tule Wind, LLC. Both the proposed project and the reduced turbine alternative exhibit a similar low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project. Alternative 5 is not necessary because similar to the proposed Tule Wind Project, the low risk of mortality due to collision with operating turbines by golden eagle resulting from the proposed project would be potentially significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10h. Specifically, BIO-10f includes requirements to construct the Tule Wind Project in two portions (phases). Construction of the first portion of the</p>

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				<p>project would occur at those turbine locations deemed to present less risk to the eagle populations and would not include turbines on the northwest ridgeline. Construction of turbines in the second portion of the project will only be authorized following detailed behavioral telemetry studies and continued nest monitoring of known eagles in the vicinity of the Tule Wind Project (considered to be within approximately 10 miles of the project). Behavior studies will be used to determine eagle usage and forage areas, and authorization for construction at each turbine location in the second portion will be at the discretion of the BLM or the appropriate land management entity. The final criteria determining the risk each location presents to eagles will be determined by the BLM or the appropriate land management agency, in consultation with the required resource agencies, tribes and other relevant permitting entities and will be detailed in the Avian Protection Plan.</p> <p>Construction of the proposed project (per the Modified Project Layout) with implementation of the requirements of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without necessitating the elimination of 62 turbines. Potential impacts to golden eagles (bird strikes) would remain regardless of the reduction in turbines as proposed by the reduced turbine alternative. From a CEQA perspective both alternatives still represent significant unmitigatable risk to eagles; and therefore this alternative is not environmentally superior.</p>

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22.	Executive Summary	ES-31 Table ES-2 (renamed Table ES-3)	<p>Impact BIO-10 Column 3 Class I <u>II</u></p> <p>Column 6 BIO 10i: Obtain written agency concurrence documenting compliance with regulations governing golden eagle.</p>	Electrocution and collision can be mitigated by measures outlined in the APLIC Guidelines. The applicant has committed to implement applicable APLIC Guidelines (APM TULE-PDF-11) and the preparation of a project-specific Avian and Bat Protection Plan as part of the design of Tule Wind Project; therefore, Tule Wind Project would not have the potential electrocution and collision risks outlined in the Draft EIR/EIS. Please change classification to reflect the change in significance determination and deletion of proposed mitigation measure BIO 10i in Section D.2.
23.	Executive Summary	ES-32 Table ES-2 (renamed Table ES-3)	<p>Impact VIS-1 Column 3 Class I (<u>County</u>) Class III (<u>BLM</u>)</p> <p>Column 6 VIS 1e: Avoid potential visibility of transmission structures and related facilities from sensitive viewing locations.</p>	<p>Please change classification to reflect the change in significance determination and deletion of mitigation measure in Section D.3, Visual Resources. It should be noted that Class I impacts would only occur on County lands.</p> <p>Please consider revising to reflect that the 138 kV line is adjacent to the route of the Sunrise transmission line and would not be the dominant feature. Please consider revising to reflect that the 138 kV line is adjacent to the route of the Sunrise Transmission Project and would not be the dominant feature if this cumulative project is constructed.</p> <p>Undergrounding the line would not provide any appreciable minimization of impacts. To the contrary, undergrounding would increase impacts due to increased land disturbance causing associated impacts to cultural resources, biological floral and fauna, jurisdictional waters, and possible increase in construction air impacts.</p>
24.	Executive Summary	ES-32 Table ES-2 (renamed Table ES-3)	<p>Impact VIS-3 Column 3 Class I (<u>County</u>) Class III (<u>BLM</u>)</p>	Please change classification to reflect the change in significance determination in Section D.3, Visual Resources. It should be noted that Class I impacts would only occur on County lands.

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25.	Executive Summary	ES-33 Table ES-2 (renamed Table ES-3)	<p>Impact VIS-4 Column 3 Class I <u>III</u></p> <p>Column 6 VIS-4b: Incorporate Obstacle Collision Avoidance System (OCAS) onto Tule Wind Project wind turbines.</p>	<p>The operation of the project would not affect the nighttime views. The O&M/Substation facility would utilize fully shielded low pressure sodium lamp types not to exceed 4050 lumens output. Please change classification to reflect the change in significance determination and deletion of proposed mitigation measure in the Visual Resources Section D.3.</p>
26.	Executive Summary	ES-33 Table ES-2 (renamed Table ES-3)	<p>Impact VIS-5 Column 3 Class I <u>III</u></p> <p>Column 6 MMs VIS-1a, and 1b, and 1c. MMs VIS-3h, 3i, 3j, 3k, 3l, 3m, and 3n. MMs VIS-4a and 4b.</p>	<p>Please consider revising to reflect these changes of the area proposed O&M/Substation will be located on BLM jurisdictional land and would not be subject to county ordinances or guidelines.</p> <p>Moreover, even if the County of San Diego plan, policies, or zoning guidelines would be applicable, no inconsistency should be identified because:</p> <ul style="list-style-type: none"> • The Draft General Plan Update is currently in draft form and has not been formally adopted by the County of San Diego. Therefore, no impact is identified. • Zoning ordinance 6324 would limit illumination of outdoor public recreational facilities, unless a specific recreational activity requiring the lighting is already in progress. Security lights are excepted. • 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. <p>Please change classification to reflect the change in significance determination and deletion of proposed mitigation measures in Section D.3, Visual Resources.</p>

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27.	Executive Summary	ES-36 Table ES-2 (renamed Table ES-3)	Impact CUL-3 Column 3 Class I <u>III</u> <u>Class I (if identified)</u>	No TCPs have been identified within the APE. A significant impact would only occur if TCPs are identified, therefore a less than significant impact is identified. Please change classification to reflect the change in significance determination in the Cultural and Paleontological Resources Section D.7.
28.	Executive Summary	ES-36 Table ES-2 (renamed Table ES-3)	Impact CUL-4 Column 3 Class II <u>III</u>	The Modified Project Layout avoids direct and indirect impacts to the identified historical structures. Direct and indirect impacts would be considered less than significant. Please change classification to reflect the change in significance determination in the Cultural and Paleontological Resources Section D.7.
29.	Executive Summary	ES-36 Table ES-2 (renamed Table ES-3)	Impact NOI-1 Column 3 Class I <u>II</u>	With the implementation of BMPs, APMs Tule-NOI-2, Tule-NOI-4, and Tule-NOI-6 through Tule-NOI-16, and Mitigation Measure NOI-1 construction noise will comply with Section 36.409 of the San Diego County Noise Ordinance. With the incorporation of BMPs and mitigation measures, the highest predicted construction noise level at an adjacent property boundary is reduced from 94 dBA to 74 dBA Leq, one decibel under the county limit. Please change classification to reflect the change in significance determination in the Noise Section D.8.
30.	Executive Summary	ES-37 Table ES-2 (renamed Table ES-3)	Impact NOI-2 Column 3 Class I <u>III</u>	The noise technical report discusses blasting as a technical source of groundborne vibration. However, blast events are extremely short in duration, groundborne vibration dissipates very quickly in soil, and best-management practices will be in place to control airborne noise effects from blasting, which are historically much greater than vibration effects from blasting. Considering these factors, vibration due to blasting is not likely to affect residences at all. If blasting is required, scheduling constraints would be implemented so to comply with Sections 36.409

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				and 36.410 of the San Diego County Noise Ordinance. Furthermore, blasting activities will have to conform to San Diego County Code of Regulatory Ordinances, Sec. 96.1.3301.2. Please change classification to reflect the change in significance determination in the Noise Section D.8.
31.	Executive Summary	ES-38 Table ES-2 (renamed Table ES-3)	Impact TRA-3 Column 3 Class II <u>III</u>	Please consider changing the impact determination to Class III. The impact discussion at pg. D.9-34 states that the project falls below the County threshold of an additional 200 ADT to reduce the LOS or meet the 2,400 ADT. Therefore, the project would not be an impact during the construction phase requiring mitigation. Please change classification to reflect the change in significance determination in the Transportation and Traffic Section D.9.
32.	Executive Summary	ES-42 Table ES-2 (renamed Table ES-3)	Impact AIR-2 Column 3 Class III <u>IV</u>	Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional generation of 201 MW of electricity. Please change classification to reflect the change in significance determination in the Air Quality Section D.11.
33.	Executive Summary	ES-45 Table ES-2 (renamed Table ES-3)	Impact PSU-3 Column 3 Class II <u>III</u>	According to the groundwater investigation conducted for the project (Geo-Logic Ass. Sept 2010, updated December 2010), adequate groundwater water supply has been identified for the construction portion of the project. Therefore, no mitigation is required for this impact. Please update estimated water usage throughout construction based on the Groundwater Investigation Report and Updated Water Memo. Please see Attachment D.12.1, Groundwater Investigation Report (December 2010) and Attachment D.12.2, Modified Construction Water Supply Evaluation (February 2011). Please change

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				classification to reflect the change in significance determination in the Public Services and Utilities Section D.10.
34.	Executive Summary	ES-45 Table ES-2 (renamed Table ES-3)	Impact PSU-4 Column 3 Class III <u>No Impact</u>	The project will be serviced by septic for the O&M building. Wastewater will not be connected to sewer lines for wastewater treatment. No impact is identified. Please change classification to reflect the change in significance determination in the Public Services and Utilities Section D.10.
35.	Executive Summary	ES-46 Table ES-2 (renamed Table ES-3)	Impact FF-1 Column 6 FF-5: Wind Turbine Generator Fire Protection Systems.	Please include the appropriate mitigation measures that would mitigate potential impacts associated with Impact FF-1.
36.	Executive Summary	ES-46 Table ES-2 (renamed Table ES-3)	Impact FF-2 Column 3 Class I <u>II</u>	The potential impacts associated with overhead transmission lines will be mitigated to a level of less than significant with implementation of mitigation measures (and additional proposed mitigation measures included the approved Fire Protection Plan) that include provisions for performing visual inspections of overhead lines (see FPP-8), line clearance in accordance with CPUC GO 95 (see FPP-9), and de-energizing the electrical system in a fire emergency event (see FPP-13). Based on this analysis, a recommendation to change the significance determination from a Class I to a Class II is provided. Please change classification to reflect the change in significance determination in the Fire and Fuels Management Section D.15.
37.	Executive Summary	ES-46 Table ES-2 (renamed Table ES-3)	Impact FF-2 Column 6 FF-5: Wind Turbine Generator Fire Protection Systems.	Please include the appropriate mitigation measure in the Fire and Fuels Management Section D.15.
38.	Executive Summary	ES-46 Table ES-2 (renamed Table ES-3)	Impact FF-3 Column 3 Class I <u>II</u>	With respect to ground-based firefighting effectiveness, improved access roads will enable ground-based firefighters to reach places that were previously inaccessible by vehicle and will enable quicker ingress and egress to the project area to

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				<p>fight fires, four (4) additional water tanks to be installed in SDRFPD-approved locations throughout the project area (see TULE-PDF-7) will improve both ground-based and aerial firefighting effectiveness, Development Agreements entered into with SDRFPD and SDCFA will provide funding for equipment, staffing, and training that will improve firefighting effectiveness, and lastly, proposed mitigation measures (included within the approved Fire Protection Plan) would further improve access and response times, coordination, and communication amongst the respective fire agencies with jurisdiction over the project. Taken together, the Tule Wind Project features will improve ground-based firefighting effectiveness, not diminish it.</p> <p>Please change classification to reflect the change in significance determination in the Fire and Fuels Management Section D.15.</p>
39.	Executive Summary	ES-46 Table ES-2 (renamed Table ES-3)	<p>Impact FF-3 Column 6 See MMs FF-1 through FF-3 and FF-5. FF-6: Funding for Fire Inspection Fire Safe Council.</p>	Please include appropriate mitigation measures as described in the Fire and Fuels Management Section D.15.
40.	Executive Summary	ES-55-62 Table E-4 (Renamed D-5)	<p>This table should be renamed to Table D-5.</p> <p>Please see changes made to impact determinations for the following resource areas: Biological Resources, Visual Resources, Land Use, Cultural and Paleontological Resources, Noise, Fire and Fuels Management, and Air Quality.</p>	Implementation of mitigation measures outlined within the Draft EIR/EIS would result in less than significant impacts to Biological Resources, Cultural and Paleontological Resources, Noise, and Fire and Fuels Management. Please consider the textual modifications and changes to impact determinations associated with the Modified Project Layout.

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section A: Introduction/Overview

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Introduction/ Overview	A-1	The Tule Wind Project, as proposed by Pacific Wind Development Tule Wind, LLC a subsidiary of Iberdrola Renewables, Inc.)...	Global Comment- Project assets have been transferred from Pacific Wind Development, LLC to Tule Wind, LLC. Both are wholly owned subsidiaries of Iberdrola Renewables, Inc. Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
2.	Introduction/ Overview	A-4	First bullet: Up to 134 wind turbines, ranging in size from 1.5 megawatt (MW) (328 feet in heath) and 3.0 MW (492 feet in height) <u>Up to 128 wind turbines, generating capacity between 1.5-megawatt (MW) and 3.0 MW, and ranging in height from 226 to 328 feet to the wind turbine hub (or nacelle), and 327 feet to 492 feet to the top-most blade tip, generating up to 201 MW of electricity.</u>	Please consider revising to reflect the Modified Project Layout.
3.	Introduction/ Overview	A-4	Fourth bullet: Two <u>Three</u> permanent meteorological towers and one sonic detecting and ranging (SODAR) unit or <u>one light detecting and ranging (LIDAR) unit</u>	Please update to reflect changes due to the Modified Layout.
4.	Introduction/ Overview	A-12	Tule Wind Project <u>The Tule Wind Project's objective is to maximize the capture and transformation of wind energy to electricity in the project area to reduce greenhouse gas emissions and meet federal and state renewable energy mandates. The project area has been determined to be part of the nation's limited wind energy resources.</u>	Please update to reflect the project's objectives.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
5.	Introduction/ Overview	A-15 Table A-1	<p>Project Component</p> <p>Jurisdiction</p> <p>Miles/Acres under Jurisdiction</p> <p>Wind Turbines and 34.5 kV Overhead and Underground Collector Cable System Ewiiapaayp Band of Kumeyaay Indians (1718 wind turbines) <u>20.2-51.6</u> acres</p> <p>BLM (9796 wind turbines) <u>280277.9</u> acres</p> <p>CSLC (7 wind turbines) <u>37.5-20.7</u> acres</p> <p>County of San Diego (437 wind turbines) <u>4919.1</u> acres</p> <p>Meteorological Towers & Sodar/Lidar Unit BLM <u>0.062083</u> acres</p> <p>138 kV Transmission Line BLM <u>7.42</u> <u>5.91</u> miles</p> <p>County of San Diego <u>4.963.05</u> miles</p> <p>State of California³ <u>0.3626</u> miles</p> <p><u>New Roadways/ Improved Roadways Ewiiapaayp Band of Kumeyaay Indians/ Campo/Manzanita</u></p> <p><u>12.3</u> miles</p> <hr/> <p>BLM <u>36.2</u> miles</p> <hr/> <p>CSLC <u>3.3</u> miles</p> <hr/> <p>County of San Diego <u>8.4</u> miles</p>	Please update the “Tule Wind Project” portion of Table A-1 to reflect corrected analysis per the Modified Project Layout. See Attachment A1- Revised Agency Jurisdiction of Project Components
6.	Introduction/ Overview	A-18 Table A-2	<p>Tule Wind Project</p> <p>State</p> <p>Column 1 - <u>Air Pollution Control District (APCD)</u></p> <p>Column 2- <u>Air Quality Permit to Construct and Operate Batch Plant and Collector Substation.</u></p> <p>Column 3 –</p> <ul style="list-style-type: none"> • <u>General Permit Application Form APP-116 for operation of portable reciprocating engines.</u> 	Please include the APCD permit required for the Tule Wind Project.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
7.	Introduction/ Overview	A-19 Table A-2	Tule Wind Project State Column 1- Regional Water Quality Control Board, Region 7 (Colorado River) State / Regional Water Quality Control Board	Please revise because the Tule Wind Project is located in two Regional Water Quality Control Board districts (7 and 9). The State Water Quality Control Board will be reviewing the Tule Wind Project's Water Quality Certification application, as established in a meeting held on April 22, 2010 in which the BLM and CPUC participated.
8.	Introduction/ Overview	A-19 Table A-2	Tule Wind Project Local San Diego County Column 3 - <ul style="list-style-type: none"> • <u>General Plan Amendment</u> • <u>Zoning Ordinance Amendment</u> • <u>Building Permit</u> • <u>Septic Permit On-Site Wastewater Treatment System Permit (OWTS)</u> 	Please insert the additional County permits.
9.	Introduction/ Overview	A-19 Table A-2	Tule Wind Project Local San Diego County Column 1 – <u>San Diego Rural Fire Protection District and San Diego County Fire Authority</u>	Please include the San Diego County Fire Authority as required for approval of an approved Fire Protection Plan.
10.	Introduction/ Overview	A-21	Paragraph 4: Iberdrola Renewables, Inc. Major Use Permit Package (October 8, December 7, 2010).	Please update MUP filing with the County of San Diego to reflect the latest submittal.

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Section B: Project Description

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Project Description	B-1	<p><i>First paragraph</i></p> <p>Section B describes the East County (ECO) Substation Project as proposed by the San Diego Gas & Electric Company (SDG&E), the Tule Wind Project as proposed by Pacific Wind Development <u>Tule Wind, LLC</u>, and the Energia Sierra Juarez U.S. Generator-Tie (ESJ Gen-Tie) Project as proposed by Energia Sierra Juarez U.S. Transmission, LLC.</p>	<p>Global Comment- Project assets have been transferred from Pacific Wind Development, LLC to Tule Wind, LLC. Both are wholly owned subsidiaries of Iberdrola Renewables, Inc.</p> <p>Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.</p>
2.	Project Description	B-2 Table B-1	<p><i>Tule Wind Project</i></p> <p><i>First column, First row: - 434 128 Wind Turbines</i></p> <p><i>Third column, First row: 386.5 <u>369.3</u></i></p> <p>Permanent impacts should equate to 369.3 acres, not 386.5 acres.</p>	<p>The maximum number of wind turbines proposed has been reduced to 128. The calculation of potential impacts for the “PROPOSED PROJECT” and for all Tule Wind Project components should be updated accordingly using data and analysis for the Modified Project Layout provided.</p>
3.	Project Description	B-2 Table B-1 (continued)	<p><i>Overhead & Underground 34.5 kV Collector Cable System (Row 2)</i></p> <p>Temporary impacts should equate to 127 acres, not 108.2 acres.</p>	<p>Please reflect potential impacts for the overhead and underground collector system and update calculation of impacts for all project components accordingly using the data and analysis for the Modified Project Layout provided.</p>
4.	Project Description	B-2 Table B-1 (continued)	<p><i>Overhead 138 kV Transmission Line (Row 5)</i></p> <p>Temporary impacts should equate to 40.3 acres, not 44.6 acres. Permanent impacts should equate to 0.09 acres, not 0.12 acres.</p>	<p>Please reflect the maximum potential impacts for the 138 kV transmission line and update calculation of impacts for all project components accordingly using the data and analysis for the Modified Project Layout provided.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
5.	Project Description	B-2 Table B-1 (continued)	<i>Meteorological Towers and SODAR or LIDAR Units (Row 6)</i> Total temporary impacts should equate to 0.064 acres, not 0.048 acres. Total permanent impacts should equate to 0.083 acres, not 0.062 acres.	A permanent SODAR or LIDAR unit may be utilized for the Tule Wind Project. Please update calculation of impacts accordingly using data and analysis for the Modified Project Layout provided.
6.	Project Description	B-2 Table B-1 (continued)	<i>Access Roads (Row 7)</i> Total temporary impacts should equate to 83.5 acres, not 84.2 acres. Total permanent impacts should equate to 152.6 acres, not 166.1 acres.	Please update calculation of impacts for access roads accordingly using data and analysis for the Modified Project Layout provided.
7.	Project Description	B-2 Table B-1 (continued)	<i>Row 8</i> Temporary Construction Areas (parking area, concrete <u>cement</u> batch plant, and laydown areas)	Please replace concrete with cement for description of the batch plant
8.	Project Description	B-2 Table B-1 (continued)	<i>Tule Wind Project Total (Row 9)</i> Total temporary impacts should equate to 303.9 (212.1) acres, not 290.1 (224.4) acres. Total permanent impacts should equate to 532.1 (513.3) acres, not (562.8) 544 acres.	Please update calculation of maximum potential impacts (temporary and permanent) for the Tule Wind Project using the data and analysis for the Modified Project Layout provided.
9.	Project Description	B-2 Table B-1 (continued)	Table B-1, footnote 1: This overlap gives a higher calculation that distorts <u>overstates</u> the overall project surface land disturbances.	Please consider revising the text to more accurately characterize the effect of summing areas where disturbed areas overlap.
10.	Project Description	B-3 Figure B-1	Please update the Regional Map (Figure B-1) with modified project layout, as necessary.	HDR has provided GIS shape files reflecting the modified layout to assist with updating the figures.
11.	Project Description	B-5 Figure B-2	Please update Vicinity/Overview Map (Figure B-2) with modified project layout, as necessary.	HDR has provided GIS shape files reflecting the modified layout to assist with updating the figures.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
12.	Project Description	B-8	<p>B.2.2 Pacific Wind Development Tule Wind, LLC's Tule Wind Project</p> <p>The proposed Tule Wind Project's objective is to <u>maximize the capture and transformation of wind energy to electricity in the project area to reduce greenhouse gas emissions and meet federal and state renewable energy mandates, by would produce producing up to 2001 megawatts (MW) of wind energy. The project area has been determined to be part of the nation's limited wind energy resources. (BLM, Record of Decision, Eastern San Diego Proposed Resource Management Plan and Final Environmental Impact Statement, 2007, pgs. 4-5).</u> As proposed by Pacific Wind Development Tule Wind, LLC, the Tule Wind Project would consist of up to 434 <u>128</u> wind turbines in the 1.5 to 3.0 MW <u>generating capacity</u> range. In addition to wind turbines and associated generator step-up transformers, the Tule Wind Project would include the following components:</p> <p><i>(Third and Fifth bullets)</i></p> <ul style="list-style-type: none"> • Two <u>Three</u> permanent meteorological (MET) towers, and one sonic detecting and ranging (SODAR) unit <u>or one light detecting and ranging (LIDAR) unit</u> • 36.7638 miles of newly constructed access roads and 27.6223 <u>23.44</u> miles of temporarily widened and improved existing access roads. 	<p>Please consider fully stating the Tule Wind project's objective to maximize the production of wind energy in the project area.</p> <p>Global Comment- The maximum capacity of the Tule Wind Project is 201 MW. 134 turbines x 1.5MW = 201 MW, which is equal to the interconnection request.</p> <p>Please revise language to reflect corrected analysis per the Modified Project Layout</p>
13.	Project Description	B-8	<p><i>Last paragraph</i></p> <p>Construction of the Tule Wind Project would require approximately 47.5 <u>19</u> million gallons of water...</p>	<p>Please revise as noted to reflect the construction water amounts.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
14.	Project Description	B-85-86	<p><i>First and second paragraphs</i></p> <p>...and presents a comprehensive listing of Pacific Wind Development Tule Wind, LLC's APMs to reduce potential impacts resulting from the Tule Wind Project.</p> <p>Pacific Wind Development Tule Wind, LLC is requesting a minimum 30-year ROW grant... The project is located on lands administered by the BLM, the El Centro Field Office; Ewiiapaayp Indian Reservation, Manzanita, and Campo Indian Reservations (access only); the CSLC; and private lands under County of San Diego jurisdiction.</p>	<p>Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.</p> <p>Please correct typo on Manzanita Indian Reservation</p>
15.	Project Description	B-86	<p>...The Tule Wind Project consists of up to 134 <u>128</u> wind turbines in the 1.5 to 3.0 MW range capable of generating up to 200 <u>1</u> MW of electricity.</p>	<p>Please update calculation of maximum potential impacts (temporary and permanent) for the Tule Wind Project using the data and analysis for the Modified Project Layout provided.</p>
16.	Project Description B.4.1	B-86	<p><i>Third, fifth, and sixth bullet:</i></p> <ul style="list-style-type: none"> • Three Two permanent MET towers, and one SODAR unit <u>or one LIDAR unit</u> • 36.38 <u>36.76</u> miles (192,074.24 <u>194,092.8</u> linear feet) of newly constructed access roads • 27.62 <u>23.44</u> miles (145,834.51 <u>123,762.2</u> linear feet) of widened and improved existing access roads 	<p>Please revise as noted to reflect corrected number of MET Towers, length of newly proposed access roads, and improvements to existing roads. Newly constructed access roads should equate to 36.76 miles, and improved access roads should equate to 23.44 miles.</p>
17.	Project Description	B-87 Table B-8	<p><i>Wind Turbines (Row 1)</i></p> <p><i>(Row 1, Column 3 – Description)</i></p> <p>Construction and installation of up to 134 <u>128</u> wind turbines in the 1.5 to 3.0 MW range. The specific turbine layout would be capable of generating 200 <u>201</u> MW of electricity. Each turbine would be mounted on a concrete pedestal, supported by pad <u>pedestal</u> and a permanent concrete foundation and would be a maximum of 492 feet tall. Each turbine tower would include a pad-mounted transformer at its base</p>	<p>Please revise language as suggested.</p> <p>The maximum capacity of the Tule Wind Project is 201 MW. 134 turbines x 1.5MW = 201 MW, which is equal to the interconnection request.</p>

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			<p><u>transformer either located on a pad at the base of each turbine, or within the wind turbine itself, which would step-up electricity produced by the generator (located in the nacelle) to 34.5 kV.</u></p> <p><i>(Row 1, Column 5 – Permanent impacts)</i> Permanent Impacts: 369.3 acres, not 386.5 acres</p>	
18.	Project Description	B-87 Table B-8 (continued)	<p><i>Overhead and Underground 34.5 kV Cable Collection System (Row 2)</i></p> <p><i>(Row 2, Column 3 - Description)</i> The underground and overhead 34.5 kV collector cable system would collect and transfer electricity generated by the wind turbines to the collector substation. The underground system would transport electricity from wind turbine strings to a centrally located overhead system (several turbine strings would be directly connected to the collector substation via the underground system). The overhead system would deliver electricity to the collector substation.</p> <p><i>(Row 2, Column 4 - Temporary Impacts)</i> Temporary Impacts: 127 acres, not 108.2 acres</p>	<p>Please update the language to accurately describe the underground collection system and avoid redundancy in the textual description of both the Overhead and Underground 34.5 kV Cable Collection System</p> <p>Please update calculation of maximum potential impacts (temporary and permanent) for the Tule Wind Project using the data and analysis for the Modified Project Layout provided.</p>
19.	Project Description	B-88 Table B-8 (continued)	<p><i>Operations and Maintenance Facility (Row 1)</i></p> <p><i>(Row 1, Column 3 - Description)</i> The 5,000-square-foot O&M building would store operational services house operations, staff, equipment, and spare parts, and would be the base of operations for the permanent O&M staff.</p>	Please update the language to correctly describe project components.
20.	Project Description	B-88 Table B-8 (continued)	<p><i>MET Towers and SODAR or LIDAR Unit (Row 2)</i></p> <p><i>(Row 2, Column 2 - Location)</i> On BLM-administered land. One MET tower would be located in the vicinity of the collector substation, and the other second would be within the Lark Canyon OHV Area, north of Rough Acres Ranch,</p>	Three MET towers are proposed for the Tule Wind Project. Please update calculation of maximum potential impacts (temporary and permanent) for the Tule Wind Project using the data and analysis for the Modified Project Layout provided.

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			<p>and the third would be located on the ridge in the northern portion of the project area. The SODAR or LIDAR unit would be located within the Lark Canyon OHV Area.</p> <p><i>(Row 2, Columns 4 & 5 - Temp/Permanent Impacts)</i> Temporary Impacts: 0.064 acres, not 0.048 acres Permanent Impacts: 0.083 acres, not 0.062 acres</p>	
21.	Project Description	B-88 Table B-8 (continued)	<p><i>Overhead 138 kV Transmission Line (Row 3)</i></p> <p><i>(Row 3, Column 2 - Location)</i> The transmission line would run south from the collector substation, along and on either side of McCain Valley Road, traversing BLM, state, and County of San Diego land north of I-8, and would cross I-8 prior to interconnecting with the rebuilt Boulevard Substation.</p> <p><i>(Row 3, Column 3, Description)</i> The new 9.7-mile <u>9.2-mile</u> 138 kV transmission line connecting the Tule Wind Project collector substation and the rebuilt Boulevard Substation would include approximately 80 a maximum of 108 steel transmission poles.</p> <p><i>(Row 3, Columns 4 & 5, Temp/Permanent Impacts)</i> Temporary Impacts : 40.3 acres, not 44.6 acres Permanent Impacts: 0.09 acres, not 0.12 acres</p>	Please update the language to correctly describe the route of the transmission line and maximum number of poles required for the transmission line
22.	Project Description	B-89 Table B-8 (continued)	<p><i>Access Roads (Row 1)</i></p> <p><i>(Row 1, Column 3, Description)</i> In order to access proposed turbine locations and facilitate delivery of wind turbine components, approximately 27.6 <u>23.4</u> miles of existing roadways in the project area would be improved and approximately 36.4 <u>36.8</u> miles of new access roads would be constructed. All roads to and between turbine strings would temporarily be 36 feet wide to allow the large crane (required to hoist and mount</p>	Please revise this statement to reflect corrected analysis per the Modified Project Layout.

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			<p>turbine components) to move between turbines. After construction, access roads would be reduced to between 18 and 24 feet wide depending on the applicable jurisdiction.</p> <p>(Row 1, Columns 4 & 5, Temp/Permanent Impacts) Temporary Impacts : 83.5 acres, not 84.2 acres Permanent Impacts: 152.6 acres, not 166.1 acres</p>	
23.	Project Description	B-90	<p><i>First paragraph - Location</i> ...The current project site layout identifies 128 134 turbines in the 1.5 to 3.0 MW range, including 97 96 on BLM lands, 47 18 on the Ewiiapaayp Indian Reservation, 7 on CSLC land, and 43 7 on privately owned lands (Rough Acres Ranch, within the permitting jurisdiction of San Diego County).</p> <p><i>Second paragraph - Location (cont.)</i> A 200-foot radius (approximately 2.88-acre) area around each turbine would be cleared (Figure B-23, Tule Wind Project Typical Turbine Site), <u>depending on site topography. Upon completion of construction, with the exception of an area 60 feet in diameter (gravel up to a 10-foot radius to provide surface stabilization), the 200-foot cleared area would be revegetated with fire safe noncombustible, low fuel vegetation, in a spacing and height configuration consistent with fire agency standard practices for a distance necessary to provide a minimum of 100 feet of fuel management from the turbine base and/or transformer.</u> This area is assumed to be permanently impacted. Total permanent impacts of the 434 128 wind turbines would be 386.5 369.3 acres and would include the wind turbine base and foundation, pad-mounted transformer, and a gravel driveway from the turbine string access road to the individual turbine. In the construction <u>area</u> of the pad sites for the wind turbines and gravel driveways, slope areas would require grading of rock and dirt.</p>	<p>Please revise this statement to reflect corrected analysis per the Modified Project Layout.</p> <p>See pg. 5, November 3, 2010 Fire Protection Plan approved by San Diego Rural Fire Protection District.</p>

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24.	Project Description	B-90	<p><i>Third paragraph – Description</i></p> <p>Wind turbines would consist of three main parts: the turbine tower, turbine rotor, and the nacelle (Figure B-24, Tule Wind Project Typical Turbine Tower Design). Measured from the ground to the turbine blade tip, the typical turbine would be a maximum of 492 feet tall and would be mounted on a concrete pedestal, supported by pad and a permanent concrete foundation, which would be located below ground surface...</p> <p>...As a standard safety precaution, turbines would automatically shut down if sustained winds or gusts exceed predetermined set points established by the turbine manufacturer to prevent equipment failure, as confirmed in the plan contained in Mitigation Measure HAZ-6, in the project area reach 50 mph or gusts reach about 56 mph. Each turbine would also be equipped with a transformer that A pad mounted transformer would also be located at the base of each turbine and would step-up the electricity received from the generator at 575600 to 690 volts to 34.5 kV. Depending on the turbine type selected, the transformer would either be located on a pad at the base of each turbine, or within the wind turbine itself.</p>	Please consider making the text modifications provided. Design standards vary from manufacturer to manufacturer, both for maximizing safe operating conditions for winds and wind gusts, and for transformer locations.
25.	Project Description	B-91 – B-97 Figures B-19 through B-22	<p>Please update the Tule Wind Project Figures B-19 through B-22 with the modified project layout.</p> <p>In addition, in the legend for “Tule Wind Project Components” in Figures B-20 through B-22, please indicate that the following project features are temporary:</p> <ul style="list-style-type: none"> * 2-acre <u>Temporary Laydown Areas</u> * 5-acre <u>Temporary Concrete Batch Plant</u> * 10-acre <u>Temporary Parking Area</u> 	<p>Please revise Figures based on GES shape files provided to show the Modified Project Layout</p> <p>Please consider making the textual changes suggested to the legend to accurately reflect the extent of permanent and temporary project impacts.</p>

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26.	Project Description	B-99 – B-101 Figure B-23 and Figure B-24	<p><i>Figure B-23 (Road Widths)</i> Please include the revised Figure B-23 which reflects minor changes to roads standards, and the revised Figure B-24 which reflects minor changes to the standard turbine design.</p> <p>Figure B-23 has been revised to indicate a width of <u>16-24 feet</u> of Permanent Road Gravel Surface and <u>36 feet</u> for Temporary Disturbance Crane Access.</p> <p>Figure B-24 has been revised to reflect shorter towers under consideration – change 69 meter tower hub height to 67 meter tower hub height (219 feet).</p>	<p>Please revise Figures to reflect corrected analysis relative to temporary and permanent widths of turbine access roads, and potential for shorter towers being constructed.</p> <p>Revised versions of both Figure B-23 and Figure B-24 are provided as attachments (please see Attachment B.1, Revised Turbine Site (February 2011) and B.2, Revised Tower Design (February 2011)).</p>
27.	Project Description	B-103	<p><i>First paragraph</i></p> <p>Turbines in the same geographical location would be grouped in rows or strings and connected by an underground and overhead collector cable system. The amount of turbines per string varies. For example, 49 <u>17</u> turbines are proposed in the G-turbine string while only 2 turbines are proposed in the Q-turbine string. All turbines have been assigned an alphanumeric identification for tracking and design purposes (Figures B-19 through B-22).</p> <p><i>Fourth paragraph - Location</i> Pad mounted <u>Transformers within the wind turbine</u> or at the base of the proposed turbines would be connected to an underground and overhead electrical system shown on Figures B-19, Tule Wind Project Overview, and B-20 through B-22, Tule Wind Project.</p> <p><i>Fifth paragraph – Location (cont)</i> The overhead collector cable system would be supported by a maximum of 232 <u>approximately 250</u> wood or steel poles. Poles would be between 60 and 80 feet in height and would be <u>approximately</u> 2 feet in diameter. Therefore, the overhead collector cable system would result in permanent impacts to 0.02 acres (approximately 871 square feet).</p>	<p>Please update the language to correctly describe the project, as modified.</p>

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28.	Project Description	B-104	<p><i>First paragraph</i></p> <p>The <u>underground</u> collector cable system would primarily be located underground and placed within a 442- to 50-inch-deep and 12-inch-wide cable trench generally located along the length of the proposed turbine access roads. . . .With the exception of riser poles, no conduits would be used <u>for power cables</u>.</p> <p><i>Second paragraph</i></p> <p>Concrete or fiberglass vaults and splice boxes would be placed along the underground cable system where necessary. Vaults would be approximately 5 feet wide by 5 feet tall by 5 feet long and spaced <u>approximately</u> 2,500 feet apart. Boxes would have locked lids to control access.</p> <p><i>Third paragraph</i></p> <p>Where site-specific conditions dictate (such as at steep canyon crossings <u>and soil conditions not conducive to underground collector construction</u>), the collector cable system would be placed aboveground. The aboveground collector system would utilize a maximum of 232 <u>approximately 250</u> wood or steel poles approximately 60 to 80 feet in height, with single and double circuit collectors. . . . A typical 34.5 kV line design is shown on Figures B-26a, Tule Wind Project Typical 34.5 kV Overhead Collector Cable System Transmission Pole – Single-Double Circuit, and B-26b, Tule Wind Project Typical 34.5 kV Overhead Collector Cable System Transmission Pole – Double-Single Circuit.</p>	<p>Please update the language to accurately reflect the trenching schematic provided in Figure B-25.</p> <p>Please update the language to correctly describe the number of poles that may be required for the overhead collector system; and to accurately describe the double and single circuit transmission pole schematics.</p>

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29.	Project Description	B-107, B-109 Figures 26a, 26b	<p>Figure 26a – the title should read: Tule Wind Project Preliminary 34.5 kV Overhead Collector Cable System Transmission Pole – Single <u>Double</u> Circuit</p> <p>Figure 26b – the title should read: Tule Wind Project Preliminary 34.5 kV Overhead Collector Cable System Transmission Pole – Single <u>Double</u> Circuit</p>	Please consider updating the titles of Figures 26a and 26b. It appears that the titles accidentally were switched between the single and double circuit schematics.
30.	Project Description	B-111	<p><i>First paragraph</i> ...The substation fence would be a <u>minimum of 7 feet</u> tall, made of fabric, topped by 3 strands of barbed wire.</p> <p><i>Second paragraph</i> Substation equipment would include two (138 and <u>34.5 kV to 138 kV</u>) 100-megavolt ampere power transformers that would be connected through 138 kV circuit breakers to a common 138 kV transmission line located within the fenced boundary of the substation.</p>	Please consider textual revisions provided. Tule Wind, LLC does not anticipate building the fence out of fabric. Please update the language to correctly describe substation equipment.
31.	Project Description	B-112	<p><i>Second paragraph</i> Operational equipment and spare parts for the Tule Wind Project would be located within an approximate 5,000-square-foot, pre-engineered, one-story metal O&M building, <u>which will be located on a maximum 5-acre area. A 4-acre cleared</u> The area would surrounding the O&M building would be cleared. <u>A central-computer system</u> that would facilitate remote operations of the proposed turbines <u>would is anticipated to be accessible located in at</u> the O&M building. In addition, an electrical, heating, ventilation, and air conditioning (HVAC) system, a septic system, <u>fire suppression system</u>, and groundwater well would also be installed within the O&M building, as the permanent O&M staff would operate from this facility.</p>	Please update language to correctly describe all the components in the O&M facility.

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32.	Project Description	B-113 Figure B-27	Far-left label for transmission line: <u>138 KV TRANSMISSION LINE TO SDG & E BOULEVARD SUBSTATION</u>	Please update the figure to correctly describe the 138 kV transmission line.
33.	Project Description	B-117 Figure B-29	<i>Tule Wind Project Typical Operations and Maintenance Facility Site</i> Please revise O&M Building dimensions from 40 feet to 75 feet, to 50 feet by 100 feet, to accurately reflect maximum square footage.	Please update the figure to correctly describe the O&M facility square footage.
34.	Project Description	B-121	B.4.1.5 Meteorological Towers and SODAR/ <u>LIDAR</u> Unit <i>First paragraph – Location</i> <u>Three</u> two permanent MET towers would be installed within the McCain Valley National Cooperative Land and Wildlife Management Area to monitor wind speed and direction. Although only three <u>two</u> MET towers would be installed, the Tule Wind Project includes three <u>two</u> proposed and two alternate tower locations (Figures B-19, Tule Wind Project Overview, and B-20 and B-21, Tule Wind Project; proposed MET towers are depicted as PM-E1, and PM-W2, and <u>PM-X1</u> while alternate MET towers are depicted as PM-E2, and PM-W1, and <u>PM-X2</u>). Proposed towers PM-E1, and PM-W2, and <u>PM-X1</u> would be freestanding lattice structures (approximately 197 <u>219 to 328</u> feet tall) supported by concrete foundations. Proposed tower PM-E1 would be located approximately 0.5 mile northeast of the collector substation and O&M facility site; while PM-W2 would be located within the Lark Canyon Off-Highway Vehicle (OHV) Area, approximately 500 feet west of the proposed wind turbine G-11; and <u>proposed tower PM-X1 would be located on the ridge near proposed wind turbine L-6</u> (Figures B-19, Tule Wind Project Overview, and B-20 and B-21, Tule Wind Project).	Please revise these statements to reflect corrected analysis per the Modified Project Layout.

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			<p><i>Second paragraph – Location (cont.)</i></p> <p>A permanent SODAR unit (approximately 9 feet tall, 6 feet wide, and 10 feet long) <u>or a permanent LIDAR unit (approximately 3 feet tall, 3 feet wide, and 3 feet long)</u> would also be installed on site. The SODAR <u>or LIDAR</u> unit would be located approximately 328 feet west of proposed MET tower PM-W2 within the Lark Canyon OHV Area.</p> <p><i>Third paragraph – Location (cont.)</i></p> <p>The permanent concrete foundations associated with the proposed MET towers would result in approximately 900 square feet of permanent impacts per tower. Installation of the SODAR unit <u>or LIDAR unit</u> would also result in approximately 900 square feet of permanent impacts.</p> <p><i>Fourth paragraph – Description</i></p> <p>As proposed, the MET towers would be approximately 200-219 <u>to 328</u> feet tall, free standing (no guy wires), and would consist of three steel tube sections supported by a concrete foundation.</p> <p><i>After SODAR paragraph, please add following LIDAR paragraph:</i></p> <p><u>The permanent LIDAR unit, if installed instead of the SODAR unit, would be capable of measuring the wind profile at heights of from about 30 feet to more than 650 feet in 50-foot increments using pulses of infrared light. The LIDAR unit is cubic in shape, measures approximately 3 feet per side, and is about 45 kg in weight. The LIDAR is similar to RADAR except that infrared waves (rather than radio waves) are used to analyze the wind. The LIDAR would be housed on a small platform approximately 3 to 5 feet</u></p>	

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			<p><u>off the ground and would be located about 20 to 30 feet from the base of the permanent meteorology tower. The LIDAR unit typically transmits data from a cell modem as well as a local area network connection.</u></p>	
35.	Project Description	B-122	<p><i>First paragraph</i></p> <p>Access roads would be constructed off McCain Valley Road and the G-turbine string access road to facilitate installation and maintenance of the proposed MET towers and SODAR or LIDAR unit (Figures B-19, Tule Wind Project Overview, and B-21, Tule Wind Project). Access roads to the proposed MET towers and SODAR unit would be gated where they start along the main access road.</p>	Global Comment - Please remove reference to gated areas on BLM lands. Roadways on BLM will not be gated.
36.	Project Description	B-122	<p>B.4.1.6 Overhead 138 kV Transmission Line</p> <p><i>Second paragraph – Location</i></p> <p>An approximate 9.79.2-mile-long 138 kV transmission line is proposed to be constructed from the collector substation to provide an interconnect to the rebuilt Boulevard Substation being proposed as part of SDG&E’s ECO Substation Project (Figures B-2, Vicinity/Overview Map, B-19, Tule Wind Project Overview, and B-21 and B-22, Tule Wind Project).</p> <p>...Along this segment, the transmission line would span cross I-8. South of I-8 the transmission line would turn west, travelling parallel with Old Highway 80 and would then enter the <u>rebuilt</u> Boulevard Substation where the line would terminate. Along the alignment, the proposed 138 kV transmission line would primarily traverse undeveloped land administered by the BLM and private land under the jurisdiction of the County of San Diego, with the exception of approximately</p>	Please edit text to reflect connection with the rebuilt Boulevard Substation.

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			0.2 63 6-linear miles of lands under the jurisdiction of the State of California (Conservation Camp and Caltrans lands).	
37.	Project Description	B-122	<p><i>Third paragraph</i></p> <p>The new 9.29-7-mile, 138 kV overhead transmission line would require a 24-foot-wide temporary area of disturbance. Therefore, assuming a 24-foot-wide temporary area of disturbance, the transmission line would have a maximum temporary disturbance of 44.6 <u>26.8</u> acres of land. In addition, each of the 108 <u>approximately 80</u> transmission line poles supporting the proposed 138 kV line would require a 50-foot by 150-foot temporary area of disturbance, totaling 48.6 <u>13.5</u> acres. Each pole would have an 8-foot-diameter permanent impact resulting in 0.12-<u>0.09</u> acres of permanent impacts.</p>	Please update the language to correctly describe the maximum temporary disturbed area relative to the construction of the transmission line.
38.	Project Description	B-122	<p><i>Fourth paragraph (Description)</i></p> <p>The new 9.27-mile-long Tule Wind Project 138 kV transmission line would be supported by approximately 80 <u>approximately 80-108</u> steel galvanized or weather steel finished tangent poles. Figure B-31, Tule Wind Project Typical 138 kV Steel Tangent Pole, shows the 138 kV poles, which would be approximately 75 feet high and would be constructed as <u>either a single or double circuit pole lacking any underbuild attachments</u>.</p>	<p>Please update the language to describe the approximate number of poles and land disturbance that may be required to construct the transmission line. Not all poles will be tangent poles.</p> <p>By providing for the proposed project to utilize a double circuit transmission line, the proposed project may be able to reduce environmental impacts by avoiding the need to tear down and rebuild the transmission line to accommodate future potential renewable energy in the area.</p>
39.	Project Description	B-123	<p><i>First paragraph</i></p> <p>As required by SDG&E, tThe proposed transmission line and steel poles would be located within a 125<u>100</u>-foot ROW easement.</p> <p><i>Fourth Paragraph – Location</i></p> <p>...Additional access roads would be required to provide access to Rough Acres Ranch from</p>	Please update the language to correctly describe the width of the proposed corridor and the correct length of new access roads that would be constructed.

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			<p>Ribbonwood Road and Pacific Wind Development Tule Wind, LLC is seeking additional project access through the Manzanita and Campo Indian Reservations.</p> <p><i>Fifth Paragraph – Description</i></p> <p>...Approximately 27.6 <u>23.4</u> miles of existing roadway would be improved and widened to 20 to 36 feet. In addition, approximately 36.4 <u>36.8</u> miles of new access roads would be constructed. In order to allow large cranes to move between turbines <u>and turbine strings</u>, temporary roads between turbine strings would be 36 feet wide. Remaining access roads would be 20-18 to 24 feet wide, <u>depending upon jurisdiction</u>. Total land requirements for new and improved access roads would be approximately 250.3 <u>236.1</u> acres (<u>83.5 acres of temporary impacts and 152.6 acres of permanent impacts</u>).</p>	
40.	Project Description	B-124	<p><i>First Paragraph, last sentence</i></p> <p>... All <u>New permanent spur-access roads would be gated off the main access McCain Valley Road, where required by the BLM, in order to prevent excessive-unauthorized motor vehicle access intrusions.</u> Proposed new access roads and existing access roads to be improved are shown on Figures B-20 through B-22 (Tule Wind Project).</p>	Please consider the textual modifications suggested. Where required by the BLM, Tule Wind, LLC will gate the turbine spur roads. As previously phrased, the gating will not be effective at preventing unauthorized vehicle access. However, strategically placed gates at the access roads running from McCain Valley Road would reduce unauthorized vehicle access.
41.	Project Description	B-124	<p><i>Third paragraph</i></p> <p>Table B-9, Proposed Tule Wind Project Construction Schedule, provides Pacific Wind Development <u>Tule Wind, LLC's</u> proposed schedule for the Tule Wind Project,</p>	Global update for Tule Wind, LLC

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42.	Project Description	B-124 Table B-9	<p><i>Project Activity – Completion Dates</i></p> <p>ROD: December 2010 <u>June 2011</u></p> <p>Acquisition of additional required permits: December 2010 through March 2011 <u>November 2011</u></p> <p>ROW/property acquisition: December 2010 <u>April 2011</u></p> <p>Construction begins: December 2010 <u>2011</u></p> <p>Completion of construction: June 2012 <u>October 2012</u></p> <p>Project operational¹: November 2012</p> <p>Punch List/Clean up - January 2013</p> <p>Include footnote to “Project Operational”: <u>“Continuous full-load operation cannot occur until the ECO Substation Project is complete.”</u></p>	Please revise construction schedule accordingly.
43.	Project Description	B-127	<p><i>First paragraph</i></p> <p>Pacific Wind Development <u>Tule Wind, LLC</u> anticipates that construction activities would occur between 7 a.m. and 7 p.m., Monday through Saturday</p>	Global update for Tule Wind, LLC
44.	Project Description	B-127	<p><i>Second paragraph</i></p> <p>... In addition to the areas identified in Table B-8, a The 10-acre temporary parking area and the 5-acre temporary concrete cement batch plant would be required during construction. These facilities are located on BLM land, located to the south of the proposed turbine strings on private lands Figures B-19, Tule Wind Project Overview, B-20, B-21, and B-22 (Tule Wind Project) illustrate the anticipated laydown areas for the Tule Wind Project (Figures B-19 and B-22 identify the location of the temporary parking area and concrete cement batch plant). As</p>	<p>Construction of the overhead transmission line and access roads will result in temporary impacts and necessitate workspace requirements.</p> <p>The parking area and batch plant is proposed on BLM land; however an alternate batch plant location has also been identified on Rough Acres Ranch. Construction activities would be similar at either location (see Comment #49).</p>

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			<p>illustrated in Table B-8, Temporary workspace would not be required for construction of the collector substation, O&M facility, MET Towers and the SODAR or LIDAR Unit, 138 kV overhead transmission line, and access roads.</p> <p><i>Third paragraph</i></p> <p>During construction, temporary security fencing (6-foot-tall chain-link fencing with security wiring at the top) may would be located around all staging and laydown areas, storage yards, and excavation areas to limit public access.</p> <p><i>Site Preparation</i></p> <p>. . . These areas would be cleared and during construction, laydown areas would may be fenced and gated to control access and to minimize theft.</p>	
45.	Project Description	B-128	<p><i>First paragraph - Foundation Construction</i></p> <p>. . . Construction of the cement-concrete turbine foundations (134128) would require between 7,500 and 15,000 gallons of water each per foundation, with up to two foundations constructed per day, totaling between 960,000 1,005,000 and 1,005,000 2,010,000 gallons to construct foundations for all 128 turbines.</p>	Please revise language to reflect corrected analysis per Modified Project Layout
46.	Project Description	B-129	<p><i>Second paragraph</i></p> <p>Permanent wind tower foundations would be approximately 60-40 to 80 feet in diameter, and 7 to 10 feet deep (exact dimensions would depend on specific site needs). Once the soil has been excavated and compacted, turbine tower foundations would be constructed of structural concrete and appropriate steel reinforcement would be applied as directed by the tower manufacturer. Each turbine foundation would also include a 5 foot by 9 foot concrete pad for the pad-mounted transformer. Each concrete</p>	Please revise language to reflect corrected analysis per Modified Project Layout

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			<p>foundation pad would incorporate approximately 25075 to 500707 CY of concrete. <u>Each turbine may also include a 5-foot by 9-foot concrete pad if the turbine utilizes a pad-mounted transformer.</u></p> <p><i>Third paragraph – Aboveground Equipment Installation</i></p> <p>... Along with underlying soils, the crane pad would be compacted to provide a minimum <u>the</u> soil-bearing capacity of 6,000 pounds per square foot in order necessary to provide a stable foundation for the crane.</p> <p><i>Last paragraph - Overhead and Underground 34.5 kV Collector Cable System</i></p> <p>The underground portion (approximately 29 <u>35.1</u> miles) of the collector cable system would require a 24-foot temporary ROW and would be placed in a 42- to 50-inch <u>44- to 50-inch</u> deep and 12-inch-wide trench that would be constructed generally along the length of the proposed turbine access roads.</p>	
47.	Project Description	B-130	<p><i>Second sentence</i></p> <p>Installation of the underground 34.5 kV collector cable system would temporarily impact 84.2 <u>99.8</u> acres of land.</p> <p><i>Aboveground Equipment Installation</i></p> <p>Once the substation pad has been established, installation of aboveground equipment <u>including electric transformers, breakers, switches, and other electrical components</u> would begin. Construction would generally consist of installing of electric transformers. Equipment installation would be accomplished by delivering equipment to the site on trucks and lifting it into place using cranes.</p>	Please consider revising text to reflect updated analysis and clarified language.

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			<p><i>Last paragraph - Operations and Maintenance Facility - Site Preparation</i></p> <p>The 5-acre O&M facility site would be cleared. During construction the site would <u>may</u> be fenced and gated to control access and to limit theft of stockpiled material and equipment. The O&M facility site access road would be graded in order to facilitate access to the O&M building. In addition, the on-site staging area would be graveled.</p>	
48.	Project Description	B-131	<p><i>Third paragraph - Meteorological Towers</i></p> <p>. . . Once the tower foundation has been established, the tower sections would be assembled and the tower would be lifted into place. by a gasoline powered winch.</p> <p><i>Fourth paragraph - Overhead 138 kV Transmission Line - Site Preparation</i></p> <p>The new 138 kV transmission line would require a 100<u>125</u>-foot ROW. All temporary and permanent impacts would occur within this ROW. Access to each steel pole location would be constructed prior to clearing activities. Once access has been established, a temporary work area measuring 50 feet by 150 feet around each steel pole location would be cleared of vegetation. Construction activities associated with the overhead 138 kV transmission are anticipated to result in temporary impacts to 44.6 <u>40.3</u> acres of land.</p> <p><i>Fifth paragraph - Foundation Transmission Line Pole Construction</i></p> <p>Each transmission line pole foundation would be <u>direct buried, with maximum hole dimensions of 8 feet wide by 25 feet deep.</u> Pole holes foundations would be excavated using a truck-mounted drill rig and poles would then be delivered on a flatbed trailer and hoisted into place by a crane. The annular space</p>	<p>It is uncertain as to which machinery will be utilized for assembling the MET towers.</p> <p>Please revise to reflect corrected analysis relative to the 138 kV transmission line.</p>

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			between poles and holes would then be backfilled with <u>soil</u> or concrete. Any remaining excavated material would be placed around the holes or spread onto access roads and adjacent areas.	
49.	Project Description	B-132	<p>Concrete <i>Cement Batch Plant (fourth paragraph)</i></p> <p>During construction, a temporary 5-acre cement batch plant would be located approximately 5 miles southeast of the collector substation, near the southern extent of the proposed G-turbine string, near Rough Acres Ranch (Figures B-19, Tule Wind Project Overview, and B-22, Tule Wind Project). <u>An alternate batch plant location has been identified on private land, and batch plant activities would be similar at this location.</u> The batch plant is necessary to mix concrete for the foundations of the turbine towers, collector substation, and the O&M facility. Sand, aggregate, and concrete would <u>could</u> be sourced from existing local and permitted quarries. After being delivered to the batch plant via truck, the aggregate and sand would be placed into stockpiles. Cement, obtained from nearby <u>offsite</u> vendors, could also be delivered by truck and stored in silos. Approximate quantities for raw materials necessary for each proposed turbine foundation would <u>could include range from 375,900-350,000-700,000</u> pounds of sand; 572,100 <u>475,000-950,000</u> pounds of aggregate; and 168,300 <u>200,000-400,000</u> pounds of cement (Pacific Wind Development Tule Wind, LLC 20092011).</p>	Please revise language as suggested for clarification.
50.	Project Description	B-133	<p><i>First paragraph</i></p> <p>In addition to the workspaces associated with the main project components discussed previously, the project is proposing a temporary 10-acre parking area on BLM Rough Acres Ranch (Figures B-19, Tule Wind Project Overview, and B-22, Tule Wind Project). . . .</p>	Please consider revising the text to be consistent with the location of the temporary 10-acre parking area on BLM land as shown in the figures.

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51.	Project Description	B-133	<p>B.4.2.3 Construction Personnel and Equipment</p> <p>Construction of the Tule Wind Project would employ up to 325 workers per day during the peak construction period. Depending on the specific stage of construction, an average daily peak workforce of 125 workers would be present at the construction site and up to 200 delivery trucks are anticipated.</p> <p>... Construction activities would <u>may</u> be supplied power by generators provided by the construction contractor.</p>	Please consider revising to make clear that the average daily workforce on site would be 125 workers on-site, with 200 delivery truck drivers.
52.	Project Description	B-134	<p><i>Second paragraph</i></p> <p>Pacific Wind Development Tule Wind, LLC has identified three existing groundwater wells located on Rough Acres Ranch as potential sources of water for use during construction (Iberdrola Renewables, Inc. 2010).</p> <p><i>Third paragraph</i></p> <p>Construction of the Tule Wind Project is estimated to require approximately 17,512,000 <u>19 million</u> gallons of water to support the water needs of the project for <u>road construction, dust suppression, and concrete mixing, and an initial fill of the four fire protection tanks</u>. Project water needs are currently expected to be supplied by a combination of on-site wells and nearby water districts. The project has received written confirmation from the Jacumba Community Service District (Lindenmeyer 2010) and Live Oak Spring Water Company (Najor 2010) of water supplies available to provide construction water to the project. The project may also receive water from McCain Valley Conservation Camp. Wells located on Rough Acres Ranch would also supply water for construction of the Tule Wind Project (Iberdrola</p>	<p>Please revise to reflect the correct water usage for road construction, dust suppression and concrete mixing.</p> <p>See Attachment D.12.1, Groundwater Investigation Report (December 2010) and Attachment D.12.2, Modified Construction Water Supply Evaluation (February 2011) describing water usage, based on the Modified Project Layout. Attachment D.18.4, Calculations of California Water Savings by Tule Wind Project Operations (February 2011).</p>

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			<p>Renewables, Inc. Tule Wind, LLC 2010). Approximately 250,000 gallons of water per day over a period of 60 to 72 days is anticipated to be needed for dust suppression and for construction while turbine construction and road construction activities would be conducted simultaneously. Up to 120,000 gallons per day (gpd) will be required over an approximate 72-day construction period for road construction. Dust suppression activities during turbine foundation construction (approximately 64 days) is estimated to require 100,000 gpd, and would reduce to 50,000 gpd for dust control on project roads for the subsequent 58 days during the period of turbine erection. Turbine foundation construction is estimated to require 7,500 to 15,000 gallons per foundation. Tule Wind, LLC anticipates being able to complete construction of up to two (2) turbine foundations per day; assuming construction of two foundations per day, water demand will be approximately 15,000 to 30,000 gpd. This would require approximately 60 truck trips per day to supply water assuming a truck capacity of 4,000 gallons. When turbine and road construction activities would not be occurring simultaneously, the project is expected to require a maximum of 30 truck trips per day to supply water. Where on-site wells can supply water, truck trips would be reduced.</p> <p><i>Please add supplemental text after third paragraph:</i></p> <p><u>Implementation of the Tule Wind project would result in a significant reduction of water use by offsetting the annual water use requirements of older, less-efficient gas fired power plants that utilize water cooling. An assessment of SDG&E's Palomar Power Project, a gas-fired power plant was conducted by the California Energy Commission (CEC) in 2003, indicated that the power plant would consume approximately 3.6 million gallons per day (mgd) or</u></p>	

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			<p><u>approximately 2,500 gallons per minute (gpm) of reclaimed water. Given the Palomar Power Project is a 546 MW combined cycle power plant, this equates to an estimated 274.73 gallons per megawatt hour (gal/MWh). The Tule Wind Project, with a planned capacity of 200 MW, is estimated to generate 543,120 MWh of energy annually. Using the figures provided as an example, the operation of the Tule Wind Project would offset annual water use of SDG&E's Palomar gas-fired power plant or similar plants by approximately 149,000,000 gallons.</u></p> <p><u>The electricity produced by the Tule Wind Project would result in the “backing down” of older less-efficient gas-fired power plants that utilize water cooling. The older less efficient plants would be backed down, or taken off line first, because of their higher variable cost as compared to the newer more efficient plants. Therefore, in the CA ISO system where power plants that do not operate efficiently are “backed down”, the wind energy from the Tule Wind Project would primarily displace generation from the older combined-cycle water-cooled gas-fired power plants, reducing overall water demand.</u></p>	
53.	Project Description	B-135	<p><i>First paragraph</i></p> <p>The SCADA system would also allow for remote operation of the wind turbines from the O&M facility, or from wherever an authorized user could access the Internet.</p> <p><i>Third paragraph- Wind Turbines</i></p> <p>As a safety precaution, turbines would automatically shut down if sustained winds <u>or gusts exceed predetermined set points established by the turbine manufacturer to prevent equipment failure, as confirmed in the plan contained in MM HAZ-6, reach 50 mph or gusts reach about 56 mph.</u></p>	<p>Please revise to reflect corrected analysis.</p> <p>The turbine manufacturer determines set points to prevent equipment failure.</p> <p>Inspections of the 34.5 kV collector cable system would occur as required.</p>

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			<p><i>Fourth paragraph - Overhead and Underground 34.5 kV Collector Cable System</i></p> <p>The overhead and underground 34.5 kV collector cable system would be regularly inspected, maintained, and repaired following construction. Overhead components would be inspected annually, at a minimum, for corrosion, equipment misalignment, loose fittings, and other mechanical problems. The underground portion of the cable system would be inspected <u>as required annually from inside the concrete vaults.</u> Pacific Wind Development <u>Tule Wind, LLC</u> would maintain a working space around all overhead structures, which would be cleared of shrubs and other obstructions for inspection and maintenance purposes.</p>	
54.	Project Description	B-136	<p><i>Second paragraph – Decommissioning</i></p> <p>Prior to the termination of the ROW authorization (Pacific Wind Development <u>Tule Wind, LLC</u> is requesting a minimum 30-year ROW grant to construct and operate the Tule Wind Project), a final decommissioning plan would be developed in compliance with the standards and requirements for closing a site and would be circulated for approval by interested agencies. The ROW grant could potentially be renewed by Pacific Wind Development <u>Tule Wind, LLC</u>;</p> <p><i>Fifth paragraph</i></p> <p>Pacific Wind Development <u>Tule Wind, LLC</u> would implement a habitat restoration plan once project facilities have been removed and the project site is returned to pre-construction and operation conditions.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
55.	Project Description	B-137 Table B-11	<p><i>Third paragraph</i></p> <p>B.4.4. Tule Wind Applicant Proposed Measures</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			<p>APMs provided by Pacific Wind Development <u>Tule Wind, LLC</u> are listed by subject in Table B-11, Tule Wind Project Applicant Proposed Measures for Each Issue Area. Table B-12, Tule Wind Project Applicant Proposed Measures, lists the APMs as proposed by Pacific Wind Development <u>Tule Wind, LLC</u>.</p> <p><i>Table B-11 Eighth Row:</i></p> <p>The Noise “Applicable APMs” line should read “TULE-NOI-1 through TULE-NOI-6<u>16</u>”</p>	See B-151 describing APMs TULE-NOI-1 through TULE-NOI-16.
56.	Project Description	B-140 Table B-12	<p><u>TULE-AES-12: The public shall be involved and informed about the visual site design elements of the proposed wind energy facilities. Possible approaches include conducting public forums for disseminating information, offering organized tours of operating wind developments, and using computer simulation and visualization techniques in public presentations.</u></p> <p><u>TULE-AES-13: Turbine arrays and turbine design shall be integrated with the surrounding landscape. Design elements to be addressed include visual uniformity, use of tubular towers, proportion and color of turbines, non-reflective paints, and prohibition of commercial messages on turbines.</u></p> <p><u>TULE-AES-14: Other site design elements shall be integrated with the surrounding landscape. Elements to address include minimizing the profile of the ancillary structures, burial of cables, prohibition of commercial symbols, and lighting. Regarding lighting, efforts shall be made to minimize the need for and amount of lighting on ancillary structures.</u></p>	Please consider adding the identified PDF as presented in the Applicants Environmental Document as part of the project design features.
57.	Project Description	B-140 Table B-12	<p><i>TULE-BIO-8</i></p> <p><u>Work Cessation during Heavy Rains. All earthwork/disruptive heavy equipment will cease during heavy rains, and will not resume until</u></p>	Although earthwork and heavy equipment will cease during heavy rains, work within the tower and nacelle may be done during these times.

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			conditions are suitable for the movement of equipment and materials. <u>However, work inside towers, nacelles, etc. should be able to continue.</u>	
58.	Project Description	B-145 Table B-12	<p><i>TULE-PDF-11</i></p> <p>The design of the power lines will comply with APLIC “Suggested Practices for Avian Protection on Power Lines” which is the industry standard developed to minimize avian contact with power lines. Bird caused flashovers are very unlikely for the project because the energized 134-138 kV conductors will have minimum distances of 30 vertical feet <u>to the ground</u> and 12 horizontal feet apart, and the 34.5 kV overhead collector lines will have a minimum distance of 18.5 feet vertical feet and 5 feet horizontal feet apart.</p>	Please revise this statement to accurately reflect voltage of conductors.
59.	Project Description	B-145-146 Table B-12	<p><i>TULE-PDF-16 (First through third paragraphs and fifth through seventh paragraphs)</i></p> <p>1. Up-Tower - Turbines with electrical (medium-voltage) equipment in the nacelle have a number of safety devices to detect electrical arc and smoke. For example, the turbine design being considered for the project include the following fire detection components are included and <u>that will be mounted on</u> key power cables within the nacelle:</p> <ul style="list-style-type: none"> • Smoke detectors; • Arc-flash sensors; and • Over-current sensing transducers; <u>and</u> • <u>Portable fire extinguishers.</u> <p>Should any of these devices register an out-of-range condition, the device immediately commands a shutdown of the turbine and will disengage it from the electrical collection system <u>and send a notice through the SCADA system to the ECC in Portland, Oregon.</u> The entire turbine is electrically protected by current-limiting switchgear that is installed inside the base of the tower.</p>	Please revise these statements to reflect corrected analysis in the Fire Protection Plan, dated November 3, 2010, and approved by the San Diego Rural Fire Protection District.

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			<p>2. Down-Tower - This type of turbine being considered for the project has the electrical components installed in metal cabinets inside the base of the tower, and a low-voltage-to-medium-voltage transformer installed adjacent to the <u>tower transformer</u>. In this configuration, the probability of an uncontained electrical fire in the nacelle is extremely remote, as there are no combustible materials inside the tower. However, <u>this turbine style still has the same risk of a fire associated with electrical components as the Up-Tower style does.</u> the same risk of a fire associated with electrical components exists. As with the other turbine type, a tower-based circuit breaker electrically protects the entire machine. <u>This location will also have supervised smoke detectors. The potential for fire ignition in the nacelle due to blade over speed, wind or vibration is limited due to the design of the turbine blades, which are equipped with a pitch system that allows the blades to be rotated in order to control and stop the turbine in high wind conditions. As back-up to the three independent blade pitch systems, the turbines are equipped with a mechanical breaking system. In addition, turbines are equipped with vibrations sensors that automatically shut the turbines down if vibrations exceed the normal operating conditions. The down tower turbine type will include similar fire detection, fire suppression, and safety features in the nacelle as the up tower turbine type (e.g., smoke detectors, arc flash mitigation relays and over current protection), however, fire suppression on the down tower transformer is unnecessary due to the enclosed conditions of the turbine and improved fire access to the site. For the down tower turbine type, there is a very low potential of an electrical fire escaping the turbine and causing a wildland fire.</u></p> <p>In addition, a potential fire risk associated with wind turbines is improperly installed electrical equipment (e.g., technical defects or components in the power</p>	

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			<p>electronics, failure of power switches, failure of control electronics, high electrical resistance caused by insufficient contact surface with electrical connections, such as loose connections, insufficient electrical protection concept with respect to the identification of insulation defects and the selectivity of switch-off units, no pole mounted disconnected switches, inadequate surge protection, inadequate grounding due to incorrect design or improper installation).</p> <p>... In addition, signage will be posted at the NCC to call a 10 digit 24/7 landline phone number to emergency dispatch center in San Diego County in the the case of an emergency.</p>	
60.	Project Description	B-146 Table B-12	<p>TULE-PDF-17</p> <p>Although a final decision on the type of wind turbine has not been made, the majority of turbine manufacturers have imbedded “grounding” systems within the turbine blades to prevent ignition of a fire due to lightning. All wind turbine models being considered for this project will incorporate blade lightning protection systems. In general, these systems consist of air-receptors on various locations along the length of the blade, ground-conducting straps in the hub, nacelle, and tower, lightning detection tell-tale circuit cards, and tower grounding to earth. As mentioned earlier, Iberdrola Renewables has nearly 50 million operating hours on its U.S. fleet, and over that time lightning-induced fire has not occurred.</p>	Please consider striking unnecessary sentences
61.	Project Description	B-146 Table B-12	<p>TULE-PDF-18</p> <ul style="list-style-type: none"> • No off-road vehicle use would be necessary because all wind turbine and associated project components (e.g., substation and O&M building) will be located in cleared areas. As part of the project design, existing 	Please revise this statement to reflect project conformance with the County of San Diego Consolidated Fire Code (2009) and <i>PDF -23</i> .

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			<p>access roads will be improved and new access roads are proposed <u>that meet the requirements of the County of San Diego Consolidated Fire Code (2009) where they occur on County lands with the exception of spurs that serve turbines only.</u></p> <ul style="list-style-type: none"> • Hot Work Procedure (PDF-1). • Construction, Operations, and Maintenance Fire Prevention / Protection Plan (PDF-2). • Road maintenance activities requiring the use of grading equipment will be suspended during red flag events. • Permanently assigned project vehicles will carry, as a minimum, a fire extinguisher, shovel, and two-way-radio. 	
62.	Project Description	B-148 Table B-12	<p><i>TULE-PDF 25 (First paragraph)</i></p> <p>Transformers contain cooling oil, which can be ignited by an electrical arc. NFPA 850, including Section 10.5.2.6, provides recommendations for transformer protection. These recommendations will be followed. Transformers associated with the substation will be located approximately 50 feet from the O&M building and will <u>be surrounded by a minimum of 100 feet of fuel management.</u> The substation is proposed to be located adjacent to the O&M building on a 5-acre parcel and will be surrounded by a 3-acre graveled parcel providing a minimum of 100 feet of fuel management around the substation.</p>	Please revise as suggested.
63.	Project Description	B-149 Table B-12	<p><i>TULE-HYD-1</i></p> <p>The project applicant will consult the Department of California Fish and Game guidelines <u>and recommendations for culvert design so that culverts are appropriately sized and protected to prevent scour and sedimentation to and ultimately minimize the long-term maintenance impacts to the natural</u></p>	Please consider clarifying TULE-HYD-1 to indicate that CDFG guidelines would be used to minimize long-term impacts to the natural streambed, as opposed to maintenance purposes.

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			<u>streambed</u> . The project design will meet a 10-year rain event to minimize the trapping of sediment.	
64.	Project Description	B-151 Table B-12	<i>TULE-NOI-11</i> Augmented backup alarms coupled with contractor observation to minimize alarm noise.	Please consider deleting as APM because TULE-NOI-11 is a duplicate of APM TULE-NOI-9.
65.	Project Description	B-152 Table B-12	<i>TULE-PHS-6</i> Temporary fencing shall <u>may</u> be installed around staging areas and storage yards during construction to limit public access. Excavation areas will be provided with barriers surrounding them.	Please consider revising text to be consistent with changes noted above.
66.	Project Description	B-152-153 Table B-12	<i>TULE-TRAF-3</i> The following has been requested by <u>Caltrans</u> as part of the project design: <ul style="list-style-type: none"> • All Caltrans standards for utility encroachments shall be met. • Clearances of overhead crossings shall conform to regulations of the California PUC, and the number of crossings to be minimized. • New installations under an existing <u>paved</u> roadbed shall be made by the boring and jacking method. Trenching under the traveled <u>paved</u> way will not be allowed. • For freeways and expressways, the placement of longitudinal encroachments is prohibited within controlled access rights-of-way. • Utilities shall not be located in median areas. • Transverse crossings should be normal (90 degrees) to the highway alignment where practical. If impractical, skews of up to 30 degrees from <u>from</u> normal may be allowed. • Supports for overhead lines crossing freeways shall be located outside the controlled access right-of-way and not on cut or fill slopes and shall not impair sight distances. All 	Please consider clarifying existing text

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			<p>installations shall be placed as close to the right-of-way line as possible. Above-ground utilities shall be outside of the clear recovery zone (20 feet from edge-or-travel way for conventional highways and 30 feet for freeways and expressways). Allowance should be made for future widening of the highways.</p> <ul style="list-style-type: none"> • New installations shall not impair sight distances. 	

Attachments

B.1 - Revised Turbine Site Figure (February 2011)

B.2 - Revised Tower Design Figure (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section C: Alternatives

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Alternatives	C-2	<p><i>Third paragraph</i></p> <p>... these projects are not included in the <u>analysis</u> of the environmentally superior alternative and will be considered in detail in future environmental analysis ...</p>	<p>Is it unfair to consider these projects for purposes of evaluating the proposed project, but not for purposes of the alternatives because they are assumed to be built in both cases. This statement seems unnecessary, or even misleading. Please consider revising the language to include the textual revisions to provide clarification.</p>
2.	Alternatives	C-10	<p><i>First paragraph</i></p> <p>Having taken into consideration the project objectives set forth by San Diego Gas and Electric (SDG&E) for the ECO Substation Project, Pacific Wind Development <u>Tule Wind, LLC</u> for the Tule Wind Project, and Energia Sierra Juarez U.S. Transmission, LLC, for the ESJ Gen-Tie Project (Section A of this EIR/EIS), the CPUC has identified the following basic project objectives used to screen alternatives:</p>	<p>Iberdrola Renewables has changed the limited liability company (LLC) name from Pacific Wind Development to Tule Wind. We recommend making this change throughout all sections of the Draft EIR/EIS.</p>
3.	Alternatives	C-20 Table C-1 (Row 2, Column 3)	<p><i>Feasibility Criteria</i></p> <p>Does not meet <u>Meets</u> feasibility criteria.</p>	<p>Please consider modifying feasibility conclusion under the basis that this alternative would not be feasible and does not meet environmental criteria as discussed below.</p> <p>Since the environmental analysis began, a portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
4.	Alternatives	C-20 Table C-1 (Row 2, Column 4)	<p><i>Environmental Criteria</i> Meets Does not meet environmental criteria. Has potential to reduce <u>visual</u> impacts due to siting and reduced 138 kV ROW. The aAlternative site for O&M and substation facilities <u>co-located on Rough Acres Ranch is not available at this location; thereby limiting the feasibility of this location, in more of a disturbed state as compared with proposed sites and would reduce access requirements.</u> The 138 kV route is 5.4-6 miles shorter when compared with the proposed route. <u>However, the length of the overhead collector line system would increase by 7.7 miles necessitating 202 extra poles than the proposed project.</u></p> <p><u>Additionally, because the O&M building and substation facility would not be centrally located, air pollution, dust, truck traffic, and fossil fuel use would all increase throughout operations.</u></p>	<p>Please consider revising language to clarify the tradeoff of impacts associated with a longer overhead collector system versus a shorter 138 kV transmission line. Reducing the length of the transmission line results in increasing the number of collector line poles required and has a larger footprint, resulting in potentially greater impacts to biological resources and cultural resources.</p> <p>Due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p>
5.	Alternatives	C-20 Table C-1 (Row 2, Column 5)	<p><i>Conclusion</i> Yes-No. Would Does not meet project objectives, feasibility or, and environmental <u>screening</u> criteria.</p>	<p>Please consider modifying conclusion under the basis that this alternative would not be feasible and does not meet environmental criteria because reducing the length of the transmission line results in a substantial increase in the length of the overhead collector line system, increasing the number of collector line poles required, and has a larger footprint, resulting in potentially greater impacts to biological resources and cultural resources.</p> <p>Since the environmental analysis began, a portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
6.	Alternatives	C-20 Table C-1 (Row 3, Column 3)	<i>Feasibility Criteria</i> Does not meet Meets feasibility criteria.	Please consider modifying feasibility conclusion under the basis that this alternative would not be feasible and does not meet environmental criteria. Since the environmental analysis began, a portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.
7.	Alternatives	C-20 Table C-1 (Row 3, Column 4)	<i>Environmental Criteria</i> Meets Does not meet environmental criteria. Has potential to reduce <u>visual</u> impacts due to siting and reduced 138 kV ROW. A <u>The alternative site for O&M and substation facilities co-located on Rough Acres Ranch is not available at this location; thereby limiting the feasibility of this location in more of a disturbed state as compared with proposed sites and would reduce access requirements.</u> The 138 kV route is 4.2 <u>3.8</u> miles shorter when compared with the proposed route. <u>However, the length of the overhead collector line system would increase by 7.7 miles necessitating 202 extra poles than the proposed project.</u> <u>Additionally, because the O&M building and substation facility would not be centrally located, air pollution, dust, truck traffic, and fossil fuel use would all increase throughout operations.</u>	Please see justification provided for Comment #4 noted above.
8.	Alternatives	C-20 Table C-1 (Row 3, Column 5)	<i>Conclusion</i> Yes No Would Does not meet project objectives, feasibility, and or environmental <u>screening</u> criteria.	Please see justification provided for Comment #5 noted above.

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9.	Alternatives	C-21 Table C-1 (Row 4, Column 2)	<p><i>Project Objectives Criteria</i></p> <p>A reduction in the number of turbines proposed would <u>not</u> meet project objectives criteria.</p>	<p>This alternative does not meet the key CEQA Project objective of creating 201 MW of wind energy because the elimination of the area where 62 of the turbines were proposed results in a loss of a minimum of approximately 93 MW. <i>See</i> Draft EIR/EIS at ES-6. For example, 3.0 MW turbines cannot replace 1.5 MW turbines in the same locations to generate more energy. A larger turbine in the remaining area of the Project cannot be used to replace the megawatts lost from the area eliminated because the larger turbines must be spaced further apart to meet manufacturers' spacing criteria.</p>
10.	Alternatives	C-21 Table C-1 (Row 4, Column 4)	<p><i>Environmental Criteria</i></p> <p>Does not meet <u>Meets</u> environmental criteria. Has potential to reduce <u>Potential</u> impacts to Areas of Critical Concern (ACEC) were not identified as a result of the proposed project; and therefore are not substantially lessened as a result of the Reduced Turbine Alternative. Potential impacts to <u>and</u> golden eagles are not quantifiable, and there is no support that a reduced turbine alternative would substantially lessen that unquantifiable risk. by <u>Although</u> increasing setbacks of project facilities would occur, potential impacts to golden eagles would remain regardless of the reduction in turbines as proposed by this alternative. From a CEQA perspective both alternatives still represent significant unmitigatable risk to eagles; and therefore this alternative does not meet environmental criteria. area as compared with proposed Tule Wind Project.</p>	<p>On June 9, 2010, a meeting conducted with biologists from Tule Wind LLC's consultants (HDR) and the U.S. Fish and Wildlife Service (USFWS) concluded that the Tule Wind project (as proposed), including the 11 turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (Turbines R-1 through R-10 and R-13), is located outside of critical habitat areas and will not have any detrimental impacts on sheep, and available evidence indicates that detrimental impacts to bighorn sheep are unlikely to occur. The Biological Assessment (August 2010) concluded that the project may affect, but is not likely to adversely affect Peninsular bighorn sheep. Furthermore, the portion of the project area on private land is not subject to ACEC restrictions and regulations set forth by the BLM because the Project facilities are not located within the ACEC.</p> <p>Tule Wind LLC will maximize mitigation options to avoid, minimize, and mitigate potential impacts to the golden eagle through implementation of various measures, as deemed appropriate by the various agencies and/or Tule Wind, LLC. Alternative 5 does not necessarily reduce the risk of eagle mortality from collisions with turbines when</p>

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				<p>compared with the Tule Wind Project. Rather, both alternatives exhibit a similar low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project. Alternative 5 is not necessary because similar to the proposed Tule Wind Project, the low risk of mortality due to collision with operating turbines by golden eagle resulting from the proposed project would be potentially significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10h. Specifically, BIO-10f includes requirements to construct the Tule Wind Project in two portions (phases). Construction of the first portion of the project would occur at those turbine locations deemed to present less risk to the eagle populations and would not include turbines on the northwest ridgeline. Construction of turbines in the second portion of the project will only be authorized following detailed behavioral telemetry studies and continued nest monitoring of known eagles in the vicinity of the Tule Wind Project (considered to be within approximately 10 miles of the project). Behavior studies will be used to determine eagle usage and forage areas, and authorization for construction at each turbine location in the second portion will be at the discretion of the BLM or the appropriate land management entity. The final criteria determining the risk each location presents to eagles will be determined by the BLM or the appropriate land management agency, in consultation with the required resource agencies, tribes and other relevant permitting entities and will be detailed in the Avian Protection Plan.</p> <p>Construction of the proposed project (per the Modified Project Layout) with implementation of</p>

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				the requirements of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without necessitating the elimination of 62 turbines. Therefore, for the reasons stated above, the Reduced Turbine Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the Draft EIR/EIS. Further consideration of the proposed project (as modified) should be provided to meet the alternative screening criteria outlined within Section C.2 of the Draft EIR/EIS.
11.	Alternatives	C-21 Table C-1 (Row 4, Column 5)	<i>Conclusion</i> Yes-No. Would Does not meet project objectives, feasibility, and environmental screening criteria.	Please revise conclusion for the Reduced Turbine Alternative, as this alternative does not provide potential overall environmental advantages over the proposed project, nor will it meet project objectives. See Comments 9 and 10 above.
12.	Alternatives	C-22 Table C-1 (Row 2, Column 3)	<i>Feasibility Criteria</i> Meets Does not meet feasibility criteria.	Since the environmental analysis began, a portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible. See Comment 3 above.
13.	Alternatives	C-22 Table C-1 (Row 2, Column 4)	<i>Environmental Criteria</i> Meets Does not meet environmental criteria. Has-Does not have the potential to reduce visual impacts due to siting and reduced 138 kV ROW, because the 500 kV Sunrise transmission line currently under construction is in the adjacent and overlapping ROW. The alternative site for the O&M and substation facilities co-located on Rough Acres Ranch is not available at this location; thereby limiting the feasibility of this location, in more of a disturbed state as compared with proposed sites and would reduce access requirements. The 138 kV route is 5.6 5.4 miles	The analysis fails to recognize that if the 138 kV line is reduced, the overhead collector lines would be longer, and numerous more poles (202 extra) would be required. Because of the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW, placing the line underground will not reduce impacts in any significant manner, as shown in Attachment D.3.1, Revised Visual Simulation with Sunrise 500 kV Line (February 2011)

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			<p>shorter when compared with proposed route. <u>However, the length of the overhead collector line system would increase by 7.7 miles necessitating 202 extra poles than the proposed project; thereby increasing the potential for environmental impacts.</u> Undergrounding of 138 kV from alternative substation site to <u>the rebuilt</u> Boulevard Substation would reduce project visual impacts, <u>but would also increase permanent impacts to cultural resources and biological resources compared to the proposed project due to open trenching required for the underground lines along the alignment. without substantially increasing impacts as terrain is not rugged.</u></p> <p><u>Additionally, because the O&M building and substation facility would not be centrally located, air pollution, dust, truck traffic, and fossil fuel use would all increase throughout operations.</u></p>	<p>Additionally, due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p> <p>The undergrounding of Transmission Line #2 would result in increased soil disturbance and increased permanent impacts to cultural resources as opposed to overhead lines due to open trenching required for the underground lines along the alignment. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified.</p> <p>The results of recent cultural resource surveys indicate that seven (7) sites known to have cultural resources would be permanently impacted as a result of open trenching associated with the undergrounding of Transmission Line #2. Of the seven sites that would be permanently impacted as a result of open trenching, one site is listed as a “Potentially Eligible Archaeological Site” under the National Historic Resource Preservation (NHRP) Assessment. Three of the remaining sites are classified as “Likely Ineligible Archeological Site”, and the remaining three are classified as “Uncertain Eligibility Archaeological Site.”</p>

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				<p>It is assumed that undergrounding the transmission line would also result in an increase in permanent impacts to biological resources that were previously classified as temporary impacts. If the overhead transmission line were constructed, the only areas of permanent impact were associated with the overhead poles. Consequently, undergrounding the transmission line would result in permanent impacts along the entire length of the transmission line corridor as opposed to just the pole locations. Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation.</p>
14.	Alternatives	C-22 Table C-1 (Row 2, Column 5)	<p><i>Conclusion</i></p> <p>Yes No. Would Does not meet project objectives, feasibility, and environmental screening criteria.</p>	<p>Please revise conclusion for the Tule Alternative Project Configuration 2 - Alternative 138 kV Transmission line Route 2 Underground and Collector Substation and O&M Facility. This alternative does not meet the feasibility or environmental screening criteria as noted in Comment #12 and 13 above.</p>
15.	Alternatives	C-22 Table C-1 (Row 3, Column 3)	<p><i>Feasibility Criteria</i></p> <p>Meets Does not meet feasibility criteria.</p>	<p>Since the environmental analysis began, a portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible. See Comment 3 above.</p>
16.	Alternatives	C-22 Table C-1 (Row 3, Column 4)	<p><i>Environmental Criteria</i></p> <p>Meets Does not meet environmental criteria. Does not have the Has potential to reduce visual impacts due to siting and reduced 138 kV ROW, because the 500 kV Sunrise transmission line currently under construction is in the adjacent and overlapping ROW. The alternative Alternative site for the O&M and substation facility co-located on Rough Acres Ranch is not</p>	<p>The analysis fails to recognize that if the 138 kV line is reduced, the overhead collector lines would be longer, and numerous more poles (202 extra) would be required.</p> <p>Because of the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW, placing the line underground will not reduce impacts in any significant manner,</p>

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			<p>available at this location; thereby limiting the feasibility of this location, facilities in more of a disturbed state as compared with proposed site and would reduce access requirements. The 138 kV route is 4.3 3.8 miles shorter when compared with proposed route. However, the length of the overhead collector line system would increase by 7.7 miles necessitating 202 extra poles than the proposed project; thereby increasing the potential for environmental impacts. Undergrounding of 138 kV from alternative substation site to Boulevard Substation would reduce project visual impacts, but would also increase permanent impacts to cultural resources and biological resources compared to the proposed project due to open trenching required for the underground lines along the alignment. without substantially increasing impacts because terrain is not rugged.</p> <p><u>Additionally, because the O&M building and substation facility would not be centrally located, air pollution, dust, truck traffic, and fossil fuel use would all increase throughout operations.</u></p>	<p>as shown in Attachment D.3.1, Revised Visual Simulation with Sunrise 500 kV Line (February 2011)</p> <p>Additionally, due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p> <p>The undergrounding of Transmission Line #3 would result in increased soil disturbance and increased permanent impacts to cultural resources as opposed to overhead lines due to open trenching required for the underground lines along the alignment. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. The results of recent cultural resource surveys indicate that ten (10) sites known to have cultural resources would be permanently impacted as a result of open trenching associated with the undergrounding of Transmission Line #3. Of the ten sites that would be permanently impacted as a result of open trenching, four sites are listed as a “Potentially Eligible Archaeological Sites” under the National Historic Resource Preservation (NHRP) Assessment, and six sites are classified as “Likely Ineligible Archeological Site.”</p>

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				It is assumed that undergrounding the transmission line would also result in an increase in permanent impacts to biological resources that were previously classified as temporary impacts. If the overhead transmission line were constructed, the only areas of permanent impact were associated with the overhead poles. Consequently, undergrounding the transmission line would result in permanent impacts along the entire length of the transmission line corridor as opposed to just the pole locations. Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation.
17.	Alternatives	C-22 Table C-1 (Row 3, Column 5)	<i>Conclusion</i> Yes No. Would Does not meet project objectives, feasibility, and environmental <u>screening</u> criteria.	Please revise conclusion for the Tule Alternative Project Configuration 3 - Alternative 138 kV transmission line Route 3 Underground and Collector Substation and O&M Facility. This alternative does not meet the feasibility or environmental screening criteria as noted in Comment #15 and 16 above.
18.	Alternatives	C-28	Tule Alternative Collector Substation and O&M Facility 3	Typo/correction to name to make consistent with map C-2.
19.	Alternatives	C-38 Table C-3 (Column 2, Rows, 1, 2, 5, 6 and 7)	<i>Proposed Tule Wind Project (Impact acreages)</i> <i>Wind Turbines</i> 0 acres temporary impacts/ 386.5 <u>369.3</u> acres permanent impacts <i>Overhead and Underground 34.5 kV Cable Collection System</i> 108.2 <u>127</u> acres temporary impacts/0.02 acre permanent impacts <i>Meteorological Towers <u>and SODAR/LIDAR unit</u></i> 0.048-064 acre temporary impacts 0.062-083 acre permanent impacts	Please update corrected analysis to reflect the Modified Project Layout.

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			<p><i>138 kV Transmission Line</i></p> <p>44.6-40.3 acres temporary impacts/0.12 <u>0.09</u> acre permanent impacts</p> <p><i>Access Roads</i></p> <p>84.2-83.5 acres temporary impacts/166.1-152.6 acres permanent impacts</p>	
20.	Alternatives	C-36 Table C-3 (Rows 2 and 6)	Please include a description of the length and number of poles associated with the collector line system and transmission line for each alternative as noted in the Draft EIR/EIS track changes revisions.	It is important to recognize that the temporary and permanent impacts (associated with the longer collector line system for Alternatives 2 through 4) would increase if the substation/O&M were located on Rough Acres Ranch.
21.	Alternatives	C-37	<p><i>Tule Alternative 1: Description (First paragraph)</i></p> <p>Under this alternative, the proposed Tule Wind Project would be the same as described in Section B of this EIR/EIS with the exception that the proposed O&M and collector substation facilities would be co-located on Rough Acres Ranch (T17S R7E Sec9), approximately 5 miles south of the originally proposed site (Figure C-2). Moving the O&M and collector substation facilities to this alternative location would result in an a substantial increase in the length of the 34.5 kV overhead collector lines <u>and number of collector line poles</u> to connect the wind turbines to the substation. <u>The overhead collector line system would increase by 7.7 miles from 9.4 9.3 miles (proposed) to 17 miles and would also necessitate the construction of 202 extra increase the amount of collector line poles from 250 (proposed) to 452 poles. However, the</u> The underground collector lines would decrease in distance <u>approximately 6.2 miles from 29.3 35.1 miles (proposed) to 28.9 miles.</u> <u>and the</u> The 138 kV transmission line would decrease in distance as a result of this alternative <u>by approximately 5.4 miles from 9.7 9.2 miles (proposed) to 3.8 miles and would decrease the amount of transmission line poles from 116 80</u></p>	Please revise language to reflect the changes to the number of poles and increased mileage of the overhead collector system as a result of utilizing the Alt #2 Transmission Line configuration.

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			poles (proposed) to 44 poles. Under this alternative, the 138 kV transmission line would run from the alternate collector substation approximately 1 mile east, south along McCain Valley Road, and then west along Old Highway 80 until connecting to the proposed Boulevard Substation Rebuild component of the ECO Substation Project. This alternative would increase the total land disturbance by 9.3 <u>49.3</u> acres, from 765.3 <u>725.3</u> acres (proposed) to 774.6 acres.	
22.	Alternatives	C-37	<p><i>Tule Alternative 1: Rationale for Full Analysis (Second paragraph)</i></p> <p>This alternative meets project objectives criteria, is considered feasible, and is consistent with the purpose and need set forth in Section A, and therefore is considered a reasonable alternative in this EIR/EIS. This project. However, this project alternative is not considered feasible and does not meet environmental screening criteria; and therefore is not considered a reasonable alternative in this EIR/EIS. also expected to meet environmental criteria. A portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E; and therefore, according to the screening criteria, this alternative location is no longer feasible. This project alternative is also not expected to meet environmental criteria because the increased length of the overhead collector line system would necessitate 202 extra poles to be constructed, resulting in increased land disturbances. It has This alternative would have a similar amount of the potential to reduce permanent impacts because the alternate site for the O&M and collector substation facilities on Rough Acres Ranch would be the same size requiring a similar area as is in more of a disturbed state than the proposed site, would have reduced access requirements, and This alternative has the potential to reduce visual impacts due to a reduced length of the 138 kV transmission line requirements</p>	<p>This Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p>The site where the alternate substation was proposed on Rough Acres Ranch, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.</p> <p>Additionally, due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p>

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			<p>(including an overall reduced ROW requirement); however would potentially increase air pollution, dust, truck traffic, and fossil fuel use throughout operations because the O&M building and substation facility would not be centrally located. Therefore, it has been selected for detailed analysis in this EIR/EIS.</p> <p>[Recommend eliminating this alternative from further consideration as a reasonable alternative in this Final EIR/EIS].</p>	
23.	Alternatives	C-38	<p><i>Alternative 2: Rationale for Full Analysis (third paragraph)</i></p> <p>This alternative meets project objectives criteria, is considered feasible, and is consistent with the purpose and need set forth in Section A. However, this alternative is not considered feasible and does not meet environmental screening criteria; and therefore is not considered a reasonable alternative in this EIR/EIS. A portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E; and therefore, according to the screening criteria, this alternative location is no longer feasible. This project alternative is also not expected to meet environmental criteria as a result of the increased length of the overhead collector line system that would necessitate 202 extra poles to be constructed. it has the potential to reduce Additionally, this alternative would have a greater amount of permanent impacts because under grounding of Transmission Line #2 would result in increased soil disturbance and increased permanent impacts to cultural resources and biological resources as opposed to overhead lines due to open trenching required for the underground lines along the alignment. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. The results of</p>	<p>This alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p>The site where the alternate substation was proposed on Rough Acres Ranch, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.</p> <p>The analysis fails to recognize that if the 138 kV line is reduced, the overhead collector lines would be longer, and numerous more poles (202 extra) would be required.</p> <p>The analysis also fails to recognize the increased potential for permanent impacts to cultural resources and biological resources as a result of undergrounding the Alternative #2 transmission line.</p>

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			<p>recent cultural resource surveys indicate that seven (7) sites known to have cultural resources would be permanently impacted as a result of open trenching associated with the undergrounding of Transmission Line #2. Of the seven (7) sites that would be permanently impacted as a result of open trenching, one site is listed as a “Potentially Eligible Archaeological Site” under the National Historic Resource Preservation (NHRP) Assessment. Three (3) of the remaining sites are classified as “Likely Ineligible Archeological Site,” and the remaining three are classified as “Uncertain Eligibility Archaeological Site.” Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation. the alternate site for the O&M and collocated substation facilities on Rough Acres Ranch is in more of a disturbed state than the proposed site, would have reduced access requirements, and This alternative would not has the potential to reduce visual impacts due to a reduced length of the 138 kV transmission line requirements (including an overall reduced ROW requirement), and would increase the amount of permanent impacts to cultural and biological resources. While (This alternative would increase short-term construction impacts, it also has the potential to would not reduce long-term visual and land use impacts because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW would be the predominant feature in the landscape. An increase in short-term construction impacts would also occur, as well as an increase in permanent impacts to cultural and biological resources and, therefore, has been selected for detailed analysis in this EIR/EIS.</p> <p><u>[Recommend eliminating this alternative from further consideration as a reasonable alternative in this Final EIR/EIS].</u></p>	

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24.	Alternatives	C-38	<p><i>Alternative 3: Description (Fourth and Fifth paragraph)</i></p> <p>...As a result of this alternative, the 138 kV transmission line would decrease in distance <u>by 3.8 miles from 9.7 9.2 miles</u> (proposed) to 5.4 miles. <u>However, the length of the overhead collector line system would increase in distance by 7.7 miles from 9.3 miles</u> (proposed) to 17 miles. Additionally, under this alternative, transmission line poles would decrease <u>by 20 poles from 46 80 poles</u> (proposed) to 60 poles, <u>but collector line poles would increase by 202 poles from 250 poles to 452 poles.</u></p> <p>This alternative would increase the total land disturbance by <u>14.7 54.7 acres</u>, from <u>765.3 725.3 acres</u> (proposed) to 780.0 acres.</p>	<p>This Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p>Tule Wind Alternative #3 would increase the length of overhead collector lines by 7.7 miles, but only reduces the length of the 138 kV transmission line by 3.8 miles (creating the highest total mileage of electrical lines of all proposed configurations). Please consider revising the language as shown.</p>
25.	Alternatives	C-39	<p><i>Tule Alternative 3: Rationale for Full Analysis (first paragraph)</i></p> <p>This alternative meets project objectives criteria, is considered feasible, and is consistent with the purpose and need set forth in Section A. However, this alternative is not considered feasible and does not meet environmental screening criteria; and therefore is <u>not</u> considered a reasonable alternative in this EIR/EIS. <u>A portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E; and therefore, according to the screening criteria, this alternative location is no longer feasible.</u> This project alternative is also <u>not</u> expected to meet environmental criteria <u>as a result of the increased length of the overhead collector line system that would necessitate 202 extra poles to be constructed. it has the potential to reduce This alternative would have a similar amount of permanent impacts because the alternate site for the O&M and collector substation facilities on Rough Acres Ranch would be the same size requiring a similar</u></p>	<p>This Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p>The site where the alternate substation was proposed on Rough Acres Ranch, and access thereto, has been leased to and occupied by SDG&E. According to the screening criteria, this alternative location is no longer feasible.</p> <p>The analysis fails to recognize that if the 138 kV line is reduced, the overhead collector lines would be longer, and numerous more poles (202 extra) would be required.</p> <p>Additionally, due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the</p>

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			<p>area as is in more of a disturbed state than the proposed site, would have reduced access requirements, and This alternative has the potential to reduce visual impacts due to a reduced length of the 138 kV transmission line requirements (including an overall reduced ROW requirement); however would potentially increase air pollution, dust, truck traffic, and fossil fuel use throughout operations because the O&M building and substation facility would not be centrally located. This alternative would also increase the amount of residences and businesses along Ribbonwood Road and Old Highway 80 to be subject to short-term construction impacts, and as a result of a longer collector line system, would result in increased temporary and permanent impacts associated with the construction of up to 202 extra collector line poles. Therefore, it has been selected for detailed analysis in this EIR/EIS.</p> <p><u>[Recommend eliminating this alternative from further consideration as a reasonable alternative in this Final EIR/EIS].</u></p>	<p>proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p>
26.	Alternatives	C-39	<p><i>Tule Alternative 4: Description (second paragraph)</i></p> <p>... described in Section C.4.2.34....</p>	<p>Corrects circular reference. It is assumed that C.4.2.3 is the intended reference.</p>
27.	Alternatives	C-39	<p><i>Tule Alternative 4: Rationale for Full Analysis (fourth paragraph)</i></p> <p>This alternative meets project objectives criteria, is considered feasible, and is consistent with the purpose and need set forth in Section A. However, <u>this alternative is not considered feasible and does not meet environmental screening criteria,</u> and therefore is not considered a reasonable alternative in this EIR/EIS. <u>A portion of the Rough Acres Ranch property where the alternate substation would be located, and access thereto, has been leased to and occupied by SDG&E; and therefore, according to the screening criteria, this alternative location is no longer feasible.</u> This project</p>	<p>This Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p>The analysis fails to recognize that if the 138 kV line is reduced, the overhead collector lines would be longer, and numerous more poles (202 extra) would be required.</p> <p>Because of the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW, placing the line underground</p>

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			<p>alternative is <u>not also</u> expected to meet environmental criteria; <u>it has the potential to reduce due to the increase in potential impacts as a result of the increased length of the overhead collector line system that would necessitate 202 extra poles to be constructed.</u> <u>Additionally, this alternative would have a greater amount of permanent impacts because under grounding of Transmission Line #3 would result in increased soil disturbance and increased permanent impacts to cultural and biological resources as opposed to overhead lines due to open trenching required for the underground lines along the alignment. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. The results of recent cultural resource surveys indicate that ten (10) sites known to have cultural resources would be permanently impacted as a result of open trenching associated with the under grounding of Transmission Line #3. Of the ten (10) sites that would be permanently impacted as a result of open trenching, four (4) sites are listed as a “Potentially Eligible Archaeological Sites” under the National Historic Resource Preservation (NHRP) Assessment, and six sites are classified as “Likely Ineligible Archeological Site.” Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation. the alternate site for the O&M and collocated substation facilities on Rough Acres Ranch is in more of a disturbed state than the proposed site, would have reduced access requirements, and has the potential to reduce impacts due to reduced 138 kV transmission line requirements (including an overall reduced ROW requirement). While t</u> This alternative would increase short-term construction impacts, <u>it has the potential to</u></p>	<p>will not reduce impacts in any significant manner, as shown in Attachment D.3.1, Revised Visual Simulation with Sunrise 500 kV Line (February 2011)</p> <p>Additionally, due to the construction of the northern portion of the Tule Wind Project (including the F-string of turbines), access to the proposed O&M/Substation site (on BLM land) would already be required; thereby providing access to the proposed O&M/Substation site (on BLM land). The proposed O&M/Substation site has adequate access off of McCain Valley Road.</p> <p>The area of temporary and permanent impact for both the O&M facility and the Substation would equate to the same acreage, regardless of the location selected.</p> <p>The undergrounding of Transmission Line #3 would result in increased soil disturbance and increased permanent impacts to cultural resources as opposed to overhead lines due to open trenching required for the underground lines along the alignment. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified.</p> <p>The results of recent cultural resource surveys indicate that ten (10) sites known to have cultural resources would be permanently impacted as a result of open trenching associated with the undergrounding of Transmission Line #3. Of the ten sites that would be permanently impacted as a result of open trenching, four sites are listed as a “Potentially Eligible Archaeological Sites” under the National Historic Resource Preservation</p>

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			<p>and would not reduce long-term visual and land use impacts because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW would be the predominant feature in the landscape. This alternative would also increase the potential for impacts resulting from a longer 34.5 overhead collector line system and 202 extra collector lines poles required for the overhead collector lines, as well as increase the amount of permanent impacts to cultural and biological resources and, therefore, has been selected for detailed analysis in this EIR/EIS.</p> <p><u>[Recommend eliminating this alternative from further consideration as a reasonable alternative in this Final EIR/EIS].</u></p>	<p>(NHRP) Assessment, and six sites are classified as “Likely Ineligible Archeological Site.”</p> <p>It is assumed that undergrounding the transmission line would also result in an increase in permanent impacts to biological resources that were previously classified as temporary impacts. If the overhead transmission line were constructed, the only areas of permanent impact were associated with the overhead poles. Consequently, undergrounding the transmission line would result in permanent impacts along the entire length of the transmission line corridor as opposed to just the pole locations. Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation.</p>
28.	Alternatives	C-40	<p><i>Tule Alternative 5: Reduction in Turbines</i></p> <p>... Under this alternative, 62⁶⁵ turbines would be removed including H1 through H5, I1 through I7, J1 through J8, J15; K1 through K6, K12; L1 through L11; M1 through M11 and M2; N1 and N2 through N8; P1 through P5; Q1 and Q2; and R7, R1 through R11, R10, and R13. Note that there are no turbines labeled J7, J12, K6, or K10.</p>	<p>Please update discussion to reflect the reduction of turbines per the Modified Project layout. As discussed in Attachment D.18.3, Tule Wind Alternative 5 would affect 65 turbines in the Modified Project Layout.</p>
29.	Alternatives	C-40	<p><i>Tule Alternative 5: Rationale for Full Analysis</i></p> <p>A reduction in turbines as proposed would meet project objectives criteria, is considered feasible, but would not meet project objectives criteria, or be <u>and is consistent with the purpose and need as set forth in Section A; therefore, this alternative is considered a reasonable alternative in this EIR/EIS. This alternative does not meet the key CEQA Project objective of creating 201 MW of wind energy because the elimination of the area where 62 of the turbines are proposed results in a loss of a minimum of approximately 52% to 56.9% of the</u></p>	<p>See Attachment D.18.3, , Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti, to Dr. Fisher and Mr. Thomsen (March 2011), which documents the Tule Wind Project’s ability to offset greenhouse gas emissions, criteria air pollutant emissions, and water use associated with fossil fuel-fired electricity generation, and the reduction in that capability that Alternative 5 would cause.</p> <p>On June 9, 2010, a meeting conducted with biologists from Tule Wind, LLC’s consultants</p>

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			<p>wind energy potential of the Tule Wind Project. (Iberdrola Renewables 2011). Tule Wind Alternative 5 would eliminate all of the ridge turbine locations, where the average wind speeds are higher, thereby disproportionately reducing the Tule Wind Project's ability to capture wind energy. It is not possible to simply install 3.0 MW turbines instead of 1.5 MW turbines in the same locations to generate more energy. A larger turbine in the remaining area of the Project cannot be used to replace the megawatts lost from the area eliminated because the larger turbines must be spaced further apart to meet manufacturers' spacing criteria. Due to this loss in wind energy potential, Tule Wind Alternative 5 also would reduce the Tule Wind Project's ability to offset greenhouse gas emissions, criteria air pollutant emissions, and water use associated with fossil fuel-fired electricity generation by a proportional amount. (Iberdrola Renewables 2011). This project alternative is also not expected to meet environmental screening criteria because it has the potential to reduce impacts to the BLM ACEC and golden eagles as <u>are not substantially lessened as compared with the proposed Tule Wind Project. Potential impacts to Areas of Critical Concern (ACEC) were not identified as a result of the proposed project; and therefore are not substantially lessened as a result of the Reduced Turbine Alternative. Potential impacts to golden eagles are not quantifiable; and therefore, there is no support that a reduced turbine alternative would substantially lessen that unquantifiable risk. Although increasing setbacks of project facilities would occur, as stated within the Draft EIR/EIS, potential impacts to golden eagles would remain regardless of the reduction in turbines as proposed by this alternative. From a CEQA perspective both alternatives still represent significant unmitigatable risk to eagles; and therefore this alternative does not meet environmental criteria. For these reasons, this alternative has been selected for detailed analysis in</u></p>	<p>(HDR) and the U.S. Fish and Wildlife Service (USFWS) concluded that the Tule Wind Project (as proposed), including the 11 turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (Turbines R-1 through R-10 and R-13), is located outside of critical habitat areas and will not have any detrimental impacts on sheep, and available evidence indicates that detrimental impacts to bighorn sheep are unlikely to occur. The Biological Assessment (August 2010) concluded that the project may affect, but is not likely to adversely affect Peninsular bighorn sheep. Furthermore, the portion of the project area located within an ACEC is on private land and thus not subject to ACEC restrictions and regulations set forth by the BLM.</p> <p>Tule Wind, LLC will maximize mitigation options to avoid, minimize, and mitigate potential impacts to the golden eagle through implementation of various measures, as deemed appropriate by the various agencies and/or Tule Wind, LLC. Alternative 5 does not necessarily reduce the risk of eagle mortality from collisions with turbines when compared with the Tule Wind Project. Rather, both alternatives exhibit a similar low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project. Alternative 5 is not necessary because similar to the proposed Tule Wind Project, the low risk of mortality due to collision with operating turbines by golden eagle resulting from the proposed project would be potentially significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10h. Specifically, BIO-10f includes requirements to construct the Tule Wind Project in two portions</p>

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			<p>this EIR/EIS.</p> <p><u>[Recommend eliminating this alternative from further consideration as a reasonable alternative in this Final EIR/EIS].</u></p>	<p>(phases). Construction of the first portion of the project would occur at those turbine locations deemed to present less risk to the eagle populations and would not include turbines on the northwest ridgeline. Construction of turbines in the second portion of the project will only be authorized following detailed behavioral telemetry studies and continued nest monitoring of known eagles in the vicinity of the Tule Wind Project (considered to be within approximately 10 miles of the project). Behavior studies will be used to determine eagle usage and forage areas, and authorization for construction at each turbine location in the second portion will be at the discretion of the BLM or the appropriate land management entity. The final criteria determining the risk each location presents to eagles will be determined by the BLM or the appropriate land management agency, in consultation with the required resource agencies, tribes and other relevant permitting entities and will be detailed in the Avian Protection Plan.</p> <p>Construction of the proposed project (per the Modified Project Layout) with implementation of the requirements of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without necessitating the elimination of turbines. Therefore, for the reasons stated above, the Reduced Turbine Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the Draft EIR/EIS. Further consideration of the proposed project (as modified) should be provided to meet the alternative screening criteria outlined within Section C.2 of the Draft EIR/EIS.</p>
30.	Alternatives	C-49	ECO Alternative Boulevard Substation Site (Rationale for Elimination)	General Comment: The alternative site for the SDG&E Boulevard Substation Rebuild is located on

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			<p>This alternative would transfer project impacts to the alternate site on public/BLM lands north of I-8 as opposed to the proposed project, which would expand an existing use on private lands. Reduction in impacts from reducing the length of the Tule 138 kV transmission line would be offset by increasing the length of the ECO Substation Project 138 kV transmission line component. This alternative may also require rearrangement of existing distribution system and/or upgrade of the existing Boulevard Substation to meet the local reliability criteria, which could result in additional impacts compared with the proposed rebuild of the existing Boulevard Substation. In addition, this alternative may conflict with management and conservation of natural resources as managed by BLM. Therefore, due to the potential need to rearrange portions of the existing distribution system and potential conflicts with the management and conservation of natural resources, the ECO Boulevard Substation Alternative was determined not to meet the alternatives screening criteria described in Section C.2 and was eliminated from further consideration as a reasonable alternative in this EIR/EIS.</p>	<p>BLM land in the general vicinity of the proposed Batch Plant south of Turbine G-18. The alternative site for the SDG&E Boulevard Substation Rebuild was eliminated from analysis in the Draft EIR/EIS. We recommend the CPUC and BLM consider and evaluate this alternative site in the Final EIR/EIS. This alternative would result in a shorter 138 kV transmission line associated with the Tule Wind Project; thereby reducing potential visual impacts and land disturbance impacts relative to biological and cultural resources.</p> <p>Utilizing this alternative site would not result in impacts to cultural resources. The nearest cultural site is SDI-20075 to the southwest of this location; however, this site is recommended as ineligible for listing on the National Register of Historic Places (NRHP). Implementing this alternative would result in impacts to four types of vegetation communities including: Open Coast Live Oak Woodland; Redshank Chaparral; Semi Desert Chaparral; and Upper Sonoran Subshrub Scrub, which are all common vegetation types in the general area. Rare plants to be potentially affected include payson's jewel flower, sticky geraea, and desert beauty. All habitat in this area is potential Quino Checkerspot Butterfly habitat. No impacts to jurisdictional waters would occur under this alternative.</p> <p>The impacts associated with construction of the SDG&E Boulevard Substation Rebuild at this location will not result in new or different impacts to biological resources or cultural resources that were disclosed in the Draft EIR/EIS. Mitigation measures identified in the Draft EIR/EIS for similar types of impacts to biological resources are applicable to this alternative site. Evaluation of this alternative site for the Boulevard Substation</p>

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				Rebuild will not result in new or substantially different impacts that require recirculation of the Draft EIR/EIS.
31.	Alternatives	C-59	The birds generally just do not see them coming.	<p>Birds have been shown to avoid wind parks and wind turbines, providing evidence they can see the wind turbines. For example, Whitfield (2009) estimate a collision avoidance rate of 99% or greater for golden eagles suggesting very high probability that eagles are able to see turbines and avoid collision. Based on studies of collision risk with wind turbines, empirical data collected suggest a high level of avoidance (Desholm and Kahlert 2005), Petersen et al. (2006), and Everaert, J. (2002).</p> <p>Sources of Information: Desholm, M. and J. Kahlert. 2005. Avian collision risk at an offshore wind farm. <i>Biology Letters</i> 1:296–298.</p> <p>Everaert, J. 2002. Wind turbines and birds in Flanders: Preliminary study results and recommendations. <i>Natuur. Oriolus</i> 69: 145-155.</p> <p>Kahlert, J., Petersen, I.K., Fox, A.D., Desholm, M. and Clausager, I. 2004a. Investigations of Birds During Construction and Operation of Nysted Offshore Wind Farm at Rodsand. Annual status report 2003. Report Commissioned by Energi E2 A/S 2004. Rønne, Denmark: National Environmental Research Institute.</p> <p>Petersen, I.B., T.K. Christensen, J. Kahlert, M. Desholm, and A.D. Fox. 2006. Final results of bird studies at the offshore wind farms at Nysted and Horns Rev, Denmark. National Environmental Research Institute, Denmark.</p> <p>Whitfield (2009). Collision Avoidance of Golden</p>

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				Eagles at Wind Farms under the 'Band' Collision Risk Model. Report to Scottish Natural Heritage. March 2009. Natural Research Ltd, Banchory, UK.
32.	Alternatives	C-59	... energy-producing capacity is less efficient than those ...	Capacity and efficiency are different measures. VAWT are less economic, and have less capacity per unit than modern horizontal axis turbines. VAWT also require guy wires.
33.	Alternatives	C-60-61	California's RPS requires retail sellers of electricity to increase their procurement of eligible renewable resources by at least 1% per year so that 20% of their retail sales are procured from eligible renewable energy resources by 2010. Executive Order S-3-05 (June 2005) identified greenhouse gas emission reduction targets for the state, providing the impetus for a potential expansion of the RPS program to include a goal of 33% renewable energy by 2020. <u>Executive Order 13514: Federal Leadership in Environmental, Energy and Economic Performance Executive Order 13514 was issued by President Obama on October 5, 2009, establishing requirements for sustainability in federal government and directing agencies to make greenhouse gas emission reductions a priority. This order establishes requirements for the management of federal facilities and vehicles, strategic planning, and integration of sustainability goals in agency missions.</u>	Please provide updated energy policy promulgated since 2005, including EO 13514.
34.	Alternatives	C-62	<i>First paragraph</i> ... There also exist a As yet undefined technical hurdles associated with high levels of PV development <u>exist</u> that ...	Please revise language as provided.
35.	Alternatives	C-62	<i>Last paragraph</i> Therefore, the distributed generation alternative was eliminated from further consideration as a viable alternative to the Proposed PROJECT because it would require substantial installations and would be prohibitively expensive. These installations would	Please change to reflect that the distributed generation alternative would endanger progress towards federal and state renewable energy goals. For instance, to meet a 33% by 2020 goal, the Renewable Energy Transmission Initiative (RETI) Phase IB Final Report Update has identified a shortfall RPS requirement in California of 59,710

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			<p>render this alternative’s ability to meet most of the project objectives infeasible from a technical and commercial perspective within the 2010–2020 time frame, <u>and therefore would endanger progress towards state and federal renewable energy goals</u>. Secondly, this alternative would not improve the reliability of power delivery to the communities of Boulevard, Jacumba, and surrounding communities.</p>	<p>gigawatt-hours (GWh) while the California Public Utility Commission’s 33% RPS Implementation Analysis has identified the shortfall to be 75,000 GWh. <i>See</i> RETI Phase 1B Final Report Update: Net Short Recalculation and New PV Assumptions with Revisions Adopted February 24, 2009, <i>available at</i> http://www.energy.ca.gov/reti/documents/phase1B/PHASE_1B_UPDATE_NET_SHORT_RECALC_ADOPTED_02-24-2009.PDF; 33% Renewables Portfolio Standard Implementation Analysis Preliminary Results at 7, <i>available at</i> http://www.cpuc.ca.gov/NR/rdonlyres/1865C207-FEB5-43CF-99EBA212B78467F6/0/33PercentRPSImplementationAnalysisInterimReport.pdf.</p> <p>In light of this large shortfall, the technical and commercial difficulties in developing the distributed generation needed to generate 201 MW of renewable energy (that would otherwise be produced by Tule Wind Project) may endanger progress towards California’s aggressive renewable energy goals.</p> <p>In addition, the no project alternative would hinder progress towards federal renewable energy goals. For instance, the Tule Wind Project would contribute towards the 10,000 MW of non-hydropower renewables on public lands by 2015 goal set in the Federal Energy Policy Act of 2005. <i>See also</i> Executive Orders 13212 and 13514.</p>
36.	Alternatives	C-64	<p>Under the No Project Alternative 1, the ECO Substation, Tule Wind, and ESJ Gen-Tie projects, as well as the Campo, Manzanita, and Jordan wind energy projects, would not be built, and the existing conditions at these sites would remain. The southeastern energy transmission system servicing the Boulevard, Jacumba, and other surrounding communities would remain unstable <u>and progress towards state and federal</u></p>	<p>GLOBAL CHANGE: Throughout document, please reference both state and federal renewable energy goals.</p> <p>Please also note that the Renewable Energy Transmission Initiative (RETI) Phase IB Final Report Update has identified a shortfall RPS requirement in California of 59,710 gigawatt-hours</p>

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			<p><u>renewable energy goals would be at risk.</u></p>	<p>(GWh) while the California Public Utility Commission's 33% RPS Implementation Analysis has identified the shortfall to be 75,000 GWh. <i>See</i> RETI Phase 1B Final Report Update: Net Short Recalculation and New PV Assumptions with Revisions Adopted February 24, 2009, <i>available at</i> http://www.energy.ca.gov/reti/documents/phase1B/PHASE_1B_UPDATE_NET_SHORT_RECALC_ADOPTED_02-24-2009.PDF; 33% Renewables Portfolio Standard Implementation Analysis Preliminary Results at 7, <i>available at</i> http://www.cpuc.ca.gov/NR/rdonlyres/1865C207-FEB5-43CF-99EBA212B78467F6/0/33PercentRPSImplementationAnalysisInterimReport.pdf. In light of this large shortfall, the up to 201 MW of new renewable energy that would be provided by the Tule Wind Project would be a critical contribution towards these goals. Adoption of the no project alternative would therefore endanger California's ability to meet its ambitious renewable energy goals.</p> <p>In addition, the no project alternative would hinder progress towards federal renewable energy goals. For instance, the Tule Wind Project would contribute towards the 10,000 MW of non-hydropower renewables on public lands by 2015 goal set in the Federal Energy Policy Act of 2005. <i>See also</i> Executive Orders 13212 and 13514.</p>

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D.1 Introduction to Environmental Analysis (Intro to EA)

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Intro to EA	D.1-4	<p><i>First paragraph</i></p> <p>... Moving the O&M and collector substation facilities to this alternative location would result in an <u>a substantial</u> increase in the length of the 34.5 kV overhead collector lines <u>and number of collector line poles</u> to connect the wind turbines to the substation. <u>The overhead collector line system would increase by 7.7 miles, from 9.3 miles (proposed) to 17 miles necessitating the construction of 202 extra collector line poles, an increase from 250 (proposed) to 452 poles.</u> However, the <u>The</u> underground collector lines would decrease in distance <u>approximately 6.2 miles</u> from 35.1 <u>28</u> miles (proposed) to 28.9 <u>27</u> miles, <u>and</u> the 138 kV transmission line would decrease in distance as a result of this alternative <u>by approximately 5.4 miles</u> from 9.2 <u>9.2</u> miles (proposed) to 4 <u>3.8</u> miles, and the number of transmission line poles would decrease from 426 <u>80</u> poles (proposed) to 4944 poles. Under this alternative the 138 kV gen-tie transmission line would run from the alternate collector substation approximately 1 mile east, south along McCain Valley Road, and then west along Old Highway 80 until connecting to the proposed Boulevard Substation rebuild component of the ECO Substation Project. This alternative would increase the land disturbance by 49.3 <u>42</u> acres, from 725.3 <u>712</u> acres (proposed) to 774.6 <u>724</u> acres.</p>	<p>Please update language to reflect corrected analysis per the Modified project Layout.</p> <p>Please revise language to reflect the changes to the number of poles and increased mileage of the overhead collector system associated with the Alt #2 and Alt #3 Transmission Line configurations. The modifications made to the text will clarify the tradeoff of impacts if an Alternate transmission line route is utilized.</p>

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			<p><i>Third paragraph</i></p> <p>...As a result of this alternative, the 138 kV gen-tie transmission line would decrease in distance <u>by 3.8 miles</u> from 9.2 miles (proposed) to 5.4 miles; <u>however, the length of the overhead collector line system would increase in distance by 7.7 miles from 9.3 miles (proposed) to 17 miles.</u> Additionally, under this alternative, transmission line poles would decrease <u>by 20 poles</u> from 426 80 poles (proposed) to 59 60 poles, <u>but collector line poles would increase by 202 poles from 250 poles to 452 poles.</u> This alternative would increase the land disturbance by <u>54.7</u> 46 acres, from <u>725.3</u> 742 acres (proposed) to <u>780</u> 728 acres.</p>	

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Section D.10: Public Health and Safety

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Public Health and Safety	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Public Health and Safety	D.10-7	<i>Fifth bulleted item</i> Rough Acres Ranch is located north of Interstate 8 (I-8) adjacent to McCain Valley Road and near the entrance to the McCain Valley National Cooperative Land and Wildlife Management Area.	Please consider striking sentence because it has no relevance to a contaminated site at or near the project area.
3.	Public Health and Safety	D.10-20	County of San Diego Draft General Plan Update – Safety Element The following goals and policies of the San Diego County Draft General Plan Update, Safety Element (County of San Diego 2010a), are associated with public health and safety and <u>are presented or informational purposes; however the following goals and policies are not applicable to the Proposed PROJECT because the Draft General Plan has not yet been adopted:</u>	Please consider clarifying the applicability of the Draft General Plan.
4.	Public Health and Safety	D.10-25, Table D.10-1		Although Table D.10-1 lists impact determinations for Impacts HAZ-7 and HAZ-8 under the Proposed Project, the text of the Draft EIR/EIR does not discuss those impacts under the Proposed Project (only under the Tule Project). Please consider adding a discussion to the text, to be consistent with the table.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
5.	Public Health and Safety	D.10-33	The proposed Tule Wind Project includes the construction and operation of up to 134 128 wind turbines, two <u>three</u> meteorological towers, a sonic detecting and ranging (SODAR) unit <u>or a light detecting and ranging (LIDAR) unit</u> , an operations and maintenance (O&M) facility... The project also includes the construction of access roadways, temporary staging areas for the construction of the wind turbines, and a temporary batch plant for construction activities.	Please consider revising to reflect the Modified Project Layout.
6.	Public Health and Safety	D.10-66 Second paragraph, fifth sentence	As a standard safety precaution, turbines would automatically shut down if <u>sustained winds or gusts exceed predetermined set points established by the turbine manufacturer to prevent equipment failure, as confirmed in the plan contained in MM HAZ-6.</u> sustained winds in the project area reach 50 miles per hour or gusts reach above 56 miles per hour.	Please revise this statement to reflect corrected analysis. Predetermined set points are established by the manufacturer (and vary slightly from manufacturer to manufacturer and from turbine model to model) and would be utilized for shutting down turbines due to windy conditions.
7.	Public Health and Safety	D.10-66	<p>MM HAZ-6 Prior to approval of final construction plans and as part of the Health and Safety Program for the project as described in Mitigation Measure HAZ-1b, the applicant shall establish a safety zone or setback for wind turbine generators from residenceses and occupied buildings, <u>public</u> roads, ROWs, transmission lines, and other public access areas sufficient to prevent accidents from the operation of wind turbine generators. A plan detailing the proposed setbacks and safety zone shall be submitted to the lead jurisdictional agencies (as described in the Mitigation Monitoring and Reporting Program) for review and approval <u>according to the following standards outlined in this mitigation measure</u> at least 30 days prior to construction <u>of any turbine foundation</u>. The plan shall include a graphic depicting each turbine and the associated buffer safety zone <u>as follows</u>:-</p> <ul style="list-style-type: none"> • <u>125% of turbine tip height from frequently traveled public roads</u> • <u>125% of turbine tip height from the edge of the existing transmission line easement</u> 	Please consider revising this mitigation measure. The Tule Wind Project has been designed to comply with, or in most circumstances, exceed this requirement, however, it should not be applied to the property lines of parcels owned by landowners that are participating in the project. Implementation would impose a hardship on the Ewiiapaayp Tribal lands because in certain locations the topography of its land only allows placement of certain turbines near the property line. The adjacent owner is the BLM. If the setback is deemed to apply to all parcel boundaries, it should be applied with discretion by the agency with jurisdiction over the particular turbine. Similarly, failure to provide a setback waiver would also harm private property owners leasing land for the Tule Wind Project. Private land owners with multiple parcels where topographic features require placement near the parcel boundary of a single owner, or adjacent to BLM land, would be precluded from lease revenues associated with several turbines.

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			<p><u>These setbacks shall not apply to lot or parcel boundaries if written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained, or the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of the EIR/EIS.</u></p>	
8.	Public Health and Safety	D.10-66-67	<p>The industry standard safety setback is 1.25 times the total height for wind turbines and 1.0 times the total height for towers that do not contain moving parts. The safety setback shall be measured from the center of the wind turbine or tower to the edge of the ROW or easement, or if no ROW or easement is established, to the line or structure in question. <u>Setbacks shall not apply to the ROW or easement, if the adjacent property owner is a participant in the wind project.</u> The applicant shall ensure that all towers and structures comply with appropriate safety zones and setbacks. The applicant or applicant's contractor shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to approved setbacks and safety zones.</p>	See previous comment.
9.	Public Health and Safety	D.10-67	<p>Operation of the Campo, Manzanita, and Jordan wind energy projects would also pose a potential risk for blade throw impacts. <u>How</u>ever, similar to the Tule Wind Project, applicants are expected to implement the latest in modern wind turbine technology to minimize these risks.</p>	Please revise for clarity.
10.	Public Health and Safety	D.10-106	<p>A <u>9.62</u>-mile-long, single-circuit, 138 kV transmission line carrying up to <u>2001</u> megawatts of power from the Tule Wind Project to Boulevard Substation (This 138 kV line would originate at a 34.5 kV/138 kV substation to carry power from a 34.5 kV overhead and underground collector system associated with the Tule Wind Project turbine generators.)</p>	Please update to reflect the Modified Project Layout.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
11.		D.10-109	A number of private residences and camps are located in the general vicinity of the Tule Wind Project, including residences within 1,000 feet of the proposed 138 kV transmission line. Mapping of receptors indicates <u>eleven</u> residences within 1,000 feet of the Tule Wind Project transmission line.	Please update to reflect the Modified Project Layout.
12.	Public Health and Safety	D.10-113 Third paragraph	<u>Attempts to reduce the length of the 138 kV transmission line do not provide a reduction in EMFs because longer collection system powerlines must be built, and those lines would create EMFs that would offset any reductions in the length of the 138 kV transmission line. EMFs from the 138 kV transmission line, but not the collector system, would be eliminated throughout the region designated for the transmission line in the Proposed Project, representing a reduction that is in proportion to the reduction of 138 kV transmission line length by 5 miles out of an original length of 19 miles.</u>	Please update the language to reflect corrected analysis.
13.		D.10-115	Route 3 has the same effects related to relocation of the 34.5/138 kV substation onto Rough Acres Ranch as described previously for Route 2. Placement of the 138 kV transmission line along an alternative route along Ribbonwood Road reduces line length by 4- <u>3.8</u> miles.	Please update to reflect the Modified Project Layout.
14.	Public Health and Safety	D.10-142	HAZ-6. Wind Turbine Safety Zone and Setbacks Prior to approval of final construction plans and as part of the Health and Safety Program for the project described in Mitigation Measure HAZ-1b, Pacific Wind Development-Tule Wind LLC , shall establish a safety zone or setback for wind turbine generators from residents <u>residences</u> and occupied buildings, <u>public</u> roads, ROWs, transmission lines, and other public access areas sufficient to prevent accidents from the operation of wind turbine generators. A plan detailing the proposed setbacks and safety zone shall be submitted to <u>the lead jurisdictional agencies (as described in MMRP) BLM, San Diego County, CSLC,</u>	Please revise Mitigation Measure HAZ-6 as suggested in Comment #7 above.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>BIA, and/or the Ewiiapaayp Band of Kumeyaay Indians, depending on the jurisdiction where the construction activities are completed, for review and approval according to the following standards outlined in this mitigation measure at least 30 days prior to construction of any turbine foundation. The plan shall include a graphic depicting each turbine and the associated buffer safety zone <u>as follows:</u></p> <ul style="list-style-type: none"> • <u>125% of turbine tip height from frequently traveled public roads</u> • <u>125% of turbine tip height from the edge of the existing transmission line easement</u> <p><u>These setbacks shall not apply to lot or parcel boundaries if written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained, or the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of the EIR/EIS.</u></p> <p>The industry standard safety setback is 1.25 times the total height for wind turbines and 1.0 times the total height for towers that do not contain moving parts. The safety setback shall be measured from the center of the wind turbine or tower to the edge of the ROW or easement, or if no ROW or easement is established, to the line or structure in question. <u>Setbacks shall not apply to the ROW or easement, if the adjacent property owner is a participant in the wind project.</u> The applicant shall ensure that all towers and structures comply with appropriate safety zones and setbacks. Pacific Wind Development-Tule Wind LLC, or its contractor shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to approved setbacks and safety zones.</p>	

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
15.	Public Health and Safety	D.10-145	Table D.10-13	Please consider adding APM TULE-PHS-5 and TULE-PHS-8 to the Project. These APMs were proposed by the Applicant but have not been addressed in the Draft EIR/EIS.

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.11: Air Quality

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Air Quality	D.11-6	<p>Ambient Air Quality</p> <p>The SDAPCD operates numerous air quality monitoring stations in western San Diego County. The monitoring station nearest to the Proposed PROJECT area is the Alpine monitoring station, located approximately 35 miles northwest of the ECO Substation and ESJ Gen-Tie Project areas and approximately 25 miles west of the Tule Wind Project area. <u>Ambient air quality data collected at the Alpine monitoring station are the most representative of the project site, because Alpine is located at higher altitudes than other monitoring stations within San Diego County, similar to the project. As the Alpine monitoring station does not measure CO or PM₁₀, data from the El Cajon-Redwood Avenue monitoring station and the Otay Mesa-Paseo International monitoring station provide estimates of background air quality data that are likely conservative. The El Centro monitoring station, which is located in Imperial County, is not considered representative of air quality in the project vicinity due to differences in terrain, climate conditions, and air emissions sources in the vicinity.</u></p>	Please consider adding this text to identify the monitoring stations in greater detail.
2.	Air Quality	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
3.	Air Quality	D.11-7 Table D.11-2	<p>National 48-Hour Ozone (Column 4) Alpine 2005 – 0<u>23</u> 2006 – 0<u>37</u> 2007 – 1<u>23</u> 2008 – 2 <u>31</u> 2009 – 0<u>22</u> El Cajon – 2006 – 0<u>4</u> 2007 – 0<u>3</u> 2008 – 0<u>5</u> 2009 – 0<u>2</u> Otay Mesa 2008 – 0<u>2</u></p> <p>Source: CARB 200911b</p>	Air Quality Standard Violations is inconsistent with what is presented in the AED. Please consider changing and updating with basin specific findings. Please update the violation numbers to reflect current data and the current source.
4.	Air Quality	D.11-7 Table D.11-1 (footnote)	¹ Source: CARB 200911a ² Source: CARB 200911b	Please update to reflect the correct year for the CARB.
5.	Air Quality	D.11-11 Table D.11-4	<p>Ozone (8-hour); Nonattainment (Subpart 1) (<u>moderate</u>)²</p> <p>². <u>The San Diego Air Basin is currently designated as a moderate nonattainment area for the federal 8-hour standard. The EPA is in the process of redesignating the air basin as a serious nonattainment area for the 8-hour ozone standard.</u></p>	Please update Table D.11-4 to reflect the correct nonattainment for federal 8-hour standard.
6.	Air Quality	D.11-14	<p><u>The SDAB was initially designated a “basic” nonattainment area for the federal 8-hour ozone standard; however, the EPA has redesignated the SDAB as a moderate nonattainment area. Because the SDAB did not attain the federal 8-hour ozone standard in 2009, the EPA is in the process of redesignating the SDAB as a serious nonattainment area. The SDAPCD has developed a plan to attain and maintain the NAAQS for O₃ in its Eight-Hour Ozone Attainment Plan for San Diego County (SDAPCD 2007b), which presents emission inventories, emission control measures, and an</u></p>	Please update language to reflect the federal 8-hour ozone standard.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			attainment demonstration conducted for the SDAB. <u>That plan will be updated as part of the redesignation of the air basin as a serious nonattainment area.</u> The SDAB is in attainment for the NAAQS for all other criteria pollutants. The SDAB is currently classified as a nonattainment area under the CAAQS for O ₃ , PM ₁₀ and PM _{2.5} ; however, no air quality plans are required for PM ₁₀ or PM _{2.5} under the California CAA.	
7.	Air Quality	D.11-15	Air Quality Management Plans, O₃. The Eight-Hour Ozone Attainment Plan for San Diego County indicates that local controls and state programs will allow the region to reach attainment of the federal 8-hour O ₃ standard by 2009 (SDAPCD 2007b). <u>Because the SDAB did not attain the federal 8-hour O₃ standard in 2009, the EPA is in the process of redesignating the SDAB as a serious nonattainment area. The redesignation will trigger the requirement for the SDAPCD to update the attainment plan. The SDAPCD is also responsible for implementing the Regional Air Quality Strategy (RAQS).</u> In this plan, SDAPCD relies on the RAQS to demonstrate how the region will comply with the federal state O ₃ standard. The RAQS details how the region will manage and reduce O ₃ precursors (NO _x and VOCs) by identifying measures and regulations intended to reduce these contaminants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and the EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS.	Please update language to reflect the federal 8-hour ozone standard.
8.	Air Quality	D.11-18	A conformity determination is required for each criteria pollutant or precursor where the total of direct and indirect emissions of the criteria pollutant or precursor in a federal nonattainment or maintenance area would equal or exceed specified annual emission rates, referred to as “de minimis” thresholds. For O ₃	Please update language to reflect this language.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>precursors and PM₁₀, the de minimis thresholds depend on the severity of the nonattainment classification; for other pollutants, the threshold is set at 100 tons per year.</p> <p>As indicated in Table D.11-4, the SDAB is <u>currently</u> designated as Subpart 1 <u>moderate</u> nonattainment for O₃. The SDAB is in attainment with all remaining NAAQS. The relevant de minimis thresholds for the SDAB are 100 tons per year for VOCs (O₃ precursor) and NO_x (O₃ precursor).</p>	
9.	Air Quality	D.11-24	The following measures shall be incorporated to reduce fugitive dust and other criteria pollutant emissions during construction <u>and decommissioning</u> activities:	Please update to include language regarding decommissioning.
10.	Air Quality	D.11-26 Paragraph 1	The project is anticipated to be constructed over the course of 18 to 24 months.	Please update language to reflect the correct construction period.
11.	Air Quality	D.11-26	<p>Table D.11-9 shows the expected emission rates for criteria pollutants. The maximum daily emissions are expected to occur during the underground utilities and tower work phase of the Tule Wind Project. The project will be constructed in three main phases. The first phase involves rough grading and tower base work. During this phase of construction, site disturbance activities will occur. It was assumed that the worker trips would be lower during this phase (assumed to be 50 percent of the maximum daily trips) and that truck trips would not be required to transport materials to the site. The second phase of construction involves underground utilities and tower work. During this phase of construction, utilities will be installed, and truck trips will be required. The final phase of construction involves tower construction and finish work. It was assumed that the workforce and truck trips would be at their average peak daily values during this phase.</p> <p>Table D.11-9 shows the expected emission rates for</p>	Please update to provide the correct project phasing for construction activities.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>criteria pollutants. The maximum daily emissions are expected to occur during the underground utilities and tower work phase of the Tule Wind Project. All activities and emissions listed in Table D.11-9 are conservatively assumed to occur concurrently. To account for fugitive dust control measures in the calculations, it was assumed that the active sites would be watered at least three times daily to comply with SDAPCD Rule 55.</p>	
12.	Air Quality	D.11-26 Table D.11-9	Estimated Daily construction Emission Sources are incorrect. Off-Road Equipment was not presented in AED air quality report.	Please update Table D.11-9 to with the correct breakdown of construction equipment construction emissions for the project.
13.	Air Quality	D.11-26-27	<p>As shown in Table D.11-9, the Tule Wind Project is expected to remain below the daily significance thresholds for criteria air pollutants for <u>VOC, CO, and SO_x, and PM_{2.5}</u>. However, construction-related emissions would exceed the VOC, NO_x and PM₁₀ and PM_{2.5} thresholds, and the Tule Wind Project would result in an adverse impact to air quality; therefore, mitigation has been provided. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce criteria pollutant emissions; however, the identified impact <u>for NO_x and PM₁₀</u> and cannot be mitigated <u>below a level of significance</u>. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	Please update the language to reflect the findings and determinations in Table D.11-9.
14.	Air Quality	D.11-27 Paragraph 2	<p><u>Sensitive receptors would be located as close as: 18 feet from roadway construction areas, 787 feet from underground utility construction, 705 feet from tower base construction, and 63 feet from 138 kV transmission line construction, and 318 feet away from batch plant operation.</u> Moreover, sensitive receptors are not generally located near the project site; the closest receptor to a component of the Tule Wind Project is approximately 0.19 mile from any active construction area. These receptors would be closest to the 138 kV overhead transmission line and therefore would not be exposed to significant construction activities, as the overhead line would be</p>	Please update language to reflect the distance to sensitive receptors. Impacts are measured on the basis of emissions rather than distance to receptors for criteria pollutant impacts.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>installed in a relatively short period of time. Accordingly, identified impacts would not be adverse. Under CEQA, impacts would be considered less than significant (Class III).</p>	
15.	Air Quality	D.11-27	<p>The expected lifespan of the Tule Wind Project is 30 years. Decommissioning activities would be expected to result in substantially lower equipment- and vehicle-related emissions due to more stringent engine and motor vehicle standards (e.g., all off-road diesel engines in 30 years will meet Tier 4 requirements at a minimum). Fugitive dust emissions; however, would likely be similar to those experienced during construction activities; therefore, they would result in a potentially significant impact. Prior to termination of the ROW authorization, a decommissioning plan would be developed and approved by BLM and San Diego County. The decommissioning plan would require similar dust control measures as described under Mitigation Measure AQ-1. The condition of the site and surrounding areas in 30 years is unknown; therefore, emissions associated with fugitive dust are unknown. However, since there is the potential for fugitive dust emissions to occur in excess of current thresholds, decommissioning activities would have the potential to result in an adverse impact. Under CEQA, unmitigated impacts would be significant. Implementation of Mitigation Measure AQ-1 would reduce this impact; however, the impacts cannot be mitigated to a level less than significant with mitigation under CEQA (Class II).</p>	<p>Please update language to reflect the fugitive dust emissions as a significant impact resulting from a Class I to a Class II significant impact.</p>
16.	Air Quality	D.11-30 First paragraph	<p><u>While it is possible that the three PROJECT components (ECO Substation, Tule Wind, and ESJ Gen-Tie) will not be developed simultaneously, it is possible that construction activities could overlap. For conservative purposes, it was assumed that the maximum activity could occur for all of the PROJECT components simultaneously.</u> Criteria pollutant emissions generated from the Proposed PROJECT are shown in Table D.11-11.</p>	<p>Please update language to clarify simultaneous construction work.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification															
17.	Air Quality	D.11-32 Table D.11-11	<p>Proposed Project Estimated Daily Construction Emissions</p> <p><i>Tule Wind Project (Row 2).</i> VOC - 16.9 80.7 NO_x - 257.3 548.4 CO - 169.4 405.7 SO_x - 0.4 6.4 PM₁₀ - 157.5 613.2 PM_{2.5} - 34.9 106.5</p> <p><i>Total Daily Emissions (Row 4)</i> VOC - 90.49 154.29 NO_x - 721.04 1,012.14 CO - 169.4 405.7 SO_x - 6.46 12.46 PM₁₀ - 550.48 1,006.18 PM_{2.5} - 109.97 481.57</p>	As discussed previously, this table overstates the expected project impacts by aggregating non-overlapping construction phases. If these activities occur simultaneously, they must be disclosed. Otherwise the project will be restricted from simultaneous construction. Please update table to reflect the corrected estimated daily construction emissions.															
18.	Air Quality	D.11-33 Table D.11-14	<p>Tule Wind Project Estimated Daily Operation and Maintenance Emissions Table</p> <table border="1"> <thead> <tr> <th>NO_x</th> <th>CO</th> <th>SO_x</th> </tr> </thead> <tbody> <tr> <td>0.51 45</td> <td>3.28 3</td> <td>0.01 0</td> </tr> <tr> <td>0.51 45</td> <td>3.28 3</td> <td>0.01 0</td> </tr> <tr> <td>250</td> <td>550</td> <td>250</td> </tr> <tr> <td>No</td> <td>No</td> <td>No</td> </tr> </tbody> </table>	NO _x	CO	SO _x	0.51 45	3.28 3	0.01 0	0.51 45	3.28 3	0.01 0	250	550	250	No	No	No	Please update the table to reflect the correct amount of daily operation and maintenance emissions. The project description includes 12 workers, and should be disclosed to the public.
NO _x	CO	SO _x																	
0.51 45	3.28 3	0.01 0																	
0.51 45	3.28 3	0.01 0																	
250	550	250																	
No	No	No																	
19.	Air Quality	D.11-33	<p>Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. <u>Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 200 MW of electricity.</u> Under</p>	Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional generation of 201 MW of electricity. Please consider changing the class impact to reflect this language.															

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification																					
			CEQA, impacts would be considered less than significant (Class III).																						
20.	Air Quality	D.11-35 Table D.11-15	Combined Project Estimated Daily Operations and Maintenance Emissions <table border="1" data-bbox="703 389 1241 613"> <thead> <tr> <th>NO_x</th> <th>CO</th> <th>SO_x</th> </tr> </thead> <tbody> <tr> <td>43.68</td> <td>110.65</td> <td>1.06</td> </tr> <tr> <td>0.51 0.45</td> <td>3.283</td> <td>0.010</td> </tr> <tr> <td>Negligible</td> <td>Negligible</td> <td>Negligible</td> </tr> <tr> <td>44.19</td> <td>113.9388</td> <td>1.076</td> </tr> <tr> <td>250</td> <td>550</td> <td>250</td> </tr> <tr> <td>No</td> <td>No</td> <td>No</td> </tr> </tbody> </table>	NO _x	CO	SO _x	43.68	110.65	1.06	0.51 0.45	3.283	0.010	Negligible	Negligible	Negligible	44.19	113.9388	1.076	250	550	250	No	No	No	Please update the table to reflect the correct amount of daily operation and maintenance emissions. The project description includes 12 workers, and should be disclosed to the public.
NO _x	CO	SO _x																							
43.68	110.65	1.06																							
0.51 0.45	3.283	0.010																							
Negligible	Negligible	Negligible																							
44.19	113.9388	1.076																							
250	550	250																							
No	No	No																							
21.	Air Quality	D.11-36 Table D.11-17	Estimated Annual Construction Emissions	Please see edits made to Table D.11-17 in Section D.11, Air Quality and update annual construction emission numbers to reflect the correct construction emissions. Please see updated construction emission numbers provided in Attachment D.11.1, Scientific Resources Associated. Air Quality Technical Memorandum (February 2011)																					
22.	Air Quality	D.11-39 44 Paragraph 4	Sensitive receptors would be located as close as: 18 feet from roadway construction areas, 787 feet from underground utility construction, 705 feet from tower base construction, 63 feet from 138 kV transmission line construction, and 318 feet away from batch plant operation.	Please update language to reflect the distance to sensitive receptors.																					
23.	Air Quality	D.11-51	Decommissioning activities would be expected to result in substantially lower equipment- and vehicle-related emissions due to more stringent off-road engine and motor vehicle standards (e.g., all off-road diesel engines in 30 years will meet Tier 4 standards at a minimum). Fugitive dust emissions would likely be similar to those experienced during construction activities. Fugitive dust emissions, however, would likely be similar to those experienced during construction activities; therefore, they would result in an adverse impact. Under CEQA, unmitigated impacts would be significant. Implementation of Mitigation Measure AQ-1 would reduce this impact;	Please update to change these significance criteria for this project alternative.																					

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>reduction in the amount of surface area that would be disturbed could reduce this impact to less than significant under CEQA (Class II). however, the impacts cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	
24.	Air Quality	D.11-51	<p><u>Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 201 MW of electricity. ; therefore</u> Impacts would be considered beneficial less than significant under CEQA (Class HIV).</p>	Please consider changing the impact determination to a Class IV impact for the reasons stated.
25.	Air Quality	D.11-53	<p><u>Fugitive dust emissions would likely be similar to those experienced during construction activities.</u> Fugitive dust emissions, however, would likely be similar to those experienced during construction activities; therefore, they would result in an adverse impact. Implementation of Mitigation Measure AQ-1 would reduce this impact; reduction in the amount of surface area that would be disturbed could reduce this impact to less than significant under CEQA (Class II). Under CEQA, unmitigated impacts would be significant. Implementation of Mitigation Measure AQ-1 would educe this impact; however the impacts cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant.</p>	Please update to change these significance criteria for this project alternative.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
26.	Air Quality	D.11-53	<p><u>Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 201 MW of electricity. Under CEQA, impacts would be considered beneficial less than significant (Class IVH).</u></p>	Please update to change these significance criteria for this project alternative.
27.	Air Quality	D.11-54	<p><u>Decommissioning activities would be expected to result in substantially lower equipment- and vehicle-related emissions due to more stringent off-road engine and motor vehicle standards (e.g., all off-road diesel engines in 30 years will meet Tier 4 standards at a minimum). Fugitive dust emissions, would likely be similar to those experienced during construction activities. Fugitive dust emissions, however, would likely be similar to those experienced during construction activities; therefore, they would result in an adverse impact. Implementation of Mitigation Measure AQ-1 would reduce this impact; reduction in the amount of surface area that would be disturbed could reduce this impact to less than significant under CEQA (Class II). Under CEQA, unmitigated impacts would be significant. Implementation of Mitigation Measure AQ-1 would reduce this impact; however, the impacts cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</u></p>	Please update to change these significance criteria for this project alternative.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
28.	Air Quality	D.11. 55	<u>Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 201 MW of electricity. Under CEQA, impacts would be considered beneficial less than significant (Class IVH).</u>	Please update to change these significance criteria for this project alternative.
29.	Air Quality	D.11-57	<u>Fugitive dust emissions, would likely be similar to those experienced during construction activities. Fugitive dust emissions, however, would likely be similar to those experienced during construction activities; therefore, they would result in an adverse impact. Implementation of Mitigation Measure AQ-1 would reduce this impact; reduction in the amount of surface area that would be disturbed could reduce this impact to less than significant under CEQA (Class II). Under CEQA, unmitigated impacts would be significant. Implementation of Mitigation Measure AQ-1 would reduce this impact; however, the impacts cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</u>	Please update to change these significance criteria for this project alternative.
30.	Air Quality	D.11-57	<u>Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. Clean, renewable energy</u>	Please update to change these significance criteria for this project alternative

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 201 MW of electricity. Under CEQA, operational impacts would be considered less than significant beneficial (Class IV III).	
31.	Air Quality	D.11-58	Decommissioning activities would be expected to result in substantially lower equipment- and vehicle-related emissions due to more stringent off-road engine and motor vehicle standards (e.g., all off-road diesel engines in 30 years will meet Tier 4 standards at a minimum). Fugitive dust emissions, however, would likely be similar to those experienced during construction activities; therefore, they would result in an adverse impact. Implementation of Mitigation Measure AQ-1 would reduce this impact; reduction in the amount of surface area that would be disturbed could reduce this impact to less than significant under CEQA (Class II).	Please update to change these significance criteria for this project alternative
32.	Air Quality	D.11-59	Additionally, wind turbines are considered a clean, renewable energy source and would not impact air quality standards by their operation. As such, pollutant emissions associated with operation of the Tule Wind Project would be negligible. Therefore, the project operations would not violate air quality standards or contribute substantially to an existing or projected air quality violation. Identified impacts would not be adverse. Clean, renewable energy sources have a beneficial impact (Class IV) and would actually result in negative emission numbers when compared with the conventional, fossil-fuel fired generation of 201 MW of electricity. Under CEQA, impacts would be considered less than significant beneficial (Class IVIII).	Please update to change these significance criteria for this project alternative
33.	Air Quality	D.11-68-71	Table D.11-21	Please consider applying APMs TULE-AIR-1 through TULE-AIR-15 to the Project. The Applicant proposed these measures, but they are not addressed in this section of the Draft EIR/EIS.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
34.	Air Quality	D.11-71 Table D.11-22 and discussion below D.11-72	TULE-AIR-1. The proposed mitigation measures for dust and exhaust emissions would not reduce the impacts to less than significant. While implementation of Mitigation Measures AQ-1 and AQ-2 would reduce criteria pollutant emissions, because the effectiveness of measures cannot be calculated, the identified impact cannot be mitigated. Despite modifications to project design that could reduce the construction schedule associated with the proposed Tule Wind Project, project alternatives are anticipated to result in similar air quality impacts associated with VOC , NO _x , and PM ₁₀ and PM_{2.5} emissions generated during construction activities and because the effectiveness of dust and exhaust emission reducing measures cannot be calculated, there is no feasible mitigation to reduce this anticipated impact to a level that is below a level of significance under CEQA.	Please update to reflect the pollutant emissions impacts due to the project.

Attachments

D.11.1 - Scientific Resources Associated. Air Quality Technical Memorandum (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.12: Water Resources

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Water Resources	D.12.1	<p><i>Third paragraph</i></p> <p>Baseline hydrologic conditions in the Proposed PROJECT area were obtained from a review of reference documents listed in Section D.12.8, including documents from the United States Geological Survey (USGS), California Department of Water Resources (DWR), State Water Resources Control Board (SWRCB), Colorado River Basin Regional Water Quality Control Board (RWQCB), and San Diego RWQCB. Other documents reviewed include Groundwater Resources, Tule Wind Project, East County San Diego (Geo-Logic Associates 2010); <u>Groundwater Investigation Report, Tule Wind Farm, East San Diego County (Geo-Logic Associates, December 2010); Modified Construction Water Supply Evaluation, Tule Wind Project, East San Diego County, California (Geo-Logic Associates, February 15, 2011); Tule Wind Project Preliminary Drainage Summary (HDR 2009a); Draft Tule Wind Project Major Use Permit Stormwater Management Plan, County of San Diego (HDR 2009b); Tule Wind Project Preliminary Drainage Report Tule Wind Project Stormwater Management Plan (HDR 2010a,); Tule Wind Project: Preliminary Drainage Report (HDR 2010b); <u>Tule Wind Project Stormwater Management Plan (HDR 2011); Tule Wind Project: Preliminary Drainage Report (HDR 2011); Hydrology Study ESJ Gen-Tie Line 230 kV and 500 kV Alternatives, San Diego County, California</u></u></p>	<p>GLOBAL COMMENT: Please include new studies references to reflect the Modified Project Layout.</p>

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			(Burns & McDonnell 2009); a groundwater supply options memorandum for the ESJ Gen-Tie Project (Bennett pers. comm. 2010); Major Stormwater Management Plan (SWMP) for the Construction Activities Associated with the Energia Sierra Juarez U.S. Transmission Gen-Tie Project (Burns & McDonnell 2010); as well as aerial photographs and topographic maps.	
2.	Water Resources	D.12-7	Update Figure D.12-1 with the provided GIS shape files	Please update Figure D-12-1 to reflect the Modified Project Layout.
3.	Water Resources	D.12.11	<p><i>Second Paragraph</i></p> <p>... Approximately one sixth of the project drains runoff to the west, ultimately discharging into the Pacific Ocean at the Tijuana Estuary (HDR 2010a2011). A northeastern ridgeline crosses the easterly draining portions of the Tule Wind Project, dividing Salton Sea bound flows southwest into Tule Creek and northeast into Carrizo Wash, Bow Willow Creek, and Canebrake Wash. Tule Creek drains the majority of the southern portion of the project site to the southeast into Tule Lake. Tule Lake drains into Carrizo Wash, and ultimately discharges into the Salton Sea (HDR 2010a2011).</p>	Please revise reference documents.
4.	Water Resources	D.12.11	<p><u>Implementation of the Tule Wind project would result in a significant reduction of water use by offsetting the annual water use requirements of older, less-efficient gas fired power plants that utilize water cooling. An assessment of SDG&E's Palomar Power Project, a gas-fired power plant was conducted by the California Energy Commission (CEC) in 2003, indicated that the power plant would consume approximately 3.6 million gallons per day (mgd) or approximately 2,500 gallons per minute (gpm) of reclaimed water. Given the Palomar Power Project is a 546 MW combined cycle power plant, this equates to an estimated 274.73 gallons per megawatt hour (gal/MWh). The Tule Wind Project, with a planned capacity of 201 MW, is estimated to</u></p>	Please consider including this information regarding the offset in water saving by energy produced by a clean renewable energy source.

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			<p><u>generate 543,120 MWh of energy annually. Using the figures provided as an example, the operation of the Tule Wind Project would offset annual water use of SDG&E's Palomar gas-fired power plant or similar plants by approximately 149,000,000 gallons.</u></p> <p><u>The electricity produced by the Tule Wind Project would result in the “backing down” of older less-efficient gas-fired power plants that utilize water cooling. The older less efficient plants would be backed down, or taken off line first, because of their higher variable cost as compared to the newer more efficient plants. Therefore, in the CA ISO system where power plants that do not operate efficiently are “backed down”, the wind energy from the Tule Wind Project would primarily displace generation from the older combined-cycle water-cooled gas-fired power plants, reducing overall water demand.</u></p>	
5.	Water Resources	D.12.22	<p>Construction and decommissioning of the Tule Wind Project would <u>be largely constructed on relatively gradual slopes with good ground cover; still, implementation of the Propose PROJECT could expose small areas of severely erodible soils on steep slopes due to ground surface disturbance, heavy equipment traffic, and alteration of surface runoff patterns.</u> Additionally, weathering of freshly exposed soils from trenching, foundation excavation, or access road construction can release various chemicals through oxidation and leaching processes. These activities can then affect the surface water and groundwater quality for down-gradient locations. The Tule Wind Project would directly impact a total of approximately 768 <u>725</u> acres (224 <u>222</u> temporary acres during construction only and 544 <u>513</u> acres of permanent impacts), which would result in adverse impacts on water quality on site and indirectly off site due to increased erosion and sedimentation.</p>	<p>A large portion of the project will be constructed on relatively gradual slopes with good ground cover and abundant large rock formations. It may be misleading to classify the whole project as being constructed on highly erodible steep slopes. Please consider revising the text accordingly.</p>

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6.	Water Resources	D.12-26	<p><i>Third paragraph</i></p> <p>Excavation activities could contaminate groundwater through accidental material spills. Groundwater in the Tule Wind project area occurs in shallow alluvium or at depth within fractures in the crystalline bedrock. Construction and decommissioning activities of the Tule Wind Project are expected to necessitate excavation to a depth of no more than 25 feet (<u>With the exception of rock anchor foundations, if needed in rocky areas which require anchor up to 50 feet</u>).</p>	Please consider revising to reflect the correct excavation depth required for turbine foundations.
7.	Water Resources	D.12-27	<p>“Impact HYD-4: The Project could <u>substantially deplete local ground water supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)</u>. <u>According to the County of San Diego’s Guidelines for Determining Significance and Report Format and Content Requirements – Groundwater Resources,</u> “<u>groundwater impacts will be considered significant if a soil moisture balance or equivalent analysis, conducted using a minimum 30 years of precipitation data including drought periods, concludes that at any given time groundwater in storage is reduced to a level of 50 percent or less as a result of groundwater extraction.</u>”</p>	To clarify the significance threshold utilized, please consider including the text from the significance question presented on pg. D.12-17.
8.	Water Resources	D.12-29	<p><u>A Groundwater Investigation Report (Geo-Logic, December 2010) and supplemental modified construction water supply evaluation (Geo-Logic, February 2011) were prepared for the Tule Wind project.</u> Construction of the Tule Wind Project is estimated to require approximately <u>17,512,000 19 million</u> gallons of water to support the water needs of the project for dust suppression and concrete mixing. <u>Turbine foundation construction is estimated to require 7,500 to 15,000 gallons of water per foundation,</u></p>	Subsequent to preparation of the Draft EIR/EIS by the CPUC, Tule Wind, LLC prepared a Groundwater Investigation Report (December 2010) and an updated with the Modified Construction Water Supply Evaluation Memo (Feb, 2011). Given the location of the groundwater wells proposed for use on land under the jurisdiction of the County of San Diego, the report is prepared to meet the requirements of the <i>County of San Diego Groundwater Ordinance No. 9826</i> , and the

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			<p><u>depending on the size of the wind turbine selected (larger turbines require more water for their foundations). Assuming construction of two foundations per day, water demand will be approximately 15,000 to 30,000 gpd. Up to 120,000 gallons per day (gpd) will be required over an approximate 72-day construction period for road construction. Dust suppression activities during turbine foundation construction (approximately 64 days) is estimated to require 100,000 gpd, and would reduce to 50,000 gpd for dust control on project roads for the subsequent 58 days during the period of turbine erection. Over a period of 72 days, maximum road watering and foundation construction would occur simultaneously, the project would require the use of up to 250235,000 gallons of water per day, requiring continuous pumping of 124 gallons per minute (24-hours per day, seven days per week) to support the water needs of the project for dust suppression and concrete mixing.</u></p> <p><u>The project is planning to obtain water from wells within the Thing Valley Water Production Area (WPA) on the Ewiiapaayp Reservation and the Rough Acres Ranch WPA. Two groundwater production wells are located within the Thing Valley WPA. Two wells (6 and 6a) are located within the Rough Acres Ranch WPA; however, seven wells surrounding the project area were evaluated during the groundwater investigation. Four of the wells are currently equipped with pumps and are actively used for municipal water supply or to provide water to livestock. The remaining three wells are either equipped with pumps and are not currently used or have not been equipped with pumps.</u></p> <p><u>Based on aquifer testing conducted as part of the groundwater investigation and well testing, Well No. 6 and No. 6a are capable of producing groundwater at 50 to 60 gpm each. The well test conducted on well No. 6a</u></p>	<p><i>County's Guidelines for Determining Significance and Report Format and Content Requirements – Groundwater Resources</i>, which stipulates that development and utilization of groundwater will not affect those who are dependent upon groundwater unless it can be demonstrated that there is an adequate supply to provide both the project and existing users. The report was also prepared based on the County approved <i>Groundwater Investigation Workplan and Well Test Plan</i> developed for the Tule Wind project.</p> <p>As identified in <i>Section 3.7, Conclusions</i> of the report, “The potential for depletion of groundwater in storage within the McCain Valley is not anticipated. Results of the groundwater demand during a drought period indicate that eight times the anticipated groundwater pumping would be required to draw groundwater to the 50% depletion level.”</p> <p>The CPUC should consider incorporating the analysis and conclusions of the Groundwater Investigation Report (December 2010) and findings contained within Attachment D.12.1, Modified Construction Water Supply Evaluation Memo into the Final EIR. Based on the conclusions of the report, the impact determination provided on <i>Page D.12-29</i> of the Draft EIR should be revised. The impact determination should be less than significant because groundwater resources in McCain Valley will not be depleted to a level less than 50% of available groundwater resources.</p>

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			<p><u>indicates a specific yield of 60 gpm. A-Major Use Permit for water extraction will be required for groundwater pumping at Well No. 6a or other wells located on land under the jurisdiction of the County of San Diego.</u></p> <p><u>There is no requirement for an MUP for groundwater extraction for use of the well on the Ewiiapaayp Reservation. Results of the testing indicate that the Reservation well can pump rate of 80 gallons per minute (gpm) is possible, but a reduced pumping rate is recommended. In addition, pumping from other reservation wells is possible to provide a supplemental water supply. The project has also received written confirmation from the Jacumba Community Service District (Lindenmeyer 2010) and Live Oak Springs Water Company (Najor 2010) of water supplies available to provide construction water to the project. However, based on the results of the Groundwater Investigation Report (Geo-Logic Associates, December 2010), water from these sources is not required to meet the 124 gpm pump rate.</u></p> <p><u>Based on the lower pumping rate of 50 gpm at Well No. 6a and an 80 gpm pumping rate at the one well tested on the Reservation, the required pumping rate of 124 gpm is achieved. Based on the results of the aquifer pumping test at Well No. 6a, the significance criteria for well interference and 50 percent depletion of groundwater in storage associated with project construction requirements will not be exceeded. Actually, at the gpm rates identified in the Groundwater Investigation Report, a gpm pumping rate of 130 is achieved, which exceeds the project's maximum daily water requirements during construction. Additionally, if the pumping rate at Well No.6a is doubled to 100 gpm, the project would exceed the required gpm pumping rate by 56 gpm/day. Also, it should be taken into consideration that additional wells on the</u></p>	

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			<p><u>Ewiiapaayp Reservation may be available for use.</u></p> <p><u>An agreement was reached between Tule Wind, LLC and SDRFPD for the provision and one-time fill of the four 10,000 gallon water tanks for fire fighting support to be placed throughout the project area prior to construction. The one-time demand of 40,000 gallons of water was not included in the Water Investigation Report, but addressed in the is included in this memorandum to account for the water usage (Geo-Logic, 2011). This one-time additional water need is not anticipated to impact the groundwater supply.</u></p> <p><u>The potential for depletion of groundwater in storage within the McCain Valley is not anticipated. Results of the groundwater demand during a drought period indicate that eight times the anticipated groundwater pumping proposed by the project would be required to draw groundwater to the 50 percent depletion level.</u> Implementation of Mitigation Measure HYD-3 would ensure that impacts to the local groundwater during construction would not be adverse because these measures would ensure verification that sufficient groundwater existed prior to use of the three wells and that groundwater availability would not be affected throughout project construction. Under CEQA, impacts would be significant but would be mitigated to a less-than-significant level (Class II).</p>	
9.	Water Resources	D.12.29	<p>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. <u>Based on the results of the aquifer pumping test at Well No. 6a, the significance criteria for well interference and 50 percent depletion of groundwater in storage associated with project</u></p>	Please consider revising to include the correct groundwater impacts due to the decommissioning phase of the project.

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			<p>construction requirements will not be exceeded. As state above, water demand associated with the decommissioning phase of the project are less than the construction phase; therefore, the significance criteria of <u>50 percent depletion of groundwater in storage would not be exceeded.</u></p>	
10.	Water Resources	D.12-31	<p>Construction of the Proposed PROJECT would require the use of up to <u>approximately 45</u> 50 million gallons of water during construction for dust suppression, grading, and concrete mixing.</p>	<p>Please consider revising total water needs for the Proposed PROJECT with the updated Tule Wind Modified Project Layout water needs.</p>
11.	Water Resources	D.12-35	<p>Construction of the Tule Wind Project O&M/Substation facility would be on a 10-acre site and would include concrete pads for the facility foundations and electrical transformers. Areas not covered by concrete pads, such as the parking area, would be surfaced with gravel to minimize changes in runoff and erosion. Concrete foundations for turbines and transmission towers would also be impervious surfaces that would alter existing drainage patterns that could potentially result in an increase in erosion and siltation. The turbines associated meteorological towers and sonic detecting and ranging (SODAR) unit, collector substation, and O&M facility combined would create approximately 44 <u>1.3</u> acres of impervious surface. The project would also include approximately 166 <u>513.3</u> acres of permanent impacts associated with access roads, staging area, and parking that would not be paved but would be maintained as semipermeable surfaces. Due to overall small impervious surface area created by the proposed Tule Wind Project, the existing drainage patterns would not be adversely affected (HDR 2010 <u>2011</u>). The Preliminary Drainage Report prepared for the Tule Wind Project was completed per the June 2003 San Diego County Hydrology Manual. Implementation of Mitigation Measure HYD-4, which provides further clarification and supersedes APMs TULE-HYD-1, TULE-HYD-2, TULE-HYD-3, and TULE-HYD-4, would ensure that any increased runoff and impacts due to drainage pattern alteration or increased erosion or</p>	<p>Impervious areas created by Project development are not as large as stated, and total permanent impacts are larger than stated. Please see the HDR Stormwater Management Plan, dated February 2011 and Preliminary Drainage Report, dated February 2011.</p>

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			siltation would not be adverse. Under CEQA, impacts would be significant but would be mitigated to level that is considered less than significant (Class II).	
12.	Water Resources	D.12-37	Trenches would be dug across these drainages during construction to install the collector transmission lines. Impacts to approximately 0.76 <u>1.13</u> acre (0.5475 acre temporary and 0.2238 acre permanent) of CDFG jurisdictional resources from installation of the transmission lines would be considered adverse without implementation of avoidance and mitigation measures.	Please update to reflect the impacts due to the Modified Project Layout.
13.	Water Resources	D.12-53	Impact HYD-5 Under this alternative, the project would not result in an increase in impervious areas. By moving the aboveground transmission lines underground, the project would result in a slightly reduced amount of impervious areas that would otherwise be associated with concrete pads used for the transmission towers. Trenching and recompacting soils along the transmission line where undergrounding would occur may slightly increase these soils' imperviousness <u>reduce infiltration rates for the soil</u> . However, with implementation of Mitigation Measure HYD-4, which would include measures such as re-tilling compacted soils and replanting with native vegetation, impacts associated with this alternative would be adverse but mitigated. Under CEQA, impacts would be less than significant with mitigation implemented (Class II).	Please update language to reflect corrected analysis.
14.	Water Resources	D.12-60	Under this alternative, the project would disturb a greater amount of land and would, therefore, require a larger volume of water to support construction activities, such as dust suppression and grading. <u>The applicant is planning to obtain water from two wells, one on Rough Acres Ranch (Well No. 6a), and the other on the Ewiiapaayp Reservation. As described in Section D.12.3.3 for the proposed Tule Wind Project, water used during construction is expected to be obtained by drilling for wells in the project vicinity.</u>	See justification for Comment 8, above.

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			<p>Water use would be temporary and is not expected to deplete the groundwater storage of the <u>Rough Acres Ranch Water Production Area, within McCain Valley and Jacumba Valley Groundwater Basin</u> aquifer (where recharge is estimated to be greater than usage). <u>Construction water usage associated with this alternative will be similar to the proposed project and based on the results of Groundwater Investigation Report (December 2010), there is adequate water from the two wells to meet the water demand. Also, similar to the proposed project, the potential for depletion of groundwater in storage within the McCain Valley is not anticipated. Results of the groundwater demand during a drought period indicate that eight times the anticipated groundwater pumping proposed by the project would be required to draw groundwater to the 50% depletion level.</u> Mitigation Measure HYD-3 would ensure that use of local groundwater during construction would not impact the production rates of groundwater wells within a 1-mile radius. Therefore, with mitigation, impacts associated with use of the local groundwater would not deplete local water supplies and would be less than significant. For this alternative, under CEQA, impacts would be significant and would be mitigated to a level that is considered less than significant (Class II).</p>	
15.	Water Resources	D.12.60-61	<p>Impact HYD-5: Under this alternative, the project would not result in an increase in impervious areas. By moving the aboveground transmission lines underground, the project would result in a slightly reduced amount of impervious areas that would otherwise be associated with concrete pads used for the transmission towers. Trenching and recompacting soils along the transmission line, where undergrounding would occur, may slightly increase these soils' imperviousness <u>reduce infiltration rates for the soil.</u> However, with implementation of Mitigation Measure HYD-4, which would include measures such as re-tilling compacted soils and replanting with native vegetation, impacts associated with this alternative</p>	<p>Please consider revising the statement of soil compaction adding imperviousness. Per San Diego County Hydrology Manual criteria, compacted soil above trenching does not require special consideration during runoff calculations.</p>

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			would be adverse but mitigated, and under CEQA would be less than significant with mitigation implemented (Class II).	
16.	Water Resources	D.12-66	<p>Under this alternative, the project would disturb a greater amount of land and would, therefore, require a larger volume of water to support construction activities, such as dust suppression and grading. <u>The project is planning to obtain water from two wells, one on Rough Acres Ranch (Well No. 6a), and the other on the Ewiiapaayp Reservation. As described in Section D.12.3.3 for the proposed Tule Wind Project, water used during construction is expected to be obtained by drilling for wells in the project vicinity.</u> Water use would be temporary and is not expected to deplete the groundwater storage of the <u>Rough Acres Ranch Water Production Area, within McCain Valley and Jacumba Valley Groundwater Basin aquifer (where recharge is estimated to be greater than usage). Construction water usage associated with this alternative will be similar to the proposed project and based on the results of Groundwater Investigation Report (December 2010), there is adequate water from the two wells to meet the water demand. Also, similar to the proposed project, the potential for depletion of groundwater in storage within the McCain Valley is not anticipated. Results of the groundwater demand during a drought period indicate that eight times the anticipated groundwater pumping proposed by the project would be required to draw groundwater to the 50% depletion level.</u> Mitigation Measure HYD-3 would ensure that use of local groundwater during construction would not impact the production rates of groundwater wells within a 1-mile radius. Therefore, with mitigation, impacts associated with use of the local groundwater would not deplete local water supplies and would be less than significant. For this alternative, under CEQA, impacts would be significant and would be mitigated to a level that is considered less than significant (Class II).</p>	See justification for Comment 8, above.

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17.	Water Resources	D.12-80 Table D.12-6	Mitigation Measures HYD-5, HYD-6, and HYD-7 are only applicable to Tule Alternative 2 and Tule Alternative 4.	Propose clarifying in Table D.12-6 that Mitigation Measures HYD-5, HYD-6, and HYD-7 are not applicable to the Proposed Project, and would only apply if either Tule Alternative 2 or Tule Alternative 4 was selected as the preferred project.
18.	Water Resources	D.12-85	Table D.12-6	Please consider applying APM TULE-HYD-5 to the project. This APM has been proposed by the Applicant but is not addressed in this section of the Draft EIR/EIS.
19.	Water Resources	D.12-89	<p>HYD-5: Implementation of creek-crossing procedures. <u>Where creek crossings can be completed during dry season, with no flows present in the creek, seasonally timed restorative open trenching will be completed. This procedure will use minimum trench widths. Trench cut material will not be placed outside of the creek bed and outside of 100-year inundated areas. Trench fill will be compacted and replaced to existing conditions, including matching existing creek bed gradations, and restoring vegetation. Open trenching restoration will be completed prior to any wet season flows, and will include anti erosion action plans for any unplanned rainfall during construction. The applicant shall obtain all required permits prior to completing open trenching through drainages. In any case, flows will be isolated from open trenching by best management practices mandated by the General Construction Permit. Areas of trenching would be restored and/or revegetated at completion of work.</u> Creek crossing shall use jack and bore procedures to avoid direct impacts and shall be conducted in a manner that does not result in sediment laden discharge or hazardous materials release to the water body. The following measures shall be implemented during horizontal boring (jack and bore) operations.</p> <p>(1) Site preparation shall begin no more than 10 days prior to initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages.</p> <p>(2) Trench and/or bore pit spoil shall be stored a</p>	Please consider incorporating the revised mitigation measure HYD-5 text to allow for open trenching at creek crossings where flows will either not be present during trenching and restoration of the channel, or can be routed around trenching activities using best management practices. As with all temporary impacts associated with the project, areas of trenching would be restored and/or revegetated at completion of work.

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			<p>minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention).</p> <p>(3) Portable pumps and stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10-gallon fuel or oil capacity should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times.</p> <p>(4) Immediately following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall be left in place until restoration is deemed successful.</p> <p>(5) The applicant shall obtain the required permits prior to conducting work associated with horizontal directional drilling activities drainage crossing. Required permits may include ACOE CWA Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. The applicant shall implement all pre- and post-construction conditions identified in the permits issued for the horizontal directional drilling. The plan shall be submitted to CPUC, BLM, and ACOE San Diego County, CSLC, BIA, and/or the Ewiiapaayp Band of Kumeyaay Indians depending on the jurisdiction where the construction activities are being completed, 60 days prior to construction.</p>	
20.	Water Resources	D.12-89	HYD-6: Horizontal Directional Drill Contingency Plan*.	Please add asterisk.
21.	Water Resources	D.12-90	HYD-7: Bury power line below 100-year scour depth*.	Please add asterisk.

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22.	Water Resources	D.12-93	*Note: Mitigation Measures HYD-5, HYD-6, and HYD-7 are only applicable to Tule Alternative 2 and Tule Alternative 4; these mitigation measures are not applicable to the proposed project.	Please see Comment 16.

Attachments

D.12.1 - Modified Construction Water Supply Evaluation Tule Wind Project (February 2011)

Technical Reports

GeoLogic Associates. Groundwater Investigation Report for the Tule Wind Farm (December 2010)

HDR Engineering, Inc. Tule Wind Project Draft Preliminary Drainage Report (February 2011)

HDR Engineering, Inc. Tule Wind Project Storm Water Management Plan (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
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Section D.13: Geology, Mineral Resources, and Soils

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1.	Geology, Mineral Resources, and Soils	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Geology, Mineral Resources, and Soils	D.13-3	Figure D.13-1 Geologic Hazards	Please update figure to reflect the Modified Project Layout.
3.	Geology, Mineral Resources, and Soils	D.13-5	Figure D.13-2 Soils Overview Map	Please update figure to reflect the Modified Project Layout.
4.	Geology, Mineral Resources, and Soils	D.13-12 Paragraph 2	Subsidence Identifies three mine tunnels and one mine shaft adjacent to turbines N7, N8, M-10, -M-11 , P4, and P5.	Please update to reflect the Modified Project Layout.
5.	Geology, Mineral Resources, and Soils	D.13-13	Figure D.13-3 Mineral Resources within Project Vicinity	Please update figure to reflect the Modified Project Layout. Mapping is unclear as to the exact location of the mines. AED identifies three mines adjacent to the project area. Please clarify the mine name and locations.
6.	Geology, Mineral Resources, and Soils	D.13-16 Paragraph 4	One potentially active fault located in the area of the Tule Wind Project is located near-between Turbines Q1 and Q2 <u>and the P turbine string</u> (Iberdrola 2010b).	GLOBAL COMMENT: Please update identified turbine numbers adjacent to identified fault to reflect the Modified Turbine Layout.
7.	Geology, Mineral Resources, and Soils	D.13-16 Paragraph 5	The County has identified loamy alluvial land as a hydric soil subject to liquefaction risk (County of San Diego 2007). As indicated in Figure D.13-2	Please consider updating to reflect the correct acreage of loamy alluvial land located within the project area.

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			(Soils Overview Map) and listed in Table D.13-2, approximately 66 31 acres of the Tule Wind Project site near Old Highway 80 is underlain by loamy alluvial land. If these soils were to become saturated, they would have liquefaction potential, <u>although the potential for available water is low.</u>	
8.	Geology, Mineral Resources, and Soils	D.13-17 Paragraph 1	There are two active tungsten ore mines located along the eastern Tule Wind Project site boundary, near proposed turbine sites N-7 M-10, N-8 M-11, and P-5 (Iberdrola 2010a). The Metal Mountain Mine is located adjacent to turbines N-7 M-10 and N-8 M-11, and the Buckthorn Deposit is located southwest of turbine P-5.	GLOBAL COMMENT: Please update turbine identification numbers based on the Modified Project Layout.
9.	Geology, Mineral Resources, and Soils	D.13-23 Paragraph 1	<p><u>Tule Wind, LLC does not propose APMs to reduce potential impacts related to geology and mineral resources.</u></p> <p>Pacific Wind Development proposed APMs TULE GEO-1 through TULE GEO-3 to reduce impacts related to geology and mineral resources. These APMs would require additional study to ensure proper foundations for the location of the proposed turbines, identification of soils and groundwater or springs in areas that contain loamy alluvial land and Mottsvill soil, and further geologic study to determine correct location and compatible soils for the placement of the operations and maintenance (O&M) septic tank, as described in Section B.4.4, Tule Wind Project Applicant Proposed Measures, of this EIR/EIS.</p>	Please remove reference to proposed APMs. Tule Wind, LLC did not propose any applicant proposed measures (project design features) for geology. APMs for geology are not listed in Section B Project Description.
10.	Geology, Mineral Resources, and Soils	D.13-30	MM GEO-4 Facilities inspections conducted following major seismic event: If large levels of ground shaking are experienced or a major earthquake occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer hired by the project applicant <u>the project applicant shall perform visual inspections shall perform at all facilities</u>	Please update mitigation measures as proposed.

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			inspections as quickly as possible. Careful examination shall be conducted of all project facilities. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised.	
11.	Geology, Mineral Resources, and Soils	D.13-31	One potentially active fault transects the project area near between turbines Q1 and Q2 <u>and the P turbine string</u> (Iberdrola 2010b).	Please update to reflect the modified layout.
12.	Geology, Mineral Resources, and Soils	D.13-32	However, the proposed 138 kV transmission line adjacent to Old Highway 80 is located on approximately 66 <u>31</u> acres of loamy alluvial land. Within this area, groundwater may occur in shallow alluvium at depth within fractures in the area's crystalline bedrock (Geo-Logic Associates 2010).	Please update to reflect the correct amount of alluvial acreage found within the project area.
13.	Geology, Mineral Resources, and Soils	D.13-32	Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (<u>Class II</u>).	Please update to reflect the significance classification.
14.	Geology, Mineral Resources, and Soils	D.13-33 Paragraph 3	One potentially active fault transects the project area near-between turbines Q1 and Q2 <u>and P turbine string P</u> (Iberdrola 2010b).	Please update to reflect the revised Modified Project Layout.
15.	Geology, Mineral Resources, and Soils	D.13-33 Paragraph 2	Impact GEO-4: Project would expose people or structures to potential substantial adverse effects as a result of landslides, earthflows, rockfall, and/or subsidence. The risk of landslides or rock slope failures is adverse. Three mine tunnels and one mine shaft have been identified adjacent to turbines N7, M-10, N8-M-11 , P4, and P5 along the southwest boundary of the project area.	Clarification needed on the additional mine tunnel and one mine shaft identified in ECOs, AED identified two mines adjacent to turbines M-5, M-10, and M-11.
16.	Geology, Mineral Resources, and Soils	D.13-33 Paragraph 3	The project proposes to utilize approximately 47 <u>19</u> million gallons of water during construction that may come from water wells in the project area (refer to Section D.12, Water Resources, of this	Please consider updating correct water usage required for the Tule Wind Project.

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			EIR/EIS). <u>Turbine foundation construction is estimated to require 7,500 to 15,000 gallons of water per foundation, depending on the size of the wind turbine selected (larger turbines require more water for their foundations). Assuming construction of two foundations per day, water demand will be approximately 15,000 to 30,000 gpd. Up to 120,000 gallons per day (gpd) will be required over an approximate 72-day construction period for road construction. Dust suppression activities during turbine foundation construction (approximately 64 days) is estimated to require 100,000 gpd, and would reduce to 50,000 gpd for dust control on project roads for the subsequent 58 days during the period of turbine erection.</u>	
17.	Geology, Mineral Resources, and Soils	D.13-33 Paragraph 1	The risk of landslides or rock slope failures is therefore adverse. Three mine tunnels and one mine shaft have been identified adjacent to turbines N7 M-10, N8 M-11 , P4, and P5 along the southwest boundary of the project area.	Please update language to reflect the Modified Project Layout.
18.	Geology, Mineral Resources, and Soils	D.13-36 & 56 Paragraph 1 & Paragraph 3, respectively	Mineral deposits have been found in the vicinity of the Tule Wind Project, and two active tungsten ore mines are located near proposed turbines N7 M-10, N8 M-11 , and P-5 (Iberdrola 2010a).	Please update to reflect this language.
19.	Geology, Mineral Resources, and Soils	D.13-47	This alternative would result in an increase in the length of the 34.5 kV overhead collector lines to connect the wind turbines to the substation, from 9.43 miles (proposed) to 17 miles, and would increase the amount of collector line poles from 250 to 452 poles. However, as a result of this alternative, the underground collector lines would decrease in distance from 29.3 <u>35.1</u> miles (proposed) to 28.9 miles, the 138 kV transmission line would decrease in distance from 9.7 <u>9.2</u> miles (proposed) to 3.8 miles, and the amount of transmission line poles would decrease from 446 <u>80</u> poles (proposed) to 44 poles.	GLOBAL COMMENT: Please update changes to proposed roadways as discussed in alternatives one through five.
20.	Geology, Mineral	D.13-50	The relocation of the collector substation and O&M	Please revise as suggested.

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	Resources, and Soils		facility to Rough Acres Ranch would result in a shorter proposed 138 kV transmission line route (approximately 5.4 miles vs. the proposed 9.27 miles) and a longer overhead cable collector system as described in Section C.4.2.4, Tule Alternative Gen-Tie Route 3 Underground with Collector Substation/O&M Facility on Rough Acres Ranch.	
21.	Geology, Mineral Resources, and Soils	D.13-51	As a result of this alternative, the 138 kV transmission line would decrease in distance from 9.7 9.2 miles (proposed) to 5.4 miles. Additionally, under this alternative, transmission line poles would decrease from 116 80 poles (proposed) to 60 poles. However, moving the O&M and collector substation facilities to this alternative location would result in an increase in the length of the 34.5 kV overhead collector lines that connect the wind turbines to the substation, from 9.4 9.3 miles (proposed) to 17 miles, and would increase the amount of collector line poles from 250 to 452 poles.	Please revise as suggested.
22.	Geology, Mineral Resources, and Soils	D.13-56	Impact GEO-5 ...Two active tungsten ore mines are located near proposed turbines N-7M-10, N-8M-11, and P5 (Iberdrola 2010a).	Please correct turbine references per the Modified Project Layout.
23.	Geology, Mineral Resources, and Soils	D.13-66	Location (Row 2) Along entire proposed project site a	Please revise to correct typo.
24.	Geology, Mineral Resources, and Soils	D.13-67	MM GEO-4: Facilities inspections conducted following major seismic event. If large levels of ground shaking are experienced or a major earthquake occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer hired by the applicant shall perform visual inspections at all facilities inspections as quickly as possible. Careful examination shall be conducted of all project	Please update to include project specific mitigation measure.

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			facilities. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised.	
25.	Geology, Mineral Resources, and Soils	D.13-70	<p>MM GEO-5</p> <p>Location: Results of geotechnical investigations are reviewed to ensure that recommendations are implemented during construction <u>All project components where structures are proposed.</u></p> <p>Monitoring/Reporting Action: BLM/ San Diego County/CSLC/BIA/Ewiiapaayp Band of Kumeyaay Indians <u>Results of geotechnical investigations are reviewed to ensure that recommendations are implemented during construction.</u></p>	Please revise to reflect corrections.

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Section D.14: Public Services and Utilities

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1.	Public Services and Utilities	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Public Services and Utilities	D.14-5	Figure D.14-2	Please update figure to reflect the Modified Project Layout.
3.	Public Services and Utilities	D.14-7	San Diego Local Agency Formation Commission (LAFCO) Community <u>County</u> Service Area No. 111.	Please revise language to reflect correct fire jurisdiction name. Service area 111 is a fire district area listed under the County of San Diego.
4.	Public Services and Utilities	D.14-14	County of San Diego Draft General Plan Update– Conservation and Open Space Element The following goals and policies identified in the Conservation and Open Space Element of the County of San Diego Draft General Plan Update would be <u>are presented for informational purposes; however the following goals and policies are not applicable to the Proposed PROJECT components under the jurisdiction of the County of San Diego (County of San Diego 2010b, Chapter 5) because the Draft General Plan has not yet been adopted:</u>	The project is consistent with these plans and polices, although the draft general plan has not been adopted to date; therefore, the project would not be required to adhere to these policies. Please consider revising to reflect this change.
5.	Public Services and Utilities	D.14-14 – D.14-15	County of San Diego Draft General Plan Update– Boulevard Subregional Planning Area Community Plan The following goal and policy of the County of San Diego Draft General Plan Update Boulevard Subregional Planning	Please consider clarifying the applicability of the Draft policies and regulations included within the Draft General Plan.

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			<p>Area Community Plan <u>are presented for informational purposes; however the following goals and policies are not would be applicable to the Proposed PROJECT</u> components located within the community of Boulevard and under County of San Diego land use jurisdiction <u>because the Draft General Plan has not yet been adopted:</u></p> <p>County of San Diego Draft General Plan Update–Part XX Mountain Empire Subregional Plan</p> <p>The following goal and policies of the Public Facilities and Services Element (Chapter 5) of the Mountain Empire Subregional Plan are <u>presented for informational purposes; however the following goals and policies are not applicable to the Proposed PROJECT components under County of San Diego land use jurisdiction (County of San Diego 2010d) because the Draft General Plan has not yet been adopted:</u></p>	
6.	Public Services and Utilities	D.14-17 Table D.14-3	<p><i>Public Services and Utilities Impacts</i></p> <p>Tule PSU-3</p> <p>Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed.</p> <p>Class II <u>III</u>.</p>	<p>Please change determination to a Class III.</p> <p>The Draft EIR/EIS states potential impacts during construction and mitigation to water resources. Mitigation Measure HYD-3 would mitigate impact regarding water availability. AED has provided groundwater study stating adequate water supply for the construction portion of the project. Impact determination should be listed as a Class III.</p>
7.	Public Services and Utilities	D.14-17 Table D.14-3	<p><i>Public Services and Utilities Impacts</i></p> <p>Tule PSU-4</p> <p>The applicable wastewater treatment provider that serves or may serve the project determines that adequate capacity to serve the project’s projected demand (in addition to the provider’s existing commitments) is not available.</p> <p>Class III <u>No Impact</u>.</p>	<p>The project will be serviced by septic for the O&M building. Wastewater will not be connected to sewer lines for wastewater treatment. No impact is identified. Please change determination to Class IV.</p>

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8.	Public Services and Utilities	D.14-20	Construction of the proposed 138 kV transmission line would occur in close proximity to existing residences adjacent to Old Highway 80. As identified in Section <u>D.8, Noise D.4, Land Use</u> , approximately six <u>eleven</u> residences would be located within 1,000 feet of <u>the transmission line construction buffer</u> on the line alignment , and rural residences in the area are typically provided electricity by individual service lines constructed off nearby distribution poles (existing distribution lines are located adjacent to McCain Valley Road and Old Highway 80).	Please update language to reflect corrected analysis per the Modified Project Layout and revised Noise Report.
9.	Public Services and Utilities	D.14-23 Paragraph 2	Fire protection services responding to a fire at a Tule Wind Project component under the land use jurisdiction of the County (the response-time goal established in the Existing General Plan would only be applicable to project components under County jurisdiction) would likely be responded to by either the Boulevard Volunteer Fire and Rescue Department, <u>San Diego Rural Fire District (Jacumba Fire Station)</u> or the CAL FIRE McCain Valley Camp Station.	The project area is identified to be located in both the County of San Diego Fire District and the San Diego County Rural Fire District. Please update to reflect this language.
10.	Public Services and Utilities	D.14-23 Paragraph 2	The northernmost segment of the 138 kV transmission line under County land use jurisdiction would be located approximately 4.5 <u>2.9</u> miles northeast of the Boulevard Volunteer Fire and Rescue Department (this distance was measured from Boulevard Volunteer Fire and Rescue Department to the termination of the paved portion of McCain Valley Road just south of the entrance to the McCain Valley National Cooperative Land and Wildlife Management Area and was measured along McCain Valley Road). Wind turbines R1 through R10 and R13 <u>R11</u> would be located approximately 7 miles northeast of the Boulevard Volunteer Fire and Rescue Department. The CAL FIRE McCain Valley Campo Station would be located considerably closer to project components (0.2 mile west of the nearest segment of the 138 kV transmission line and approximately 4 miles southwest of turbines R1 through R10 and R13 <u>R11</u>).	Distance measured to the entrance to the BLM lands is less than indicated, according to the Updated Fire Protection Plan. Please update numbers to reflect the correct mileage and components per the Modified Project Layout.

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11.	Public Services and Utilities	D.14-26 Paragraph 2	<p><u>It is assumed that turbine foundation construction is estimated to require 7,500 to 15,000 gallons of water per foundation, depending on the size of the wind turbine selected (larger turbines require more water for their foundations). Assuming construction of two foundations per day, water demand will be approximately 15,000 to 30,000 gpd. Up to 120,000 gallons per day (gpd) will be required over an approximate 72-day construction period for road construction. Dust suppression activities during turbine foundation construction (approximately 64 days) is estimated to require 100,000 gpd, and would reduce to 50,000 gpd for dust control on project roads for the subsequent 58 days during the period of turbine erection. In total, construction water demand is estimated to be approximately 17,512,000 19 million gallons, or 235,000 gallons per day. As discussed in Section D.12, Water Resources, Pacific Wind Development Tule Wind, LLC has indicated that it would obtain water from three existing wells on Rough Acres Ranch and would submit a Major Use Permit for water extraction with the County. Impacts and mitigation measures associated with the use of existing wells or the drilling of new wells to groundwater resources are discussed in Section D.12, Water Resources, of this EIR/EIS.</u></p> <p><u>As discussed in Section D.12, Water Resources, Pacific Wind Development Tule Wind, LLC has indicated that it would obtain water from three existing wells on Rough Acres Ranch and would submit a Major Use Permit for water extraction with the County. Impacts and mitigation measures associated with the use of existing wells or the drilling of new wells to groundwater resources are discussed in Section D.12, Water Resources, of this EIR/EIS. Groundwater source has been identified for construction of the Tule Wind Project in the Groundwater Investigation Report (Geo-Logic Dec. 2010). If groundwater is determined to be an inadequate water</u></p>	<p>According to the groundwater investigation conducted for the project (Geo-Logic Ass. Sept 2010, updated December 2010), adequate groundwater water supply has been identified for the construction portion of the project. Therefore, no mitigation is required for this impact. Please update estimated water usage throughout construction based on the Groundwater Investigation Report and Updated Water Memo. A recommendation to change the impact determination to Class III is also provided based on this information.</p> <p>Please see the Groundwater Investigation Report (December 2010) and Attachment D.12.1, Modified Construction Water Supply Evaluation (February 2011).</p>

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			<p>source for construction of the Tule Wind Project, then Pacific Wind Development would be required to provide written documentation from water districts indicating the total amount of water to be provided and the time frame that the water will be made available to the project (see Mitigation Measure HYD 3, Section D.12, Water Resources). Pacific Wind Development <u>In addition to the identified groundwater, Tule Wind LLC has received written confirmation from the Jacumba Community Service District (Lindenmeyer 2010c) and Live Oak Spring Water Company (Najor 2010) of water supplies available to provide construction water to the project. Therefore, with implementation of mitigation is not required. identified in Section D.12, Water Resources, and with water supplied from local water districts, the construction water requirements of the Tule Wind Project would be met. Identified impacts would be adverse and Mitigation Measure HYD 3 has been provided to mitigate this impact. Under CEQA, impacts would be considered less than significant but can be mitigated to a level that is considered less than significant (Class III).</u></p>	
12.	Public Services and Utilities	D.14-26 Paragraph 3	<p>A septic system would be installed at the O&M facility to be used by employees during operations. The septic system would be self-contained, and use of the system would be limited to O&M staff. This system would be self-contained, and would be serviced by a local septic service on an as-needed basis. Because use of the system would be limited, wastewater generated at the O&M facility would not be substantial such that a treatment provider would determine that they could not serve the project. Therefore, identified impacts would not be adverse, and under CEQA, impacts would be less than significant <u>no impact (Class III No Impact) is identified.</u></p>	<p>The project will be serviced by septic for the O&M building. Wastewater will not be connected to sewer lines for wastewater treatment. No impact is identified. Please change determination to Class IV.</p>
13.	Public Services and Utilities	D.14-40; Table D.14-5	<p>Tule-PSU-3 (Alternative 1) Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed. Class III</p>	<p>Please see Comment #11 above.</p>

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14.	Public Services and Utilities	D.14-40; Table D.14-5	Tule-PSU-3 (Alternative 2) Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed. Class III	Please see Comment #11 above.
15.	Public Services and Utilities	D.14-40; Table D.14-5	Tule-PSU-3 (Alternative 3) Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed. Class III	Please see Comment #11 above.
16.	Public Services and Utilities	D.14-41; Table D.14-5	Tule-PSU-3 (Alternative 4) Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed. Class III	Please see Comment #11 above.
17.	Public Services and Utilities	D.14-41; Table D.14-5	Tule-PSU-3 (Alternative 5) Sufficient water supplies are not available to serve the project from existing entitlements, and resources and new or expanded entitlements would be needed. Class III	Please see Comment #11 above.
18.	Public Services and Utilities	D.14- 43,45,48,50, and 53	Impact PSU-3 Therefore, approximately 17,512,000 <u>19 million</u> gallons (46 to 55 acre-feet) of water would be required during construction, and approximately 2,500 gallons per day (2.8 acre-foot-year) would be required during operations at the O&M facility (water would also be required for insulator washing on transmission line structures). <u>Groundwater sources have been identified for the construction of the Tule Wind Project in the Groundwater Investigation (Geo-Logic Dec 2010) and are deemed to be adequate.</u> Since similar volumes of water would be required for construction and operations, overall PSU-3 impacts under this alternative would be similar to those previously identified in Section D.14.3.3 for the proposed Tule Wind Project. Identified impacts would not be adverse, and, therefore, no mitigation is required. Mitigation Measure HYD-3 (see Section D.12, Water Resources) has been provided to mitigate this impact. Under CEQA, impacts	To be updated pending information from the water consultant. Please change determination to a Class III. The Draft EIR/EIS states potential impacts during construction and mitigation to water resources. Mitigation Measure HYD-3 would mitigate impact regarding water availability. AED has provided groundwater study stating adequate water supply for the construction portion of the project. Impact determination should be listed as a Class III.

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			would be considered less than significant but can be mitigated to a level that is considered less than significant (Class II <u>III</u>).	
19.	Public Services and Utilities	D.14-67; References	Geo-Logic. December 2010. Groundwater Investigation Report. Geo-Logic. February 2010. Modified Construction Water Supply Evaluation.	Please add these references.

Attachments

D.12.1 - Modified Construction Water Supply Evaluation Tule Wind Project (February 2011)

Technical Reports

Geo-Logic Associates Groundwater Investigation Report for the Tule Wind Farm (December 2010)

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Section D.15: Fire and Fuels Management

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1.	Fire and Fuels Management		<p>Subsequent to submittal of the September 2010 Fire Protection Plan (FPP) to the CPUC, based on comments from the fire agencies, Tule Wind, LLC revised its FPP to identify a substantial number of project design features (PDFs) that reduced the potential for fire ignition and mitigation measures that reduce the potential for fire ignition associated with the project to cause a wildland fire. The revised FPP was approved by the San Diego Rural Fire District (SDRFPD) Board of Directors on November 2, 2010. The SDRFPD also issued an approval letter for the FPP (See Attachment D.15.1, San Diego Rural Fire Protection District Approval Letter).</p> <p>In addition, Tule Wind, LLC recently submitted a Fire Protection Plan for the San Diego County Fire Authority (SDCFA), which was accepted on February 28, 2011(Attachment D.15.2, San Diego County Fire Authority Acceptance Letter).</p> <p>Mitigation measures provided in this EIR/EIS which have been accepted by SDCFA have been incorporated into the revised Tule Wind, LLC FPP, February 2011 (Attachment D.15.3, Tule Wind Fire Protection Plan). Mitigation Measures proposed in the SDCFA-approved FPP have been presented as mitigation to reduce significance criteria for the Tule Wind Project. The Tule Wind Project will comply with the mitigation measures incorporated into the Final EIR/EIS, as well as any extra mitigation measures specified in is approved Fire Protection Plans with SDRFPD and SDCFA, however, to the extent that any mitigation measures conflict, the Tule Wind Project will comply with and implement the mitigation measure(s) found in the Final EIR/EIS.</p> <p>Tule Wind, LLC requests that the CPUC update the Fire and Fuels Management section to reflect the content, analysis, and conclusions presented in its SDCFA-approved FPP (February 2011) (Attachment D.15.2). For your convenience, the Tule Win,d LLC project team has revised the Draft EIR/EIS Fire and Fuels Management section to reflect the content, analysis, and conclusions of the SDCFA-accepted FPP.</p>	
2.	Fire and Fuels Management	D.15-1	<ul style="list-style-type: none"> • <u>Iberdrola Renewables (Tule Wind, LLC) Fire Protection Plan for the Tule Wind Project (November 2010). Submitted to the San Diego Rural Fire Protection District, approved November 3, 2010.</u> 	Please update list to include an additional bulleted item that reflects the updated Fire Protection Plan for the Tule Wind Project.

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			Additional information was provided by the Pacific Wind Development Tule Wind Project Environmental Document (Iberdrola Resources, Inc. 2010a) and from Energia Sierra Juarez U.S. Transmission, LLC's, Major Use Permit Package and Initial Study (March 2010), including its Fire Protection Plan (Hunt Research Corporation 2009).	
3.	Fire and Fuels Management	D.15-3 Figure D.15-1	Please update Figure D.15-1 to reflect the Modified Project Layout, in addition to the following figure changes: <ul style="list-style-type: none"> • A definition in the legend to describe numbering along the transmission line routes. • Make the Substation and O&M facility a contrasting color so it is visible on the map. 	Please update figure to reflect these proposed changes and to reflect the Modified Project Layout. Please also consider adding a notation to the legend to explain the significance of the numbers along the transmission line routes.
4.	Fire and Fuels Management	D.15-6	Between these agencies, there are significant firefighting resources to serve the area's wildfire potential, especially with CAL FIRE's and USFS air attack capabilities that can reach the area within 20 minutes.	Please update to reflect the United States Forest Service as an additional fire agency in the area.
5.	Fire and Fuels Management	D.15-6	The Proposed PROJECT occurs in varying classification areas, but generally occurs within areas ranked high, very high, or extreme (CAL FIRE 200510).	Please update to reflect the correct reference.
6.	Fire and Fuels Management	D.15-7	Supporting this conclusion is CAL FIRE's Fire Threat ranking, which indicates the level of fire threat based on the potential fire behavior (fuel rank) and expected fire frequency (fire rotation). Fire Threat classifications vary over the project extent and include rankings of high, very high, or extreme (CAL FIRE 20057a).	Please update to reflect the correct reference.
7.	Fire and Fuels Management	D.15-7	Consider adding a Table similar to Table 5, at pg. 42, from the San Diego Rural Fire Protection District (SDRFPD) approved Fire Protection Plan, dated	Table 5 documents and supports the Draft EIR/EIS's statement that, "These agencies include significant firefighting resources to serve the area's wildfire

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			November 3, 2010, which describes the fire suppression resources available to respond to the area.	potential, especially with the combined CAL FIRE and USFS air attack capabilities that can reach the area within 20 minutes or less.”
8.	Fire and Fuels Management	D.15-9	Fires Caused by Potential Ignition Sources From Equipment Use Equipment that may cause a fire hazard includes:	Use of equipment types listed will not necessarily result in a fire. Please consider revising the text accordingly.
9.	Fire and Fuels Management	D.15-9	Compost-Debris piles—large piles that are allowed to dry and are left on-site for extended periods may pose a risk of ignition result in combustion and potential for embers landing in adjacent vegetation	Composting is not anticipated as part of the Proposed Project. Please consider removing.
10.	Fire and Fuels Management	D.15-9	<ul style="list-style-type: none"> Transformers—in turbines with a down-tower transformer design, where the transformer is pad-mounted outside the turbine housing, the transformer is at the base of each tower and filled with flammable oils and are is subject to occasional failure and explosion, sending sparks, hot materials out in all directions. <u>Transformers are constructed with a metal containment housing. Transformer failure would only create a risk of ignition if the explosion breaches the metal containment housing of the transformer and ignitable vegetation is within range.</u> Capacitors—may overheat, fail, and cause a spark, which may result in combustion of flammable materials, such as vegetation, if nearby. <u>Capacitors are normally contained within a substation that separates them from flammable materials.</u> 	<p>Please consider adding additional information about the fire risk posed by transformers and capacitors, which are constructed with containment.</p> <p>See Figure B-24, pg. B-101, which shows that the maximum hub height for the nacelle is between 201 and 328 feet.</p>
11.	Fire and Fuels Management	D.15-9 – D.15-10	<ul style="list-style-type: none"> Wind turbines—include various components inside the nacelle as well as transformers that may ignite and cause heated or flaming debris/embers from as high as 400<u>328</u> feet above ground <u>Use of chemicals such as lubricating oils and cleaners for wind turbines</u> 	Please consider adding additional information about the fire risk posed by transformers and capacitors, which are constructed with containment.

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			<ul style="list-style-type: none"> Vehicles–heated exhausts in contact with vegetation may result in ignition <u>Lightning strikes to wind turbines</u> 	
12.	Fire and Fuels Management	D.15-10	Potential Ignition Sources From Fires Caused by Power Lines	Use of equipment types listed will not necessarily result in a fire. Please consider revising the text accordingly.
13.	Fire and Fuels Management	D.15-11	voltage line, and, on average, annual low-voltage and high-voltage line ignitions, on a per-mile basis, are similar within SDG&E’s territory. <u>Per CPUC GO 95 “Rules For Overhead Electric Line Construction” and the current edition of the NESC, the Proposed Project is required to ensure sufficient clearance between conductors and vegetation to prevent contact.</u>	CPUC GO 95 is a requirement. Please consider including it and revising the text according.
14.	Fire and Fuels Management	D.15-13	<p>Potential Ignition Sources From Fires Caused by Wind Turbines</p> <p><u>Tule Wind, LLC independently analyzed data from the California State Fire Marshal’s Office, and was only able to identify four (4) confirmed wind turbine-related fire incidents in the period between January 1, 2008 and Fall 2010 – a rate of approximately 1.3 turbine fires per year. To place this number in context, the California Wind Energy Association calculates that there are approximately 11,000 wind turbines currently in operation in California. See http://www.calwea.org/bigPicture.html. However, most modern turbines are equipped with lightning arresters and automatic fire detection and suppression systems (CPUC and BLM 2007a). Fire suppression systems installed in the wind turbine nacelle are in the early adoption phase, and are not widely utilized in the wind industry. (RC Biological, Inc. 2010.</u></p>	<p>See Attachment D.15.4, Letter from Harley McDonald to James Pine, dated October 25, 2010. pgs. 6-7.</p> <p>The wind industry is at the nascent stages of adopting fire suppression technology in the wind turbine nacelle. See the SDCFA-approved Fire Protection Plan (Attachment D.15.3).</p>
15.	Fire and Fuels Management	D.15-13	<p>Potential Ignition Sources From Fires Caused By Transformers.</p> <p>Transformers located at the base of each wind turbine tower may cause fires through arcing that</p>	Use of equipment types listed will not necessarily result in a fire. Please consider revising the text accordingly.

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			occurs following failure of insulation within the transformer. <u>Transformers are constructed with a metal containment housing.</u> Industry statistics indicate that one in five transformer failures result in a fire (USDI 2005). The extremely hot arc may cause oils to combust, metals to be vaporized, and molten copper to be thrown into the air (USDI 2005). Explosions sometimes occur from the vaporization of mineral oils and release of carbon monoxide.	
16.	Fire and Fuels Management	D.15-18 D. 15-6	Consider adding a Table similar to Table 5, at pg. 42, from the San Diego Rural Fire Protection District (SDRFPD)-approved Fire Protection Plan, dated November 3, 2010, which describes the fire suppression resources available to respond to the area. “Between these agencies, there are significant firefighting resources to serve the area’s wildfire potential, especially with CAL FIRE’s and USFS’ air attack capabilities that can reach the area within 20 minutes.”	Table 5 documents and supports the Draft EIR/EIS’s statement that, “Between these agencies, there are significant firefighting resources to serve the area’s wildfire potential, especially with CAL FIRE’s air attack capabilities that can reach the area within 20 minutes.” Add USFS air attack capabilities for consistency with statement at pg. D.15-7.
17.	Fire and Fuels Management	D.15-18	<u>California Department of Forestry and Fire Protection-Whitestar Unit</u> <u>In addition, to the San Diego Unit, the Whitestar (Campo) Unit is located 1684 Tierra Del Sol Road, Boulevard. This unit has the following equipment and personnel available:</u> <ul style="list-style-type: none"> • <u>Five engines</u> • <u>One bulldozer</u> • <u>Two air tankers</u> • <u>Two helicopters</u> • <u>Staff: Four firefighters, one battalion chief, two hand crews.</u> 	Please update with current staffing for the CALFIRE Whitestar Unit.
18.	Fire and Fuels Management	D.15-18	Anza-Borrego Desert State Park As a state park (and thus an SRA), wildland fire oversight within Anza-Borrego Desert State Park	The project area is not located within Anza-Borrego. Please consider removing language.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>(Anza Borrego) is provided by CAL FIRE. A Cooperative Fire Protection Agreement and Operating Plan between Anza Borrego Desert State Park and CAL FIRE was established and is intended to coordinate pre fire planning and coordinate an effective response during fire suppression activities in order to minimize threats to threatened and endangered biological resources and sensitive cultural and archaeological sites (CPUC and BLM 2008a). According to the plan, Anza Borrego is responsible for rehabilitation of the post fire environment. Portions of Anza Borrego area are also identified as local responsibility areas (LRA), which receive fire support services from the Borrego Springs Fire Protection District (Borrego Springs is a small desert community located some 90 miles northeast of San Diego). Fire support services provided by the Borrego Springs Fire Protection District on Anza Borrego lands are provided by virtue of a mutual aid agreement with CAL FIRE.</p>	
19.	Fire and Fuels Management	D.15-18	<p><u>San Diego Rural Fire Protection District (SDRFPD)</u></p> <p><u>San Diego Rural Fire Protection District (SDRFPD)</u></p> <p><u>The San Diego Rural Fire Protection District was formed on May 18, 1983 through the consolidation of 13 East County volunteer fire departments. SDFPD, under a cooperative fire protection agreement with CAL FIRE, protects an area of approximately 720 square miles and provides emergency medical services, structural fire protection and rescue services. SDRFPD also responds to wildland fires; although wildland fire protection within this area is primarily the responsibility of CAL FIRE and the United States Forest Service (USFS). The SDRFPD has a substantial portion of the Proposed Project and would be considered the first responder. The Jacumba area is</u></p>	<p>The San Diego Rural Fire Protection District is an agency with jurisdiction over a substantial portion of the Proposed Project, and will be a first responder. Please update to include specific SDRFPD staffing and equipment.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>serviced by Station 43 of the San Diego Rural Fire Protection District (staff consists of volunteer firefighters) and is equipped with the following:</p> <ul style="list-style-type: none"> • One engine • One 1,500-gallon tender • Staff: Two stipend firefighters <p>The Lake Morena Fire Station (Station #42) located to the west is also equipped with one engine or water tender and is staffed by two firefighters.</p>	
20.	Fire and Fuels Management	D.15-18	<p><u>San Diego County Fire Authority (SDCFA)</u></p> <p>...The Boulevard area is also serviced by a Boulevard Fire Department, Station 87, which is located at 39223 Highway 94 in Boulevard and is equipped with the following equipment:</p> <ul style="list-style-type: none"> • One Type I engine • Two Type II engines • One Type III engine • One 1,000 gallon water tender 	Please update with current staffing for the SDCFA.
21.	Fire and Fuels Management	D.15-18	<p><u>Tribal Lands</u></p> <p>Additionally, the area has a mutual-aid agreement with the Campo and Manzanita Indian tribes for fire protection services. The Campo Reservation Fire Station is located at 36190 Highway 94, which is equipped with one type III engine and the Manzanita Indian Tribe's fire services are located adjacent to the Tule Wind area.</p>	Please update with current staffing for the area tribal lands.
22.	Fire and Fuels Management	D.15-20 Table D.15-2	Please update "Tule" and "Proposed Project" columns of Table D.15-2 for vegetation fuel types to reflect the Modified Project Layout.	Please revise Table D.15-2 to reflect corrected analysis per the Modified Project Layout.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification																																																																															
Table D.15-2 Project Area Vegetation Fuel Types																																																																																			
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woodland	—	<u>0.47</u>	—	<u>0.47</u>	<u>Developed</u>	=	<u>7.64</u>	=	<u>7.64</u>	<u>Disturbed Habitat</u>	=	<u>56.42</u>	=	<u>56.42</u>	Emergent wetland	5.0		—	5.0	<u>Field Pasture</u>	=	<u>1.50</u>	=	<u>1.50</u>	Montane buckwheat scrub	—	<u>9.56</u>	—	<u>9.56</u>	Non-native grassland	—	<u>3.87</u>	—	<u>3.87</u>	Non-vegetated channel	—	<u>0.59</u>	—	<u>0.59</u>	Northern mixed chaparral	—	<u>123.88</u>	—	<u>123.88</u>	Open coast live oak woodland	6.5	<u>2.23</u>	—	<u>8.73</u>	Peninsular juniper woodland and scrub	98.0		14.9	112.9
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			Redshank chaparral	—	<u>10.42</u>	—	<u>10.42</u>											
Scrub oak chaparral	—	<u>89.20</u>	—	<u>89.20</u>														
Semi-desert chaparral	—	<u>220.48</u>	—	<u>220.48</u>														
Shadscale scrub	16.5		—	<u>16.5</u>														
Sonoran mixed woody succulent scrub	287.5		46.4	<u>333.9</u>														
Southern north slope chaparral	—	<u>8.23</u>	—	<u>8.23</u>														
Southern willow scrub	—	<u>0.14</u>	—	<u>0.14</u>														
Southern willow scrub/mulefat scrub	7.0		—	<u>7.0</u>														
Upper Sonoran manzanita chaparral	—	<u>62.32</u>	—	<u>62.32</u>														
Upper Sonoran subshrub scrub	—	<u>82.61</u>	—	<u>82.61</u>														
Total	723.5	<u>725.31</u>	61.3	<u>7</u> <u>1,510.1</u>														
23.	Fire and Fuels Management	D.15-20 Table D.15-2 footnotes	² Includes a construction corridor study area encompassing <u>temporary and permanent impacts due to all Tule Project components, including the turbines, and meteorological towers, collector system, proposed and alternate transmission lines, collector lines, access roads, batch plants, parking areas, staging areas, substation, and operation and maintenance areas.</u> ³ Includes a study area encompassing the ESJ Gen-Tie two alternate transmission line alignments and the two public access routes. ⁴ Unsurveyed area refers to portions of the project that were not accessible due to private land restrictions.													Please update footnotes for Table D.15-2.		

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification												
24.	Fire and Fuels Management	D.15-20 – D.15-21	The Tule Wind Project would be located in the In-Ko-Pah Mountains and in the McCain Valley areas, which have moderate slopes and elevations between roughly 3,600 and 6,400 <u>5,600</u> feet amsl.	Please update to reflect the elevation listed in the AED.												
25.	Fire and Fuels Management	D.15-21	Tule Wind Project The Tule Wind Project includes 134 <u>128</u> wind turbines, overhead and underground collector cable, substation, operations facility, overhead transmission line, access roads, and temporary construction areas. These components would occur in steeper terrain and within a variety of potentially flammable vegetation types, including chaparral, scrub, oak woodland, and <u>non-native grassland, in addition to agriculture, disturbed, landscaped and developed lands</u> . Given the steep terrain and fuel bed throughout this project area combined with the potential ignition sources associated with wind turbines, the potential for wildfire ignition and spread is higher than associated with the ECO Substation Project.	All ignition sources have been reasonably mitigated. Please update language to reflect the ignition sources and the correct turbine numbers based on the Modified Project Layout.												
26.	Fire and Fuels Management	D.15-22 Table D.15-3	Please update “Tule Wind Project” portions of Table D.15-3 to reflect the Modified Project Layout. Please also revise footnotes accordingly. <table border="1"> <thead> <tr> <th>Project Component</th> <th>Temporary Impacts</th> <th>Permanent Impacts</th> </tr> </thead> <tbody> <tr> <td>128 <u>134</u>-Wind Turbines (1.5 to 3.0 megawatt (MW))</td> <td>0</td> <td>369.3<u>386.50</u></td> </tr> <tr> <td>Overhead and Underground 34.5 kV Collector Cable System</td> <td>127<u>108.20</u></td> <td>0.02</td> </tr> <tr> <td>Collector Substation</td> <td>0</td> <td>5.00</td> </tr> </tbody> </table>	Project Component	Temporary Impacts	Permanent Impacts	128 <u>134</u> -Wind Turbines (1.5 to 3.0 megawatt (MW))	0	369.3 <u>386.50</u>	Overhead and Underground 34.5 kV Collector Cable System	127 <u>108.20</u>	0.02	Collector Substation	0	5.00	Please revise Table D.15-3 to reflect corrected analysis per the Modified Project Layout and update language in footnote one.
Project Component	Temporary Impacts	Permanent Impacts														
128 <u>134</u> -Wind Turbines (1.5 to 3.0 megawatt (MW))	0	369.3 <u>386.50</u>														
Overhead and Underground 34.5 kV Collector Cable System	127 <u>108.20</u>	0.02														
Collector Substation	0	5.00														

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision			Justification
			Operations and Maintenance Facility	0	5.00	
			Overhead 138 kV Transmission Line	40.344.60	0.09-0.12	
			Meteorological Towers and SODAR or LIDAR Unit	0.064-0.048	0.083 0.062	
			Access Roads	83.5 84.20	152.6 166.10	
			Temporary Construction Areas (parking area, concrete batch plant, and laydown areas)	53	0	
			<i>Tule Wind Project Total</i>	290.1-303.9 (224.40-212.1)^f	562.80-532.1 (544.00-513.3)^f	
			Footnote: This overlap gives a higher calculation that distorts <u>overstates</u> the overall project surface land disturbances.			
27.	Fire and Fuels Management	D.15-23	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 exception of The Ewiiapaayp Band of Kumeyaay Indians Reservation has land uses zoned for commercial economic development and specifically renewable wind and solar energy development in accordance with its Land Use Code (Title 102), Land			Please update language to properly describe existing setting of the project area.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			Planning Code (Title 107), Community Economic Development Strategy Plan, and Integrated Resources Management Plan.	
28.	Fire and Fuels Management	D.15-23	<p>Land uses in the vicinity of the Tule Wind Project are consistent with the area, although Rough Acres Ranch residential structures occur to the southeast of the proposed Tule Wind facility. A total of <u>three properties which contain 24</u> 44 residences/structures are located within approximately 2,000 feet of proposed turbines. To the northeast, a single residence is within roughly 2,000 feet of one or more of the proposed wind turbines. It should be noted that distances were measured from the property line; and although properties are within 2,000 feet of proposed turbines, no residences/structures would be within 2,000 feet of proposed turbines. However, there are a total of six residences/structures <u>eleven properties</u> within roughly 1,000 feet (range from with the nearest located 100 63 to 950 feet from the 200-foot construction buffer) of the 138 kV transmission line, occurring primarily to the south and west of the proposed alignment.</p>	Please update language to reflect the Modified Project Layout. No residences are located within 2,000 feet of proposed turbines.
29.	Fire and Fuels Management	D.15-24	<p><i>Regional Assets at Risk</i></p> <p>From a regional wildfire perspective, the Proposed PROJECT is located in an area designated by the County of San Diego as a wildfire corridor based on fuel ages, topography, and climate. Based on this designation, it is feasible that communities and individual structures beyond the arbitrary 0.5-mile distance from the Proposed PROJECT may be impacted should a wildfire ignite from a Proposed PROJECT-related source. As such, County fire estimates that over 2,000 residences (not including other structures) may be at risk of loss during a wind driven wildfire (Miller et al. 2009). <u>According to the CALFIRE San Diego Unit, CALFIRE can contain 90-95% of all wildland fires in its jurisdiction, should they occur, to</u></p>	Please revise to include CALFIRE call information.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			10 acres or less in size. (Hunt Research Corp., personal communication with Chief Nick Schuler, January 10, 2011.)	
30.	Fire and Fuels Management	D.15-25	<p><u>This section provides a description of the regulations and guidance pertinent to the project. As described in the following sections, a wide range of standards are used throughout the industry.</u></p> <p>Federal Energy Regulatory Commission</p> <p>The Federal Energy Regulatory Commission (FERC) requires utilities to adopt and maintain minimum clearance standards between vegetation and transmission voltage power lines. These clearances vary depending on voltage. In most cases, the minimum clearances required in state regulations are greater than the federal requirement. In California for example, the state has adopted General Order 95 rather than the North American Electric Reliability Corporation (NERC) Standards as the electric safety standard for the state (CPUC and BLM 2008a). FERC is not discussed further.</p>	Please update language to provide an introduction to the federal regulatory setting and to strike language regarding FERC.
31.	Fire and Fuels Management	D.15-25	<p><u>National Fire Protection Association (NFPA) Codes, Standards, Practices and Guides</u></p> <p><u>NFPA® codes, standards, recommended practices, and guides (“NFPA Documents”), are developed through a consensus standards development process approved by ANSI. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or “codes” unless adopted as such or referenced as such by the California Fire Code or the Local Fire Agency.</u></p> <ul style="list-style-type: none"> • <u>NFPA 850, Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations, 2010: NFPA</u> 	Please consider adding the NFPA Codes, Standards, Practices and Guides as proposed.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>850 was prepared for the <u>guidance of those charged with the design, construction, operation, and protection of electric generating plants and high voltage direct current converter stations that are covered by the scope of this document. This document provides fire hazard control recommendations for the safety of construction and operating personnel, the physical integrity of plant components, fire protection systems and equipment, and the continuity of plant operations.</u></p> <ul style="list-style-type: none"> • <u>NFPA 10, Fire Extinguishers: A long-standing standard, which specifies the types, sizes, rating and locations for portable fire extinguishers. It also provides information on how to calculate the number and size of portable fire extinguishers needed.</u> • <u>NFPA 11, Fire Fighting Foam (Low, Medium, and High Expansion Foam): NFPA 11 is a longstanding standard, which provides recommendations for design and installation of firefighting foam systems and portable equipment. It also provides recommendations regarding calculating the amount of foam concentrate and solution needed on a flammable or combustible liquid fire.</u> • <u>NFPA 13, Standard for Installation of Sprinkler systems: NFPA 13 is the standard for design and installation of fire sprinkler systems in a building. It provides the requirements for the type of system needed in a particular occupancy, water supply, sprinkler head flow and pressures, the locations of sprinkler heads, and installation of the system. This standard is referenced by the California Fire Code.</u> • <u>NFPA 22, Standard for Water Tanks for Private Fire Protection: Provides</u> 	

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			<p><u>recommendations for the design, construction and installation of water storage tanks for private fire protection systems.</u></p> <ul style="list-style-type: none"> • <u>NFPA 30, Flammable and Combustible Liquids Code: This standard provides recommendations for storage, use and handling of flammable and combustible liquids. It provides detailed information regarding tank storage, spacing, dispensing of liquids, portable containers and other related operations. NFPA 30 is referenced by the California Fire Code.</u> • <u>NFPA 70, National Electrical Code: NFPA 70 is the standard for the design and installation of electrical systems. It includes recommendations for various types of occupancies and also provides recommendations and criteria for the location and installation of “explosion proof” electrical systems.</u> • <u>NFPA 72, National Fire Alarm and Signaling Code: NFPA 72 is the standard for the design, installation and operation of fire alarm systems in various occupancies. This standard is used by fire alarm system designers when designing and installing a system. It is utilized also by Fire Agencies when reviewing plans for new systems.</u> • <u>NFPA 497, Classification of Flammable Liquids, Gases and Vapors, and for Electrical Area Installations in Chemical Process Areas: NFPA 497 is the standard, which is utilized along with NFPA 70 to determine flammable gas, flammable liquid and combustible liquid hazards and recommend the areas which require explosion proof electrical systems. It also sets forth the extent of the classified areas. Although the title says chemical process areas, it is used as a</u> 	

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			<p><u>standard for explosion proof electrical as it defines various risks and contains numerous diagrams to help the electrical system designer.</u></p>	
32.	Fire and Fuels Management	D.15-26	<p>International Fire Code</p> <p>Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property including fire, explosions, and hazardous materials handling or usage <u>(although it is not a federal regulation, but rather the product of the International Code Council).</u></p>	The International Fire Code is not a Federal Regulation. Please consider revising the text accordingly.
33.	Fire and Fuels Management	D.15-26	<p><u>International Wildland-Urban Interface Code</u></p> <p><u>The International Wildland-Urban Interface Code is published by the IFC, and is a model code addressing wildfire issues.</u></p>	Please update to include this language.
34.	Fire and Fuels Management	D.15-27 – D.15-28	<p>California Fire Code</p> <p>Similar to the International Fire Code, the California Fire Code and the California Building Code use a hazards classification system to determine the appropriate measures to incorporate to protect life and property. <u>There is not a Hazard Classification System in the Fire Code that includes Wind Turbines, in fact the Fire Code does not address Wind Turbines.</u></p>	Please update to include clarification regarding California Fire Code.
35.	Fire and Fuels Management	D.15-29	<p>California Public Utilities Commission General Order 95: Rules for Overhead Transmission Line Construction</p> <p>Rule 35 of General Order 95 (Tree Trimming) requires tree trimming to occur when overhead utility lines pass through trees in order to maintain reasonable clearance distance between the utility line and any branches or foliage. In addition, Rule 35</p>	Please include this language regarding transmission line construction and line clearances.

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			<p>requires that dead or diseased trees that overhang or lean toward and may fall into a span be removed. the following:</p> <ul style="list-style-type: none"> • 4 feet radial clearances are required for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts; • 6 feet radial clearances are required for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts; • 10 feet radial clearances are required for any conductor of a line operating at 110,000 volts or more, but less than 300,000 volts (this would apply to the project); • 15 feet radial clearances are required for any conductor of a line operating at 300,000 volts or more. 	
36.	Fire and Fuels Management	D.15-30	<p>Fire break clearances are established by Public Resources Code 4292 and 4293. <u>In the section of Southern California where the project is proposed, the power line hazard reduction standards are applicable year round due to the scope of the fire season. More detailed descriptions of the applicable codes and regulations and images of exempt and non-exempt power line structures may be found in CAL FIRE Power Line Fire Prevention Field Guide (CAL FIRE 2008).</u></p> <p>These regulations are discussed in further detail as follows:</p> <ul style="list-style-type: none"> • Public Resource Code 4291 requires a <u>reduction of Fire Hazards Around Buildings, requiring 100 feet of vegetation management around all buildings, and is the primary mechanism for conducting fire prevention activities on private property within CAL FIRE jurisdiction.</u> 	Please update language to reflect all Public Resource Codes.

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37.	Fire and Fuels Management	D.15-31	<p><u>California Code of Regulations - California Building and Fire Codes</u></p> <p><u>California Code of Regulations, Title 24 parts 2 & 9, (http://osfm.fire.ca.gov/). Title 24 contains several International Codes that address fire safety including the International Fire Code, International Building Code. Additional safety regulations adopted by the California Building Standards Commission include the Uniform Mechanical Code, and Uniform Plumbing Code, which are also part of the California Code of Regulations.</u></p>	Please consider adding the California Building and Fire Codes as proposed.
38.	Fire and Fuels Management	D.15-32	<p>CAL FIRE San Diego Unit “Pre-Fire Management Plan 2009”</p>	Please update to reflect the correct year reference.
39.	Fire and Fuels Management	D.15-39 Table D.15-4	<p>APMs TULE-Project Design Feature (PDF)-1 through TULE-PDF-26 are proposed by Pacific Wind Development <u>Tule Wind, LLC</u> to reduce impacts related to fire safety.</p> <p>Table D.15-4 – change title to “Pacific Wind Development <u>Tule Wind, LLC</u> Tule Wind – Fire and Fuels Management Impacts”</p>	Global Change: Tule Wind, LLC owns the project assets, and is a wholly owned subsidiary of Iberdrola Renewables. Please change all references to Pacific Wind Development to reflect Tule Wind, LLC.
40.	Fire and Fuels Management	D.15-40 Table D.15-4	<p>TULE-FF-2 Presence of project facilities including overhead transmission line would increase the probability of a wildfire.</p> <p>Class I <u>II</u></p>	The potential impacts associated with overhead transmission lines will be mitigated to a level of less than significant with implementation of mitigation measures (and additional proposed mitigation measures included the SDCFA-approved Fire Protection Plan, Attachment D.15.3) that include provisions for performing visual inspections of overhead lines (see FPP-8), line clearance in accordance with CPUC GO 95 (see FPP-9), and de-energizing the electrical system in a fire emergency event (see FPP-11). Furthermore, the SDCFA has identified additional mitigation measures that in its opinion will reduce this impact to below a level of significance. Based on this analysis, a

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				recommendation to change the significance determination from a Class I to a Class II is provided.
41.	Fire and Fuels Management	D.15-40 Table D.15-4	TULE-FF-3 Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting. Class I II	It is unsubstantiated that the presence of overhead transmission lines and turbines will reduce the effectiveness of fire fighting within the area. See comment 40 above and 59 and 60 regarding ground and aerial fire fighting. Please change significance determination from a Class I to a Class II.
42.	Fire and Fuels Management	D. 15-44	<p>MM FF-1 Develop and implement a Construction Fire Prevention/Protection Plan. <u>A complete description of MM FF-1 is presented in Table D.15-8. A multiagency Construction Fire Prevention/Protection Plan shall be developed in consultation with and to the satisfaction of CAL FIRE, Rural Fire Protection District, and SDCFA. The final plan will be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all construction activities.</u> At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition <ul style="list-style-type: none"> ○ vegetation clearing ○ fuel modification establishment ○ parking requirements ○ smoking restrictions ○ hot work restrictions • Red Flag Warning restrictions • Fire coordinator role and responsibility • Fire suppression equipment on site at all times work is occurring • Requirements of Title 14 of the California Code of Regulations, Article 8 #918 “Fire Protection” for the private land portions • <u>Access Road widening (28-foot County roads, 18-foot-wide spur roads)</u> 	Please update mitigation to include the proposed provisions that reflect the mitigation measures contained in the SDCFA-approved FPP (Attachment D.15.3).

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			<ul style="list-style-type: none"> • Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009) • Emergency response and reporting procedures • Emergency contact information • Worker education materials; kick-off and tailgate meeting schedules • Other information as provided by <u>CAL FIRE, Rural Fire Protection District, SDCFA, BLM, California State Land Commission (CSLC), and Tribal Governments</u> responsible fire agencies for the Proposed PROJECT. <p><u>Additional restrictions will include the following:</u></p> <ul style="list-style-type: none"> • <u>During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for one (1) hour after end of daily construction, and hotwork.</u> • <u>Fire Suppression Resource Inventory – In addition to CCR Title 14, 918.1(a), (b), and (c), the applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on quarterly basis and provide it to the Rural Fire Protection District, SDCFA, and CAL FIRE.</u> • <u>During Red Flag Warning events, as issued daily by the National Weather Service in SRAs and LRAs, and when the USFS PAL is Very High on CNF (as appropriate), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under a Hot Work</u> 	

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			<p><u>Procedure (see TULE-PDF-1).</u></p> <ul style="list-style-type: none"> • <u>The applicant and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF.</u> • <u>All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires.</u> • <u>Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition.</u> • <u>Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect.</u> • <u>Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each crew member</u> 	

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			<p>shall at all times be within 100 yards of a <u>vehicle containing equipment necessary for fire suppression as outlined in the final Construction Fire Prevention/Protection Plan.</u></p> <ul style="list-style-type: none"> • <u>For the Tule Wind Project, water storage tanks (TULE-PDF-7) shall be installed and operational at the time of start of construction, except where construction of new access roads is necessary to reach the SDRFPD's preferred location for the water tank, in which case the water tank will be installed along with access road construction.</u> <p>The project applicant will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to the applicant and revisions to the plan will address each comment to the satisfaction of the commenting agency. The final plan will be approved by the responsible fire agencies with input from other permitting agencies, as desired, <u>prior to the initiation of construction activities and provided to the project applicant for implementation during all construction and maintenance activities. All construction work on the Proposed PROJECT shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.</u></p>	
43.	Fire and Fuels Management	D.15-45 – D.15-46	<p>MM FF-2 Revise the Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009) to Create the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan</p> <p>The <u>revised</u> plan will address the Proposed PROJECT and will be implemented during all operation and maintenance work associated with the project for the life of the project. Important fire safety concepts that</p>	Please update mitigation to reflect the mitigation measures contained in the FPP approved by the SDRFPD and accepted by SDCFA.

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			<p>are included in this document and make it an important overall mitigation measure are the following:</p> <ul style="list-style-type: none"> • <u>Focused Fire Protection Plan content applicable to the applicant’s ongoing operation.</u> • Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans). • Fuel modification buffers required by the Fire Protection Plans (FPP). • When vegetation work will occur (prior to any other work activity). • Timing of vegetation clearance work to reduce likelihood of ignition and/or fire spread. • Coordination procedures with fire authority. • Integration of the project’s Construction Fire Prevention/Protection Plan content. • Personnel training and fire suppression equipment. <u>Prior to energizing the Tule Wind Project, Tule Wind, LLC will install a skid-mounted Type VI firefighting unit with at least 100 gallons water capacity and a pump rate of approximately 25-30 gallons per minute into two (2) of its operations and maintenance pick-up trucks. In addition, also prior to energizing the Tule Wind Project, Tule Wind, LLC personnel will undergo training by San Diego Rural Fire Protection</u> 	

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			<p><u>District personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires.</u></p> <ul style="list-style-type: none"> • Red Flag Warning restrictions for operation and maintenance work. • Fire safety coordinator role as manager of fire prevention and protection procedures, coordinator with fire authority and educator. • Communication protocols. • Incorporation of <u>CAL FIRE, San Diego Rural Fire Protection District, and SDCFA</u> responsible fire agencies reviewed and approved Response Plan mapping and assessment. • Other information as provided by CAL FIRE, San Diego Rural Fire Protection District, San Diego County Fire Authority (SDCFA), BLM, <u>CSLC, Tribal Governments</u>, and U.S. Forest Service (USFS), as applicable. <p>The project applicant will provide a draft copy of the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to the applicant and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be approved by the responsible fire agencies with input from permitting agencies, as desired, prior to energizing the project and provided to the project applicant for implementation during all construction <u>operation and</u></p>	

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			<u>maintenance</u> activities.	
44.	Fire and Fuels Management	D.15-46	<p>MM FF-3 Development Agreement with Rural Fire Protection District and San Diego County Fire Authority. Provide funding for the training and acquisition of necessary firefighting equipment and services to Rural Fire Protection District/SDCFA the local fire authority to improve the response and firefighting effectiveness near <u>wind turbines, electrical transmission lines, and aerial infrastructure based on fire protection needs and each agency's professional judgment.</u> Although not implementable on BLM or other federal land, the local fire authority will respond through mutual aid to wildfires within its jurisdiction, regardless of land ownership designation, and, therefore, the Development Agreement is applicable to the Proposed PROJECT on a project-wide basis. Funding would be provided through a Development Agreement <u>between the applicant and the with Rural Fire Protection District and San Diego County Fire Authority which shall be executed prior to construction.</u> The Development Agreement would include, but not be limited to the following items as agreed upon by the Rural Fire Protection District, the San Diego County Fire Authority and the applicant:</p> <ul style="list-style-type: none"> • Funding toward purchase of a Type I (or other) fire engine equipped for potential project related fires (i.e., foam capability). • Funding as required by standard fire fee schedule. • Foam concentrate supply of 450 gallons, foam education equipment, and nozzles on mobile trailer. 	Please update mitigation to reflect the mitigation measures contained in the SDCFA-approved FPP (Attachment D.15.3).
45.	Fire and Fuels Management	D.15-46 – D.15-47	MM FF-4 Customized Fire Protection Plan for Project. A Fire Protection Plan will be submitted as part of the Proposed PROJECT EIR/EIS (pre-	Please revise webpage citation accordingly. Please also update mitigation to reflect the mitigation measures contained in the SDCFA-approved FPP

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			<p>project) and will include, at minimum, the following:</p> <ul style="list-style-type: none"> • San Diego County FPP Content Requirements (http://www.co.san-diego.ca.us/dplu/docs/Fire-Report-Format.pdf Error! Hyperlink reference not valid. http://www.sdcounty.ca.gov/dplu/docs/Fire-Report-Format.pdf) • Rural Fire Protection District Content Requirements: <ul style="list-style-type: none"> ○ Provisions for fire safety and prevention ○ Water supply ○ Fire suppression/detection systems – built-in detection system with notification ○ Secondary containment ○ Site security and access ○ Emergency shut-down provisions ○ Fuel modification plan ○ Access road widths and surfacing ○ Emergency drill participation. • Emergency evacuation plan- • <u>Integration into Plans created to satisfy Mitigation Measures FF-1 and FF-2</u> <p>The FPP will be submitted as part of the project EIR/EIS and will be incorporated into MM FF-1, the Construction Fire Prevention/Protection Plan, and MM FF-2, the Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009)¹ Operation and Maintenance Plan. The Customized Fire Protection Plan will incorporate clarifications and additional <u>applicant proposed measures (APMs) detailed in this section described in Section B, Project Description of this EIR/EIS.</u> <u>The Final FPP is to be approved by the commenting agencies prior to construction.</u></p>	(Attachment D.15.3).

¹http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/Attach%204_07-B%20Wildland%20Fire%20Prevention%20and%20Safety%20Practice.pdf

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46.	Fire and Fuels Management	D.15-47	The construction period for the Tule Wind Project is proposed to be 18 to 24 months and will include up to 125 workers per day at peak.	Please update to reflect the correct construction period.
47.	Fire and Fuels Management	D.15-48	<p>The presence of up to 134¹²⁸ wind turbines, up to 400 feet tall presents a unique potential ignition source for burning embers/materials in an <u>high wildland fire hazard area with receptive fuel beds</u>. Wind turbines in California does not track annual wind turbine fire, although Tule Wind, LLC independently analyzed data from the California State Fire Marshal's Office, and was only able to identify four (4) confirmed wind turbine-related fire incidents in the period between January 1, 2008 and Fall 2010 – a rate of approximately 1.3 turbine fires per year (Iberdrola 2010). To place this number in context, the California Wind Energy Association calculates that there are approximately 11,000 wind turbines currently in operation in California. See http://www.calwea.org/bigPicture.html. An IAEI article previously claimed that wind turbines in California annually results in 35 turbine generator related fires (IAEI 2010). The article cited an anti-wind power website maintained by the Keepers of the Blue Ridge to document this assertion. The Keepers of the Blue Ridge website did not provide attribution for the figure, and the figure was removed when challenged by the California State Fire Marshal's Office annually result in 35 turbine generator related fire (IAEI 2010). Fire causes are related to short-circuits and lightning. The A fire in the elevated nacelle, where most wind turbine fires occur, results in <u>has</u> the potential for burning, heated or flaming material to be liberated from the turbine. Under worst-case wind conditions, with wind gusts in excess of 50 mph, burning material (embers) may travel a mile or more, held aloft by the wind (Dudek 2010). However, most debris from a failed turbine drops within 500 feet of the turbine (Iberdrola Renewables, Inc. 2010b).</p>	<p>Please consider removing the word “unique.” There are over 11,000 operating wind turbines in California, and the wind industry has been operating in California for decades.</p> <p>The IAEI article’s claims are based on an information source that has been shown to be faulty. <i>See</i> Attachment D.15.4, Letter from Harley McDonald, Iberdrola Renewables, to James Pine, San Diego County Fire Marshal (dated October 25, 2010), pgs. 1-3. The SDCFA concurs and agrees that the IAEI reference should be removed from the EIR/EIS. <i>See</i> Attachment D.15.2, SDCFA acceptance letter for the Tule Wind Project FPP, pg. 5.</p> <p>There is no evidence to support the Draft EIR/EIS claim that most wind turbine fires occur in the nacelle.</p>

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48.	Fire and Fuels Management	D.15-48	<p><i>Decommissioning (6th paragraph)</i></p> <p>When the facility is retired or decommissioned, the turbine towers will be removed from the site and the materials will be reused or sold for scrap. Decommissioning activities are anticipated to have similar types of construction-related activities, and, therefore, all procedures, management plans, <u>mitigation measures</u>, and <u>BMPs-APMs</u> developed for the construction phase of the project would be applied to the decommissioning phase of the project.</p>	Please consider clarifying the decommissioning phase to indicate what MMs and APMs will be applied to the project.
49.	Fire and Fuels Management	D.15-49	<p><i>Wildfire Risk Analysis (5th paragraph)</i></p> <p>“Initial attack for a nacelle fire that is up to 400 feet in the air may be limited through conventional firefighting strategies. In the absence of Tule Wind, LLC, will install built in fire suppression systems, in the wind turbine nacelle. In the event of an ignition in the wind turbine nacelle, the fire suppression system would be activated and the fire agencies would be immediately notified. In addition, each wind turbine nacelle will be equipped with smoke detectors, arc flash sensors, and over-current sensing transducers that can detect conditions that could lead to a fire prior to ignition. Should any of these devices register an out-of-range condition, the device immediately commands a shutdown of the turbine and will disengage it from the electrical collection system. The entire turbine is electrically protected by current-limiting switchgear that is installed inside the base of the tower. The fire agencies would provide ground-based fire suppression, in the event that fire fighters would likely focus on monitoring the nacelle fire and focusing ground suppression efforts on ember or debris created spot fires.</p>	The original text incorrectly implied that fire suppression systems were not a part of the Tule Wind Project Design. See the SDCFA-approved FPP (Attachment D.15.3).
50.	Fire and Fuels Management	D.15-50	APMs TULE-PDF-1 through TULE-PDF-26 would reduce the likelihood of ignition during construction, operation and maintenance, and decommissioning.	Please update language and mitigation measures to reflect the updated FPP and correct misspelling.

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			<p>These measures include pre-planning and design features intended to minimize ignition potential of equipment components, minimize equipment failure, which may result in ignition, and provide a non-flammable buffer between equipment and combustible vegetation. In addition, the project's Conceptual Draft Fire Protection Plan, identifies additional built in features and processes that would reduce and manage wildfire related risk (RC Biological Consulting, Inc. 2010). Implementation of Mitigation Measures FF-1 and FF-2, which augment and clarify APMs TULE-PDFE-1 through TULE-PDF-26, along with incorporation of Mitigation Measures FF-3 (development agreement) and FF-4 (customized fire protection plan incorporating APMs), would mitigate the increased probability of a wildfire during construction operation and maintenance and decommissioning of the Tule Wind Project. Under CEQA, this impact with implementation of mitigation would be less than significant (Class II).</p> <p><u>In addition to the APMs and mitigation measures described above, the approved Fire Protection Plan for the Tule Wind Project identifies additional mitigation measures that would further reduce and manage wildfire-related risk (RC Biological Consulting, Inc. 2011). The following mitigation measures contained within the approved Fire Protection Plan are described as follows:</u></p> <p><u>FPP-4 Remove Hazards From the Work Area.</u> <u>Tule Wind, LLC shall comply with Public Resources Code 4291, Reduction of Fire Hazards Around Building, to provide 100 feet fuel modification around all buildings, and the County Code Title 9 regarding brush management. Tule Wind, LLC and/or its contractor shall clear brush and dead and decaying vegetation from the work area</u></p>	

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			<p><u>prior to starting construction and/or maintenance work. The work area includes only those areas where personnel are active or where equipment is in use or stored, and may include portions of the transmission ROW, construction laydown areas, pull sites, access roads, parking pads, turbine pads, O&M building, substation and any other sites adjacent to the ROW where personnel are active or where equipment is in use or stored.</u></p> <p>FPP-5 Helicopter Use. <u>Tule Wind, LLC shall contact CAL FIRE and the SDRFPD dispatch centers two days prior to helicopter use and will provide dispatch centers with radio frequencies being used by the aircraft, aircraft identifiers, the number of helicopters that will be used while working on or near SRA lands at any given time, and the flight pattern of helicopters to be used. Should a wildfire occur within one (1) mile of the work area, upon contact from a CAL FIRE Incident Commander and/or Forest Aviation Officer, helicopters in use by Tule Wind, LLC will immediately cease construction activities and not restart aerial operations until authorized by the appropriate fire agency.</u></p> <p>FPP-6 Roads. <u>Any BLM roads or turbine roads that are proposed to be gated shall be provided with an approved Knox Box prior to energizing the project.</u></p> <p>FPP-7 Combustible Storage (CFC Chapter 3). <u>Combustible storage and trash on site during construction and operation phases shall be properly stored in a clear area with fuel</u></p>	

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			<p><u>modification around it, and be away from turbines and the substation. Such storage shall be orderly and be removed from the site as soon as possible.</u></p>	
51.	Fire and Fuels Management	D.15-52	<p><i>Last paragraph</i></p> <p>The presence of habitable structures in the vicinity of the project, and to the east and south, where wind driven wildfire could threaten more than 2,000 residential structures, presents a considerable potential risk. However, with implementation of Mitigation Measures FF-1, FF-2, FF-3, and FF-4, <u>FPP-4, FPP-5, FPP-6, and FPP-7</u>, construction, operation and maintenance, and decommissioning (of the four wind projects) related fire safety impacts associated with the project increasing the risk of wildfire would mitigate adverse effects. Under CEQA, this impact with implementation of mitigation would be less than significant (Class II).</p>	Please include a reference to additional proposed mitigation measures from the Fire Protection Plan that will further mitigate fire risk and safety impacts.
52.	Fire and Fuels Management	D.15-54	<p>Tule Wind Project</p> <p>The presence of over 400-128 wind turbines and related electrical transmission lines would result in potential ignition sources adjacent to wildland fuels in an area with a history of wildfires and over 2,000 inhabited structures in the vicinity, especially “down wind” to the east and west during a Santa Ana wind-driven fire. <u>Pre-planning and personnel fire awareness and suppression training not only results in lower probability of ignition, but also in higher probability of fire control and extinguishment in its incipient stages. Data indicates that 95% of all wildfire ignitions are controlled during initial attack (Smalley 2008).</u> Turbines and electrical transmission lines include potential for sparks, heat, and flammable liquids, and they require ongoing maintenance procedures for the life of the project. Ongoing maintenance activities and the inclusion of five-12</p>	Please update the number of turbines and the number of personnel anticipated for the Modified Project Layout. Please also clarify the potential sources of ignition for wildfires and probability of fire control based on the revised analysis.

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			permanent and five part time employees at the facility will also increase the possibility of a vegetation ignition.	
53.	Fire and Fuels Management	D.15-55	<p><i>Third paragraph</i></p> <p>Wind turbines do have the potential for lightning strikes, of which the turbine engineering is designed to withstand the atmospheric discharge and dissipate the strike into the ground via the ground grid, assuming the lightning protection is installed correctly and functioning at intended levels. <u>APM TULE PDF-17 includes provisions such that each turbine will have turbine lightning protection systems to reduce risk of fire ignition caused by lightning strikes.</u> Given the fuel modification buffers that will occur around each turbine base, it is unlikely that this type of ignition will occur.</p>	Please consider revising language to include reference to APM PDF-17 that would reduce impacts due to lightning strikes.
54.	Fire and Fuels Management	D.15-56	<p>Although these systems are not available in a tested, state or nationally approved package for wind turbines, the applicant will implement this technology through the wind turbine manufacturer or an aftermarket supplier to the satisfaction of the appropriate fire authority as part of the project design described in Mitigation Measure FF-5 below. In addition, APMs for fire safety, referred to as Project Design Features (PDF) PDF 1 through PDF 26, described in detail in Section B.4.4, will be incorporated to reduce overall fire risk during construction and operation of the project.</p> <p>MM FF-5 Wind Turbine Generator Fire Protection Systems. Fire detection, warning, and suppression systems for each wind turbine generator will include the latest <u>modern</u> technology and will address, at minimum, the following:</p> <ul style="list-style-type: none"> • Use of non-combustible or difficult to ignite 	Please update mitigation language and provisions as contained in the SDCFA-approved FPP (Attachment D.15.3).

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			<p>materials.</p> <ul style="list-style-type: none"> • Early fire detection and warning systems. • <u>Maintenance according to manufacturer specifications.</u> Frequent maintenance • Auto switch-off and complete disconnection from the power supply system. • Ongoing hazard/fire safety training for staff. • Automatic fire extinguishing systems in the nacelle of each wind turbine (stationary, inert gas, or similar). Pacific Wind Development Tule Wind, LLC will implement this technology through the wind turbine manufacturer or an aftermarket supplier. • Non-combustible or high flash point lubricant oils. 	
55.	Fire and Fuels Management	D.15-56	<p><u>In addition, APMs for fire safety, referred to as Project Design Features (PDF) PDF-1 through PDF-26, described in detail in Section B.4.4, will be incorporated to further reduce overall fire risk during construction and operation of the project. The identified PDFs and mitigation measures that have been proposed to minimize the potential for an ignition include: automatic fire suppression systems in the wind turbine nacelle(s) (see MM FF-5), various design features such as arc flash relays (see TULE-PDF-16), fuel management around project features (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management) (see TULE-PDF-10 and TULE-PDF-17), four (4) 10,000 gallon water storage tanks installed throughout the project area that can be utilized for regional fire suppression support (see TULE-PDF-7), training of both construction and operational personnel by San Diego Rural Fire Protection District personnel, or another entity certified to conduct such training, on the proper</u></p>	<p>With implementation of all PDFs and mitigation measures included in the DEIR/EIS and the SDCFA-approved Fire Protection Plan, the Tule Wind Project will result in a less than significant impact. See Attachment D.15-1 San Diego Rural Fire District Approval Letter (November 3, 2010); Attachment D.15.2, San Diego County Fire Authority Acceptance Letter (February 28, 2011); Attachment D.15.3, Tule Wind Fire Protection Plan (February 2011); Attachment D.15.5, Jim Hunt Comment Letter (March 3, 2011), and Attachment D.15.6 Letter from Robin Church to Patrick Brown (January 10, 2011).</p> <p>Although Tule Wind, LLC maintains that the mitigation measures and APMs included in its FPP approved by the SDRFPD (Nov. 2010) fully mitigate all fire-related impacts associated with the Tule Wind Project, Tule Wind, LLC agrees with the SDCFA and SDRFPD that the DEIR/DEIS misses a</p>

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			<p><u>use of Type VI firefighting equipment to fight incipient fires (see MM FF-2), and funding for both the SDCFA and the SDRFPD (as further described in MM FF-6). Not only has the project minimized the risk of potential ignition sources resulting from the project, but it will also improve access and response times throughout the project area, and provide water for wildland firefighting within the large expanse of BLM lands that do not currently have access or water.</u></p> <p>Although Implementation of APMs PDF-1 through PDF-26, and Mitigation Measures FF-1 through FF-4 along with FF-65, would reduce the fire risk and probability of a wildfire to a level considered less than significant. Implementation of additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-7) would further reduce fire risk which provides ignition resistance, warning, and extinguishing measures, will and the probability of wildfire from the Tule Wind Project provide a proactive plan for ongoing operation and maintenance of the Tule Wind Project with reduced fire threat, this impact remains adverse due to the impact created by the presence of the wind turbine facility and the corresponding increase in the probability of a wildfire. Under CEQA, impacts would be considered <u>be less than significant with mitigation and cannot be mitigated to a level that is considered less than significant (Class II).</u></p>	<p>key opportunity to apply mitigation measures that would reduce the existing baseline risk of damage and destruction by wildfire to the structures in the high and very high fire risk areas to the west of the Proposed Project. By reducing this baseline risk, which exists today and will continue to exist even if the Proposed Project is never constructed, any risk of wildfire ignition added by the ECO Substation, ESJ Gen-Tie, and Tule Wind Projects could be offset, thereby resulting in a Class II less than significant impact after mitigation for Impact FF-2.</p> <p>Based on the fire agencies' experience, the most effective way to reduce baseline fire risk to structures in the very high and high fire risk areas to the west of the Proposed Project is to increase fire code compliance inspections on structures in that area. In the fire agencies' experience, fire code inspections result in very high compliance rates, which translates into significant improvement in structure survivability in a wildfire. SDCFA has assessed the Proposed Project's risk of increasing the likelihood of wildfire ignition after application of APMs and Mitigation Measures, and has concluded that with sufficient funding, it could offset any remaining risk by adding one (1) full-time Fire Code Specialist II, and four (4) part-time, stipend reserve and/or volunteer firefighters that perform fire code inspections up to ninety (90) days per year. It is the SDCFA's opinion that this reduction of baseline fire risk, which exists regardless of whether the Proposed Project is built, would offset any additional unavoidable risk of wildfire ignition posed by the Proposed Project, and consequently, that Impact FF-2 should be changed to a Class II less-than-significant impact. SDCFA's proposed mitigation measure revises and replaces MM FF-6 in the DEIR/EIS.</p>

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				<p>Finally, Dr. Richard Thompson, PhD, has conducted a statistical analysis of the probability of an unsuppressed nacelle fire escaping the nacelle and the fire agencies' initial response and attack to create an uncontrolled wildland fire (Attachment D.15.7). Dr. Thompson concluded that the probability of such a fire occurring from the Tule Wind Project is approximately 0.0036% per year, which equates to less than 1 uncontained wind-turbine caused wildfire every 27,000 years.</p>
56.	Fire and Fuels Management	D.15-58	<p><i>First paragraph</i></p> <p>Although Mitigation Measures FF-1 through FF-65 and Mitigation Measures FPP-4 through FPP-9 will reduce the potential for wildfire ignitions or fire spread by requiring intensive pre-planning, fire safety procedures, customized operation and maintenance restrictions and requirements, and customized fire detection warning and suppression systems (wind turbines), among other fire safety features, the Proposed PROJECT's likelihood of increasing the occurrences of wildfires is considered adverse and inmitigable. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class II).</p>	<p>Please consider revising impact conclusion for the Proposed PROJECT based on the rationale and evidence presented in Comment 55, above.</p>
57.	Fire and Fuels Management	D.15-60	<p>MM FF-6 Funding for Fire Inspection FireSafe Council. The applicants are to provide funding for locally based one (1) SDCFA Fire Code Specialist II position to enforce existing fire code requirements, including but not limited to implementing required fuel management requirements (e.g., defensible space), in priority areas to be identified by the SDCFA for the life of the project. In addition, the applicants are to provide funding to allow SDCFA to employ up to four (4) volunteer/reserve firefighters as part-time code inspectors on a stipend basis for up to 90 days per year for the life of the project. FireSafe Council (e.g., Campo/Lake Moreno FireSafe Council) to prepare or implement a Community Wildfire</p>	<p>Although Tule Wind, LLC maintains that the mitigation measures and APMs included in its FPP approved by the SDRFPD (Nov. 2010) fully mitigate all fire-related impacts associated with the Tule Wind Project, Tule Wind, LLC agrees with the SDCFA and SDRFPD that the DEIR/DEIS misses a key opportunity to apply mitigation measures that would reduce the existing baseline risk of damage and destruction by wildfire to the structures in the high and very high fire risk areas to the west of the Proposed Project. By reducing this baseline risk, which exists today and will continue to exist even if the Proposed Project is never constructed, any risk of wildfire ignition added by the ECO Substation, ESJ</p>

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			<p>Protection Plan. The funding for the SDCFA Fire Code Specialist II position and the four (4) volunteer/reserve firefighters as part-time code inspectors will be provided through proportional contributions from each applicant to the SDCFA through their respective Development Agreements (see MM FF-3), which shall be executed prior to construction. will be determined in conjunction with the local fire authority's input, the specified fuel reduction project priorities identified by the FireSafe Council and in consideration of the funding amount provided under Mitigation Measure FF-3.</p> <p>This measure is irrespective of project location on BLM land as the funding will be to a local FireSafe Council for analysis and implementation of fuel reduction projects on privately owned, City or County lands adjacent to assets at risk. The Community Wildfire Protection Plan (CWPP) allows the local community to identify strategic fuel reduction projects to minimize fire risk, and become eligible for additional grant funding. Project related funding amounts will be determined with input from local fire agencies. Environmental review occurs as part of the CWPP process and would not, therefore, be required within the Proposed PROJECT EIR/EIS.</p>	<p>Gen-Tie, and Tule Wind Projects could be offset, thereby resulting in a Class II less than significant impact after mitigation for Impact FF-2.</p> <p>Based on the fire agencies' experience, the most effective way to reduce baseline fire risk to structures in the very high and high fire risk areas to the west of the Proposed Project is to increase fire code compliance inspections on structures in that area. In the fire agencies' experience, fire code inspections result in very high compliance rates, which translates into significant improvement in structure survivability in a wildfire. SDCFA has assessed the Proposed Project's risk of increasing the likelihood of wildfire ignition after application of APMs and Mitigation Measures, and has concluded that with sufficient funding, it could offset any remaining risk by adding one (1) full-time Fire Code Specialist II, and four (4) part-time, stipend reserve and/or volunteer firefighters that perform fire code inspections up to ninety (90) days per year. It is the SDCFA's opinion that this reduction of baseline fire risk, which exists regardless of whether the Proposed Project is built, would offset any additional unavoidable risk of wildfire ignition posed by the Proposed Project, and consequently, that Impact FF-2 should be changed to a Class II less-than-significant impact. SDCFA's proposed mitigation measure revises and replaces MM FF-6 in the DEIR/EIS.</p>
58.	Fire and Fuels Management	D.15-60 – D.15-61	<p>Construction and long-term operation of a wind facility and electrical transmission line and overhead collectors in an area that currently does not include this type of facility in an area with a history of fires would present challenges to firefighting operations. Challenges related to responding to fires related to the electrical generating or transmission systems would be difficult for the firefighting forces that have jurisdiction. CAL FIRE responders are familiar with</p>	<p>The Draft Boulevard Subregional Plan has not adopted, and therefore, it is inappropriate to quote it as a statement of risk.</p> <p>Tule Wind, LLC has committed to working closely with relevant fire agencies to make sure they are appraised on the Tule Wind Project's features. As noted in MM FF-5, each wind turbine nacelle will be equipped with a fire suppression system that will</p>

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			<p>the requirements of firefighting around electrical facilities. Volunteer firefighters in the area may not have the latest training for this type of condition. Regardless, even trained firefighters have accidents as indicated by the number of deaths related to electrical transmission lines over the last 40 years. Indicative of the difficulty of fighting fires related to these facilities is the Draft Boulevard Subregional Plan that states, —There is uncertainty in how Boulevard’s volunteer fire and rescue department will be able to handle a fire or other emergency event at the top of new industrial turbines which now stand between 400 and 600 feet tall.” The plan goes on to state that —fires at an industrial wind energy facility represents a new and significant health and safety issue that needs to be fully and properly addressed” (County of San Diego 2010b).</p>	<p>provide immediate fire suppression in the event of an ignition in the wind turbine nacelle.</p> <p>Furthermore, there is no confusion as to whether firefighters responding to a nacelle fire would attempt to fight the fire because they will not enter the turbine, but develop a perimeter and verify that no ground fires are started. Also, the wind turbines contemplated by the Tule Wind Project are at maximum 328 feet tall at the nacelle, not the 400 to 600 feet tall claimed in the draft plan. Please consider removing the identified text.</p>
59.	Fire and Fuels Management	D.15-61	<p><i>Ground Based Firefighting</i></p> <p>Wildland firefighters working around energized transmission lines may be exposed to electrical shock hazards including the following: direct contact with downed power lines, contact with electrically charged materials and equipment due to broken lines, contact with smoke that can conduct electricity between lines, and the use of solid-stream water applications around energized lines. Between 1980 and 1999 in the U.S., there were 10 firefighter fatalities due to electrical structure contact during wildfire suppression (NFPA 2001). Maintaining a minimum 500-foot safety buffer greatly reduces the risk of electrical structure contact, and it reduces the effectiveness of ground-based frontal attacks. Most, if not all, firefighting organizations employ a similar safety buffer around electrical structures. Depending on the fire circumstances, the presence of the electrical transmission line may result in the decision to let a fire burn through the area before attacking with ground and aerial firefighting resources; <u>however,</u></p>	<p>Please provide a source for the use of a minimum 500-foot safety buffer around electrical transmission lines. The International Fire Service Training Association (IFSTA) Fire Department Training manual “Fundamentals of Wildland Fire fighting” 3rd edition, states on page 304 that Firefighters should stay a distance away from downed power lines a distance equal to one span between poles (the reason is that this distance is typically the longest distance that a wire would fall, and then they typically only fall at one end) until they are sure the power is off. And then, use fine spray fog streams for any firefighting.</p> <p>The modern highly trained, well equipped, Firefighter and Fire Agency needs to be given credit in the EIR for their ability to evaluate the risks intelligently and properly handle a fire at the property. Public Fire Protection has vastly improved in San Diego County, to the point that a fire at this facility should be a fairly routine fire, rather than a catastrophic event.</p>

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			<p><u>firefighters are typically trained to operate and fight fires around electrical transmission lines.</u></p> <p><u>With respect to ground-based firefighting effectiveness, improved access roads will enable ground-based firefighters to reach places that were previously inaccessible by vehicle and will enable quicker ingress and egress to the project area to fight fires, four (4) additional water tanks to be installed in SDRFPD-approved locations throughout the project area (see TULE-PDF-7) will improve both ground-based and aerial firefighting effectiveness, Development Agreements entered into with SDRFPD and SDCFA will provide funding for equipment, staffing, and training that will improve firefighting effectiveness, and lastly, proposed mitigation measures (as described below, and included within the approved Fire Protection Plan) would further improve coordination/communication amongst the respective fire agencies, access and response times, and enhanced fire inspection capabilities. Taken together, the Tule Wind Project features will improve ground-based firefighting effectiveness, not diminish it.</u></p> <p><u>The Tule Wind Fire Protection Plan (RC Biological, 2011) includes mitigation measures to de-energize the electric system during fire emergencies at the direction of SDG&E, and immediately notifying appropriate fire agencies of the de-energizing. Additional proposed mitigation measures will provide for site maps to the fire agencies, communication devices to operations staff, and funding to increase SDCFA's fire inspection capabilities. These proposed mitigation measures will further reduce ground-based firefighting impacts.</u></p> <p><u>FPP-11 De-Energize Electrical System.</u> <u>Tule Wind, LLC shall immediately de-energize the electrical collector and transmission systems</u></p>	<p>With respect to ground-based firefighting, Tule Wind, LLC has proposed numerous mitigation measures that will mitigate the potentially significant impacts to a level less than significant, as contained in the SDCFA-approved FPP (Attachment D.15.3). Please consider including the proposed language to describe the steps taken to reduce significant impacts relative to firefighting effectiveness.</p>

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			<p><u>during fire emergencies at the direction of SDG&E. The fire agency liaison will coordinate with the SDG&E liaison during a fire incident to identify which, if any, particular electrical lines need to be de-energized. Appropriate fire agencies responding to the incident shall be immediately notified of the line de-energizing. Additionally, Tule Wind, LLC shall provide all appropriate local, state, and federal fire dispatching agencies with an on-call contact person (Fire Coordinator) who has the authority to shut down the line in areas affected by a fire. If the transmission line is de-energized, prior to re-energizing Tule Wind, LLC shall notify and receive approval from the SDG&E liaison and fire agency liaison representing the responsible fire agencies.</u></p> <p>FPP-12 Site Maps. <u>All responsible agencies shall be provided with maps indicating the location of the water tanks, turbines, access roads, and project layout prior to construction, as well as “as-built” maps after completion of construction. Tule Wind, LLC will coordinate with the SDCFA to ensure that its construction plans and “as-built” plans are incorporated into the SANGIS public safety layer for GIS mapping purposes prior to energizing the project.</u></p> <p>FPP-13 Communication Devices. <u>In order to easily communicate immediate fire incidence during operation or maintenance of the project, all crews and inspectors shall be equipped with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires and</u></p>	

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			<p><u>open communication pathways shall be established prior to energizing the project.</u></p>	
60.	Fire and Fuels Management	D.15-61 – D.15-62	<p><i>Aerial Firefighting</i></p> <p>The presence of the nearly 400-foot wind turbines and the 138 kV Transmission Line in an area where there is currently no aerial obstructions would have the potential of significantly impacting aerial firefighting efforts <u>in the project area.</u> <u>Firefighters are trained, equipped, and able to work around facilities such as tall buildings and deal with these types of obstacles.</u> Introducing these vertical features to the area could affect firefighting operations and endanger the safety of firefighters responding to a wildfire in the area (CAL FIRE 2010a). <u>Furthermore, the turbines and towers will be equipped with safety lighting as required by the FAA.</u> The proposed electrical transmission lines <u>are spaced far enough apart to not restrict aircraft maneuverability, however, or to significantly increase the risk of contact by aircraft or water buckets. Water drops are performed at 150 feet above the ground, otherwise known as the “150 foot drop zone.”</u> The 138 kV transmission towers are proposed to be 75 feet in height, less than half the height of the “150 foot drop” zone. <u>Due to the rugged nature of the terrain and existing Campo Wind Project turbines, aerial firefighting professionals will be focused on aerial impediments during the course of firefighting in the project area. Chief Nissen (SDRFPD) spoke with Ray Chaney (CAL Fire Battalion Chief, Special Ops Battalion), who stated that the determination to perform aerial operations would be made on a case by case basis and would not be prohibited just by the presence of the Tule Wind project (Robin Church personal conversation with Chief Nissen). Furthermore, the Tule project’s 138 kV transmission line will be adjacent to and overlap with the approved Sunrise Powerlink, which will be approximately 130 to 160 feet in height. Accordingly,</u></p>	<p>See updated Fire Protection Plan (February 2011) which includes additional proposed mitigation. Please update language to reflect these mitigation measures approved by the SDRFPD and accepted by the SDCFA. <i>See</i> Attachments D.15.1; D.15.3. Implementation of additional proposed mitigation measures will reduce aerial fire fighting effectiveness related to overhead transmission lines.</p> <p>Furthermore, firefighters are trained, equipped, and able to work around facilities and deal with this type of issue frequently. Any development has “facilities” and may have “aerial features” such as a tall building would have, for example. This should not affect aerial and ground firefighting effectiveness and it is unclear why this is raised as an issue. The modern fire service and firefighter should be given more credit in the EIR for their knowledge and skills, towards being able to respond to, and mitigate, incidents at this facility. Please revise text accordingly.</p>

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			<p>the Tule Wind Project will not add to any additional aerial firefighting risk to what is already in construction in the project area would create a substantial number of north-south trending aerial features in an area that currently does not include this potential barrier for several miles to the east and is void of aerial barriers to the west.</p> <p>The implementation of Mitigation Measure FF-2 will result in reduction in the likelihood of ignitions occurring due to the project's ongoing presence on the landscape, but it does not reduce the effect that the project would have on firefighting activities. Implementation of Mitigation Measures FF-2, FF-3, FF-5, and FF-6 will further reduce the potential impacts conflict by providing funding for Rural Fire Protection District, the and San Diego County Fire Authority, and one fire code enforcement position, training and equipment, equipping maintenance trucks with fire fighting apparatus and training operations staff on proper use of firefighting equipment, providing for additional water tanks on site, including fire detection, warning, and suppression systems in wind turbines, and additional proposed mitigation includes provisions for de-energizing the electrical system during fire emergencies, providing site maps to appropriate fire agencies, and equipping operations staff with communication devices for immediate reporting of fires, as well as funding for local FireSafe Council fire management planning and fuel reduction project implementation. Even w With implementation of these mitigation measures, including FPP-11 through FPP-13 the source of potential conflict (i.e., the presence of the 400-foot-tall wind turbines and overhead transmission line) would remain, and the potential for reduced aerial and ground firefighter effectiveness would be adverse and cannot be reliably mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level</p>	

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			that is considered less than significant (Class II).	
61.		D.15-65	<p>MM FF-7 Preparation of Disturbed Area Revegetation Plan. All areas disturbed during construction activities that will not be continuously included in the long-term maintenance access ROW will be provided native plant restoration in order to prevent non-native, weedy plants from establishing. Disturbed areas that will be included in the long-term maintenance program will not be revegetated as any plants that establish in these areas will be removed on an ongoing (at least annual) basis.</p> <p>Mitigation Measure FF-7 directs that the temporary disturbance areas will be revegetated with native plants common to the area through direction detailed in a habitat restoration plan. The habitat restoration plan will be prepared to restore native habitat and to reduce the potential for non-native plant establishment. The restoration plan will incorporate a Noxious Weeds and Invasive Species Control Plan to assist in restoring the construction area to the prior vegetated state and lessen the possibility of establishment of non-native, flammable plant species. The <u>A copy of the Revegetation Plan will be provided to the approving agencies for review and approval BLM and San Diego County.</u></p> <p><u>In addition, prior to the termination of the ROW authorization, a decommissioning plan will be developed and approved by the BLM and other agencies having jurisdiction. The decommissioning plan will include a site reclamation plan and monitoring program. Topsoil from all</u></p>	Please revise Mitigation Measure MM-FF-7 to include specific agencies the Revegetation Plan will be provided to and provisions for decommissioning and reclamation.

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			<u>decommissioning activities will be salvaged and reapplied during final reclamation. All areas of disturbed soil will be reclaimed to native habitat conditions found naturally in the area.</u>	
62.	Fire and Fuels Management	D.15-66	The project is anticipated to disturb a total of 762.5 <u>725.3</u> acres, with approximately 230 <u>212</u> acres of temporary disturbance during construction.	Please update language to reflect corrected analysis per the correct Modified Project Layout land disturbance calculations.
63.	Fire and Fuels Management	D.15-66	<i>Second paragraph</i> <u>If invasive plants become established and Establishment and corresponding spread of invasive plants within the proposed project ROW, such growth would adversely influence fire behavior by altering fuel beds . . . ”</u>	Existing phrasing makes it appear that the Tule Wind project will be establishing invasive plant species, which is not the case. Please consider revising the text to clarify.
64.	Fire and Fuels Management	D.15-74 – D.15-75 Table D.15-6	All Alternatives Tule-FF-2 Presence of project facilities including overhead transmission line would increase the probability of a wildfire. Class II Tule-FF-3 Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting. Class II	For all alternatives, a recommendation to change the impact determination is provided based on the analysis provided for the proposed project. Please see comments 55 through 62 above. For the reasons set forth in Comments [55 through 62], above, all Impacts relative to fire and fuels management are determined to be less than significant with mitigation (Class II).
65.	Fire and Fuels Management	D.15-75	Alternative 1 Impact TULE-FF-1: Under this alternative the O&M and collector substation facilities would be relocated to the Rough Acres Ranch. Impacts associated with construction and maintenance activities would be similar to those identified for the proposed Tule Wind Project in Section D.15.3.3. Implementation of APMs TULE PDF-1 through TULE PDF-26, and Mitigation Measures FF-1 through FF-4, <u>and additional proposed</u>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.

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			<p>Mitigation Measures FPP-4 through FPP-7 would mitigate the increased probability of a wildfire during construction or maintenance of this alternative. Under CEQA, this impact with implementation of mitigation would be less than significant (Class II).</p>	
66.	Fire and Fuels Management	D.15-76 & D.15-80	<p>Alternative 1 and Alternative 3</p> <p>Impact TULE-FF-2: The presence of over 100 <u>128</u> wind turbines, electrical transmission lines, and overhead collectors presents an ongoing source of potential wildfire ignitions adjacent to wildland fuels....</p> <p>Implementation of APMs PDF-1 through PDF-26, Mitigation Measures FF-1 through FF-6, and additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-9) would reduce fire risk and the probability of wildfire from the Tule Wind Project. Implementation of Mitigation Measures FF-1 through FF-5 will provide a proactive plan for ongoing operation and maintenance of this alternative with reduced fire threat; however, this would remain an adverse and immitigable effect. Under CEQA, for this alternative, impacts would be significant and cannot be mitigated to a level that is considered less than significant with the proposed mitigation (Class II).</p>	Please update language to reflect the Modified Project Layout. The proposed mitigation for the proposed project would e applicable to any alternative and therefore, impacts would be considered less than significant, similar to the proposed project.
67.	Fire and Fuels Management	D.15-76,78,80,82	<p>Alternative 1</p> <p>Impact TULE-FF-3: ... While altering the location of the O&M and collector substation facilities from the project would reduce the length of the 138 kV Transmission Line project component, <u>the 34.5 kV collector line system would increase in distance.</u> Impact TULE-FF-3 would be similar to the proposed project for this alternative.</p> <p>Relocation of the O&M and collector substation facilities under this alternative does not eliminate the</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.

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			<p>presence of the overhead transmission line or turbines; thus impacts would be adverse and but can be mitigated, similar to inmitigable as those identified for the proposed Tule Wind Project presented in Section D.15.3.3. <u>Implementation of Mitigation Measures FF-1 through FF-6 and additional proposed mitigation measures included in the Fire Protection Plan (see FPP-11 through FPP-13) will reduce the potential impacts due to wind turbines and transmission lines to level less than significant.</u> Under CEQA, for this alternative, impacts would be considered less than significant and cannot be with the proposed mitigation to a level that is considered less than significant (Class II).</p>	
68.	Fire and Fuels Management	D.15-77 – D.15-78	<p>Alternative 2</p> <p>Impact TULE-FF-1: Construction and maintenance under this alternative would result an increase in the amount of human activity in the project area and introduction of a variety of ignition sources, including vehicles, heavy equipment for grading, trenching, and vegetation removal, heat generating equipment for welding, cutting, or grinding, sparks from various equipment and sources, and potentially discarded cigarettes, among others. Implementation of APMs TULE PDF-1 through TULE PDF-26, and Mitigation Measures FF-1 through FF-4, <u>and additional proposed Mitigation Measures FPP-4 through FPP-7</u> would mitigate the increased probability of a wildfire during construction or maintenance of this alternative. Under CEQA, this impact with implementation of mitigation would be less than significant (Class II).</p>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.
69.	Fire and Fuels Management	D.15-78	<p>Alternative 2</p> <p>Impact TULE-FF-2: The presence of 10028 wind turbines, electrical transmission lines, and overhead collectors presents an ongoing source of potential wildfire ignitions adjacent to wildland fuels...</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.

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			<p><u>Implementation of APMs PDF-1 through PDF-26, Mitigation Measures FF-1 through FF-6, and additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-9) would reduce fire risk and the probability of wildfire from the Tule Wind Project</u> Implementation of Mitigation Measures FF 1 through FF 5 will provide a proactive plan for ongoing operation and maintenance of this alternative with reduced fire threat. However, the adverse effect created by the presence of the wind turbine facility and the corresponding increase in the probability of a wildfire would be adverse and immitigable. Under CEQA, for this alternative, impacts would be considered less than significant with the proposed mitigation and cannot be mitigated to a level that is considered less than significant (Class II).</p>	
70.	Fire and Fuels Management	D.15-78	<p>Alternative 2</p> <p>Impact TULE-FF-3: ... While altering the location of the O&M and collector substation facilities from the project and undergrounding the alternate 138 kV Transmission Line, <u>it would increase the amount of 34.5 KV collector lines which would reduce have the same</u> probability of increased wildfire for the undergrounded section, this alternative would not eliminate the presence of overhead collector lines or turbines; thus, impacts would be similar to those identified for the proposed Tule Wind Project in Section D.15.3.3.</p> <p>Implementation of Mitigation Measures FF-1, FF-2, FF-3, FF-5, and FF-6 and additional proposed mitigation measures included in the Fire Protection Plan (see FPP-11 through FPP-13) will reduce the risk of ignitions and the risk of damage from a project-related ignition; however, this would be adverse and immitigable. Under CEQA, for this alternative, impacts would be considered less than significant and</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.

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			cannot be mitigated to a level that is considered less than significant with the proposed mitigation (Class II).	
71.	Fire and Fuels Management	D.15-79 – D.15-80	<p>Alternative 3</p> <p>Impact TULE-FF-1: Under this alternative the O&M and collector substation facilities would be relocated to the Rough Acres Ranch. Impacts associated with construction and maintenance activities would be the same as those identified for the proposed Tule Wind Project in Section D.15.3.3. Implementation of APMs TULE PDF-1 through TULE PDF-26, and Mitigation Measures FF-1 through FF-4, and additional proposed Mitigation Measures FPP-4 through FPP-7 would mitigate the increased probability of a wildfire during construction or maintenance of the Tule Wind Project. Under CEQA, for this alternative, this impact with implementation of mitigation would be less than significant (Class II).</p>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.
72.	Fire and Fuels Management	D.15-80	<p>Alternative 3</p> <p>Impact TULE-FF-2: The presence of over 10028 wind turbines, electrical transmission lines, and overhead collectors presents an ongoing source of potential wildfire ignitions adjacent to wildland fuels...</p> <p><u>Implementation of APMs PDF-1 through PDF-26, Mitigation Measures FF-1 through FF-6, and additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-9) would reduce fire risk and the probability of wildfire from the Tule Wind Project.</u> Implementation of Mitigation Measures FF-1 through FF-5 would provide a proactive plan for ongoing operation and maintenance of this alternative with reduced fire threat; however, this would remain an adverse and inmitigable effect. Under CEQA, for this alternative, impacts would be significant and</p>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.

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			cannot be mitigated to a level that is considered less than significant <u>with the proposed mitigation</u> (Class II)	
73.	Fire and Fuels Management	D.15-80 – D.15-81	<p>Alternative 3</p> <p>Impact TULE-FF-3: ...Although altering the location of the O&M and collector substation facilities from the project would reduce the length of the 138 kV Transmission Line project component, <u>the 34.5 kV collector line system would increase in distance.</u> Impact TULE-FF-3 would be similar to the proposed project for this alternative.</p> <p>Relocation of the O&M and collector substation facilities under this alternative does not eliminate the presence of the overhead transmission line or turbines; thus, impacts would be the same as those identified for the proposed Tule Wind Project in Section D.15.3.3.</p> <p>Implementation of Mitigation Measures FF-1, FF-2, FF-3, FF-5, and FF-6 <u>and additional proposed mitigation measures included in the Fire Protection Plan (See FPP-11 through FPP-13)</u> will reduce the risk of ignitions and the risk of damage from a project-related ignition; however, this would be adverse and immitigable. Under CEQA, for this alternative, impacts would be <u>considered less than significant and cannot be mitigated to a level that is considered less than significant with the proposed mitigation</u> (Class II).</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.
74.	Fire and Fuels Management	D.15-81 – D.15-82	<p>Alternative 4</p> <p>Impact TULE-FF-1: Construction and maintenance under this alternative would result an increase in the amount of human activity in the project area and introduction of a variety of ignition sources, including vehicles, heavy equipment for grading, trenching, and vegetation removal, heat generating equipment for</p>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.

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			<p>welding, cutting, or grinding, sparks from various equipment and sources, and potentially discarded cigarettes, among others. Impacts associated with construction and maintenance activities would be the same as those identified for the proposed Tule Wind Project in Section D.15.3.3.</p> <p>Implementation of APMs TULE PDF-1 through TULE PDF-26, and Mitigation Measures FF-1 through FF-4, <u>and additional proposed Mitigation Measures FPP-4 through FPP-7</u> would mitigate the increased probability of a wildfire during construction or maintenance of the Tule Wind Project this alternative. Under CEQA, for this alternative, this impact with implementation of mitigation would be less than significant (Class II).</p>	
75.	Fire and Fuels Management	D.15-82	<p>Alternative 2</p> <p><u>Impact TULE-FF-2:</u> The presence of over 10028 wind turbines, electrical transmission lines, and overhead collectors presents an ongoing source of potential wildfire ignitions adjacent to wildland fuels...</p> <p><u>Implementation of APMs PDF-1 through PDF-26, Mitigation Measures FF-1 through FF-6, and additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-9) would reduce fire risk and the probability of wildfire from the Tule Wind Project.</u> Implementation of Mitigation Measures FF-1 through FF-5 will provide a proactive plan for ongoing operation and maintenance of this alternative with reduced fire threat. However, the adverse effect created by the presence of the wind turbine facility and the corresponding increase in the probability of a wildfire would remain an adverse and immitigable effect. Under CEQA, for this alternative, impacts would be considered less than significant with the</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.

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			proposed mitigation and cannot be mitigated to a level that is considered less than significant (Class II).	
76.	Fire and Fuels Management	D.15-82 – D.15-83	<p>Alternative 4</p> <p>Impact TULE-FF-3: ... While altering the location of the O&M and collector substation facilities from the project and undergrounding the alternate 138 kV Transmission Line would reduce the probability of increased wildfire for the undergrounded section, this alternative would not eliminate the increase the presence of the overhead collector lines or turbines; thus, impacts would be similar to those identified for the proposed Tule Wind Project in Section D.15.3.3. Implementation of Mitigation Measures FF-1, FF-2, FF-3, FF-5, and FF-6 <u>and additional proposed mitigation measures included in the Fire Protection Plan (see FPP-11 through FPP-13)</u> would help reduce the adverse risk of ignitions and the risk of damage from a project-related ignition, however, not to a reliable level. Under CEQA, for this alternative, impacts would be <u>considered less than significant and mitigated to a level of less than significant</u> cannot be mitigated to a level that is considered less than significant (Class II).</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.
77.	Fire and Fuels Management	D.15-83	<p>Environmental Setting/Affected Environment</p> <p>Under this alternative the proposed Tule Wind Project would be the same as that described in Section B of this EIR/EIS with the exception that this alternative would remove specific turbine locations. The proposed action would erect 44 <u>5</u> turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (ACEC) and 54 <u>57</u> turbines adjacent to wilderness areas on the western side of the project site (see Figure C-2). Under this alternative these turbines would be removed. Therefore, with the exception of removed turbines, the environmental setting for this alternative would be similar to that identified for the proposed Tule Wind Project in Section D.15.1.</p>	Please update language to reflect corrected analysis per the Modified Project Layout.

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78.	Fire and Fuels Management	D.15-84	<p>Alternative 5</p> <p><u>Impact TULE-FF-1:</u> Similar to the proposed Tule Wind Project, construction and maintenance under this alternative would result an increase in the amount of human activity in the project area and introduction of a variety of ignition sources, despite the reduction in the number of turbines. Impacts associated with construction and maintenance activities would be similar to those identified for the proposed Tule Wind Project in Section D.15.3.3. Implementation of APMs TULE PDF-1 through TULE PDF-26, and Mitigation Measures FF-1 through FF-4, <u>and additional proposed Mitigation Measures FPP-4 through FPP-7</u>would mitigate the increased probability of a wildfire during construction or maintenance of this alternative. Under CEQA, for this alternative, this impact with implementation of mitigation would be less than significant (Class II).</p>	Please include a reference to additional proposed mitigation measures that will further minimize increased probability of a wildfire.
79.	Fire and Fuels Management	D.15-84	<p>Alternative 5</p> <p><u>Impact TULE-FF-2</u></p> <p><u>Implementation of APMs PDF-1 through PDF-26, Mitigation Measures FF-1 through FF-6, and additional mitigation measures included within the Fire Protection Plan (Mitigation Measures FPP-4 through FPP-9) would reduce fire risk and the probability of wildfire from the Tule Wind Project. Implementation of Mitigation Measures FF 1 through FF 5 will provide a proactive plan for ongoing operation and maintenance of this alternative with reduced fire threat; however, this would remain an adverse and immitigable effect.</u> Under CEQA, for this alternative, impacts would be <u>considered less than significant with the proposed mitigation and cannot be mitigated to a level that is considered less than significant</u> (Class II).</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.

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80.	Fire and Fuels Management	D.15-85	<p>Alternative 5</p> <p><u>Impact TULE-FF-3:</u></p> <p>Although the number of turbines is reduced under this alternative, the presence of over 70 turbines results in the same adverse and immitigable effect as identified for the proposed Tule Wind Project in Section D.15.3.3. Implementation of Mitigation Measures FF-1, FF-2, FF-3, FF 5, and FF-6 <u>and additional proposed mitigation measures included in the Fire Protection Plan (See FPP-11 through FPP-13) would help reduce the adverse risk of ignitions and the risk of damage from a project-related ignition; however, not to a reliable level.</u> Under CEQA, for this alternative, impacts would be <u>considered less than significant with the proposed mitigation and cannot be mitigated to a level that is considered less than significant</u> (Class II).</p>	Please update language to reflect the change in impact determination based on the additional proposed mitigation measures.
81.	Fire and Fuels Management	D.15-91	<p>Under the No Project Alternative 3 – No Tule Wind Project, a significant source of ignitions would be removed from the Proposed PROJECT. The Tule Wind Project represents a significant potential source of ignitions and obstruction to firefighting effectiveness and operations; therefore, its removal from the project would significantly reduce the likelihood of wildfires. Additionally, removal of the wind turbines from the landscape would result in substantially reduced obstructions for firefighting response and would avoid a large area of disturbance that could lead to establishment of non-native, fire-prone plant species. Removal of the project would <u>remove the additional roadways and four water tanks proposed to be placed throughout the area, which would be considered a benefit to the general area.</u></p>	The reason for this statement is unclear because potential ignition sources have been mitigated. Please consider revising text accordingly.
82.	Fire and Fuels Management	D.15-97 – D.15-98 Table D.15-8	<p>Mitigation Measure</p> <p><u>FF-1: Develop and Implement a Construction Fire Prevention/Protection Plan.</u> Pacific Wind, Development <u>The applicant shall develop a</u></p>	Please update this mitigation measure to include mitigation language that was included in the SDCFA-approved Tule Wind FPP and information that has been agreed upon with the SDRFPD and SDCFA. See Attachments D.15.1; D.15.3.

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			<p>multiagency Construction Fire Prevention/Protection Plan for the Tule Wind Project and monitor construction activities to ensure implementation and effectiveness of the plan. Plan reviewers shall include the following: CAL FIRE, Rural Fire Protection District, and SDCFA. Pacific Wind Development <u>The applicant</u> shall provide a draft copy of this plan to each listed agency at least 90 days before the start of any construction activities. Comments on the plan shall be provided by Pacific Wind Development <u>the applicant</u> to all other participants, and Pacific Wind Development <u>the applicant</u> shall resolve each comment in consultation with <u>and to the satisfaction of</u> CAL FIRE, Rural Fire Protection District, and SDCFA. The final plan will be approved by the commenting agencies <u>prior to the initiation of construction activities</u> and provided to Pacific Wind Development <u>for the applicant</u> for implementation during all construction activities.</p> <p>At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition <ul style="list-style-type: none"> ○ vegetation clearing ○ fuel modification establishment ○ parking requirements ○ smoking restrictions ○ hot work restrictions • Red Flag Warning restrictions • Fire coordinator role and responsibility • Fire suppression equipment on-site at all times work is occurring • Requirements of Title 14 of the CCR, Article 8 #918 “Fire Protection” for private land portions • Access Road widening (28-foot County roads, 18-foot-wide spur roads) • Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety 	

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			<p>Electric Standard Practice (2009)</p> <ul style="list-style-type: none"> • Emergency response and reporting procedures • Emergency contact information • Worker education materials; kick-off and tailgate meeting schedules • Other information as provided by CAL FIRE, Rural Fire Protection District, SDCFA, BLM, California State Land Commission (CSLC), and Tribal Governments <p>Additional restrictions will include the following:</p> <ul style="list-style-type: none"> • During the construction phase of the project, Pacific Wind Development <u>the applicant</u> shall implement ongoing fire patrols. <u>The applicant shall maintain fire patrols during construction hours and for one (1) hour after end of daily construction, and hotwork during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods.</u> • Fire Suppression Resource Inventory – In addition to CCR Title 14, 918.1(a), (b), and (c), Pacific Wind development <u>the applicant</u> shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the Rural Fire Protection District, SDCFA, and CAL FIRE. • During Red Flag Warning events, as issued daily by the National Weather Service in SRAs and LRAs, and when the USFS PAL is Very High on CNF (as appropriate), <u>all non-essential, non-emergency construction and maintenance activities shall cease or be</u> 	

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			<p>required to operate under a Hot Work Procedure (see TULE-PDF-1). Exception for transmission line testing: A transmission line may be tested, one time only, if the loss of another transmission facility could lead to system instability or cascading outages.</p> <ul style="list-style-type: none"> • Utility <u>The applicant</u> and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF. • All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved <u>throughout the project area</u> route to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition. • Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crewmembers as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect. • Each member of the construction crew shall be trained and equipped to extinguish small fires <u>with hand-held fire extinguishers</u> in order to prevent them from growing into more serious threats. Each crew member shall at all 	

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			<p>times be within 100 yards of a vehicle containing equipment necessary for fire suppression as outlined in the final Construction Fire Prevention/Protection Plan.</p> <ul style="list-style-type: none"> • <u>Water storage tanks (TULE-PDF-7) shall be installed and operational at the time of start of construction, except where construction of new access roads is necessary to reach the SDRFPD’s preferred location for the water tank, in which case the water tank will be installed along with access road construction.</u> <p>Pacific Wind Development The applicant shall fully implement the plan during all construction and maintenance activities. All construction work on <u>the ECO Substation Project, ESJ Project, and the Tule Wind Project</u> shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments, and plan contents are to be incorporated into the standard construction contracting agreements for the construction of the Tule Wind Project. Primary plan enforcement implementation responsibility shall remain with Pacific Wind Development <u>the applicant</u> and monitored by CAL FIRE, Rural Fire Protection District, and SDCFA.</p> <p>Monitoring/Reporting Action</p> <p>CAL FIRE, Rural Fire Protection District, SDCFA, BLM, CSLC, BIA, and/or Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed), and USFS (as appropriate) will review Pacific Wind Development’s <u>Tule Wind, LLC’s</u> Construction Fire Prevention/Protection Plan and ensure its implementation.</p>	
83.	Fire and Fuels	D.15-98 – D.15-99	Mitigation Measure	Please revise to include the additional mitigation

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	Management	Table D.15-8	<p>FF-2: Revise Existing Wildland Fire Prevention and Fire Safety Electric Standard Practice Plan (2009) to Create the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan. Revised plan will address the <u>ECO Substation Project, ESJ Project, and the Tule Wind Project</u> and will be implemented during all operation and maintenance work associated with the project for the life of the project. Important fire safety concepts that will be included in this document are as follows:</p> <ul style="list-style-type: none"> • Focused Fire Protection Plan content applicable to the <u>Tule Wind Project's applicant's</u> ongoing operation • Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans) • Fuel modification buffers required by the FPP • When vegetation work will occur (prior to any other work activity) • Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread • Coordination procedures with fire authority • Integration of the project's Construction Fire Prevention/Protection Plan content • Personnel training and fire suppression equipment. <u>Prior to energizing the Tule Wind Project, Tule Wind, LLC will install a skid-mounted Type VI firefighting unit with at least 100 gallons water capacity and a pump rate of approximately 25-30 gallons per minute into two (2) of its operations and maintenance pick-up trucks. In addition, also</u> 	measures that are included in the Tule FPP to reduce potential impacts due to the construction and operation of the project.

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			<p><u>prior to energizing the Tule Wind Project, Tule Wind, LLC personnel will undergo training by San Diego Rural Fire Protection District personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires.</u></p> <ul style="list-style-type: none"> • Red Flag Warning restrictions for operation and maintenance work • Fire safety coordinator role as manager of fire prevention and protection procedures, coordinator with fire authority and educator • Communication protocols • Incorporation of CAL FIRE, San Diego Rural Fire Protection District, and SDCFA reviewed and approved Response Plan mapping and assessment. • Other information as provided by CAL FIRE, San Diego Rural Fire Protection District, SDCFA, BLM, CSLC, Tribal Governments, and USFS. <p>Pacific Wind Development <u>The applicant will provide a draft copy of the Wildland Fire Prevention and Fire Safety Electric Standard Practice to the agencies listed previously for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to Pacific Wind Development the applicant and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be approved by the commenting agencies prior to energizing the project and provided to Pacific Wind Development the applicant for implementation during all operation and maintenance activities.</u></p> <p>Monitoring/Reporting Action</p>	

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			<p>CAL FIRE, Rural Fire Protection District, SDCFA, BLM, and USFS will review and provide comment, and CAL FIRE, Rural Fire Protection District, and SDCFA will approve the applicant's Pacific Wind Development's revised Fire Plan for Electric Standard Practice. BLM and San Diego County will verify adoption of plan.</p>	
84.	Fire and Fuels Management	<p>D.15-99 – D.15-100 Table D.15-8</p>	<p>Mitigation Measure</p> <p>FF-3: Development Agreement with Rural Fire Protection District and San Diego County Fire Authority (SDCFA). Provide funding for the training and acquisition of necessary firefighting equipment and services to Rural Fire Protection District/SDCFA to improve the response and firefighting effectiveness near wind turbines, electrical transmission lines, and aerial infrastructure <u>based on fire protection needs and each agency's professional judgment.</u> Although not implementable on BLM or other federal land, the local fire authority will respond through mutual aid to wildfires within its jurisdiction, regardless of land ownership designation. Funding would be provided through a Development Agreement with between the applicant and the Rural Fire Protection District and SDCFA <u>which shall be executed prior to construction.</u> The Development Agreement would include, but not be limited to, the following items as agreed upon by Rural Fire Protection District, SDCFA, and the applicant:</p> <ul style="list-style-type: none"> • Funding toward purchase of a Type I (or other) fire engine equipped for potential project related fires (i.e., foam capability). • Funding as required by standard Fire District fee schedule • Foam concentrate supply of 450 gallons, foam education equipment, and nozzles on mobile trailer. 	<p>Fire agencies respond statewide via the state Mutual Aid system. This includes emergencies in Federal land or BLM land, reservations, etc. Fire agencies also respond nationwide and into Mexico upon request.</p> <p>Please update language to reflect the changes in this mitigation measure.</p>

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			<p>Monitoring and Reporting Action Rural Fire Protection District/SDCFA verifies Pacific Wind Development <u>Tule Wind, LLC</u> contributes to fund.</p> <p>Effectiveness Criteria Agreement is finalized. Annual contributions are made according to agreement between Pacific Wind Development <u>Tule Wind, LLC</u> and Rural Fire Protection District/SDCFA. Equipment is acquired and put “online”.</p>	
85.	Fire and Fuels Management	D.15-100 Table D.15-8	<p>Mitigation Measure</p> <p>FF-4: Customized Fire Protection Plan for Project. A Fire Protection Plan to include, at minimum, the following:</p> <ul style="list-style-type: none"> • San Diego County FPP Content Requirements (http://www.co.san-diego.ca.us/dplu/docs/Fire-Report-Format.pdfhttp://www.sdcounty.ca.gov/dplu/docs/Fire-Report-Format.pdf) • Rural Fire Protection District Content Requirements <ul style="list-style-type: none"> ○ Provisions for fire safety and prevention ○ Water supply ○ Fire suppression/detection systems – built-in detection system with notification ○ Secondary containment ○ Site security and access ○ Emergency shut-down provisions ○ Fuel modification plan ○ Access road widths and surfacing ○ Emergency drill participation • Emergency evacuation plan- • Integration into Plans created to satisfy <u>Mitigation Measures FF-1 and FF-2-</u> 	Please update correct website reference and the language to reflect the changes in this mitigation measure.

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			<p>The FPP will incorporate additional APMs described in Section B.4.4 of this EIR/EIS. <u>The final FPP is to be approved by the commenting agencies prior to construction.</u></p> <p>Timing Draft FPP incorporated into EIR/EIS submittal. Findings incorporated into Plans created to satisfy Mitigation Measures FF-1 and FF-2. Comments provided to <u>Tule Wind, LLC</u> Pacific Wind Development a minimum of 60 days prior to scheduled start of construction. Final FPP completed a minimum of 30 days prior to the scheduled start of construction. Plan applicable for life of project.</p>	
86.	Fire and Fuels Management	D.15-100 – D.15-101 Table D.15-8	<p>Mitigation Measure</p> <p>FF-5: Wind Turbine Generator Fire Protection Systems. Fire detection, warning, and suppression systems for each wind turbine generator will include the latest <u>modern</u> technology and will address, at minimum, the following:</p> <ul style="list-style-type: none"> • Use of non-combustible or difficult to ignite materials • Early fire detection and warning systems • Frequent maintenance <u>Maintenance according to manufacturer specifications</u> • Auto switch-off and complete disconnection from the power supply system • Ongoing hazard/fire safety training for staff • Automatic fire extinguishing systems in the nacelle of each wind turbine (stationary, inert gas, or similar). Pacific Wind Development <u>Tule Wind, LLC</u> will implement this technology through the wind turbine manufacturer or an aftermarket supplier. • Non-combustible or high flash point lubricant oils. 	Please update to reflect some slight changes to this mitigation measure.

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			<p>Monitoring and Reporting Action Rural Fire Protection District and SDCFA approve Pacific Wind Development Tule Wind, LLC's Fire Protection System.</p>	
87.	Fire and Fuels Management	D.15-101 Table D.15-8	<p>MM FF-6 Funding for <u>Fire Inspection</u> FireSafe Council. The applicants are to provide funding for locally based one (1) SDCFA Fire Code Specialist II position to enforce existing fire code requirements, including but not limited to implementing required fuel management requirements (e.g., defensible space), in priority areas to be identified by the SDCFA for the life of the project. In addition, the applicants are to provide funding to allow SDCFA to employ up to four (4) volunteer/reserve firefighters as part-time code inspectors on a stipend basis for up to 90 days per year for the life of the project. FireSafe Council (e.g., Campo/Lake Moreno FireSafe Council) to prepare or implement a Community Wildfire Protection Plan. The funding for the SDCFA Fire Code Specialist II position and the four (4) volunteer/reserve firefighters as part-time code inspectors will be provided through proportional contributions from each applicant to the SDCFA through their respective Development Agreements (see MM FF-3), which shall be executed prior to construction. will be determined in conjunction with the local fire authority's input, the specified fuel reduction project priorities identified by the FireSafe Council and in consideration of the funding amount provided under Mitigation Measure FF 3.</p> <p>Location Funds to be allocated by SDCFA for hazard reduction projects within the nearest jurisdiction/FireSafe Council boundary with assets to be protected.</p> <p>Monitoring and Reporting Action San Diego County FireSafe Council verifies project contributions. SDCFA verifies project contributions</p>	<p>Although Tule Wind, LLC maintains that the mitigation measures and APMs included in its FPP approved by the SDRFPD (Nov. 2010) fully mitigate all fire-related impacts associated with the Tule Wind Project, Tule Wind, LLC agrees with the SDCFA and SDRFPD that the DEIR/DEIS misses a key opportunity to apply mitigation measures that would reduce the existing baseline risk of damage and destruction by wildfire to the structures in the high and very high fire risk areas to the west of the Proposed Project. By reducing this baseline risk, which exists today and will continue to exist even if the Proposed Project is never constructed, any risk of wildfire ignition added by the ECO Substation, ESJ Gen-Tie, and Tule Wind Projects could be offset, thereby resulting in a Class II less than significant impact after mitigation for Impact FF-2.</p> <p>Based on the fire agencies' experience, the most effective way to reduce baseline fire risk to structures in the very high and high fire risk areas to the west of the Proposed Project is to increase fire code compliance inspections on structures in that area. In the fire agencies' experience, fire code inspections result in very high compliance rates, which translates into significant improvement in structure survivability in a wildfire. SDCFA has assessed the Proposed Project's risk of increasing the likelihood of wildfire ignition after application of APMs and Mitigation Measures, and has concluded that with sufficient funding, it could offset any remaining risk by adding one (1) full-time Fire Code Specialist II, and four (4) part-time, stipend reserve and/or volunteer firefighters that perform fire code inspections up to ninety (90) days per year. It is the</p>

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			<p><u>and effectiveness of inspection program.</u></p> <p>Effectiveness Criteria Funds are deposited. <u>SDCFA conducts defensible space inspections. Community Wildfire Protection Plan is prepared and/or hazard reduction projects are initiated and completed.</u></p> <p>Responsible Agency <u>San Diego County Fire Safe Council</u> SDCFA monitors Pacific Wind Development Tule Wind, LLC's fund contributions</p>	<p>SDCFA's opinion that this reduction of baseline fire risk, which exists regardless of whether the Proposed Project is built, would offset any additional unavoidable risk of wildfire ignition posed by the Proposed Project, and consequently, that Impact FF-2 should be changed to a Class II less-than-significant impact. SDCFA's proposed mitigation measure revises and replaces MM FF-6 in the DEIR/EIS.</p>
88.	Fire and Fuels Management	D.15-106	<p>Residual Effects</p> <p>Implementation of the mitigation measures presented in Section D.15.8 would not mitigate the impacts in Table D.15-9 <u>for the Substation and the ESJ transmission line</u> because full mitigation of wildfire related impacts from the presence of the Proposed PROJECT or alternatives (including turbines, transmission line, and related facilities) increases the probability of a wildfire and reduces the effectiveness of firefighting and, therefore, cannot be fully mitigated <u>for the Substation and the ESJ transmission line</u>. The transmission line and wind turbine presence results in a potential ignition source, with historical fire start examples, located over a long time horizon within a susceptible fire environment. The electrical transmission lines and related components and the wind turbine facility present a potential obstacle for normal firefighting operations and strategies and even with training, firefighting effectiveness will be reduced by the presence of these facilities over a long time frame. <u>The Tule Wind APMs and Mitigation Measures FF-1 through FF-7, and the additional mitigation measures included in the Fire Protection Plan (FPP-4 through FPP-9, FPP-11 through FPP-13) would reduce impacts relative to the Tule Wind Project to a level of less than significant.</u> Under</p>	<p>Please revise language to include the additional mitigation measures that are included in the Tule wind FPP to reduce potential impacts to a level less than significant.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification												
			CEQA, the following remaining project impacts would be significant and cannot be mitigated to a level that is considered less than significant; therefore, impacts would yield residual effects.													
89.	Fire and Fuels Management	D.15-107 Table D.15-9	<table border="1"> <thead> <tr> <th data-bbox="785 420 936 488"><i>Impact No.</i></th> <th data-bbox="936 420 1163 488"><i>Description</i></th> <th data-bbox="1163 420 1352 488"><i>Status after Mitigation</i></th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="785 488 1352 521">Tule Wind Class I Impacts</td> </tr> <tr> <td data-bbox="785 521 936 914">Tule FF 2</td> <td data-bbox="936 521 1163 914">Presence of project facilities including overhead transmission line would increase the probability of a wildfire.</td> <td data-bbox="1163 521 1352 914">The presence of the 138 kV transmission line and wind turbines would increase the probability of a wildfire and would remain a significant and unmitigable impact.</td> </tr> <tr> <td data-bbox="785 914 936 1344">Tule FF 3</td> <td data-bbox="936 914 1163 1344">Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting.</td> <td data-bbox="1163 914 1352 1344">The 138 kV transmission line and wind turbines present an obstacle for normal firefighting operations and would remain a significant and unmitigable impact.</td> </tr> </tbody> </table>	<i>Impact No.</i>	<i>Description</i>	<i>Status after Mitigation</i>	Tule Wind Class I Impacts			Tule FF 2	Presence of project facilities including overhead transmission line would increase the probability of a wildfire.	The presence of the 138 kV transmission line and wind turbines would increase the probability of a wildfire and would remain a significant and unmitigable impact.	Tule FF 3	Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting.	The 138 kV transmission line and wind turbines present an obstacle for normal firefighting operations and would remain a significant and unmitigable impact.	Please consider revising impact determination based on the additional proposed mitigation measures. For the reasons set forth in previous discussion and the additional applied mitigation measures, all impact determinations for Tule-FF-2 and Tule-FF-3 should be changed from Class I to Class II.
<i>Impact No.</i>	<i>Description</i>	<i>Status after Mitigation</i>														
Tule Wind Class I Impacts																
Tule FF 2	Presence of project facilities including overhead transmission line would increase the probability of a wildfire.	The presence of the 138 kV transmission line and wind turbines would increase the probability of a wildfire and would remain a significant and unmitigable impact.														
Tule FF 3	Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting.	The 138 kV transmission line and wind turbines present an obstacle for normal firefighting operations and would remain a significant and unmitigable impact.														

Attachments

D.15.1 - San Diego Rural Fire District Approval Letter (November 3, 2010)

D.15.2 - San Diego County Fire Authority Acceptance Letter (February 28, 2011)

D.15.3 - Tule Wind Fire Protection Plan (February 28, 2011)

D.15.4 - Iberdrola Renewables (Harley McDonald). Letter to San Diego County Fire Authority (James Pine) (October 25, 2010)

D.15.5 - Jim Hunt Comment Letter

D.15.6 - RC Biological Consulting (Robin Church). Letter to County of San Diego (Patrick Brown, via email) (January 10, 2011)

D.15.7 - Dr. Thompson Fire Analysis Letter (March 2, 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.16: Social and Economic Conditions

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Social and Economic Conditions	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Social and Economic Conditions	D.16-9	<p>Executive Order 12898 which addresses environmental justice in minority populations and low-income populations is not included in the federal regulatory section.</p> <p><u>The Council on Environmental Quality (CEQ) has oversight of the Federal government’s compliance with Executive Order 12898 and the National Environmental Policy Act (NEPA). CEQ, in consultation with EPA and other affected agencies, has developed this guidance to further assist Federal agencies with their NEPA procedures so that environmental justice concerns are effectively identified and addressed.</u></p> <p><u>Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs Federal agencies to make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations, low-income populations, and Indian tribes.</u></p> <p><u>A description of the geographic distribution of low-income and minority population groups was based on</u></p>	Consider adding Regulatory Setting to Federal Regulations, Plans and Standards Section D.16.2.1. Please update the language to reflect this regulation.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p><u>demographic data from the 2000 Census (U.S. Bureau of the Census 2001). The following definitions of individuals were used to define low-income and minority populations:</u></p> <ul style="list-style-type: none"> • <u>Minority.</u> Persons are included in the minority category if they classify themselves as belonging to any of the following racial groups: Hispanic, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. <p><u>Beginning with the 2000 Census, where appropriate, the Census form allows individuals to designate multiple population group categories to reflect their ethnic or racial origin. In addition, persons who classify themselves as being of multiple racial origins may choose up to six racial groups as the basis of their racial origins. The term minority includes all persons, including those classifying themselves in multiple racial categories, except those who classify themselves as not of Hispanic origin and as White or “Other Race” (U.S. Bureau of the Census 2001).</u></p> <p><u>A minority population exists where the percentage of minority persons for any given geographic unit, a state, for example, is more than 20 percentage points higher than the percentage of minority persons for the reference geographic unit, the 11-state region, for example. A minority population also exists in any geographic unit where the number of minority persons exceeds 50 percent of the total population.</u></p> <ul style="list-style-type: none"> • <u>Low-Income.</u> Low-income individuals are defined as individuals who fall below the poverty line. The poverty line takes into account family size and age of individuals in the family. In 1999, for example, the poverty line for a family of five with three children below the age of 18 was \$19,882. For any given family below the poverty line, all family members are considered as being below 	

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p><u>the poverty line for the purposes of analysis (U.S. Bureau of the Census 2001).</u></p> <p><u>A low-income population exists where the percentage of low-income persons for any given geographic unit, a state, for example, is more than 20 percentage points higher than the percentage of low-income persons for the reference geographic unit, the 11-state region, for example. A low-income population also exists in any geographic unit where the number of low-income persons exceeds 50 percent of the total population.</u></p>	
3.	Social and Economic Conditions	D.16-13 Table D.16-7	Project construction and operation would <u>not</u> cause a decrease in property values.	<p>Please consider revising the language to be consistent with the discussion of Impact Socio-3, which concludes “insufficient evidence to suggest that property values near wind developments are affected by wind facilities, and if these impacts do exist, they are either too small and/or too infrequent to result in any widespread and consistent statistically observable impact,” which is based on the Memorandum of HDR, Summary of Current Studies Regarding Wind Farms and Property Values, dated October 16, 2009. Attached are additional studies with similar conclusions published after that date, including, Hoen et al., Ernest Orlando Lawrence Berkeley National Laboratory. The Impact of Wind Power Projects on Residential Property Values in the United States: A Multi-Site Hedonic Analysis, Ernest Orlando Lawrence Berkeley National Laboratory (December 2009).</p> <p>Please see Attachment D.16.1, Piner, Angela. Wind and Property Values Memorandum (October 2009) and Attachment D.16.2, Hoen, et al. The Impact of Wind Power Projects on Residential Property Values in the United States (December 2009).</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
4.	Social and Economic Conditions	D.16-16	<p><i>Second paragraph</i></p> <p>Construction of the Tule Wind Project is anticipated to require 2 years to complete and would require an average daily peak workforce of <u>approximately 125 workers</u> and an estimated peak workforce of approximately 325 workers. It is estimated that approximately 60% to 70% of the site labor would be employed locally, and local construction expenditures are estimated to be \$3,407,000-3,507,000 (Iberdrola Renewables, Inc. 2010b-Tule Wind LLC, 2011).</p>	Please revise to reflect corrected analysis.
5.	Social and Economic Conditions	D.16-16	<p><i>Third paragraph</i></p> <p>Once completed, the Tule Wind Project would require up to 12 <u>full-time</u> employees.</p>	Please consider revising the estimated number of employees throughout operations to reflect the corrected analysis.

Attachments

D.16.1 - Piner, Angela. Wind and Property Values Memorandum (October 2009)

D.16.2 - Hoen, et al., Ernest Orlando Lawrence Berkeley National Laboratory. The Impact of Wind Power Projects on Residential Property Values in the United States (December 2009)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.17: Environmental Justice

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Environmental Justice		No Comments on Section D.17, Environmental Justice	

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT

IBERDROLA RENEWABLES

COMMENTS & SUGGESTED REVISIONS

Section D.18: Climate Change

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Climate Change	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Climate Change	D.18-2	<u>With respect to the California Environmental Quality Act (CEQA), the CEQA Guidelines directs that the lead agency make a careful effort to quantify a project’s GHG emissions, and to assess the significance of a project’s GHG emissions on the environment, including to the extent the project will increase or decrease GHG emissions compared to the environmental setting, whether the project exceeds the applicable threshold of significance for GHG emissions, and the extent to which the project complies with regulations and requirements adopted to implement statewide, regional, or local plans to reduce or mitigate GHG emissions (14 CCR 15064.4). The CEQA Guidelines allow the lead agency to develop its own threshold of significance for GHG emissions, or adopt the threshold of another agency. (14 CCR 15064.7(c)).</u>	Please consider inserting the proposed text immediately before Section D.18.1. The purpose of the proposed text is to provide a corresponding discussion of how CEQA addresses GHG emissions to match that provided for NEPA.
3.	Climate Change	D.18-7	[please consider inserting after the CEQ discussion] <u>Federal Energy Policy Act of 2005</u> <u>The Federal Energy Policy Act of 2005 sets as a goal the approval of at least 10,000 MW of non-</u>	Please consider inserting the relevant 2015 federal renewable energy goal for public lands expressed in the Federal Energy Policy Act of 2005. See Attachment D.18.1, Federal Energy Policy Act of 2005.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<u>hydropower renewable energy projects on public lands by 2015.</u>	
4.	Climate Change	D.18-12	<p><u>CARB Regulation Adopting 33% Renewable Energy Standard</u></p> <p><u>Pursuant to Executive Order S-21-09, on September 23, 2010, CARB unanimously adopted the Renewable Energy Standard (RES) to require that most retail sellers of electricity in California obtain 33% of their supply through renewable energy by 2020.</u></p>	Please consider inserting the proposed text after the Executive Order S-21-09 discussion to accurately reflect the Renewable Energy Standard requirement in California.
5.	Climate Change	D.18-12	<p>D.18.3.1 Definition and Use of CEQA Significance Criteria/Indicators under NEPA</p> <p>GHG emissions contributing to global climate change have only recently been addressed in. It is clear that CEQA documents now require a discussion of climate change. (14 CCR 15064.4, 15064.7), such that CEQA and case law do not provide much guidance relative to their assessment. In addition, CEQA also does, however, provides guidance regarding topics where some degree of forecasting may be necessary, such as climate change (14 CCR 15144). Section 15144 notes that preparation of an environmental impact analysis document necessarily involves some degree of forecasting. While forecasting the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.</p> <p>The San Diego Air Pollution Control District (SDAPCD) has not established CEQA significance thresholds for GHG emissions, <u>however, the San Diego County Department of Planning & Land Use issued an Interim Approach to Addressing Climate Change in CEQA Documents (July 22, 2009). The County's Interim Approach establishes an initial screening level of 900 metric tons of GHG emissions</u></p>	<p>Please consider revising the text to include CEQA Guidelines that explicitly direct the lead agency to consider climate change under CEQA.</p> <p>Please note that the San Diego County Department of Planning & Land Use issued an Interim Approach to Addressing Climate Change in CEQA Documents (July 22, 2009), which establishes an initial screening level of 900 metric tons of GHG emissions per year, and suggests that a project be found to have a significant impact on climate change if “[t]he project would conflict with the implementation of AB 32. To demonstrate that the project would not conflict with the implementation of AB 32, the project should demonstrate how it would reduce overall carbon emissions to 25% below Business As Usual (BAU).” See Attachment D.18.2, San Diego County Department of Planning & Land Use - Interim Approach to Addressing Climate Change in CEQA Documents (July 22, 2009).</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p><u>per year, and suggests that a project be found to have a significant impact on climate change if “[t]he project would conflict with the implementation of AB 32. To demonstrate that the project would not conflict with the implementation of AB 32, the project should demonstrate how it would reduce overall carbon emissions to 25% below Business As Usual (BAU). In addition,</u> However, the Natural Resources Agency adopted CEQA Guidelines Amendments on December 30, 2009, which are now effective (California Natural Resources Agency 2009).”</p>	
6.	Climate Change	D.18-13	<p>Third Paragraph</p> <p>“To assess the impacts of the significance of the Proposed PROJECT’s GHG emissions with respect to CEQA, the CPUC will apply the SCAQMD significance threshold of 10,000 MTCO₂E/yr, including all operational emissions and the construction emissions amortized over 30 years for this project. <u>The CPUC will also assess the extent to which the Proposed PROJECT decrease GHG emissions compared to the environmental setting. (14 CCR 15064.4).”</u></p>	<p>The CEQA Guidelines direct the lead agency to account for both a proposed project’s potential to increase and decrease GHG emissions from the environmental setting. Please consider revising the text to include an evaluation of the Proposed PROJECT’s potential to decrease GHG emissions.</p>
7.	Climate Change	D.18-14 Table D.18-2	<p>Tule Wind - Greenhouse Gas Impacts</p> <p>Tule-GHG-1 – Class IIIIV Tule-GHG-2 – Class IIIIV Tule-GHG-3 – Class IIIIV</p>	<p>Please consider changing the impact determination for the impacts relative to Greenhouse Gases for the Tule Wind Project to indicate a Class IV Beneficial Impact, based on the information presented herein.</p>
8.	Climate Change	D.18-16	<p>Operational Emissions</p> <p>The operational emissions would be less than the NEPA indicator of 25,000 MTCO₂E/yr. Identified operational impacts would not be adverse. In addition, when combined with the amortized annual construction emissions, the ECO Substation Project’s GHG emissions would be 4,132 MTCO₂E/yr, <u>prior</u></p>	<p>Tule Wind, LLC has calculated the amount of avoid GHG emissions and water used through the generation of wind energy associated with the Tule Wind Project. See Attachments D.18.3, Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti, to Dr. Fisher and Mr. Thomsen (March 2011); and Attachment D.18.4, Letter from Valorie Thompson, Ph.D., Scientific</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p><u>to applying any calculation of GHG offsets through the displacement of traditional fossil-fuel electricity generation.</u> The combined GHG emissions would be well below the CEQA significance threshold of 10,000 MTCO₂E per year. Furthermore, APMs ECO-AIR-12 and ECO-AIR-13, which call for routine inspection and maintenance of SF₆ equipment, and which evaluate the feasibility of using rooftop photovoltaic panels as part of the ECO Substation Project, would further reduce impacts related to GHG emissions. Under CEQA, impacts would be considered less than significant (Class III). In addition, the project would facilitate interconnection of renewable sources of energy, thereby potentially decreasing overall GHG emissions attributable to electrical generation in California, <u>as quantified and described below with respect to the Tule Wind Project and ESJ Gen-Tie Project.</u> Under CEQA, the project would have a <u>beneficial impact (Class IV) because it would reduce greenhouse gas emissions, criteria air pollutant emissions, and water use below that estimated in the environmental baseline.”</u></p>	<p>Resources Associated, to Patrick O’Neill, HDR Engineering Inc. (March 3, 2011).</p> <p>Please consider including this important information.</p>
9.	Climate Change	D.18-17	<p>Construction Emissions</p> <p>GHG emissions were simulated for the construction phase of the Tule Wind Project. These GHG emissions will occur as a result of burning the fuel required to operate the on-site construction equipment and mobilize work crews to and from the Tule Wind Project site. The CO₂E annual emissions were calculated using the <u>OFFROAD emission factors generated by the SCAQMD (SCAQMD 2007) (which are considered representative of the southern California fleet of construction equipment) for heavy construction equipment, and emission factors from the EMFAC2007 Model.</u> CH₄ and N₂O emissions were calculated by adjusting the CO₂ emissions were adjusted using factors for diesel</p>	<p>Please consider updating the discussion of air emissions, as reflected in Section D.11.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification										
			<p>use in off-road vehicles from the California Climate Action Registry's General Reporting Protocol (GRP), and emission factors for vehicles from the GRP, to calculate the total GHG emissions as CO₂E indicated in the Tule Wind Applicant's Environmental Document (Iberdrola Renewables, Inc. 2010) were adjusted to account for delivery vehicles and worker vehicles, and emission factors used for construction equipment were revised as well (refer to Appendix 8, Air Quality Calculations). Table D.18-4, Estimated Construction Greenhouse Gas Emissions for the Tule Wind Project, shows the total annual GHG construction emissions associated with construction of the Tule Wind Project.</p>											
10.	Climate Change	D.18-17 Table D.18-4	<p>Construction Year CO₂E Emissions (total metric tons/year)</p> <table border="0"> <tr> <td>2010</td> <td style="text-align: right;">625</td> </tr> <tr> <td>2011</td> <td style="text-align: right;">7,208</td> </tr> <tr> <td>2012</td> <td style="text-align: right;">7,296</td> </tr> <tr> <td>Total</td> <td style="text-align: right;">15,129 7,908</td> </tr> <tr> <td>Amortized Annual Emissions</td> <td style="text-align: right;">504 264</td> </tr> </table>	2010	625	2011	7,208	2012	7,296	Total	15,129 7,908	Amortized Annual Emissions	504 264	Please revise Table D.18-4 accordingly to reflect accurate GHG emissions from the Tule Wind Project.
2010	625													
2011	7,208													
2012	7,296													
Total	15,129 7,908													
Amortized Annual Emissions	504 264													
11.	Climate Change	D.18-17	<p>Third paragraph</p> <p>Impacts resulting from decommissioning would be well below the NEPA indicator of 25,000 MTCO₂E/yr, and would not be adverse. <u>Therefore, GHG emissions that occur during decommissioning activities will not result in an adverse impact.</u></p>	Please include a conclusion to this paragraph to describe the GHG emissions resulting decommissioning activities.										
12.	Climate Change	D.18-18	<p>Operational Emissions</p> <p>The O&M of the project would contribute a small amount of vehicle emissions from up to 12 permanent employees. GHG emissions from the O&M of the Tule Wind Project were estimated to be</p>	Tule Wind, LLC has calculated the amount of avoided GHG emissions, criteria air pollutants, and water used through the generation of wind energy associated with the Tule Wind Project. See Attachments D.18.3, Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti,										

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>approximately 142 <u>73</u> MTCO₂E/yr (see Appendix 8, Air Quality Calculations).</p> <p>The operational emissions would be less than the NEPA indicator of 25,000 MTCO₂E/yr. Identified operational impacts would not be adverse. In addition, when combined with the amortized annual construction emissions, the Tule Wind Project's GHG emissions would be 337<u>646</u> MTCO₂E/yr, <u>prior to applying any calculation of GHG offsets through the displacement of traditional fossil-fuel electricity generation.</u> The combined GHG emissions would be well below the CEQA significance threshold of 10,000 MTCO₂E/yr. Under CEQA, impacts would be considered less than significant (Class III). In addition, the project would create a renewable source of energy, thereby potentially decreasing overall <u>GHG emissions attributable to electrical generation in California.</u></p> <p><u>The Tule Wind Project would offset 231,744 metric tons of CO₂ emissions per year by displacing fossil-fuel based electricity generation, creating a net reduction in CO₂ emissions of 231,407 metric tons/yr after accounting for the Tule Wind Project's own yearly operational emissions. (Attachment D.18.3, Table 2). Furthermore, the Tule Wind Project would also offset criteria air pollutants that would otherwise have been emitted by fossil-fuel based electricity generation, conservatively estimated as 12.4 short tons/yr of oxides of nitrogen (NO_x), 11.1 short tons/yr of particulate matter 10 microns or less in size (PM₁₀), 14.7 short tons/yr of carbon monoxide (CO), 3.8 short tons/yr of oxides of sulfur (SO_x), and 3.8 short tons/yr of volatile organic compounds (VOC). (Attachment D.18.3, Table 3). Finally, the Tule Wind Project would offset annual water use of approximately 149 million gallons/yr after accounting for its own water use. (Attachment</u></p>	<p>to Dr. Fisher and Mr. Thomsen (March 2011); and Attachment D.18.4, Letter from Valorie Thompson, Ph.D., Scientific Resources Associated, to Patrick O'Neill, HDR Engineering Inc. (March 3, 2011). Please consider including this important information.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			D.18.3, Table 4). Under CEQA, the project would <u>have a beneficial impact (Class IV) because it would reduce greenhouse gas emissions, criteria air pollutant emissions, and water use below that estimated in the environmental baseline.</u>	
13.	Climate Change	D.18-19 Table D.18-6	<p>Construction Year CO₂E Emissions (total metric tons/year)</p> <p>2010 <u>4,331</u></p> <p>2011 <u>17,502</u></p> <p>2012 <u>8,586</u></p> <p>Total <u>30,419</u><u>23,817</u></p> <p>Amortized Annual Emissions <u>1,014</u> <u>773</u></p>	Please revise Table D.18-6 accordingly to reflect accurate GHG emissions from the Proposed PROJECT.
14.	Climate Change	D.18-20	<p>Operational Emissions</p> <p>GHG emissions during O&M of the Proposed PROJECT will be the result of burning fuel during vehicle and equipment operation, electrical generation used to power the ECO and Boulevard substations, and fugitive emissions of SF6 from the operation of transmission-line equipment. GHG emissions from the O&M of the Proposed PROJECT were estimated to be approximately 3,819 <u>3,741</u> MTCO₂E/yr. Although sufficient project-level information has yet to be developed for the Campo, Manzanita, and Jordan wind energy project components to the Proposed PROJECT, it is assumed that these three wind projects would generate similar GHG emissions during O&M as the Tule Wind project due a small amount of vehicle emissions from employees trips to the facilities. The operational emissions are less than the NEPA indicator of 25,000 MTCO₂E/yr. Identified operational impacts would not be adverse. In addition, when combined with the amortized annual construction emissions, the Proposed PROJECT's</p>	Please consider the proposed revisions, based on the justification provided in Comment 12, above.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>GHG emissions would be 4,824,514 MTCO₂E/yr. The combined GHG emissions will be well below the CEQA significance threshold of 10,000 MTCO₂E/yr. <u>In addition, the PROPOSED PROJECT would displace fossil-fuel based electricity generation, creating a net reduction in CO₂ emissions that will consist of the Tule Wind Project's offsets described above, in addition to any associated benefit from the other projects. Likewise, the Proposed PROJECT would also offset criteria air pollutants that would otherwise have been emitted by fossil-fuel based electricity generation. These offsets include the Tule Wind Project's offsets described above, along with any associated benefit from the other projects. Under CEQA, the Proposed PROJECT would have a beneficial impact-s would be considered less than significant (Class IVH) because it would reduce greenhouse gas emissions, criteria air pollutant emissions, and water use below that estimated in the environmental baseline.</u></p>	
15.	Climate Change	D.18-20	<p>Impact GHG-3:</p> <p>“California’s current RPS is intended to increase the share of renewable energy to 20% by the end of 2010, and the RES adopted by CARB regulations requires 33% renewable energy generation by 2020. Based on Governor Schwarzenegger’s call for a statewide 33% RPS, the Climate Change Seoping Plan anticipates that California will have 33% of its electricity provided by renewable resources by 2020.”</p> <p><u>“ . . . The Proposed PROJECT, along with the proposed Campo, Manzanita, and Jordan wind projects would therefore be consistent with and critical to achieving federal and state initiatives aimed at reducing GHG emissions and increasing the percentage of renewable energy generation nationally and in California, and impacts would</u></p>	Please revise language to reflect corrected analysis.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			therefore not be adverse. Under CEQA, <u>the PROPOSED PROJECT would have a beneficial impacts would be considered less than significant</u> (Class <u>IVH</u>).	
16.	Climate Change	D.18-25 Table D.18-8	Impact Classification Change all “Classification” designations from “Class III” to “Class IV”	Please consider changing the “Classification” for Impact Tule-GHG-1 through Tule-GHG-3 for Tule Wind Alternatives 1 through Tule Wind Alternative 5 from “Class III” to “Class IV” based on the previous comments.
17.	Climate Change	D.18-26	Tule Wind Alternative 1, Impacts GHG-1 and GHG-2: “Operational impacts associated with this alternative would be the same. Identified impacts would not be adverse. Under CEQA, GHG emissions from construction (amortized over 30 years), plus those from operational and maintenance activities, <u>less those emissions that would be offset by the Tule Wind Project</u> , would be expected to result in a <u>less-than-significant beneficial impact</u> (Class <u>IVH</u>).”	Please consider the proposed revisions, based on the justification provided in Comment 12, above.
18.	Climate Change	D.18-27	First paragraph (continued discussion of Tule Wind Alternative 2, Impacts GHG-1 and GHG-2): “Operational impacts associated with this alternative would be the same. Identified impacts would not be adverse. Under CEQA, GHG emissions from construction (amortized over 30 years), plus those from operational and maintenance activities, <u>less those emissions that would be offset by the Tule Wind Project</u> , would be expected to result in a <u>less-than-significant beneficial impact</u> (Class <u>IVH</u>).” “Impact GHG-3: With respect to Impact GHG-3, the alternative would assist in the attainment of the state’s goals by utilizing a renewable source of energy that could displace electricity generated by fossil fuel-fired power plants. The alternative would therefore be consistent with <u>and critical to achieving</u>	Please consider the proposed revisions, based on the justification provided in Comment 12, above.

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			<p>federal and state initiatives aimed at reducing GHG emissions and increasing the percentage of renewable energy generation nationally and in California, and impacts would not be adverse. Under CEQA, the project would have a beneficial impacts would be considered less than significant (Class IVH).</p> <p>Tule Wind Alternative 3</p> <p>Impacts GHG-1 and GHG-2: “Operational impacts associated with this alternative would be the same. Identified impacts would not be adverse. Under CEQA, GHG emissions from construction (amortized over 30 years), plus those from operational and maintenance activities, <u>less those emissions that would be offset by the Tule Wind Project</u>, would be expected to result in a less-than-significant<u>beneficial</u> impact (Class <u>IVH</u>).”</p>	
19.	Climate Change	D.18-28	<p>Tule Wind Alternative 3, Impact GHG-3: “. . . The alternative would therefore be consistent with <u>and critical to achieving federal and state initiatives aimed at reducing GHG emissions and increasing the percentage of renewable energy generation nationally and in California</u>, and impacts would not be adverse. Under CEQA, <u>the project would have a beneficial impacts would be considered less than significant</u> (Class <u>IVH</u>).”</p> <p>Tule Wind Alternative 4, Impact GHG-1 and GHG-2 “Operational impacts associated with this alternative would be the same. Identified impacts would not be adverse. Under CEQA, GHG emissions from construction (amortized over 30 years), plus those from operational and maintenance activities, <u>less those emissions that would be offset by the Tule Wind Project</u>, would be expected to result in a less-</p>	Please consider the proposed revisions, based on the justification provided in Comment 12, above.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>than significant <u>beneficial</u> impact (Class IVH).”</p> <p>Impact GHG-3: “... The alternative would therefore be consistent with <u>and critical to achieving federal and state initiatives aimed at reducing GHG emissions and increasing the percentage of renewable energy generation nationally and in California</u>, and impacts would not be adverse. Under CEQA, <u>the project would have a beneficial impacts would be considered less than significant</u> (Class IVH).”</p>	
20.	Climate Change	D.18-29	<p>Tule Wind Alternative 5, Impact GHG-1 and GHG-2</p> <p>“Impacts would reflect impact findings previously discussed in Section D.18.3.3 for the proposed Tule Wind Project. Construction impacts under this alternative would be reduced when compared to the proposed Tule Wind Project. Due to the reduction in wind turbines and resulting reduction in construction of access roads and the length of necessary cable collector system, the construction schedule would likely be shortened as well (the original proposed Tule Wind Project construction schedule is expected to take between 18 and 24 months). Accordingly, this alternative would result in <u>slightly less construction GHG emissions than the proposed Tule Wind Project, but that slight reduction amortized over the life of the project would not make up for the large decrease in the amount of GHG emissions that the Tule Wind Project would otherwise offset.</u> Identified impacts would not be adverse.</p> <p>Operational impacts associated with this alternative would be the same <u>substantially reduce the project’s ability to offset GHG emissions from the environmental baseline. By reducing the Tule Wind Project by 62 turbines, the project would result in a permanent loss in the ability to offset approximately</u></p>	<p>Please consider the proposed revisions, based on the justification provided in Comment 12, above, and the calculations provided in Attachments D.18.3, Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti, to Dr. Fisher and Mr. Thomsen (March 2011); and Attachment D.18.4, Letter from Valorie Thompson, Ph.D., Scientific Resources Associated, to Patrick O’Neill, HDR Engineering Inc. (March 3, 2011).</p>

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			<p><u>120,749 metric tons of CO₂ per year, or 132,128 metric tons of CO₂ per year if the Modified Project Layout is adopted. (Attachment D.18.3, Table 2). The project would also lose the ability to offset 6.4 metric tons/yr of NO_x, 5.8 metric tons/yr of PM₁₀, 7.6 metric tons/yr of CO, 2.0 metric tons/yr of SO_x, and 2.0 metric tons/yr of VOCs (Attachment D.18.3, Table 3), or 7.1 metric tons/yr of NO_x, 6.3 metric tons/yr of PM₁₀, 8.4 metric tons/yr of CO, 2.2 metric tons/yr of SO_x, and 2.2 metric tons/yr of VOCs if the Modified Project Layout is selected (Attachment D.18.3, Table 3). Finally, the project would also lose the ability to offset 77.48 million gallons of water per year (Attachment D.18.3, Table 4), or 84.78 million gallons of water per year if the Modified Project Layout is selected. Identified impacts would not be adverse. Under CEQA, GHG emissions from construction (amortized over 30 years), plus those from operational and maintenance activities, would be expected to result in a less than significant <u>beneficial</u> impact (Class <u>IVH</u>)."</u></p>	
21.	Climate Change	D.18.-32-33	<p>No Project Alternative 1 – No ECO Substation Substation, Tule Wind, ESJ Gen-Tie, Campo, Manzanita, or Jordan Wind Energy Projects</p> <p>Impacts GHG-1 through GHG-3: Under the No Project Alternative 1, the ECO Substation, Tule Wind, and ESJ Gen-Tie, as well as the Campo, Manzanita, and Jordan wind energy projects, would not be built and the existing conditions would remain at these sites. Climate change impacts resulting from the Proposed PROJECT would not occur, <u>however, the Proposed PROJECT's GHG, criteria air pollutant, and water use offsets would also not occur. This alternative also would not be consistent with federal and state policies to reduce GHG emissions and increase renewable energy generation.</u></p>	Please consider the proposed revisions, based on the justification provided in Comment 12, above.
22.	Climate Change	D.18-33	No Project Alternative 3 – No Tule Wind Project	Please consider the proposed revisions, based on the

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			<p>Impact GHG-1 through GHG-3: Under the No Project Alternative 3, the Tule Wind Project would not be built and the existing conditions on the project site would remain. Under this alternative, the amount of GHG emissions generated by construction activities would be <u>slightly reduced</u> when compared to the Proposed PROJECT, <u>but that slight reduction amortized over the life of the project would not make up for the large decrease in the amount of GHG emissions that the Tule Wind Project would otherwise offset through its operations.</u> Additionally, the amount of GHG emissions generated by operational and maintenance activities would be reduced when compared to the Proposed PROJECT with the removal of the Tule Wind Project component. However, if the Tule Wind Project were not built, SDG&E's plans to achieve the state RPS goals would be hampered or delayed, which could conflict with the state's plans under the Scoping Plan, <u>state GHG emissions reduction goals, and federal renewable energy policies.</u></p>	<p>justification provided in Comment 12, above.</p>

Attachments

D.18.1 - Federal Energy Policy Act of 2005

D.18.2 - San Diego County Department of Planning & Land Use - Interim Approach to Addressing Climate Change in CEQA Documents (July 22, 2009)

D.18.3 - Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti, to Dr. Fisher and Mr. Thomsen (March 2011)

D.18.4 - Letter from Valorie Thompson, Ph.D., Scientific Resources Associated, to Patrick O'Neill, HDR Engineering Inc. (March 3, 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.2: Biological Resources

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Biological Resources	Global	Section D.2.1 provides a summary of the environmental setting/affected environment for biological resources in the project study area. <u>As detailed below, the biological study area, excluding golden eagle surveys, totals approximately 6,500 acres although the construction footprint of the project would impact no more than 11-percent (725.3 acres) of that area.</u> Applicable regulations, plans, and standards are listed in Section D.2.2. Potential impacts/environmental effects and mitigation measures for the Proposed PROJECT are presented in Section D.2.3, and project alternatives are described in Sections D.2.4 through D.2.7. Mitigation monitoring, compliance, and reporting are discussed in Section D.2.8. Section D.2.9 addresses residual effects of the project and references cited in the preparation of this section are listed in Section D.2.10.	Please revise discussion in Section D.2 to reflect that the actual footprint of the Tule Wind Project is far less than the surveyed area.
2.	Biological Resources	D.2-1	This section considers information presented in the San Diego Gas and Electric (SDG&E) East County 500/230/138 kV Substation Project Proponent’s Environmental Assessment (PEA) (SDG&E 2009), the Burrowing Owl Resource Summary Report for the ECO Substation Project (Insignia Environmental 2010b), the Energia Sierra Juarez Gen-Tie Line Project Biological Resources Report (EDAW 2009), <u>the Quino Checkerspot Butterfly Habitat Assessment (Dudek 2008)</u> , the Quino Checkerspot Butterfly Focused	Please revise to reflect all available studies currently available relating to the Tule Wind Project.

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			<p>Survey for the Tule Wind Project (Dudek 2009), the <u>Quino Checkerspot Butterfly Survey Report (HDR 2010d)</u>, the 2005–2006 and 2007–2008 Avian Survey for the Tule Wind Resource Area (Tetra Tech EC, Inc. 2008, 2009), Pacific Wind Development’s Environmental Document for the Tule Wind Project (Iberdrola Renewables, Inc. 2010), the Interim Draft Biological Technical Report for the Tule Wind Project (HDR 2010a), the Draft Jurisdictional Delineation for the Tule Wind Project (HDR 2010b), the Biological Assessment for the Tule Wind Project (HDR 2010c; <u>Golden Eagle Information (WEST 2010b)</u>), and the golden eagle survey results (WRI 2010), <u>bat acoustic studies (WEST 2009b; WEST 2010a; WEST 2010c)</u>, <u>habitat assessment for the barefoot banded gecko (Dugan 2010)</u>, and rare plants (HDR 2010e).</p>	
3.	Biological Resources	D.2-3	<p>All potentially <u>ACOE</u> jurisdictional features were considered to be ACOE jurisdictional under the preliminary jurisdictional determination process.</p>	<p>Consider revising for clarity.</p>
4.	Biological Resources	D.2-3	<p>General biological surveys were conducted for the Tule Wind Project area by HDR (2010a, <u>2011</u>) for the entire project area, except for <u>some</u> private parcels in the Boulevard area and the Manzanita and Campo Native American lands where <u>limited improvements to existing roads area where a transmission line is proposed for Alternatives 1 and 3</u>. HDR <u>and Dudek</u> conducted vegetation mapping, jurisdictional delineation, rare plant surveys, and focused, protocol-level surveys for the federally endangered Quino checkerspot butterfly (<u>Dudek 2008, 2009, HDR 2010a, 2010b, 2011</u>). All potentially <u>ACOE</u> jurisdictional features were considered to be jurisdictional under the preliminary jurisdictional determination process. Rare plant surveys are ongoing and will be completed in September <u>2011</u> (HDR 2010a, 2011). Three new towers have been fitted with paired detectors and are currently monitoring. Two detectors were also</p>	<p>Consider revising to reflect surveys and additional habitat mapping conducted to date. (HDR Biological Technical Memo 2011). General biological surveys have been conducted in all project areas with the limited exception along the transmission line at Alternatives 1 and 3. Also revise to reflect that Dudek conducted surveys in June 2009.</p>

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			placed on the west side of the ridge. A report is pending with the results from the additional studies (HDR 2010a, WEST 2011). <u>U.S. Fish and Wildlife protocol surveys for nesting golden eagle</u> were conducted by Wildlife Research Institute (WRI) in April 2010 (WRI 2010) to determine the status of nesting golden eagles within a 10-mile radius of the Tule Wind Project site (Pagel 2010).	
5.	Biological Resources	D.2-3	Additional acoustic studies are being <u>have been</u> conducted as of June 2010 at the northern mines. Three new towers have been fitted with paired detectors and are currently monitoring. Two detectors were also placed on the west side of the ridge.	Consider revising to reflect that additional acoustic studies have been completed.
6.	Biological Resources	D.2-4	This section addresses <u>describes</u> the vegetation communities and associated wildlife habitat that occur in the Proposed PROJECT area.	Consider revising for clarification.
7.	Biological Resources	D.2-5	Table D.2-1: Update existing native vegetation communities study area acreage for Tule based on the GIS shape files provided, as well as the calculations Unsurveyed Area. These changes are provided in the Tule Wind Project Comments, Section D.2 Biological Resources, Track Changes. <i>Change footnote as follows:</i> ⁴ Unsurveyed area refers to portions of the project (<u>Alternatives 1 and 3</u>) that were not accessible due to private land restrictions.	Please revise to reflect that additional habitat has been mapped and general biological surveys have been conducted in all project areas with the exception of limited areas along the transmission line route under Alternatives 1 and 3.
8.	Biological Resources	D.2-29	In addition to these other land covers, a portion of the Proposed PROJECT area was not surveyed due to lack of access. The unsurveyed areas are assumed to support several of the native vegetation communities and other land covers described previously.	Please revise to reflect that additional habitat has been mapped and general biological surveys have been conducted in all project areas with the limited exception along the transmission line route under Alternatives 1 and 3.
9.	Biological Resources	D.2-29	These regulatory agencies make the ultimate determinations of which features are subject to their respective jurisdiction. Boundary Creek, Bow	Please consider revising for clarification.

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			Willow Creek, Canebrake Wash, Carrizo Creek, and Tule Creek are the major drainages in the Proposed PROJECT area, and these features support scattered wetland <u>and riparian</u> -communities (i.e., emergent wetlands, mulefat scrub, southern riparian woodland, and southern willow scrub as described previously) that would be considered jurisdictional. Aside from these major drainages and scattered wetland <u>and riparian</u> communities, jurisdictional features in the Proposed PROJECT area are predominantly narrow, sandy ephemeral washes that would be considered non-wetland waters of the U.S. and streambeds.	
10.	Biological Resources	D.2-46	Within the Proposed PROJECT area, suitable foraging habitat <u>may</u> include all vegetation communities and land cover on site (i.e., agriculture, big sagebrush scrub, chamise chaparral, coast live oak woodland, disturbed habitat, field/pasture, emergent wetland, montane buckwheat scrub mulefat scrub, non-native grassland, northern mixed chaparral, semi-desert chaparral, southern north slope chaparral, scrub oak chaparral, Peninsular juniper woodland and scrub, redshank chaparral, shadscale scrub, Sonoran mixed woody succulent scrub, southern riparian woodland, upper Sonoran manzanita chaparral, upper Sonoran subshrub scrub, and southern willow scrub). <u>However</u> , the denser forms of chaparral habitat are not <u>typically</u> suitable for foraging of golden eagle. Suitable nesting habitat (i.e., cliffs) is not known within the Proposed PROJECT area; however, 10 known golden eagle territories have been documented within 10 miles of the Proposed PROJECT (WRI 2010).	Please consider revising for clarification.
11.	Biological Resources	D.2-50	The earliest that <u>the</u> willow flycatcher may be observed is approximately mid-May, when all of the subspecies may be present.	Please consider revising for clarification.
12.	Biological Resources	D.2-54	Within the Proposed PROJECT area, suitable <u>foraging</u> habitat <u>would include all vegetation types found on site</u> . <u>Forage includes crickets, scorpions,</u>	Please consider revising for clarification.

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			<p>small lizards and other small ground dwelling animals (usually insects larger than 17mm). includes big sagebrush scrub, chamise chaparral, coast live oak woodland, emergent wetland, mulefat scrub, Peninsular juniper woodland and scrub, montane buckwheat scrub, redshank chaparral, northern mixed chaparral, semi desert chaparral, southern north slope chaparral, shadscale scrub, Sonoran mixed woody succulent scrub, upper Sonoran subshrub scrub, southern riparian woodland, and southern willow scrub, as well as agriculture, field/pasture, and non native grassland.</p>	
13.	Biological Resources	D.2-56	<p>Within the Proposed PROJECT area, suitable foraging habitat includes <u>areas with flying insects</u>. <u>All vegetation types within the project area potentially can support foraging areas</u>. big sagebrush scrub, chamise chaparral, coastlive oak woodland, emergent wetland, mulefat scrub, Peninsular juniper woodland and scrub, montane buckwheat scrub, redshank chaparral, northern mixed chaparral, semi-desert chaparral, southern north slope chaparral, shadscale scrub, Sonoran mixed woody succulent scrub, upper Sonoran subshrub scrub, southern riparian woodland, and southern willow scrub as well as agriculture, field/pasture, and non native grassland.</p>	Please consider revising for clarification.
14.	Biological Resources	D.2-58	<p>The Proposed PROJECT <u>The ECO Substation Project</u> may be subject to a federal action in that it may be required to obtain a Section 404 permit from the ACOE and/or a ROW from the BLM. ACOE and BLM will determine whether it <u>they</u> will consult with USFWS under Section 7 with respect to critical habitat <u>for the Quino checkerspot butterfly</u>.</p>	Consider revising to reflect that the BLM may initiate consultation for the ECO Substation Project under Section 7.
15.	Biological Resources	D.2-58	<p>Within the Proposed PROJECT area, <u>there is no designated critical habitat for the Quino checkerspot butterfly within the Tule Wind and ESJ Projects</u>. There is <u>designated Critical Habitat for the Quino checkerspot butterfly along the ECO 138 kV</u></p>	Consider clarifying where Quino checkerspot butterfly habitat is within the Proposed PROJECT. It is important to make clear that this is the only location of designated critical habitat for the Quino checkerspot butterfly.

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			transmission line approximately between mileposts (MP) 4 and 5.5 (see Figure D.2-9). This is designated as Unit 10 and includes 2,514 acres of critical habitat (74 FR 28776–28862).	
16.	Biological Resources	D.2-59	Unit 3 of the 2009 revised critical habitat for Peninsular bighorn sheep includes the Carrizo Gorge and portions of the In-Ko-Pah Mountains and are located within approximately <u>780</u> feet of the Proposed PROJECT footprint (74 FR 17288–17365). Unit 3 contains the physical and biological features that are essential for Peninsular bighorn sheep habitat, including a range of vegetation types, foraging and watering areas, and steep to very steep, rocky terrain with appropriate elevations and slope (74 FR 17288–17365). Unit 3 is currently occupied by Peninsular bighorn sheep (74 FR 17288–17365). Records of Peninsular bighorn sheep dating back to 1940, <u>including extensive telemetry data from the last decade</u> , show the closest documented Peninsular bighorn sheep location as 0.79 <u>0.77</u> mile from the Proposed PROJECT, near Tule Peak (USFWS 2010b, cited in HDR 2010a).	Consider revising to reflect the extensive telemetry studies that have been completed in Unit 3 of the critical habitat for Peninsular bighorn sheep.
17.	Biological Resources	D.2-79	<p><i>First Paragraph:</i></p> <p>As shown in Table D.2-1, a total of 17 native vegetation communities were mapped within the Tule Wind Project <u>survey</u> area, including big sagebrush scrub (451.3 <u>224.9</u> acres), chamise chaparral (478.5 <u>251.7</u> acres), closed coast live oak woodland (42.8 <u>23.2</u> acres), open coast live oak woodland (50.3 <u>84.4</u> acres), montane buckwheat scrub (471.0 <u>316.4</u> acres), mulefat scrub (0.3 acre), non-native grassland (65.1 <u>102.9</u> acres), non-vegetated channel (3.4 <u>4.7</u> acres), northern mixed chaparral (477.4 <u>726.8</u> acres), redshank chaparral (418.1 <u>200.2</u> acres), scrub oak chaparral (550.8 <u>711.0</u> acres), semi-desert chaparral (4,689.8 <u>2,221.8</u> acres), southern north slope chaparral (56.7 <u>83.1</u> acres), southern riparian woodland (1.2 6 acres), southern</p>	Please revise to reflect that additional habitat has been mapped and general biological surveys have been conducted in all project areas with the limited exception along the transmission line route under Alternatives 1 and 3. For specific alternations, please refer to the Tule Wind Project Comments, Section D.2 Biological Resources, Track Changes.

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			<p>willow scrub (42.8 acres), upper Sonoran manzanita chaparral (220.8 <u>278.4</u> acres), and upper Sonoran subshrub scrub (610.8 <u>924.3</u> acres). Other land cover in the Tule Wind Project area includes agriculture/field/pasture (<u>50.4 acres</u>), developed (<u>66.8 acres</u>), and disturbed habitat (<u>198.8 acres</u>). In addition, 374.4 <u>20.5</u> acres of the Tule Wind Project area Alternatives 1 and 3 were not surveyed due to access restrictions on Native American and private lands. <u>While the project survey area totals 6,495.0 acres, the modified layout footprint totals only 733.7 acres.</u> Update existing native vegetation communities acreages based on the GIS shape files provided.</p>	
18.	Biological Resources	D.2-80	<p>The mapping of vegetation communities identified mulefat scrub, southern riparian woodland, and southern willow scrub in the project area, and these features would be considered CDFG jurisdictional riparian wetland <u>habitat</u>. No <u>In addition,</u> <u>approximately 0.43 acre of ACOE three-parameter jurisdictional wetlands occur in the Tule Wind Project survey area, primarily due to the lack of hydric soils and lack of hydrophytic vegetation dominance.</u> The mapping of vegetation communities identified mulefat scrub, southern riparian woodland, and southern willow scrub in the project area, and these features would be considered CDFG jurisdictional riparian wetland <u>habitat</u>. <u>In addition, live oaks associated with streambeds were considered CDFG jurisdictional riparian habitat. In total, the survey area includes 11.99 acres of ACOE and RWQCB jurisdiction, 24.64 acres of CDFG jurisdiction and 3.46 acres of County RPO jurisdiction.</u></p>	<p>Streambed Alteration Agreements require the applicant to distinguish between unvegetated streambed and riparian habitat unlike Section 404 permits under the Clean Water Act that require applicants to distinguish between non-wetland and wetland waters.</p>
19.	Biological Resources	D.2-80	<p>During the 2009 general biological survey, large numbers of milk vetch were observed on site but had not yet flowered, and positive identification of the species had not yet been determined. In spring 2010, Jacumba milk vetch was confirmed</p>	<p>Please revise to reflect that additional habitat has been mapped and general biological surveys have been conducted in all project areas with the limited exception along the transmission line route under Alternatives 1 and 3.</p>

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			in the project area Jacumba milkvetch was observed <u>on-site during general vegetation surveys and focused rare plants surveys of the project area</u> (HDR 2010a). It is widespread and abundant below 4,500 feet in elevation within the project area.	
20.	Biological Resources	D.2-80	California Ayenia This species has moderate potential to occur based on suitable habitat, and it is within the elevation range of the species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Consider revising to reflect rare plants data to date.
21.	Biological Resources	D.2-80	Elephant Tree This species has moderate potential to occur based on suitable habitat in the project area; however, it is slightly outside of the known elevation range for this species. This species would have been observed if it occurred on site. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located. The closest CNDDDB record is from 1979 approximately 5 miles northeast in Sweeny Pass quadrangle.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, the species need not be analyzed.
22.	Biological Resources	D.2-81	Utah Vine Milkweed This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.
23.	Biological Resources	D.2-81	Tecate Tarplant This species was observed on site along in McCain Valley Road south of from <u>Lost Valley Road south through Rough Acres Ranch, and along Highway 80</u> during general vegetation surveys and focused rare plants surveys of the project survey -area (HDR 2010a).	Please consider revising based on current rare plants data.
24.	Biological Resources	D.2-81	Colorado Desert Larkspur	Please consider revising based on current rare plants

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			This species was observed during focused rare plant surveys of the project survey corridor (HDR 2010a). <u>It is widespread and abundant throughout the project area.</u>	data.
25.	Biological Resources	D.2-81	Sticky Geranium This species was observed on site along McCain Valley Road during general vegetation surveys and focused rare plants surveys of the project survey corridor (HDR 2010a). <u>It is abundant within McCain Valley and widespread within the project survey area.</u>	Please consider revising based on current rare plants data.
26.	Biological Resources	D.2-81	Palmer's Grappling Hook This species has low potential to occur based on marginal habitat in the project area. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
27.	Biological Resources	D.2-82	Curly Herissantia This species has moderate potential to occur based on suitable habitat in the project area. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located. The closest CNDDDB record (date unknown) is approximately 8.5 miles east of the project area in the In-Ko-Pah Gorge quadrangle.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
28.	Biological Resources	D.2-82	Laguna Mountains Alumroot This species was observed during focused rare plants surveys of the project survey corridor (HDR 2010a). <u>Three occurrences were documented in the extreme northwest of the project site during focused rare plants surveys.</u>	Please consider revising based on current rare plants data.
29.	Biological Resources	D.2-82	San Diego Sunflower This species was observed during focused rare plants surveys of the project survey corridor (HDR 2010a). <u>It is abundant in the northwest portion of the project</u>	Please consider revising based on current rare plants data.

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			<u>area above 5,000 feet.</u>	
30.	Biological Resources	D.2-82	Slender-Leaved Ipomopsis This species has high potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. It was <u>not observed during general surveys or focused rare plants surveys of the project area.</u> It was observed in the adjacent ECO project area.	Please consider revising based on current rare plants data.
31.	Biological Resources	D.2-82	Pride-of-California This species has low potential to occur based on marginal habitat in the project area. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.
32.	Biological Resources	D.2-83	Pygmy Lotus This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.
33.	Biological Resources	D.2-83	Mountain Springs Bush Lupine This species was observed in the project area during focused rare plants surveys of the project survey corridor (HDR 2010a). <u>There are several occurrences in McCain Valley within the central portion of the project area.</u>	Please consider revising based on current rare plants data.
34.	Biological Resources	D.2-83	Parish's Desert-Thorn This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.
35.	Biological Resources	D.2-83	Hairy Stickleaf This species has moderate potential to occur based on suitable habitat in the project area; however, it is slightly outside of the known elevation range for this species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
36.	Biological Resources	D.2-83	Creamy Blazing Star This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. <u>It was not observed during general surveys or focused rare plants surveys of the project area.</u>	Please consider revising based on current rare plants data.
37.	Biological Resources	D.2-83	Jacumba Monkeyflower This species was observed on site during focused rare plant surveys (HDR 2010a). <u>There are a few occurrences in McCain Valley within the central portion of the project area.</u>	Please consider revising based on current rare plants data.
38.	Biological Resources	D.2-84	Palmer's Monkeyflower This species was observed on site during focused rare plant surveys (HDR 2010a). <u>There are scattered occurrences of this species throughout the project area.</u>	Please consider revising based on current rare plants data.
39.	Biological Resources	D.2-84	Thurber's Beardtongue This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
40.	Biological Resources	D.2-84	Desert Spike Moss This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. There are no CNDDDB records within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located. The closest CNDDDB record (date unknown) is located approximately 6.5 miles northeast of the project area in Sweeny Pass quadrangle.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
41.	Biological Resources	D.2-84	Chaparral Ragwort This species has moderate potential to occur based on suitable habitat in the project area. <u>It was not</u>	Please consider revising based on current rare plants data.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<u>observed during general surveys or focused rare plants surveys of the project area.</u>	
42.	Biological Resources	D.2-84	Cove's Cassia This species has moderate potential to occur based on suitable habitat in the project area, and it is within the elevation range of the species. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located.	The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
43.	Biological Resources	D.2-84	Southern Jewel-Flower This species was observed on site during focused rare plant surveys (HDR 2010a). <u>It occurs in the northwest portion of the project area.</u>	Please consider revising based on current rare plants data.
44.	Biological Resources	D.2-85	All butterfly species observed in the field were recorded as well as the presence of Quino checkerspot butterfly host plants Chinese houses, <u>white snapdragon</u> , and thread-leaved bird's beak (HDR 2010a).	Please consider revising based on Quino checkerspot butterfly survey. White snapdragon was observed and recorded on site.
45.	Biological Resources	D.2-88	There were three observations of golden eagles during the avian survey in fall 2007 and spring 2008 (Tetra Tech EC, Inc. 2009). Two of the observations were during point count and one was an incidental observation. <u>Of the two point count observations, one of the observations was outside of the Tule Wind Project area in Thing Valley. Point Count 15, Tetra Tech EC, Inc. 2009. The second observation made from the southern portion of the ridge line. Point Count 11, Tetra Tech EC, Inc. 2009.</u>	Please revise to include additional information about the point count observations. <i>See Tetra Tech EC, Inc. 2009.</i>
46.	Biological Resources	D.2-88	No nests were observed during the survey and overall the observations of golden eagles were low <u>after two full years of surveys relative to the survey effort.</u>	Please revise as suggested.
47.	Biological Resources	D.2-89	A total of 317 golden eagle nests were recorded during the helicopter survey, 34 <u>many</u> of which were considered to be golden eagle nests <u>alternative nesting sites for the same territory used in past years.</u>	Consider revising to more accurately reflect results of the 2010 WRI Report.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
48.	Biological Resources	D.2-89	The Canebrake location is approximately 0.1 mile west <u>north</u> of the northern portion of the Tule <u>Wind</u> Project.	Please revise for clarification.
49.	Biological Resources	D.2-92	<p>Pallid Bat</p> <p>In the northwestern portion of the project area, there are several abandoned mines; based on the visual survey of these mines, most of them do not appear to be suitable for roosting and acoustic surveys did not detect the frequency of the pallid bat (WEST 2010a, 2011). One mine shaft could have roosting potential and acoustic surveys for that mine were not yet available (WEST 2010a, 2011); therefore, it is assumed that this mine could support roosting pallid bat. During the <u>2008/2009</u> surveys conducted for bat species within the project area, the frequency range of the pallid bat (15–30 kilohertz) was observed <u>at fixed stations 17.94% of the time. In 2010, bat passes in that frequency range occurred at the met tower fixed stations 9.7% of the time, and this pattern was largely consistent among at the ground-level fixed stations; and 62.8% of the time at the raised stations. roaming station passes in that frequency range accounted for 28.6% of overall bat activity (WEST 2011).</u></p>	Consider revising to more accurately reflect the 2011 WEST report
50.	Biological Resources	D.2-93	<p>There is moderate potential for this species to forage over the site. In the northwestern portion of the project area, there are several abandoned mines; based on the visual survey of these mines, most of them do not appear to be suitable for roosting, and acoustic surveys did not detect the frequency of the pocketed free-tailed bat (WEST 2010a, 2011). One mine shaft could have roosting potential, and acoustic surveys for that mine are ongoing (WEST 2010a, 2011); therefore, it is assumed that this mine could support roosting pocketed free-tailed bat. <u>During the 2008/2009 surveys conducted for bat species within the project area, the frequency range of the pocketed free-tailed bat (15–30 kilohertz) was observed at fixed stations 17.4% of the time. In</u></p>	Consider revising to more accurately reflect the updated 2011 WEST report.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>2010, bat passes in that frequency range occurred at the met tower fixed stations 9.7% of the time, and this pattern was largely consistent among ground-level fixed stations; roaming station passes in that frequency range accounted for 28.6% of overall bat activity. There are no CNDDDB records of this species within the Mount Laguna, Sombrero Peak, Live Oak Springs, and Jacumba quadrangles where the project area is located.</p>	
51.	Biological Resources	D.2-94	<p>There are no historic observations of bighorn sheep by USFWS, as published in the Recovery Plan for this Distinct Vertebrate Population Segment (USFWS 2000), in the project area; however point locations are within 0.75 mile of the northeastern portion of the Tule wind Project area. Bighorn sheep have not been documented in McCain Valley (HDR 2010c), and no bighorn sheep, tracks, or droppings were observed during the 2005 through 2010 biological surveys of the project area (HDR 2010a). The closest ever recorded Peninsular bighorn sheep location is 0.79 mile from the northeastern portion of the Tule Wind Project. While-point locations are within 0.75 mile of the northeastern portion of the Tule Wind Project area, extensive telemetry data from USFWS collected over the past decade confirms that there have been no occurrences of the bighorn sheep on the Tule Wind Project area.</p>	<p>Consider revising to reflect current data from the Biological Assessment. Note that 0.79 mile is the accurate distance to the nearest recorded Peninsular bighorn sheep occurrence to the Tule Wind Project, as noted in other project documents. Also, revise to include information regarding the extensive USFWS telemetry data collected over the past decade confirming the absence of Peninsular bighorn sheep on the Tule Wind Project area.</p>
52.	Biological Resources	D.2-94	<p>In close proximity to the Tule Wind Project but not within the project footprint, the USFWS has designated critical habitat for one species: Peninsular bighorn sheep. The Tule Wind Project is not located within USFWS designated critical habitat for Peninsular bighorn sheep. Unit 3 of the 2009 revised critical habitat for Peninsular bighorn sheep includes the Carrizo Gorge and portions of the In-Ko Pah Mountains and are is located within approximately 800 780 feet east of the Tule Wind Project footprint (74 FR 17288-17365).</p>	<p>Please revise as suggested to reflect that the Tule Wind Project is not located within designated critical habitat for the Peninsular bighorn sheep.</p>

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53.	Biological Resources	D.2-96	The Pacific Flyway goes through the western United States and birds could pass through the Tule Wind Project area during migration. In addition, it supports a number of resident bird species such as red-tailed hawks, mourning doves, and common ravens. A major route of the Pacific Flyway is to the east and northeast, particularly the Salton Sea, which is a major stopover for many migratory bird species. <u>However, birds migrating in the Pacific Flyway may not cross over the Tule Wind Project area. Even if migratory birds may cross over the Tule Wind Project, these birds likely will fly at an elevation far above the wind turbines and transmission infrastructure proposed as part of the project.</u>	Please consider revising to reflect that there is not necessarily a correlation between the Pacific Flyway and the probability of birds passing through the Tule Wind Project area during migration. The Pacific Flyway represents a huge swath of land (namely, the Western United States), of which a large percentage of the underlying land may or may not experience high avian presence. Also, the elevations that the migrants fly in the major migratory corridors are generally well above the rotor swept area (RSA) and therefore the wind turbines would pose an insignificant risk.
54.	Biological Resources	D.2-96	Based on the County's DPLU wildlife movement modeling of connectivity, the Tule Wind Project area as is an important wildlife linkage within the East County. This linkage area extends north from I-8 and the proposed project.	Consider revising for clarity.
55.	Biological Resources	D.2-111	Federal agencies are required to identify and assess reasonable alternatives to proposed actions based on the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations (CFR) Parts 1500–1508). Alternatives must avoid or minimize adverse environmental impacts and enhance the quality of the human environment.	Please revise to be consistent with language of 40 C.F.R. Section 1502.14.
56.	Biological Resources	D.2-111	BLM published <u>regulations pursuant to</u> the Federal Land and <u>Policy Management Act</u> of 1976, as amended in 2001 (43 U.S.C. 1701–1782) to establish a public land policy and provide guidelines for land management.	Consider revising to include inadvertently omitted text.
57.	Biological Resources	D.2-111	Two million acres of the CDCA are covered as Class C and are intended to be keep wilderness characteristics and values with restrictions on access and limits human disturbance to foot and horse traffic.	Consider correcting typographical error.

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58.	Biological Resources	D.2-115	Harm includes any act that actually kills or injures <u>listed</u> fish or wildlife	Consider clarifying to reflect that Endangered Species Act provisions apply to listed species.
59.	Biological Resources	D.2-116	California BLM Sensitive Species are plant and wildlife species that are designated as sensitive by the California State Director that are not already federally listed proposed, or candidate species, or state listed because of potential endangerment.	Consider revising for clarity.
60.	Biological Resources	D.2-120	The Native Plant Protection Act remains part of the California Fish and Game Code, and mitigation measures for impacts to rare plants are specified in a formal agreement between CDFG and the a project proponent.	Consider revising for clarity.
61.	Biological Resources	D.2-120	The California Natural Community Conservation Planning (NCCP) Act provides for regional planning to conserve listed and candidate species, their habitats, and natural communities through habitat-based conservation measures while allowing economic growth and development.	Revise to correct typographical error.
62.	Biological Resources	D.2-124	TULE-BIO-11 Presence of transmission lines and wind turbines may result in electrocution of, and/or collisions by, listed or sensitive bird or bat species. Class II.	Please consider revising significance determination based on the discussion presented in Comment 100.
63.	Biological Resources	D.2-130	In addition, a portion of the <u>included in Alternatives 1 and 3 Tule Wind Project area</u> was not surveyed due to access restrictions.	Consider revising to reflect surveys and additional habitat mapping conducted to date. (HDR Biological Technical Memo 2011). General biological surveys have been conducted in all project areas with the limited exception along the transmission line at Alternatives 1 and 3.
64.	Biological Resources	D.2-130	Under CEQA, impacts would <u>potentially be significant</u> but can be mitigated to a level that is considered less than significant (Class II) with implementation of Mitigation Measures BIO-1a through BIO-1d.	GLOBAL COMMENT: Please change the language regarding the determination from significant to potentially significant.
65.	Biological Resources	D.2-131	Table D.2-4: Update new existing native vegetation communities' acreages and impacts based on the GIS shape files provided and unsurveyed area as reflected in the Tule Wind Project Comments, Section D.2	Please revise to reflect that additional habitat has been mapped and general biological surveys have been conducted in all project areas with the exception of limited areas along the transmission line route

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scrub	316.4	6.2	3.3		<u>9.5</u>			Mulefat scrub	0.3	0.0	0.0		<u>0.0</u>		0.0	Non-native grassland	102.9	2.7	1.2		<u>3.9</u>			Non-vegetated channel	4.7	0.1	0.5		<u>0.6</u>			Northern mixed chaparral	727.3	21.3	102.6		<u>123.9</u>			Open coast live oak woodland		84.5	1.2		<u>1.0</u>	<u>2.2</u>		Redshank chaparral	200.2	4.6	5.8		<u>10.4</u>			Scrub oak chaparral	711.0	26.6	62.6		<u>89.2</u>			Semi-desert chaparral	2,221.8	76.3	144.2		<u>220.5</u>			Southern north slope chaparral		83.1	2.4		<u>5.9</u>	<u>8.3</u>		Southern riparian woodland	1.6	0.0	0.0		<u>0.0</u>			Southern willow scrub	2.8	0.1	0.0		<u>0.1</u>			<p>under Alternatives 1 and 3.</p> <p>The Tule Modified Project Layout footprint is reduced from 765.8 acres (<i>see</i> Appendix 2 of the Draft EIR/EIS) to 725.3 acres (<i>see</i> Table D.2-4 of the Draft EIR/EIS with tracked changes submitted by Tule Wind Project). Additionally, Table D.2-4 of the Draft EIR/EIS includes 374.4 acres of unsurveyed lands. At this time, all but 20.5 acres of those lands have been surveyed. Excluding field pastures/agriculture, developed and disturbed habitats, the Tule Modified Project Layout footprint impacts 659.8 acres of native vegetation in comparison to the proposed project, which impacts 686.9 acres of native vegetation.</p>
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			<p>Upper Sonoran Manzanita chaparral <u>278.4</u> <u>10.4</u> <u>51.9</u> <u>62.3</u></p> <p>Upper Sonoran subshrub scrub <u>924.3</u> <u>30.2</u> <u>52.4</u> <u>82.6</u></p> <p>Subtotal <u>6,179.8</u> <u>203.8</u> <u>456.0</u> <u>659.8</u></p> <p>OTHER COVER TYPES</p> <p>Field/Pasture, Agriculture <u>50.4</u> <u>0.5</u> <u>1.0</u> <u>1.5</u></p> <p>Developed <u>66.8</u> <u>0.2</u> <u>7.4</u> <u>7.6</u></p> <p>Disturbed Habitat <u>199.0</u> <u>7.5</u> <u>48.9</u> <u>56.4</u></p> <p>Subtotal <u>316.2</u> <u>8.2</u> <u>57.3</u> <u>65.5</u></p> <p>Total <u>6,496.0</u> <u>212.0</u> <u>513.3</u> <u>725.3</u></p> <p><i>Change footnote as follows:</i> ¹Unsurveyed area refers to portions of the project <u>alternatives</u> that were not accessible due to private land restrictions.</p>	
66.	Biological Resources	D.2-131	Permanent impacts to native vegetation communities would result from the construction of turbines, support facilities, <u>meteorological towers</u> , and access roads.	Please consider revising to recognize permanent impacts from meteorological towers.
67.	Biological Resources	D.2-132	No temporary or permanent impacts to mulefat scrub or southern riparian woodland would occur. The Tule Wind Project would result in 9.7 <u>9.8</u> acres of total impact to big sagebrush scrub, <u>10.4</u> 9.2 acres of total impact to redshank chaparral, and 0.1 acre of total temporary impact to southern willow scrub.	See Comment 65 above.
68.	Biological Resources	D.2-134	In total, the Proposed PROJECT would result in 856.6 <u>819.2</u> acres of impact to native vegetation communities (i.e., direct removal of vegetation), including 239.4 <u>258.9</u> acres of temporary impacts and 617.2 <u>560.3</u> acres of permanent impact.	See Comment 65 above.
69.	Biological Resources	D.2-135	Limit temporary and permanent impacts to jurisdictional features to the minimum necessary as defined by the final engineering plans. Obtain and implement the terms and conditions of agency	Please update to reflect this additional language.

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			<p>permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits identified on the final engineering plans. The limits of construction shall be delineated with orange construction fencing and maintained throughout construction to avoid and minimize impacts to jurisdictional resources. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit (or project authorization of a <u>Section 404 Nationwide Permit</u>), a Clean Water Act Section 401 water quality certification, and a Section 1602 streambed alteration agreement with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Game for impacts to jurisdictional features prior to project construction. The terms and conditions of these authorizations shall be implemented.</p>	
70.	Biological Resources	D.2-136	<p>MM BIO-2b Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment), <u>preservation</u> and habitat restoration at a minimum of a 1:1 ratio or as required by the permitting agencies. The creation/restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Temporary impacts shall be restored sufficient to compensate for the impact to the</p>	<p>Please revise as suggested. Although USACE has a “no-net-loss” policy in regards to wetlands, there is no such policy for non-wetland waters. In fact, the April 10, 2008 Final Rule regarding Compensatory Mitigation for Loss of Aquatic Resources identifies four means of compensating for impacts: restoration, enhancement, establishment, or preservation. The aquatic features in question are relatively high-order ephemeral drainages that exhibit somewhat limited function. A combination of mitigation that targets preservation and enhancement may be preferable if large, contiguous, high quality areas are available.</p>

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			satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the BLM or County <u>appropriate agencies</u> , the temporary impact shall be considered a permanent impact and compensated accordingly.	
71.	Biological Resources	D.2-136	Numerous dry washes, swales, and wetland features occur in the Tule Wind Project area (see Figures D.2-5 through D.2-8). These features have the potential to be subject to the jurisdiction of the ACOE, CDFG, <u>RWQCB</u> , and/or RWQCB County of San Diego .	GLOBAL CHANGE: Consider revising document to reflect that no ACOE or RWQCB wetlands were identified within the Tule Project area. CDFG riparian habitat and County of San Diego RPO wetland was identified within the Tule Project area.
72.	Biological Resources	D.2-137	No ACOE jurisdictional wetlands occur in the Tule Wind Project area; therefore, n No impact to ACOE jurisdictional wetlands would result from project implementation. The Tule Wind Project would result in a total of 0.35 <u>0.65</u> acre of impact (0.22 <u>0.35</u> acre of temporary impact; 0.13 <u>0.30</u> acre of permanent impact) to ACOE and RWQCB non-wetland waters. The Tule Wind Project would result in a total of 0.76 <u>1.13</u> acre of impact (0.54 <u>0.75</u> acre of temporary impact; 0.22 <u>0.38</u> acre of permanent impact) to CDFG jurisdictional features. <u>The Tule Wind Project would result in a total of 0.10 acre of impact (0.06 acre of temporary impact; 0.04 acre of permanent impact) to County of San Diego RPO wetlands.</u>	<i>See Comment 64 above.</i>
73.	Biological Resources	D.2-137	As discussed previously, construction of the Proposed PROJECT would result in adverse impacts to jurisdictional resources. In total, the Proposed PROJECT would result in 4.26 <u>1.63</u> acres of direct permanent impact to jurisdictional resources.	Please update to reflect the impact numbers based on the Modified Project Layout.
74.	Biological Resources	D.2-141	MM BIO-4a(h) plant vegetative ground cover in disturbed areas as soon as possible following construction <u>to meet the criteria of the restoration plan</u> ;	Please consider revising to reflect the correct timing for plant restoration.
75.	Biological Resources	D.2-143	MM BIO-5a Install fencing or flagging around identified special-status plant species	Please update mitigation measure to include the following language.

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			<p>populations in the construction areas. For areas without existing rare plant data, Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas.</p>	
76.	Biological Resources	D.2-143	<p>MM BIO-5b Implement special-status plant species compensation. Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the BLM or County.</p>	Please update mitigation measure to include the following language.
77.	Biological Resources	D.2-144	<p>As discussed in Section D.2.1.1 and Appendix 1, Table 1, Jacumba milk-vetch, Tecate tarplant, Payson's jewel-flower, Colorado Desert larkspur, sticky geraea, early herissantia, Laguna Mountains alumroot, San Diego sunflower, slender-leaved ipomopsis, desert beauty, Mountain Springs bush lupine, Jacumba monkeyflower, Palomar monkeyflower, and southern jewel-flower occur or have a high potential to occur in the Tule Wind Project area.</p>	Curly herissantia was listed as moderate potential (not high) in Section D.2.1.1. The potential for this species to occur on site is negligible because there is no suitable habitat; therefore, it need not be analyzed.
78.	Biological Resources	D.2-144	<p>California ayenia, elephant tree, Utah vine milkweed, pygmy lotus, Parish's desert-thorn, hairy stickleaf, creamy blazing star, Thurber's beardtongue, desert spike moss, and chaparral ragwort, and Cove's cassia have a moderate potential to occur in the Tule Wind Project area.</p>	The potential for these species to occur on site is negligible because there is no suitable habitat; therefore, they need not be analyzed.
79.	Biological Resources	D.2-144	<p>Based on current available data, (The Tule Wind Project could result in impacts to 511 524 Jacumba milk-vetch; 10,608 8,573 Payson's jewel-flower; 2,915 3,743 Colorado Desert larkspur; 739 424</p>	See Comment 65 above.

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			sticky geraea; 401 Laguna Mountains alumroot; 6,095 7,264 San Diego sunflower; 53,230 <u>43,008</u> desert beauty; 98 <u>86</u> Mountain Springs bush lupine; 248 <u>24</u> Palomar monkeyflower; <u>1,284</u> Tecata tarplant and 578-122 southern jewel-flower individuals. <u>Additional individuals may be identified during pre-construction surveys.</u>	
80.	Biological Resources	D.2-144	Direct removal of these species or indirect loss of these species from construction-related dust or trampling or direct removal of suitable habitat would be an adverse impact and therefore, Mitigation Measures BIO-1a through BIO-1g, BIO-3a, BIO-4a, BIO-5a and BIO-5b (Mitigation Measures BIO-5a and BIO-5b provide further clarification and supersede APMs TULE BIO-16 and TULE BIO-17) have been provided to mitigate this impact.	Consider revising to reflect that Mitigation Measures BIO-5a and BIO-5b are unrelated to APMs TULE-BIO-16 and TULE-BIO-17.
81.	Biological Resources	D.2-153	MM BIO-7g Conduct protocol surveys for Quino checkerspot butterfly within 1 year prior to project construction activities <u>the QCB flight season prior to commencement of construction activities</u> in occupied habitat. The project proponent shall conduct pre-construction protocol surveys for Quino checkerspot butterfly within 1 year prior to construction activities <u>the QCB flight season prior to commencement of construction activities</u> in any area known to support the species. Surveys shall be conducted by a qualified, permitted biologist in accordance with the most currently accepted protocol survey method. Results shall be reported to the U.S. Fish and Wildlife Service within 45 days of the completion of the survey.	Please update mitigation measure to include the proper timing for QCB protocol surveys to be conducted.
82.	Biological Resources	D.2-153	MM BIO-7j Conduct pre-construction nesting bird surveys and implement appropriate avoidance measures for identified nesting birds. <u>The project proponent shall conduct pre-construction surveys for nesting birds if construction and removal activities are scheduled to occur during the breeding season. Surveys shall be conducted in areas within</u>	Consider revising Mitigation Measure BIO-7j. Mitigation Measure BIO-7j as stated in the Draft EIR/EIS is infeasible because the restrictions contained therein could restrict the construction window to only four months a year (September through December). Given the projected 24-month construction schedule, construction of Tule Wind

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			<p><u>500 feet of construction activities, such as tower sites, laydown/staging areas, substation sites, and access/spur road locations. The breeding season is generally defined as period from February 1 through August 15. For raptors, the breeding season is generally defined as January 15 through July 31. The required survey dates may be modified based on local conditions (i.e., high altitude locations) with the approval of the USFWS, CDFG and/or the relevant jurisdictional agency. The project applicant shall be responsible for retaining qualified biologists who can conduct pre-construction surveys and monitoring for breeding birds. Biological monitors will note any nests observed during construction within or adjacent to the project construction areas.</u></p> <p><u>If breeding birds with active nests are found, a biological monitor shall establish up to a 300-foot buffer around the nest for construction activities and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. Construction within one mile of a golden eagle nest may only proceed if construction monitoring confirms the nest is not occupied. See Draft EIR/EIS at D.2-157.</u></p> <p><u>The 300-foot (1-mile for golden eagle) buffer may be adjusted to reflect existing conditions including ambient noise, topography, and disturbance with the approval of with the approval of the USFWS, CDFG and/or the relevant jurisdictional agency.</u></p> <p><u>The biological monitors shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The biological monitors shall be responsible for documenting the results of the surveys and the ongoing monitoring and will provide a copy of the monitoring reports for impact</u></p>	<p>Project would extend at least six years and require repeated mobilization and demobilization of construction equipment, likely increasing construction impacts to natural resources, including sensitive biological resources. The suggested mitigation measure language provided is consistent with many other infrastructure projects, including the Tehachapi Renewable Transmission Project, currently under construction. <i>See</i> Tehachapi Renewable Transmission Project, Final Environmental Impact Report, Section 3.4, Mitigation Measure BIO-5 (Conduct pre-construction surveys and monitoring for breeding birds).</p> <p>The proposed language provides the needed flexibility to make the mitigation measure feasible, while providing specific protocols for the project applicant to follow to ensure protection of the resource.</p> <p>Note that the suggested revision to Mitigation Measure 7-j should be applied throughout the Draft EIR/EIS.</p>

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			<p><u>areas to the respective agencies. If for any reason a bird nest must be removed during the nesting season, the project applicant shall provide written documentation providing concurrence from the USFWS and CDFG authorizing the nest relocation. The project applicant shall provide a written report documenting the relocation efforts. The report shall include what actions were taken to avoid moving the nest, the location of the nest, what species is being relocated, the number and condition of the eggs taken from the nest, the location of where the eggs are incubated, the survival rate, the location of the nests where the chicks are relocated, and whether the birds were accepted by the adopted parent.</u></p> <p>When not feasible to construct outside of the bird nesting season, the project applicant shall hire a qualified biologist to conduct pre construction nesting bird surveys to determine the presence/absence of active nests in or adjacent to construction areas. If active nests are identified, appropriate avoidance measures would be identified and implemented to prevent disturbance to potentially nesting bird(s). If federally or state listed or fully protected nesting birds are identified, the project proponent shall contact the U.S. Fish and Wildlife Service and/or California Department of Fish and Game to determine the appropriate course of action to avoid disturbance to nesting birds. For golden eagle, depending on the location of the active nest, avoidance may include buffers including viewshed analysis. If the spatial buffer is not a large enough distance to be confident about avoiding disturbance to nesting eagles, a temporal buffer may required that restricts construction during the breeding season. The breeding season is generally defined as period from March through September. For raptors, the breeding season is generally defined as January through August.</p>	

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83.	Biological Resources	D.2-155	The Biological Assessment (HDR 2010c) describes permanent impacts to 23.6 acres of Quino checkerspot butterfly habitat within the 1-kilometer (3-foot <u>0.6-mile</u>) movement radius of the 2010 observation . . .	Please consider revising to correct the conversion from kilometers to miles.
84.	Biological Resources	D.2-155	The direct effects of temporary construction will temporarily <u>temporarily</u> impacts will be the loss of 5.2 <u>7.3</u> acres of Quino checkerspot butterfly habitat within the 1-kilometer (3-foot <u>0.6-mile</u>) movement radius of the 2010 observation.	Please consider revising to correct the conversion from kilometers to miles
85.	Biological Resources	D.2-155	Direct or indirect loss of this species from construction-related dust or vehicle collisions or permanent loss of suitable habitat would be adverse and therefore, Mitigation Measures BIO-1a through BIO-1g, BIO-3a, BIO-4a, and BIO-7b through BIO-7i (these measures provide further clarification and supersede APMs TULE-BIO-12, TULE-BIO-15, and TULE-BIO-18) have been provided to mitigate this impact.	Please consider revising to reflect that APM TULE-BIO-12 is not applicable for Quino checkerspot butterfly and should not be affected by the mitigation measures.
86.	Biological Resources	D.2-155-234	Under CEQA, impacts would <u>potentially be</u> significant but can be mitigated to a level that is considered less than significant . . .	Please consider revising to correct missing word to reflect appropriate significance determination. This omission occurs in several sections: Quino Checkerspot Butterfly, Western Spadefoot Toad, Other Special-Status Reptiles, Other Special-Status Raptors, Southwestern Willow Flycatcher, American Badger, Special-Status Bats, Special-Status Small Mammals.
87.	Biological Resources	D.2-156	Orange-throated whiptail, northern red-diamond rattlesnake, Blainville's horned lizard, coast patch-nosed snake, <u>rosy boa</u> , and common chuckwalla were observed in the project area, and rosy boa has potential to occur in the project area.	Please consider revising to reflect that the rosy boa was observed in the project area, as stated previously on page D.2-86 of the Draft EIR/EIS.
88.	Biological Resources	D.2-157	The <u>current</u> Canebrake location is less than 0.5 mile west <u>north</u> of the northern portion of the Tule Wind Project <u>although the territory also includes more distant alternative nesting sites including a more distant nest that was active in 2009.</u>	Revise to reflect accurate location of the Canebrake location relative to the Tule Project.

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89.	Biological Resources	D.2-157	The nest locations of the other active territories, located at Garnet Mountain, Monument Peak, and Thing Valley, are <u>approximately</u> 10, 7, and 3 miles west of the Tule Wind Project, respectively.	Consider revising for clarification.
90.	Biological Resources	D.2-158 to D.2-159	<p>The southwestern willow flycatcher is a federally and state-listed endangered species. This species has low potential to occur on site; however, the full species of willow flycatcher (E. traillii) could <u>is unlikely to occur</u> during migration in a variety of shrub/tree habitats. There is a small area of suitable habitat in the project area; however, there are no breeding records in the area (Unitt 2004). Direct loss of any subspecies of willow flycatcher, indirect loss of these species from noise and increased human presence, or removal of suitable habitat including stop-over habitat for migrating species would be adverse, and therefore, However, Mitigation Measures BIO-1a through BIO-1g, BIO-3a, BIO-4a, BIO-7b through BIO-7e, and BIO-7j (these measures provide further clarification and supersede APMs TULE-BIO-12, TULE-BIO-15, and TULE-BIO-18) have been to <u>would</u> mitigate this impact. Under CEQA, impacts would significant but can be mitigated to a level that is considered less than significant (Class II) with implementation of BIO-1a through BIO-1g, BIO-3a, BIO-4a, BIO-7b through BIO-7e, and BIO-7j.</p>	<p>Consider revising to reflect the low potential for impacts on the southwestern willow flycatcher. The willow flycatchers may migrate through the region, the area is not known to be a major migratory corridor. As a result, present and future wind-energy development in the area is not likely to have a significant effect on the species ability to breed in, and migrate through the region, particularly if existing riparian habitats within these developments is maintained, as is the case.</p> <p>Willow flycatchers, like most passerines, generally migrate at night. Nocturnal migrant mortality has not been identified as a significant concern at any wind projects that we are aware of (NRC 2007). Generally, risk to nocturnal migrant songbirds from collision with wind turbines is expected to be low, due to the generally high altitudes nocturnal migrants typically fly (e.g. Tidhar 2010), and the fact that the FAA lighting on wind turbines have not been show to be an attractant to nocturnal migrating songbirds (Kerlinger et al. 2010). Solid red incandescent lighting on communication towers has been shown to attract nocturnal migrants during poor weather conditions. Willow flycatchers are a nocturnal migrating</p> <p>Among six fatality monitoring studies conducted at wind-energy facilities in central and southern California, a total of 38 unique passerine species were documented as fatalities (Anderson et al. 2004; Anderson et al. 2005; Chatfield et al. 2009; Smallwood et al. 2009; WEST 2009). Of these documented passerine fatalities, none were willow flycatchers.</p>

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91.	Biological Resources	D.2-159	Tricolored blackbird, Southern California rufous-crowned sparrow, Bell's sage sparrow, Vaux's swift, olive-sided flycatcher, California horned lark, yellow warbler, loggerhead shrike, and gray vireo can be found occur in a variety of habitats <u>that can be found within</u> the project area, as discussed in Section D.2.1.1.	Please consider revising as suggested for clarity. As it is written, the sentence implies that all the species listed were observed in the project area.
92.	Biological Resources	D.2-159	This species was not observed during the surveys, but it has the potential to occur in the project area. Based on the high mobility of the mountain lion, the potential for direct loss of these species is low and would not be adverse. In addition, <u>due to high mobility of the species,</u> indirect effects of noise and increased human presence on this species would not be considered adverse.	Please consider revising to include the following language.
93.	Biological Resources	D.2-160	No USFWS critical habitat occurs in the project area. Steep, rocky habitat preferred by the species is lacking in the project area. <u>Physical and biological features that are essential for Pensinsular bighorn sheep habitat, including a range of vegetation types, foraging and water areas, and steep to very steep, rocky terrain with appropriate elevations and slope (74 FR 70) is lacking in the project area.</u> <u>Additionally, there is a lack of sufficient escape terrain within the vicinity, and bighorn sheep have never been recorded anywhere in which the proposed turbines would be visible within half a mile (HDR 2010c).</u>	Please consider revising to include the following language.
94.	Biological Resources	D.2-160	Pallid bat and pocketed free-tailed bat can be found occur in a variety of habitats <u>that can be found within</u> the project area, as discussed in Section D.2.1.1.	Please consider revising to include the following language.
95.	Biological Resources	D.2-161	Dulzura pocket mouse, pallid San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, and Jacumba little pocket mouse can be found occur in a variety of habitats <u>that can be found within</u> the project area, as discussed in Section D.2.1.1.	Please consider revising to include the following language.

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96.	Biological Resources	D.2-167	Impact BIO-8: Construction activities would result in a potential loss of nesting birds (violation of the Migratory Bird Treaty Act).	Revise to reflect that there is no basis to conclude that construction activities will result in the take of active nests or nesting birds in violation of the Migratory Bird Treaty Act. <i>See</i> Applicant Environmental Document, HDR 2010 at page 2-56. (Applicant Proposed Measures 1, 2, and 3).
97.	Biological Resources	D.2-167	Construction of the Tule Wind Project would result in the removal of vegetation and increased human presence and noise that has the potential to cause the loss of nesting birds, which would be a violation of the Migratory Bird Treaty Act.	Revise to reflect that there is no basis to conclude that construction activities will result in the take of active nests or nesting birds in violation of the Migratory Bird Treaty Act. <i>See</i> Applicant Environmental Document, HDR 2010 at page 2-56. (Applicant Proposed Measures 1, 2, and 3).
98.	Biological Resources	D.2-172	BIO-10a. Design all transmission towers and lines to conform with Avian Power Line Interaction Committee standards. The Proposed PROJECT shall have the minimum clearances between phase conductors or between phase conductors and grounded hardware, as recommended <u>implement recommendations</u> by the Avian Power Line Interaction Committee (2006), which <u>will protect raptors and other birds from electrocution. These measures are</u> is sufficient to protect even the largest birds that may perch or roost on transmission lines or towers from electrocution.	Please consider revising to reflect that the APLIC standards implement measures in addition to minimum clearances.
99.	Biological Resources	D.2-172	The Tule Wind Project would result in the installation of approximately 9.7 2 miles of 138 kV transmission line with 408 <u>80</u> towers, as described in Section B.	Please revise based on the Modified Project Layout.
100.	Biological Resources	D.2-174	From this data, the encounter rate for species can be determined, which is an estimate of the frequency with which a species is observed at the elevations of the proposed turbine s ' rotor swept area (RSA).	Consider revising to correct typographical error.
101.	Biological Resources	D.2-175	Golden eagles can be sensitive to changes in their environment (e.g., wind farms). Madders (2009) describes a home range use change in a pair of resident golden eagles after a wind farm was	Please consider revising to reflect the availability of alternative nest sites within the pairs' territory.

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			<p>constructed in their territory. Madders (2009) also indicates that it is unlikely that golden eagles would nest within the immediate vicinity (i.e., 500 meters or 1,640 feet) of the proposed wind turbines, likely constraining the eagles from occupying nests within their existing territory. Currently, the Canebrake eagle pair is nesting within the 500-meter (1,640-foot) area; <u>but if they choose to use one of the more distant alternative nests, the territory may continue to be occupied with the nest outside the 500 meter area.</u> thus, if the pair changes its nesting location to avoid the Tule Wind Project area that territory may be lost from use.</p>	
102.	Biological Resources	D.2-177	<p>Collision risk can also be increased from idling turbines, which provides increased perching opportunities for birds in the project area. Although it is not clear that perching would increase the risk of collision, Erickson et al. 2001, suggests that a lack of perching and nesting opportunities may discourage some birds from utilizing these areas. Idling of turbines is a potential adaptive management option that could be employed, if determined appropriate under the adaptive management program as triggered by substantial bird mortality. The adaptive management program will address the potential increase in perching opportunities if turbines are idled.</p> <p>In terms of raptor nest surveys, red-tailed hawk and Cooper's hawk nests have been detected in the project area. In the golden eagle nest survey for the project area and a 10-mile buffer around the project area, 10 golden eagle territories were identified, including 6 active territories, 3 of which had nests with incubating adults (WRI 2010). The nests with incubating adults are generally located or described as the Canebrake, Moreno Butte, and Glenn Cliff/Buckman Springs locations. The Canebrake location comprises</p>	<p>Consider deleting reference to increased collision risk from idling turbines. Turbines like those proposed for Tule Wind Project are not used for perching, because the turbines, including the nacelles, do not have structures used for perching and the turbines are higher in the air than the typical heights from which raptors tend to hunt and roost. Erickson et al. (2001) was referring to smaller turbines, like those in the Altamont Pass, where raptors are observed perching on the lattice towers, short towers and nacelles that had open cat walks, and raptors were observed frequently nesting on these structures.</p> <p>The data in the record shows that there is low golden eagle use on the project site. West 2010b. Low use and low prey base on project site suggest poor foraging habitat. West 2010b at page 2. Based on WEST (2010), use of a wind project site by golden eagles has been shown to be more indicative of risk than a wind project's proximity to nest. Golden eagle mortality at the Altamont Pass is primarily floater and non-breeders (Hunt 2002). The population study of Hunt (2002) demonstrated no population level impact to the resident golden eagle population near the Altamont Pass, despite high mortality within the Altamont Pass Wind Project. Follow-up studies by</p>

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			<p>a group of four nests, with the closest nest less than 0.5 mile northwest of a string of turbines in the northern portion of the Tule <u>Wind</u> Project. The Moreno Butte location is approximately 10 miles southwest of the project. The Glenn Cliff/Buckman Springs location is approximately 8 miles west of the central portion of the project. The active territories, located at Garnet Mountain, Monument Peak, and Thing Valley, are <u>approximately</u> 10, 7, and 3 miles west of the Tule <u>Wind</u> Project, respectively. Although Golden eagle use of the Tule Wind Project area was very low based on point count surveys, suggesting the project is not used significantly for foraging. Habitat for golden eagle foraging is found more frequently in valleys (WEST 2010b, referencing J. Platt pers. comm.), the presence of an active golden eagle nest at the Canebrake location indicates that golden eagles are using a foraging area in the vicinity of the northern portion of the project area. Therefore, there would be an increased risk of collision for golden eagle in the northern portion of the project area than would be estimated from the bird use data alone. A low risk of collision for golden eagle in the southern portion of the project area would be estimated based on increased distance to active nests and low bird use.</p>	<p>Hunt (2005) continues to show occupancy of all golden eagle territories monitored during previous studies (Hunt 2005). No demonstrated reduction in active nest density has been documented in the Wyoming wind resource area, near several wind projects in Carbon County, Wyoming. Nests within several miles of the wind project continue to be active, 15 years post-construction of that project (Young et al. 2010).</p>
103.	Biological Resources	D.2-178	<p>D.2-178 (and throughout the document): Based on the use data, encounter rate index, nest survey information, and the species' population and regulatory status, the operation of wind turbines proposed by the project would result in an adverse impact to golden eagle and therefore, Mitigation Measures BIO-10a through BIO-10i 10h have been provided. However, the identified impact cannot be mitigated. <u>Under CEQA, the risk of collision is low, based on low golden eagle use of the to golden eagle in the western portion of the project area, would <u>may</u> be significant and <u>but</u> cannot be</u></p>	<p>GLOBAL CHANGE: The data in the record shows that there is low golden eagle use on the project site. West 2010b. Low use and low prey base on project site suggest poor foraging habitat. West 2010b at page 2. Based on WEST (2010), use of a wind project site by golden eagles has been shown to be more indicative of risk than a wind project's proximity to nest. Golden eagle mortality at the Altamont Pass is primarily floater and non-breeders (Hunt 2002). The population study of Hunt (2002) demonstrated no population level impact to the resident golden eagle population near the Altamont</p>

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			<p>mitigated to a level that is considered less than significant (Class II). This mitigation includes implementation of an Avian and Bat Protection Plan (Mitigation Measure BIO-10b), an adaptive management program (Mitigation Measure BIO-10h), and eagle-specific surveys (Mitigation Measure BIO-10g), including telemetry, to guide final turbine site selection (Mitigation Measure BIO-10f). Together, these mitigation measures will be implemented to ensure net zero loss of golden eagle on a population basis. The proximity of active golden eagle nests to the proposed turbines in the western portion of the project area makes it probable that an adult or juvenile eagle could collide with the turbines at some point within the lifetime of the project. In the worst case, this western area of the project could become a continuing sink for golden eagles attempting to use nesting sites west of the project area. There is no established buffer distance from active nests deemed high risk for golden eagle collision with wind turbines, and golden eagle use and foraging areas around active nests are not uniform and will vary from territory to territory. Although territory size and shape is not known for the golden eagle territories around the Tule Wind Project, circular foraging areas with a 4-mile radius around each of the active nest locations shows overlap of potential golden eagle use area with the western half of the proposed turbine strings. The same analysis shows no overlap of potential use areas, and therefore low risk of collision for golden eagles, in the eastern half of the proposed turbine strings.</p>	<p>Pass, despite high mortality within the Altamont Pass Wind Project. Follow-up studies by Hunt (2005) continues to show occupancy of all golden eagle territories monitored during previous studies (Hunt 2005). No demonstrated reduction in active nest density has been documented in the Wyoming wind resource area, near several wind projects in Carbon County, Wyoming. Nests within several miles of the Carbon County wind project continue to be active, 15 years post-construction of that project (Young et al. 2010).</p> <p>Zero risk to individual birds should not be the threshold for a finding of no significance under CEQA. The significance classification and the determination under CEQA that risk cannot be mitigated should not be based on the existence of any risk above zero over the life of the project. Such a standard would be unreasonable and would exist for any wind project located within the golden eagle range. Instead, the record evidence concludes that risk of collision is low, would not have population-level impacts, and any risk would be decreased to a less-than-significant level by applicable APMs and mitigation measures.</p> <p>Electrocution and collision can be mitigated by measures outlined in the APLIC Guidelines. The applicant has committed to implement applicable APLIC Guidelines (APM TULE-PDF-11) and the preparation of a project-specific Avian and Bat Protection Plan as part of the design of Tule Wind Project; therefore, Tule Wind Project would not have the potential electrocution and collision risks outlined in the Draft EIR/EIS. The measures contained in Mitigation Measures BIO-10a and BIO-10b are unnecessary as they merely restate commitments already made by the project applicant as part of the project's design.</p>

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104.	Biological Resources	D.2-179	<p>Bat activity at the Tule Wind Project area was estimated through the use of acoustical monitoring <u>conducted in two phases between September 2008 and November 2010 over an approximately 1-year period between 2007 and 2008.</u> Bat use for the Tule Wind Project area was estimated to be <u>approximately 717.7 bat passes per detector night at ground-based stations at met towers (WEST 2011).</u> Compared to <u>existing data from nine wind energy facilities where both bat activity rates and mortality levels have been measured, the level of bat activity documented at the Tule Wind Project area was higher than that at wind facilities in Minnesota and Wyoming, where reported bat mortalities are low, but was lower than at facilities in the eastern United States, where reported bat fatalities have been highest (WEST 2011), which is on the low range of reported bat use from other wind farm sites (2.1 to 38.3 bat passes per detector night) (WEST 2009).</u> The acoustical monitoring did not identify <u>specific bat species, but grouped known frequency ranges associated with certain bat species bats to species.</u></p>	Please consider revising to reflect the most recent data concerning acoustical monitoring and bat information provided by WEST, submitted concurrently with the Tule Wind Project comments.
105.	Biological Resources	D.2-180	<p>Reported bat fatality rates from post-construction monitoring of existing wind farm sites shows a wide range of fatality rates, from 0 to nearly 40 bat fatalities/MW/year (WEST 2009, WEST 2011). Based solely on the correlation between pre-project bat use and post-construction bat mortality, the Tule Wind Project has the potential to result in up to 2.5 bat fatalities/MW/year (WEST 2009, WEST 2011).</p>	Please consider revising to reflect the most recent data concerning acoustical monitoring and bat information provided by WEST, submitted concurrently with the Tule Wind Project comments.
106.	Biological Resources	D.2-180	<p>Seven horizontal mine shafts and three vertical shafts are present within or near the Proposed PROJECT; <u>and these shafts were searched for bat signs surveyed and assessed for potential use by bats.</u> Only one horizontal mine shaft has <u>potential to support bat activity appeared suitable as a roost structure</u> (WEST 2010a).</p>	Consider revising for clarification.
107.	Biological Resources	D.2-180	<p><u>Frequencies in the pallid bat range were detected</u></p>	Consider deleting because pallid bat and pocketed

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			during acoustical monitoring, but pocketed free-tailed bat frequencies were not detected.	free-tailed bat are in the same frequency range, and the acoustical monitoring detected all frequency ranges.
108.	Biological Resources	D.2-181	MM BIO-10d Minimize turbine lighting. Night-lighting may serve as an attractant for birds, especially migrants, which may be attracted to the light and then become unable to leave it. Except <u>where FAA requirements determine the requirements for lighting</u> , lighting that attracts birds shall be avoided on the turbines.	Please consider revising mitigation measure to clarify FAA required lighting.
109.	Biological Resources	D.2-181	<p>Mitigation Measure 10e: Conduct post-construction bird and bat species mortality monitoring and reporting pursuant to a monitoring program. Conduct at least <u>5</u> years of post-construction bird and bat mortality monitoring. A Post-Construction Monitoring Program shall be developed in accordance with the <i>California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development</i> (CEC and CDFG 2007) and recommendations from the Wind Turbine Guidelines Advisory Committee (USFWS 2009 <u>2010</u>) to satisfy Tier 4 and Tier 5 monitoring requirements.</p> <p>This plan shall be reviewed by the permitting agencies prior to project initiation. At a minimum, the plan shall outline the monitoring methods, evaluation methods, threshold criteria for action, and types of management actions to be undertaken. Annual monitoring reports shall be submitted to the wildlife agencies and lead agencies as appropriate.</p>	<p>According to the CEC and CDFG Guidelines cited in Mitigation Measure 10e: “For most projects, one year of pre-permitting surveys and two years of carcass searches during operations are recommended. However, a reduced level of survey effort may be warranted for certain categories of projects, such as infill development, some repowering projects, or projects contiguous to existing low-impact wind facilities. On the other hand, survey duration and intensity may need to be expanded for other kinds of projects, such as those with potential for impacts to special-status species, or for sites near wind energy projects known to have high impacts to birds or bats.” <i>California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development</i> (CEC and CDFG 2007) at page E-2.</p> <p>There is no indication that high impacts to avian and bat species; to the contrary, impacts are expected to be low. WEST 2009; West 2010b. Accordingly, 2 years of monitoring, as recommended by the CEC and CDFG Guidelines, is appropriate.</p> <p>For the life of the project, Tule Wind Project will include the Wildlife Monitoring and Reporting System, a systematic approach to reporting bird and bat fatalities to provide longer term monitoring of project impacts. The Wildlife Monitoring and Reporting System will be a critical component of the</p>

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				Applicant's Avian and Bat Protection Plan, currently under development in consultation with the U.S. Fish and Wildlife Service and CDFG. The Wildlife Monitoring and Reporting System is consistent with the recommendations of Tier 4 and 5 of the Wind Turbine Guidelines Advisory Committee submitted to the Secretary of the Interior on March 4, 2010 by the Wind Turbine Advisory Committee (USFWS 2010).
110.	Biological Resources	D.2-182	MM BIO-10g Monitor golden eagles nests in the area to track productivity. Conduct annual <u>periodic</u> surveys of golden eagle territories <u>as provided in the Avian and Bat Protection Plan.</u> within 10 miles of the turbines for a minimum of 10 years. Conduct surveys to determine location of active nest, number of eggs laid and number of young fledged, as described by Pagel et al. 2010. Annual <u>Monitoring</u> reports shall be provided to the wildlife agencies and the Bureau of Land Management.	As currently drafted, the broad survey area and duration is not related to project impacts and may be duplicative of other non-project data collection efforts. Observer disturbance associated with repeated and intensive surveys should be minimized where unnecessary to assess project impacts. The stated purpose of the survey protocol outlined by Pagel, et al. is to determine golden eagle nesting. Protocol level surveys conducted to date have already determined golden eagle use within 10 miles of the Tule Wind Project (WRI 2010). Periodic surveys may be appropriate to monitor long term behavior patterns, but annual surveys would be unwarranted and may result in unnecessary disturbance to nesting golden eagles.
111.	Biological Resources	D.2-182 to D.2-183	BIO-10h. Implement an adaptive management program in an Avian and Bat Protection Plan developed jointly with USFWS and CDFG that provides triggers for required operational modifications (e.g., seasonality, radar, turbine-specific modifications, and cut-in speed). An adaptive management program shall be prepared <u>jointly with USFWS and CDFG</u> and implemented <u>by the project applicant</u> that uses the information provided from <u>implementation of Mitigation Measures 10e and 10g, which includes</u> the post-	Please consider clarifying that the adaptive management plan will be included in an Avian and Bat Protection Plan currently being developed in consultation with the USFWS and CDFG. Please clarify that adaptive management actions would be triggered by loss of golden eagle caused by Tule Wind Project's operation. There are no studies establishing that curtailment is an effective method for reducing mortality of avian

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			<p>construction bird monitoring mitigation measure and the golden eagle nest productivity monitoring. mitigation measure. <u>This program must be implemented in a manner that assures net zero loss of golden eagle on a population level basis.</u> If mortality of any golden eagle occurs <u>as the result of the Tule Wind Project's operation</u>, regardless of age or gender, the responsible and adjacent turbines will be shut down while the adaptive management program is assessed for its validity and modified to the satisfaction of the resource agencies. This program will be based on monitoring of the active nest locations and eagle activity within 10 miles of the turbines. Measures <u>to be considered for implementation</u> will include curtailing operation of all or selected turbines during the fledging period of the active nests or potential permanent shutdown of turbines that are closest to active nests until the nest location changes to a farther location (eagles are known to build numerous nests within their territory and use different nest locations each year (Kochert et al. 2002)). Adaptive management measures may will also include prey population control if populations of ground squirrels and rabbit species are noted in proximity (within 50 meters or 164 feet) to the turbine base. The prey population may serve as an attractant to foraging raptors and could result in the collision with the turbines as a result. Other measures (e.g., radar monitoring and turbine modifications) will be implemented as dictated by the monitoring data and as specified by the adaptive management program. Based on the monitoring of bat mortality, the adaptive management program shall have triggers for the implementation of limited and periodic feathering or shut downs of turbines to avoid impacts to bats.</p>	<p>species. There are no studies we are aware of that have shown. <i>See</i> Draft EIR/EIS at D.2-178.</p>
112.	Biological Resources	D.2-183	<p>MM BIO-10i — Obtain written agency concurrence documenting compliance with regulations governing golden eagle. Prior to project construction, written</p>	<p>This mitigation measure is not feasible and is not required by the Bald and Golden Eagle Protection Act or the California Fish & Game Code. It therefore</p>

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			<p>concurrence from the U.S. Fish and Wildlife Service and California Department of Fish and Game shall be obtained that documents approval of the mitigation measures and adaptive management program related to golden eagle sufficient to provide compliance with the Bald and Golden Eagle Protection Act and the California Fish and Game Code.</p>	<p>should not be applied.</p> <p>Consultation with the USFWS is ongoing, and the Applicant will implement an approved ABPP, which shall be developed jointly with the USFWS and CDFG, as required by Mitigation Measure BIO-10b.</p> <p>Additionally, the timing of this mitigation measure (prior to project construction) is inconsistent with MM BIO-10f, which applies siting decision on the specific ridge turbines after construction has started on the valley turbines, and with the concept of an ABPP, which is implemented at the start of operations and is based on all baseline information collected to date at that time.</p>
113.	Biological Resources	D.2-184	<p>The risk of mortality due to collision with operating turbines by golden eagles resulting from the Proposed PROJECT (specifically, the Tule Wind Project) would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10h have been provided. However, the identified impact cannot be mitigated and uUnder CEQA, the risk of collision is low based on golden eagle use of the project areato golden eagle in the western portion of the project area, and maywould be significant but and cannot be mitigated to a level that is considered less than significant (Class II).</p>	<p>The referenced mitigation measures apply to the whole project.</p>
114.	Biological Resources	D.2-211 to D.2-212	<p>Impact BIO-10: ...However, the electrocution risk would remain adverse and therefore, significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10b have been provided to mitigate this impact. Under CEQA, impacts would significant but can be mitigated to a level that is considered less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b. Similar to the proposed Tule Wind Project, the risk of mortality due to collision with operating turbines by golden eagle resulting from</p>	<p>See Comment 102 above.</p>

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			<p>this alternative would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10<i>h</i> have been provided. However, the identified impact cannot be mitigated and Under CEQA, impacts may be <u>would be considered significant but and cannot be</u> mitigated to a level that is considered less than significant (Class II). <u>This mitigation includes implementation of an Avian and Bat Protection Plan (Mitigation Measure BIO-10b), an adaptive management program (Mitigation Measure BIO-10h), and eagle-specific surveys (Mitigation Measure BIO-10g), including telemetry, to guide final turbine site selection (Mitigation Measure BIO-10f). Together, these mitigation measures will be implemented to ensure net zero loss of golden eagle on a population basis.</u></p>	
115.	Biological Resources	F.2-212	<p>Impact BIO-10: The risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be adverse and therefore significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10e, and BIO-10h, and BIO-10i have been provided. Under CEQA, impacts would be significant but can be mitigated to a level that is less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10e, BIO-10h, and BIO-10i.</p>	Please update the appropriate mitigation measure to reduce this determination to a Class II impact.
116.	Biological Resources	D.2-213	<p>No design information was available for the undergrounding of this line; therefore, a detailed impact analysis was not possible.</p>	Consider revising.
117.	Biological Resources	D.2-215	<p>However, the electrocution risk would remain adverse and therefore, significant but can be <u>mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10b have been provided to mitigate this impact.</u> Under CEQA, impacts would be significant but can be mitigated to a level that is</p>	<i>See</i> Comment 103 above.

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			<p>considered less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b. Similar to the proposed Tule Wind Project, the risk of mortality due to collision with operating turbines by golden eagle resulting from this alternative would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10h have been provided. However, the identified impact cannot be mitigated and Under CEQA, impacts <u>may be considered significant but cannot be mitigated to a level that is considered less than significant (Class II). This mitigation includes implementation of an Avian and Bat Protection Plan (Mitigation Measure BIO-10b), an adaptive management program (Mitigation Measure BIO-10h), and eagle-specific surveys (Mitigation Measure BIO-10g), including telemetry, to guide final turbine site selection (Mitigation Measure BIO-10f). Together, these mitigation measures will be implemented to ensure net zero loss of golden eagle on a population basis.</u></p>	
118.	Biological Resources	D.2-215	<p>The risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be adverse and therefore, significant <u>but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10e, and BIO-10h, and BIO-10i have been provided. Under CEQA, impacts would be significant but can be mitigated to a level that is less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10e, BIO-10h, and BIO-10i.</u></p>	Please update the appropriate mitigation measure to reduce this determination to a Class II impact.
119.	Biological Resources	D.2-220	<p>Impact BIO-10 However, the electrocution risk would remain adverse and therefore, significant but <u>can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10b have been provided to mitigate this impact. Under CEQA, impacts would significant but can be mitigated to a level that is</u></p>	See Comment 103 above.

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			<p>considered less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b.</p> <p>Similar to the proposed Tule Wind Project, the risk of mortality due to collision with operating turbines by golden eagle resulting from this alternative would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10h have been provided. However, the identified impact cannot be mitigated and uUnder CEQA, impacts may be <u>would be considered significant but and cannot</u> be mitigated to a level that is considered less than significant (Class II). <u>This mitigation includes implementation of an Avian and Bat Protection Plan (Mitigation Measure BIO-10b), an adaptive management program (Mitigation Measure BIO-10h), and eagle-specific surveys (Mitigation Measure BIO-10g), including telemetry, to guide final turbine site selection (Mitigation Measure BIO-10f).</u> Together, these mitigation measures will be implemented to ensure net zero loss of golden eagle on a population basis.</p> <p>The risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be adverse and therefore, significant <u>but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10e, and BIO-10h, and BIO-10i have been provided. Under CEQA, impacts would be significant but can be mitigated to a level that is less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10e, BIO-10h, and BIO-10i.</u></p>	
120.	Biological Resources	D.2-221	Therefore, this alternative would result in greater temporary and permanent impacts than that assessed in Section D.2.3.3 for the Tule Wind Project. No design information was available for the undergrounding of this line; therefore, a detailed impact analysis was not possible.	Please update.

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121.	Biological Resources	D.2-223	<p>However, the electrocution risk would remain adverse and therefore, would be significant but can be mitigated to less than significant levels (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b, have been provided to mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b. Similar to the proposed Tule Wind Project, the risk of mortality due to collision with operating turbines by golden eagle resulting from this alternative would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10i have been provided. However, the identified impact cannot be mitigated and Under CEQA, impacts may be considered significant but cannot be mitigated to a level that is considered less than significant (Class II). This mitigation includes implementation of an Avian and Bat Protection Plan (Mitigation Measure BIO-10b), an adaptive management program (Mitigation Measure BIO-10h), and eagle-specific surveys (Mitigation Measure BIO-10g), including telemetry, to guide final turbine site selection (Mitigation Measure BIO-10f). Together, these mitigation measures will be implemented to ensure net zero loss of golden eagle on a population basis.</p> <p>The risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be adverse and therefore <u>potentially significant but can be mitigated to less than significant levels (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10e, BIO-10h, and BIO-10i. 10h have been provided. Under CEQA, impacts would be significant but can be mitigated to a level that is less than significant (Class II) with implementation of Mitigation</u></p>	See Comment 103 above.

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			Measures BIO-10a through BIO-10e, BIO-10h, and BIO-10i.	
122.	Biological Resources	D.2-224	Tule Wind Alternative 5, Reduction in Turbines	<p>Tule Wind LLC will maximize mitigation options to avoid, minimize, and mitigate potential impacts to the golden eagle through implementation of various measures, as deemed appropriate by the various agencies and/or Tule Wind, LLC. Alternative 5 does not necessarily reduce the risk of eagle mortality from collisions with turbines when compared with the Tule Wind Project. Rather, both alternatives exhibit a similar low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project. Alternative 5 is not necessary because similar to the proposed Tule Wind Project, the low risk of mortality due to collision with operating turbines by golden eagle resulting from the proposed project would be potentially significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10h. Specifically, Mitigation Measure BIO-10f includes requirements to construct the Tule Wind Project in two portions (phases). Construction of the first portion of the project would occur at those turbine locations deemed to present less risk to the eagle populations and would not include turbines on the northwest ridgeline. Construction of turbines in the second portion of the project will only be authorized following detailed behavioral telemetry studies and continued nest monitoring of known eagles in the vicinity of the Tule Wind Project (considered to be within approximately 10 miles of the project). Behavior studies will be used to determine eagle usage and forage areas, and authorization for construction at each turbine location in the second portion will be at the discretion of the BLM or the appropriate land management entity. The final criteria determining the risk each location</p>

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				<p>presents to eagles will be determined by the BLM or the appropriate land management agency, in consultation with the required resource agencies, tribes and other relevant permitting entities and will be detailed in the Avian Protection Plan.</p> <p>Construction of the Proposed Project (per the Modified Project Layout) with implementation of the requirements of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without necessitating the elimination of 62 turbines. Therefore, for the reasons stated above, the Reduced Turbine Alternative should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the Draft EIR/EIS. Further consideration of the proposed project (as modified) should be provided to meet the alternative screening criteria outlined within Section C.2 of the Draft EIR/EIS.</p>
123.	Biological Resources	D.2-227 to D.2-228	<p>Impact BIO-10: The risk of electrocution to special-status bird species from transmission lines and towers under this alternative would be the same as that assessed in Section D.2.3.3 for the Tule Wind Project. The electrocution risk would <u>be significant but can be mitigated to less than significant levels (Class II) with implementation of</u> remain adverse and therefore, Mitigation Measures BIO-10a through BIO-10b have been provided to mitigate this impact. Under CEQA, impacts would significant but can be mitigated to a level that is considered less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10b. The risk of collision to special-status bird and bat species would be reduced under this alternative as compared to the Tule Wind Project due to the reduction in the overall number of turbines and the removal of turbines</p>	<p>GLOBAL CHANGE: The data in the record shows that there is low golden eagle use on the project site. West 2010b. Low use and low prey base on project site suggest poor foraging habitat. West 2010b at page 2. Based on WEST (2010), use of a wind project site by golden eagles has been shown to be more indicative of risk than a wind project’s proximity to nest. Golden eagle mortality at the Altamont Pass is primarily floater and non-breeders (Hunt 2002). The population study of Hunt (2002) demonstrated no population level impact to the resident golden eagle population near the Altamont Pass, despite high mortality within the Altamont Pass Wind Project. Follow up studies by Hunt (2005) continues to show occupancy of all golden eagle territories monitored during previous studies (Hunt 2005). No demonstrated reduction in active nest density has been documented in the Wyoming wind</p>

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			<p>within areas considered high risk for golden eagle turbine collision in the western portion of the Tule Wind Project area. Turbines removed under this alternative include the turbines presenting high risk of collision for golden eagles based on topography, landforms, and distance to known active nests. Removed turbines were those turbines along the entire western ridgeline east of the known active golden eagle territories within the potential use areas of these eagles. The reduction in turbines under this alternative does not take into account the project specific golden eagle telemetry data that will be collected pursuant to Mitigation Measure BIO 10f. As a result this alternative does not necessarily reduce the risk of eagle mortality from collisions with turbines when compared with the Tule Wind Project. Rather, both alternatives exhibit a similar, low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project. Specifically, pursuant to Mitigation Measure BIO 10f, tTurbines removed under this alternative would that exceed the nest buffer recommendations provided in a number of studies of nesting golden eagles would be removed (Scott 1985, Richardson and Miller 1997, Kochert et al. 1999, Suter and Joness 1981, NJ Department of Environmental Protection 2009). In addition to the benefit of the nest buffer provided by this alternative mitigation measure, turbines would be removed from the viewshed of the closest eagle nest does not include the proposed turbines under this alternative, and this thus providesing additional protection for the nesting eagles (Camp et al. 1997).</p> <p>All turbines that would be subject to Mitigation Measure BIO-10f considered high risk for golden eagle collision would be are removed under this alternative, which and may this would substantially</p>	<p>resource area, near several wind projects in Carbon County, Wyoming. Nests within several miles of the wind project continue to be active, 15 years post-construction of that project (Young et al. 2010).</p> <p>Zero risk to one individual gold eagle should not be the threshold for a finding of no significance. The significance classification and the determination that risk cannot be mitigated should not be based on the existence of any risk above zero over the life of the project. Such a standard would be unreasonable and would exist for any wind project located within the golden eagle range. Instead, the record evidence concludes that risk of collision is low, would not have population-level impacts, and any risk would be decreased to a less-than-significant level by APMs and applicable mitigation measures.</p> <p>The record evidence does not support the assumption that the removed turbines would pose a high risk to golden eagles. Proximity to the nest and the turbines' location on the ridgeline has not been demonstrated to equate to. There is no stated basis for topographical, landform, or proximity risk at this site. There are many factors potentially affecting risk; however, the studies of the site to date demonstrate low golden eagle use of the site (which is one of the primary factors linked to mortality), and low potential for prey and foraging habitat on the site.</p>

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			<p>reduce the risk of golden eagle mortality; however the risk of mortality due to collision with operating turbines by golden eagle remains <u>significant, but can be mitigated to less than significant levels (Class II) with implementation of</u> adverse and therefore, Mitigation Measures BIO-10a through BIO-10i h have been provided.</p> <p>However, the identified impact cannot be mitigated and under CEQA, impacts of golden eagle collision from this alternative would be significant and cannot be mitigated to a level that is considered less than significant (Class I). This is due to the fact that although the turbines presenting high risk of golden eagle collision would be removed, the remaining turbines would continue to present risk, albeit substantially reduced, of golden eagle collision. Without additional pair specific behavior and golden eagle population studies, the risk of this alternative to golden eagles cannot be determined.</p> <p>Similar to the proposed Tule Wind Project, the risk of mortality due to collision with operating turbines by Vaux's swift and special-status bat species would be adverse and therefore, Mitigation Measures BIO-10a through BIO-10e, <u>and</u> BIO-10h, and BIO-10i have been provided. Under CEQA, impacts would be significant but can be mitigated to a level that is less than significant (Class II) with implementation of Mitigation Measures BIO-10a through BIO-10e, <u>and</u> BIO-10h, and BIO-10i.</p> <p>The risk of mortality due to collision with operating turbines by other special-status bird species resulting from this alternative would not be adverse and under CEQA, would be considered less than significant (Class III) or would have no effect</p>	

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			(No Impact).	
124.	Biological Resources	D.2-252 Table D.2-12	BLM, San Diego County, CSLC, BIA, and/or Ewiiapaayp Band of Kumeyaay Indians	GLOBAL CHANGE: Please consider revising for clarification.
125.	Biological Resources	D.2-252 Table D.2-12	A third-party environmental monitor shall oversee construction monitoring to ensure biological impacts are avoided or minimized, and ensure that appropriate work practices necessary to implement the mitigation measures are implemented.	Please consider revising to avoid duplicative
126.	Biological Resources	D.2-253 Table D.2-12	BIO-1d If restoration of temporary impact areas is not possible to the satisfaction of the BLM or County <u>appropriate agencies</u> , the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-1e).	Please consider revising to reflect this language.
127.	Biological Resources	D.2-253 Table D.2-12	Effectiveness Criteria- Habitat restoration plans are implemented and meet success criteria. Long-term habitat management is provided for all mitigation sites.	The Mitigation Measure is addressing recovery of temporary disturbance from construction not acquisition of mitigation lands. There is no need for long term plans or habitat acquisition. Once the impact has recovered to the satisfaction of the agencies mitigation requirements have been met.
128.	Biological Resources	D.2-253 Table D.2-12	Timing - Restoration will be initiated at earliest opportunity upon completion of soil disturbing activities <u>to meet the criteria of the restoration plan.</u>	The earliest opportunity to restore a site after disturbance is often not the best time to plant or prepare the site for a successful restoration.
129.	Biological Resources	D.2-254 Table D.2-12	Effectiveness criteria -For habitat preservation, it shall meet the minimum compensation standards on an acre-for-acre, in-kind <u>basis or as otherwise</u> required by the agencies. For habitat restoration, the habitat restoration plan shall specify success criteria. Long-term management assurances and legal protection mechanisms shall satisfy agency requirements.	Requiring in-kind compensation could result in mitigation exceeding the scope of impact. When added to the likely agency requirements it seems unnecessarily difficult to meet and will add significant land acquisition costs. Acceptable alternatives could be within tier (County of San Diego tier system) or within Nature Serve vegetation alliance.
130.	Biological Resources	D.2-254 Table D.2-12	Timing - Habitat mitigation lands shall be identified and approved within 1 year of the initiation of project construction. Long-term management and legal protection for mitigation lands shall be in place no later than 18 months after the initiation of project	Consider revising to allow additional time before restoration is initiated. Eighteen months may be insufficient and result in unsuccessful restoration. For example, 18 months may contain only one rainy season and may result in forcing the applicant to

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			<p>construction. Habitat restoration plan(s), if applicable, shall be submitted be to 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, for review within 1 year of the initiation of project construction. Restoration, if applicable, shall be initiated no later than 48 <u>30</u> months after the initiation of project construction.</p>	<p>plant at poor times of year. Thirty months seems reasonable, given the “as soon as possible” requirements of Mitigation Measure BIO-1d. The window may still be too short for local seed collection, but at least allows for planting at the right time of year.</p>
131.	Biological Resources	D.2-255 Table D.2-12	<p>BIO-2a. Limit temporary and permanent impacts to jurisdictional features to the minimum necessary as defined by the final engineering plans. Obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits identified on the final engineering plans. The limits of construction shall be delineated with orange construction fencing and maintained throughout construction to avoid and minimize impacts to jurisdictional resources. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit (<u>or project authorization of a Section 404 Nationwide Permit</u>), a Clean Water Act Section 401 water quality certification, and a Section 1602 streambed alteration agreement with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Game for impacts to jurisdictional features prior to project construction. The terms and conditions of these authorizations shall be implemented.</p>	<p>Please consider revising to clarify that for a Nationwide Permit, authorization to use the existing permit is provided, not a separate permit.</p> <p>Changes to this Mitigation Measure would have to be made throughout the document.</p>
132.	Biological Resources	D.2-255 Table D.2-12	<p>BIO-2b. Implement habitat creation and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to all jurisdictional resources shall be compensated</p>	<p>Please update this language to clarify that the habitat will be preserved after creation.</p>

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			through a combination habitat creation (i.e., establishment), and habitat restoration <u>and preservation</u> at a minimum of a 1:1 ratio or as required by the permitting agencies.	
133.	Biological Resources	D.2-256 Table D.2-12	BIO-3a. Prepare and implement a Noxious Weeds and Invasive Species Control Plan.	A draft NNICP for the Tule Wind Project is being submitted concurrently with Tule Wind Project's comments. Please see Attachment D.2.1. Noxious Weeds and Invasive Species Control Plan.
134.	Biological Resources	D.2-257 Table D.2-12	Mitigation Measure Bio-4a: The project proponent shall (a) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; (b) pre-water sites for 48 hours in advance of clearing; (c) reduce the amount of disturbed area where feasible; (d) spray all dirt stock-pile areas daily as needed; (e) cover loads in haul trucks or maintain at least 6 inches of free-board when traveling on public roads; (f) pre-moisten, prior to transport, import and export dirt, sand, or loose materials; (g) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets or wash trucks and equipment before entering public streets; (h) plant vegetative ground cover in disturbed areas <u>to meet the criteria of the restoration plan, as soon as possible</u> following construction; (i) apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for 14 consecutive days); and (j) prepare and file with the San Diego Air Pollution Control District, Bureau of Land Management and California Public Utilities Commission a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. This plan shall be developed consistent with the requirements of Mitigation Measure AQ-1.	GLOBAL COMMENT: Please consider revising to reflect that the earliest opportunity to restore a site after disturbance is often not the best time to plant or prepare the site for a successful restoration. Note that changes to this Mitigation Measure would have to be made throughout the document for Mitigation Measure BIO-4a.

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135.	Biological Resources	D.2-257 to D.2-258 Table D.2-12	<p>BIO-5a. Install fencing or flagging around identified special-status plant species populations in the construction areas. <u>For areas without existing rare plant survey data</u> Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities.</p>	<p>Focused rare plant surveys have already been completed for nearly all of the Tule Wind Project. An updated rare plant survey report will be submitted with these comments. There is no need to repeat the effort in areas that have been surveyed. For the limited areas where surveys have not been completed, additional rare plant surveys will be completed.</p> <p>Changes to this Mitigation Measure should be made throughout the document.</p>
136.	Biological Resources	D.2-258 Table D.2-12	<p>BIO-5b. Implement special-status plant species compensation. Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through plant salvage and relocation or through off-site land preservation. Where salvage and relocation is feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting and the characteristics of the receiver sites. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. Where off-site land preservation is biologically preferred, it shall be implemented pursuant to an agency approved plan that describes the mitigation land resources and the long-term management and legal protection assurances.</p>	<p>Consider revising to allow flexibility for on-site preservation, if feasible.</p> <p>Changes to this Mitigation Measure would have to be made throughout the document.</p>

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137.	Biological Resources	D.2-258	Timing - Habitat mitigation lands shall be identified and approved within 1 year of the initiation of project construction. Long-term management and legal protection for mitigation lands shall be in place no later than 18 months after the initiation of project construction. Salvage and relocation plan(s), if applicable, shall be be submitted to 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, for review 90 days prior to the initiation of project construction. Salvage and relocation, if applicable, shall be initiated during project construction.	Please consider revising typographical error.
138.	Biological Resources	D.2-261 Table D.2-12	BIO-7g. Conduct protocol surveys for Quino checkerspot butterfly within <u>the QCB flight season prior to commencement of construction activities 1-year prior to project construction activities in occupied habitat.</u> Pacific Wind Development shall conduct pre-construction protocol surveys for Quino checkerspot butterfly within 4 year prior to construction activities <u>the QCB flight season prior to commencement construction activities</u> in any area known to support the species. Surveys shall be conducted by a qualified, permitted biologist in accordance with the most currently accepted protocol survey method. Results shall be reported to the U.S. Fish and Wildlife Service within 45 days of the completion of the survey.	Please consider revising to reflect proposed mitigation measures in the Biological Assessment. Changes to this Mitigation Measure would have to be made throughout the document.
139.	Biological Resources	D.2-261 Table D.2-12	Within 1 year of the initiation of project construction <u>the QCB flight season prior to initiation of the project construction</u> in occupied habitat.	Please consider revising for clarity.
140.	Biological Resources	D.2-261 to D.2-262 Table D.2-12	Habitat mitigation lands shall be identified and approved within 1 year of the initiation of project construction. Long-term management and legal protection for mitigation lands shall be in place no later than 18 months after the initiation of project construction. Habitat restoration plan(s), if	Consider revising to allow additional time before restoration is initiated. Eighteen months may be insufficient and result in unsuccessful restoration. For example, 18 months may contain only one rainy season and may result in forcing the applicant to plant at poor times of year. Thirty months seems

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			<p>applicable, shall be submitted to 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, for review within 1 year of the initiation of project construction. Restoration, if applicable, shall be initiated no later than 18-30 months after the initiation of project construction.</p>	<p>reasonable, given the “as soon as possible” requirements of Mitigation Measure BIO-1d. The window may still be too short for local seed collection, but at least allows for planting at the right time of year.</p>
141.	Biological Resources	D.2-262 Table D.2-12	<p>BIO-7j. Conduct pre-construction nesting bird surveys and implement appropriate avoidance measures for identified nesting birds. <u>The project proponent shall conduct pre-construction surveys for nesting birds if construction and removal activities are scheduled to occur during the breeding season. Surveys shall be conducted in areas within 500 feet of construction activities, such as tower sites, laydown/staging areas, substation sites, and access/spur road locations. The breeding season is generally defined as period from February 1 through August 15. For raptors, the breeding season is generally defined as January 15 through July 31. The required survey dates may be modified based on local conditions (i.e., high altitude locations) with the approval of the USFWS, CDFG and/or the relevant jurisdictional agency. The project applicant shall be responsible for retaining qualified biologists who can conduct pre-construction surveys and monitoring for breeding birds. Biological monitors will note any nests observed during construction within or adjacent to the project construction areas.</u></p> <p><u>If breeding birds with active nests are found, a biological monitor shall establish up to a 300-foot buffer around the nest for construction activities and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. Construction within one mile of a golden eagle nest may only proceed if construction monitoring confirms the nest is not occupied. See Draft EIR/EIS</u></p>	<p>Consider revising Mitigation Measure BIO-7j. Mitigation Measure BIO-7j as stated in the Draft EIR/EIS is infeasible because the restrictions contained therein could restrict the construction window to only four months a year (September through December). Given the projected 24-month construction schedule, construction of Tule Wind Project would extend at least six years and require repeated mobilization and demobilization of construction equipment, likely increasing construction impacts to natural resources, including sensitive biological resources. The suggested mitigation measure language provided is consistent with many other infrastructure projects, including the Tehachapi Renewable Transmission Project, currently under construction. See Tehachapi Renewable Transmission Project, Final Environmental Impact Report, Section 3.4, Mitigation Measure BIO-5 (Conduct pre-construction surveys and monitoring for breeding birds).</p> <p>The proposed language provides the needed flexibility to make the mitigation measure feasible, while providing specific protocols for the project applicant to follow to ensure protection of the resource.</p> <p>Note that the suggested revision to Mitigation Measure 7-j should be applied throughout the Draft EIR/EIS.</p>

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			<p><u>at D.2-157.</u></p> <p><u>The 300-foot (1-mile for golden eagle) buffer may be adjusted to reflect existing conditions including ambient noise, topography, and disturbance in consultation with the approval of the USFWS, CDFG and/or the relevant jurisdictional agency.</u></p> <p><u>The biological monitors shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The biological monitors shall be responsible for documenting the results of the surveys and the ongoing monitoring and will provide a copy of the monitoring reports for impact areas to the respective agencies. If for any reason a bird nest must be removed during the nesting season, the project applicant shall provide written documentation providing concurrence from the USFWS and CDFG authorizing the nest relocation. The project applicant shall provide a written report documenting the relocation efforts. The report shall include what actions were taken to avoid moving the nest, the location of the nest, what species is being relocated, the number and condition of the eggs taken from the nest, the location of where the eggs are incubated, the survival rate, the location of the nests where the chicks are relocated, and whether the birds were accepted by the adopted parent.</u></p> <p>BIO-7j. When not feasible to construct outside of the bird nesting season, the project proponent shall hire a qualified biologist to conduct pre construction nesting bird surveys to determine the presence/absence of active nests in or adjacent to construction areas. If active nests are identified, appropriate avoidance measures would be identified and implemented to prevent disturbance to</p>	

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			<p>potentially nesting bird(s). If federally or state listed or fully protected nesting birds are identified, Pacific Wind Development shall contact the U.S. Fish and Wildlife Service and/or California Department of Fish and Game to determine the appropriate course of action to avoid disturbance to nesting birds. For golden eagle, depending on the location of the active nest, avoidance may include buffers including viewshed analysis. If the spatial buffer is not a large enough distance to be confident about avoiding disturbance to nesting eagles, a temporal buffer may be required that restricts construction during the breeding season. The breeding season is generally defined as period from March through September. For raptors, the breeding season is generally defined as January through August</p>	
142.	Biological Resources	D.2-262 Table D.2-12	<p>BIO-10a. Design all transmission towers and lines to conform with Avian Power Line Interaction Committee standards. The Proposed Project shall have the minimum clearances between phase conductors or between phase conductors and grounded hardware, as recommended <u>implement recommendations</u> by the Avian Power Line Interaction Committee (2006), which <u>will protect raptors and other birds from electrocution</u>. These measures are <u>is</u> sufficient to protect even the largest birds that may perch or roost on transmission lines or towers from electrocution.</p>	Please revise Mitigation Measure BIO-10a in Table D.2-12 as suggested in Comment 98 above
143.	Biological Resources	D.2-263 Table D.2-12	<p>Mitigation Measure BIO-10d. Minimize turbine lighting. Night-lighting may serve as an attractant for birds especially migrants, which may be attracted to the light and then become unable to leave it. <u>Except where FAA safety requirements determine the requirements for lighting</u>, Lighting that attracts birds shall be avoided on the turbines. Lights with short flash duration that emit no light during the off phase shall be used. Lights that have the minimum number of flashes per minute and the briefest flash duration shall be used. Lights on auxiliary buildings</p>	<p>The only proposed lighting on the turbines are flashing red lights required by FAA for safety. There is no significant difference between fatality rates at turbines with this type of FAA lighting as opposed to turbines without lighting. <i>Wilson Journal of Ornithology</i> 122(4):744-754 (2010) (attached to these comments).</p> <p>Changes to this Mitigation Measure would have to be made throughout the document.</p>

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			near turbines and met towers shall be motion-sensitive rather than constant “on” lights. All lighting on buildings shall be shielded and downcast. To avoid disorienting or attracting birds, Federal Aviation Administration visibility lighting shall employ only strobe, strobe-like, or blinking incandescent lights, preferably with all lights illuminating simultaneously. Minimum intensity, maximum “off-phased” dual strobes are preferred. No steady burning lights shall be used.	
144.	Biological Resources	D.2-264 Table D.2-12	BIO-10e. Conduct post-construction bird and bat species mortality monitoring and reporting pursuant to an approved monitoring program. Conduct at least 5-2 years of post-construction bird and bat mortality monitoring. A Post-Construction Monitoring Program shall be developed in accordance with the California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development (CEC and CDFG 2007) and recommendations from the Wind Turbine Guidelines Advisory Committee (USFWS 2009 <u>2010</u>) to satisfy Tier 4 and Tier 5 monitoring requirements. This plan shall be reviewed by the permitting agencies prior to project initiation. At a minimum, the plan shall outline the monitoring methods, evaluation methods, threshold criteria for action, and types of management actions to be undertaken. Annual monitoring reports shall be submitted to the wildlife agencies, BLM, San Diego County, and BIA.	Please revise Mitigation Measure BIO-10e in Table D.2-12, as suggested in Comment 109 above
145.	Biological Resources	D.2-265 Table D.2-12	BIO-10g. Monitor golden eagles nests in the area to track productivity. Conduct annual <u>periodic</u> surveys of golden eagle territories within 10 miles of the turbines for a minimum of 10 years as provided in the Avian and Bat Protection Plan. Conduct surveys to determine location of active nest, number of eggs laid and number of young fledged, as described by Pagel et al. 2010. Annual <u>Monitoring</u> reports shall be provided to the wildlife agencies, BIA, and the Bureau of Land Management.	Please revise Mitigation Measure BIO-10g in Table D.2-12, as suggested in Comment 110 above

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146.	Biological Resources	D.2-265 Table D.2-12	Table D.2-12 – Mitigation Measure BIO-10h	Please revise Mitigation Measure BIO-10h in Table D.2-12, as suggested in Comment 111 above
147.	Biological Resources	D.2-266 Table D.2-12	<p>BIO-10i. Obtain written agency concurrence documenting compliance with regulations governing golden eagle. Prior to project construction, written concurrence from the USFWS and CDFG shall be obtained that documents approval of the mitigation measures and adaptive management program related to golden eagle sufficient to provide compliance with the Bald and Golden Eagle Protection Act and the California Fish and Game Code.</p>	<p>This mitigation measure is not feasible and is not required by the Bald and Golden Eagle Protection Act or the California Fish & Game Code. It therefore should not be applied.</p> <p>Consultation with the USFWS is ongoing, and the Applicant will implement an approved ABPP, which shall be developed jointly with the USFWS and CDFG, as required by Mitigation Measure BIO-10b.</p> <p>Additionally, the timing of this mitigation measure (prior to project construction) is inconsistent with MM BIO-10f, which applies siting decision on the specific ridge turbines <i>after</i> construction has started on the valley turbines, and with the concept of an ABPP, which is implemented at the start of operations and is based on all baseline information collected to date at that time.</p>
148.	Biological Resources	D.2-268 Table D.2-12	<p><u>APM TULE-BIO-21. Prior to any blasting east of McCain Valley Road biological monitors would confirm that no peninsular bighorn sheep were present within one-third of a mile of the area designated for blasting, in order to avoid harassment or disturbance impacts from blasting. If sheep are present and blasting cannot wait for a time when they have left the area then a temporary sound barrier will be erected to reduce the impacts on sheep habitat.</u></p> <p><u>Location – Construction east of McCain Valley Road</u></p> <p><u>Monitoring/Reporting Action – BLM/San Diego County to review final engineering plans and verify in the field that specifications are included and implemented.</u></p> <p><u>Effectiveness Criteria – Field verification that measures are implemented corresponding with final</u></p>	Please apply APM TULE-BIO-21 to the Project. It was proposed by the Applicant and has not been superseded.

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			<u>plans.</u> <u>Responsible Agency – BLM/San Diego County/CSLC/BIA</u> <u>Timing - Confirm implementation throughout the construction period.</u>	
149.	Biological Resources	D.2-276 Table D.2-13 and discussion below.	TULE BIO 10. Feasible alternatives are not available to reduce this impact to below a level of significance. Although the Tule Reduction in Turbines Alternative would remove all turbines considered high risk for golden eagle collision, the risk of mortality due to collision would remain adverse. While avoidance, minimization, and mitigation measures would be implemented, the operation of remaining turbines would pose a significant and unmitigable risk of collision for golden eagles, in the absence of data demonstrating low risk, due to the proximity of known active nests near the project site. In addition, all other alternatives would construct and operate 134 turbines in the McCain Valley area and therefore impacts associated with golden eagle mortality due to collision with turbines would remain significant and unmitigable. There is no feasible mitigation to reduce this anticipated impact to a level that is below a level of significance under CEQA.	Please see comment 103 for justification.
150.	Biological Resources	D.2-277 to D.2-290	Please insert alphabetically into references section: <u>Dugan, Eric. 2010. Letter from Eric Dugan to HDR, June 10, 2010.</u> <u>HDR. 2010d. Quino Checkerspot Butterfly Survey Report, Tule Wind Project, San Diego County, California, June 2010.</u> <u>HDR. 2010e. Rare Plants Survey Report, Tule Wind Project, San Diego County, California, November 2010.</u> <u>HDR. 2010f. Noxious Weeds and Non-Native</u>	Consider revising to incorporate all applicable references.

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			<p><u>Species Control Plan, Tule Wind Project, San Diego County, California, November 2010.</u></p> <p><u>HDR. 2010g. Draft Biological Technical Report, Tule Wind Project, San Diego, California, September 2010.</u></p> <p><u>HDR. 2011a. Addendum to the Biological Technical Report, Tule Wind Project. January, 2011.</u></p> <p><u>HDR. 2011b. Addendum to the Jurisdictional Delineation Report, Tule Wind Project, San Diego County, California. January, 2011.</u></p> <p><u>WEST. 2009b. Bat Acoustic Studies for the Tule Wind Resource Area, San Diego County, California, September 4, 2008 – August 10, 2009, December 21, 2009.</u></p> <p><u>WEST. 2010c. Technical Memorandum: Preliminary Results of Bat Acoustic Surveys at the Proposed Tule Wind Farm for the Period March 11, 2010 to September 24, 2010, November 23, 2010.</u></p> <p><u>WEST. 2011. Bat Acoustic Studies for the Tule Wind Resource Area San Diego County, California; Final Report September 2008 – November 2010. January 24.</u></p> <p><u>USFWS. 2010. USFWS Wind Turbine Guidelines Advisory Committee Recommendations. Submitted to Secretary of Interior on March 4, 2010.</u></p>	

Attachments

D.2.1 – HDR Engineering, Inc. Noxious Weeds and Invasive Species Control Plan (December 2010)

Technical Reports

HDR Engineering, Inc. Draft Biological Technical Memorandum (February 2011)

HDR Engineering, Inc. Amendment to the Jurisdictional Wetland Delineation Report (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.3: Visual Resources

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1.	Visual Resources	D.3-1	Pacific Wind Development's Tule Wind, LLC's Environmental Document for the Tule Wind Project (Iberdrola Renewables, Inc. 2010).	GLOBAL COMMENT. Please consider changing "Pacific Wind Development" to "Tule Wind, LLC" throughout the Draft EIR/EIS.
2.	Visual Resources	Entire Section		GLOBAL COMMENT: Please note that the Key Observation Points (KOPs) presented in the Draft EIR/EIS are not consistent with what was presented in the AED. The table in Attachment D.3.1 to these comments presents a comparison of the KOPs. Tule evaluated 9 KOPs, with 4 rated Class B, and 5 rated Class C. The Draft EIR/EIS evaluated 7 (not including alternatives) with 2 rated Class A, 4 rated Class B, and 1 rated Class C.
3.	Visual Resources	D.3-2	... most representative of gen-tie's the ESJ Gen-Tie Project's potential effects on the viewshed ...	Please consider revising for clarity.
4.	Visual Resources	Figure D.3-2	Please update Figure D.3-2 to reflect the "Modified Project Layout" with the provided GIS shape files and include the following revisions. <ul style="list-style-type: none"> • Please zoom to show that the majority of the community of Boulevard will not be able to view the Tule Project. • Please update the new turbine locations. • Please update the legend to adequately see the sensitive visual receptor symbol. • Please add to the legend the 	Please update figures to reflect the Modified Project Layout. Please consider including and labeling the entire community of Boulevard and delineating its boundaries. Please also update the legend on Figure D.3-2 to reflect more accurately the symbols used in the figure

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			substation/O&M facility. <ul style="list-style-type: none"> Please change the turbine symbol color different from the other project components (currently everything is red). 	
5.	Visual Resources	D.3-10	Visual sensitivity data were verified by the EIR/EIS team based on land use data and the Public Scoping Report.	Consider revising to reflect that the visual sensitivity data do not appear in the Public Scoping Report.
6.	Visual Resources	D.3-10	Land uses within the project area that are considered sensitive to visual changes to their settings include; residential areas; designated park, recreation; <u>(including off-highway vehicle staging and use)</u> , and natural areas.	Please revise to reflect additional detail.
7.	Visual Resources	D.3-10	Public Concerns	GENERAL COMMENT: Please summarize project concerns in this section
8.	Visual Resources	D.3-12	<p>The KOPs and supporting simulations prepared by each of the project applicants' consultants were determined by the EIR/EIS team to provide photorealistic representations for various project components, covering a range of viewing locations and viewer types. However, since each of the applicant's consultants was responsible for, and focused on, their separate, respective projects, the KOP view orientations and simulations were found to be limited and deficient in a number of instances with respect to illustrating the full visual effects of the Proposed PROJECT or alternatives from various KOPs. In such instances, Applicant consultants provided photo-documentation, and the EIR/EIS team further documented the degree of views potentially affected by the Proposed PROJECT or alternatives. Supplemental photographs with narrative notations are provided in the EIR/EIS Section D.3 figures to cover such instances. The lack of complete simulations for each KOP represents an analytical limitation that may affect the accuracy of some findings. Issues of concern include the lack of</p>	The visual analysis is representative of existing and proposed conditions, except as noted later in comments, and can serve as the basis of accurate findings. Any perceived limitations or deficiencies in Applicant prepared materials have been addressed and corrected in the Visual Analysis in the Draft EIR/EIS.

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			access roads shown in some simulations, as well as photographs with atypical lighting conditions. Simulation limitations are noted on Section D.3 figures, as applicable.	
9.	Visual Resources	D.3-13	Please update Figure D.3-4 to reflect the “Modified Project Layout” with the provided GIS shape files.	Please update to reflect the Modified Project Layout.
10.	Visual Resources	D.3-20 – D.3-21	<ul style="list-style-type: none"> • KOP 1: I-8 Eastbound, view toward ECO Substation and ESJ Gen-Tie project sites– Interstate highway motorists (Figure D.3-6A). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 2: Old Highway 80 Eastbound, view toward ECO Substation Project site–State highway motorists, residents, and recreationists–bicyclists (Figure D.3-7A). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 3: Old Highway 80 Eastbound, view toward ECO Substation and ESJ Gen-Tie project sites–State highway motorists, and recreationists (e.g., hikers and bicyclists) (Figure D.3-8A and Figure D.3-8B). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 4: Old Highway 80 Westbound, view toward ECO Substation Project site–State highway motorists, residents, and recreationists (Figure D.3-9A) • KOP 5: Community of Jacumba, view toward ECO Substation and ESJ Gen-Tie project sites–Residents and State highway motorists and recreationists (Figure D.3-10A) • KOP 6: Community of Jacumba, Hill 	Please indicate which KOPs would be affected by the SDGE Sunrise Powerlink if constructed.

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			<p>Street, view toward ECO Substation and ESJ Gen-Tie project sites–Residents (Figure D.3-11A and Figure D.3-11B). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u></p> <ul style="list-style-type: none"> • KOP 7: Community of Boulevard, Jewel Valley Road, view toward ECO Substation Project site–Residents and Recreationists (Figure D.3-12A) • KOP 8: Community of Boulevard, Old Highway 80, view toward ECO Substation and Tule Wind project sites – Residents, state highway motorists, and recreationists (Figure D.3-13A). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 9: Community of Boulevard, south of Old Highway 80, view toward ECO Substation and Tule Wind project sites – Residents (Figure D.3-14A and Figure D.3-14B). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 10: Community of Boulevard, Ribbonwood Road, view toward Tule Wind Project site and Alternative Tule Wind sites–Residents and Recreationists (Figure D.3-15A). <u>SDG&E’s Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 11: McCain Valley Road Northbound, view toward Tule Wind Project site–Public land recreationists (Figure D.3-16A) • KOP 12: McCain Valley Road, Lark Canyon OHV Entrance, view toward Tule Wind Project site–Public land recreationists (Figure D.3-17A and Figure D.3-17B). 	

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			<p><u>SDG&E's Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u></p> <ul style="list-style-type: none"> • KOP 13: Lark Canyon Staging Area, view toward Tule Wind Project site–Public land recreationists (Figure D.3-18A). <u>SDG&E's Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 14: Carrizo Overlook, view toward Tule Wind Project site–Public land recreationists (Figure D.3-19A). <u>SDG&E's Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 15: Old Highway 80 Westbound, view toward ECO Substation Alternative Project site–State highway motorists, residents, and recreationists (Figure D.3-20A). <u>SDG&E's Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> • KOP 16: McCain Valley Road, BLM In-Ko-Pah ACEC, view toward Tule Wind Alternative Project sites–Public land recreationists (Figure D.3-21A). <u>SDG&E's Sunrise Powerlink (500 kV transmission line), if constructed, would be visible within this KOP.</u> 	
11.	Visual Resources	D.3-33	<p>Proposed wind turbines would be visible, <u>where not otherwise shielded by topography along portions of I-8, Old Highway 80, Highway 94, Ribbonwood Road, McCain Valley Road, and other smaller roadways located in eastern San Diego County near the community of Boulevard and on the Ewiiapaayp, Campo, La Posta, and Manzanita Indian reservations. However, the view from I-8 is dominated by existing Kumeyaay Wind Project turbines in the foreground view, which are less than</u></p>	<p>Please consider revising to reflect existing conditions, specifically the dominant visibility of the existing Kumeyaay Wind Project turbines, located less than 0.5 miles from I-8, to avoid overstating visual impacts from I-8.</p>

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			<u>0.5 miles from I-8. By comparison, the closest Tule turbine to I-8 is 2.3 miles from I-8.</u>	
12.	Visual Resources	D.3-34	These include KOP 9, described previously for the Boulevard Substation site, and KOPs; 10, 11, 12, 13, <u>14, 15 and 16.</u>	Please revise to reflect that KOP 14, 15 and 16 also relate to the Tule Wind Project.
13.	Visual Resources	D.3-35	Remove KOP 11 – VS2/Figure D.3-16C.	Please consider removing redundant KOP 11 – VS2 because no existing condition for this simulation is shown, and it uses cloudy conditions. Statement was also added to KOP 11 Figure.
14.	Visual Resources	D.3-37	KOP 13	Please consider revising KOP 13 – ES and VS to be consistent and use the same scale to avoid overstating project impacts. Statement was added to KOP 13 Figure.
15.	Visual Resources	D.3-37	Northerly, northeasterly, and easterly views from KOP 13 would be <u>oriented</u> toward Tule wind turbines and the Tule Wind 138 kV transmission line (views of the transmission line would extend to the southwest).	Please consider revising text to accurately depict the view from KOP 13.
16.	Visual Resources	D.3-38	KOP 16 is located north of McCain Valley Road and northeast of the Lark Canyon OHV Area on BLM lands (KOP 16 would is located approximately 0.60 mile northeast of KOP 13).	Please revise to reflect correction.
17.	Visual Resources	D.3-40	Visual Quality: <u>Class A – Exceptional. Views to the east toward Carrizo Gorge and away from project features are classified as Class A –Exceptional. The views from KOP 14 to the east (not depicted in the visual simulations) are panoramic and are not impacted by the Tule Wind Project. However, views to the west and toward the Tule Wind Project, depicted in KOP 14, contain a view of the existing Kumeyaay Wind Project turbines and should be considered Class B – Above Average.</u>	Please consider clarifying that the Carrizo Gorge Overlook is designed to direct viewers to the panoramic view to the east, the opposite direction from the Tule Wind Project and the view presented in the visual simulations.
18.	Visual Resources	D.3-40	View orientation to the south consists primarily of rolling, chaparral vegetation-covered hillsides. With the exception of the existing Kumeyaay wind farm, landscape disturbance from cultural modification is	Please consider updating to reflect that the Sunrise Powerlink will be a cumulative impact to the visual resources in this area. The Sunrise Powerlink, once constructed, would result in a reduction of the

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			relatively limited, <u>although this area would contain the approved 500 kV Sunrise Powerlink, which will be the dominant feature in this area, if constructed.</u>	impacts of the Tule Wind Project.
19.	Visual Resources	D.3-41	Along this stretch of the project area, the 138 kV line crosses natural desert landscapes and passes near rural, residential homes south and east of the community of Boulevard. The landscape character of this setting is influenced by a combination of existing transportation facilities (Old Highway 80), natural desert settings, interspersed large boulders and community homes, and ancillary structures. The rural community of Boulevard adds a number of elements along this segment, such as structures, fences, power poles and rural unpaved roads, which contribute to the color and texture elements to the visual environment. <u>However, the 500 kV Sunrise Powerlink, if constructed, would cross the same landscape as the Tule Wind Project 138 kV line.</u>	Please consider updating to reflect that the approved Sunrise Powerlink would be a cumulative impact to the visual resources in this area. The Sunrise Powerlink, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
20.	Visual Resources	D.3.41	On BLM-managed lands north of I-8 within the McCain Valley Cooperative Land and Wildlife Management Area (and along McCain Valley Road) the 138 kV line passes through primarily undeveloped natural desert landscape. After exiting the collector substation, the 138 kV line would travel south (crossing McCain Valley Road several times), and along this segment the 138 kV line would be the dominant feature on the landscape. Because the 138 kV line would travel generally adjacent to McCain Valley Road, views of the line along McCain Valley Road would be constant. <u>However, if constructed, the Sunrise Powerlink's 500 kV transmission line would be the dominant feature along this segment as it would more visible than the adjacent 138 kV line, which would therefore no longer be the dominant feature.</u> Near Rough Acres Ranch, the 138 kV line would continue to travel adjacent McCain Valley	Please consider revising to reflect that the 138 kV line is adjacent to the route of the Sunrise Powerlink and would not be the dominant feature if this cumulative project is constructed. The Sunrise Powerlink, once constructed, would result in a reduction of the impacts of the Tule Wind Project.

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			<p>Road. In this area the roadway is paved and provides access to Rough Acres Ranch, agricultural operations, residences, and the CAL FIRE McCain Valley Camp. The 138 kV line would be the dominant feature along this segment and would be highly visible to passing motorists. At the southern extent of this segment, the 138 kV line would be highly visible to motorists along I-8 (the line would cross the interstate), but the duration of views from I-8 would be short. Residential views along this segment from an existing rural residence adjacent to McCain Valley Road (within 0.06 mile) and Rough Acres Ranch (at its closest point within 0.07 mile) would be in close proximity. <u>However, if constructed, the Sunrise Powerlink's 500 kV transmission line would be the dominant feature along this segment and would be more visible; at that point, the adjacent 138 kV line would therefore not be the dominant feature.</u></p>	
21.	Visual Resources	D.3-48 Table D.3-1	<p>Third Column</p> <p><i>Wind Turbines and 34.5 kV Overhead and Underground Collector Cable System</i> County of San Diego (turbines R1, <u>R2</u>, and R-7 through R11):</p> <ul style="list-style-type: none"> • County of San Diego Existing General Plan – <u>Scenic Highway Element</u> • County of San Diego Draft General Plan Update • Mountain Empire Subregional Plan • San Diego County Light Pollution Code • County of San Diego Zoning Ordinance (Sections 6320, 6322, and 6324) 	Please update to reflect the correct plans and policies that would apply to the project.
22.	Visual Resources	D.3-48 Table D.3-1	<p>Third Column</p> <p><i>138 kV Transmission Line</i> BLM (7.42 <u>5.91</u>-mile segment): County of San Diego (23-mile segment):</p>	The County of San Diego Draft General Plan Update has not be adopted by the County Council and therefore, the project would not be subject this document. California courts have cautioned agencies against making CEQA determinations on

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			<ul style="list-style-type: none"> • County of San Diego Draft General Plan Update • County of San Diego Zoning Ordinance (Sections 6320, 6322, and 6324). 	<p>land use plans and polices that have not been finalized or adopted. See <i>County of Amador v. El Dorado County Water Agency</i>, 76 Cal. App. 4th 931, 949-952 (1999).</p> <p>These ordinances would not apply to transmission lines as they do not create a light source and would not create humidity, heat, or cold; therefore, the project would not be subject to these County Zoning Ordinances.</p>
23.	Visual Resources	D.3-52	<p>Portions of the Proposed PROJECT located on BLM-administered lands have established VRM Classifications (these classifications are identified in the BLM’s Eastern San Diego RMP discussed in the following text). The majority of the Tule Wind Project site would be located within the McCain Valley National Cooperative Land and Wildlife Management Area, which has been designated by the BLM as VRM Class IV. <u>Considering the majority of the Tule Wind Project is located within BLM VRM Class IV which permits major modification of the landscape, no visual impacts are associated due to the wind turbines and transmission lines on BLM jurisdictional land.</u></p>	<p>Please update language to reflect the current BLM VRM Class IV which permits greater visual change due to renewable energy projects.</p>
24.	Visual Resources	D.3-52	<p>The list identifies the route’s priority for scenic corridor planning and implementation. <u>There are only two official scenic highways located in San Diego County, with neither located adjacent to the proposed project.</u> Within the project area, I-8, from SR-79 east to the Imperial County line, and SR-94, from SR-125 to I-8, are listed as third priority San Diego County scenic routes <u>with no state designation.</u></p>	<p>Please update language to reflect the correct scenic highway routes within San Diego County.</p>
25.	Visual Resources	D.3-53	<p>The following goals and policies of the San Diego County Draft General Plan Update, Boulevard Subregional Planning Area Community Plan, and Draft Mountain Empire Subregional Plan (County of</p>	<p>Please update to reflect the accurate County plans and policies.</p>

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			San Diego 1995) are associated with visual resources and <u>are presented for informational purposes, but would only be applicable to the Proposed PROJECT in the event they were adopted prior to the construction of the PROJECT.</u>	
26.	Visual Resources	D.3-61	APM's TULE AES-1 through TULE-AES- 11 14 were proposed by Tule Wind LLC, to reduce impacts related to visual resources.	<p>The Draft EIR/EIS does not include all of the proposed project design features presented in the AED and have been added to the Project Description Section. Please consider adding the following PDFs as presented in the AED to Section B, Project Description to avoid overstating the potential impacts of the Tule Wind Project.</p> <p><u>BLM Requirements</u></p> <ul style="list-style-type: none"> • <u>The public shall be involved and informed about the visual site design elements of the proposed wind energy facilities. Possible approaches include conducting public forums for disseminating information, offering organized tours of operating wind developments, and using computer simulation and visualization techniques in public presentations.</u> • <u>Turbine arrays and turbine design shall be integrated with the surrounding landscape. Design elements to be addressed include visual uniformity, use of tubular towers, proportion and color of turbines, non-reflective paints, and prohibition of commercial messages on turbines.</u> • <u>Other site design elements shall be integrated with the surrounding landscape. Elements to address include minimizing the profile of the ancillary structures, burial of cables, prohibition of commercial symbols, and lighting. Regarding lighting, efforts shall be made to minimize the need for and amount of lighting on ancillary structures.</u>

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27.	Visual Resources	D.3-65	<p>TULE-VIS-1 The project would have a substantial adverse effect on a scenic vista.</p> <p><u>Class I (County)</u> <u>Class III (BLM)</u></p>	<p>Please consider revising to a Class III impact determination to avoid overstating impact and to recognize BLM visual classification. Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV for visual classification, which takes into consideration reduced visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified. Significance determination would remain the same for the County jurisdiction (Class I), but be reduced to a level of less than significant (Class III) for the BLM jurisdictional area.</p>
28.	Visual Resources	D.3-62 Table D.3-2	<p>TULE- VIS-3 The project would substantially degrade the existing visual character or quality of the site and its surroundings.</p> <p><u>Class I (County)</u> <u>Class III (BLM)</u></p>	<p>Please consider revising to a Class III impact determination to avoid overstating impacts. Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV for visual classification, which takes into consideration reduced visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified.</p> <p>In addition, the McCain Valley area is within the approved route of the Sunrise Powerlink Project, which would include 500 kV transmission infrastructure with 90-170-foot transmission structures. If constructed, this transmission line would be the dominant feature in the area. The proposed 138 kV transmission line for the Tule Wind Project would be approximately 75 feet, or 15 to 95 feet shorter than the 500 kV line structures. Please consider revising to reflect that the 138 kV line is adjacent to the route of the Sunrise Powerlink</p>

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				and would not be the dominant feature if this cumulative project is constructed.
29.	Visual Resources	D.3-62 Table D.3-2	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. Class † <u>III</u>	The O&M/Substation facility is proposed to be located on BLM jurisdictional lands and would not be subject to County requirements. Although, 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.
30.	Visual Resources	D.3-62 Table D.3-2	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. Class † <u>III</u>	The Tule Wind Project would be consistent with all federal, state and local regulations relative to protection of visual resources. Please consider changing the determination to reflect this information.
31.	Visual Resources	D.3-65	Tule VIS-1 Impacts to scenic views resulting from the Tule Wind Project would occur <u>only in the portions of the project that are visible from County identified lands, where</u> Portions of the wind turbine development would be visible from the Carrizo Overlook (KOP 14, Figure D.3-19B), <u>and would be consistent with the BLM VRM Class IV</u>	Please update to in to reflect the correct visual impact on BLM jurisdictional lands.

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			<p><u>classification which allows for visual impacts due to renewable energy projects.</u> ¶Ribbonwood Trail and the Ribbonwood Road Pathway (KOP 10, Figure D.3-15B), <u>located on County jurisdictional lands would be impacted.</u> <u>and where</u> The 138 kV transmission line would cross I-8 and parallel Old Highway 80 into the Boulevard Substation (KOP 15, Figure D.3-20B; and KOP 9, Figure D.3-14D). <u>However, if constructed, the approved Sunrise Powerlink Project would then be the dominant feature.</u></p>	
32.	Visual Resources	D.3-65 Paragraph 2	<p>Tule VIS-1 Although ¶the Tule Wind turbines would be visually dominant and skylined from the Carrizo Overlook (KOP 14, Figure D.3-19B), <u>the views of Carrizo Gorge to the east will not be obstructed.</u> The large scale of the structures, blade movement, and light color would collectively create very strong contrasts within the seen landscape. Although some of the existing Kumeyaay wind farm (Campo Indian Reservation) turbines are currently visible to the southwest at middle-ground to background viewing distances (approximately 5 miles away), the Tule Wind turbines would be substantially closer and, therefore, would appear much larger in scale and be more visually dominant in the landscape. The Tule Wind turbines would be viewed toward the northwest, west, southwest, and south, and due to scale, color, and blade movement, identified impacts would be adverse and cannot be mitigated <u>for County jurisdictional areas.</u> Under CEQA, impacts would be <u>less than significant for BLM jurisdictional areas (Class III) and in County jurisdictional areas impacts cannot be mitigated to a level that is considered less than significant (Class I County, Class III BLM).</u> Scenic views looking east toward the desert from the Carrizo Overlook would not be obstructed by components of the Tule Wind Project.</p>	<p>As identified in the AED, this area is located on BLM land, would have 5 turbines that would be highly visible (F-1 through F-4, and F-6) with a distance of foreground/middle ground (up to 5 miles), with 76 to 100 turbines located in the background. Overall visual impact rating is moderate. BLM has classified the McCain Valley area as a Class IV visual rating, which takes into consideration reduced visual classification for renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified; therefore, no impact is identified. Please consider changing this determination to reflect the assessment presented in the AED.</p>

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33.	Visual Resources	D.3-65	Tule VIS-1 The northern terminus of the Ribbonwood Trail is located approximately 0.10 mile southwest of proposed wind turbine E-9, and the Ribbonwood Road Pathway (located along Ribbonwood Road) would be located approximately 2 miles west of the nearest turbine, G-19 18 (KOP 10, Figure D.3-15B for simulation of wind turbines as viewed from Ribbonwood Road and the Ribbonwood Road Pathway).	Please update turbine numbers to reflect the Modified Project Layout.
34.	Visual Resources	D.3-65	Tule VIS-1 Due to scale, color, and blade movement of wind turbines, located on County lands would have be adverse impacts and cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to clarify visual impacts would be limited to County lands.
35.	Visual Resources	D.3-66 Paragraph 1	At the present time, a number of distribution lines exist in the area, but no high-voltage power lines are present, <u>although the Sunrise Powerlink, if constructed, would be in the same general area as the Tule 138 kV transmission line. Consequently, if the Sunrise Powerlink's 500 kV transmission line (90-170 feet in height) is constructed, it would introduce a moderate to strong industrial feature into a landscape characterized by a mixture of natural and rural community elements and the 138 kV transmission line would be smaller in scale (up to 75 feet in height).</u> Identified impacts would <u>not</u> be adverse <u>due to the presence of the Sunrise Powerlink transmission line; therefore Mitigation Measures VIS 1b and VIS 1c have been provided and would mitigate this impact.</u> Under CEQA, impacts would be <u>considered less than significant but can be mitigated to a level that is considered less than significant (Class III).</u>	Although transmission lines could be up to 75 feet in height, they would not obstruct scenic views and vistas in the area. The McCain Valley area is identified for the route of Sunrise Powerlink, which, if constructed, would be the dominant feature in the area. The proposed 138 kV transmission line will be approximately 75 feet and 15 to 95 feet shorter than the 500 kV line. Please consider revising to reflect that the 138 kV line is adjacent to the route of Sunrise Powerlink and would not be the dominant feature if this cumulative project is constructed. Additionally, the use of dull gray porcelain insulators will be used to reduce insulator visibility. No impacts to scenic vistas from the proposed transmission line are identified. Please consider changing the determination to reflect the assessment presented in the AED.
36.	Visual Resources	D.3-66 Paragraph 2	<i>MM VIS 1c: Avoid potential visibility of transmission structures and related facilities from sensitive viewing locations.</i> Underground portions of the 138 kV transmission	Please consider revising to reflect that the 138 kV line is adjacent to the route of the approved Sunrise Powerlink, and if constructed, the 138 kV transmission line would not be the dominant feature.

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			<p>line and/or collector systems to avoid visual impacts to scenic highways, scenic vistas, or scenic resources.</p>	<p>Please consider revising to reflect that the 138 kV line is adjacent to the route of the approved Sunrise Powerlink, which, if constructed, would be the dominant feature.</p> <p>Undergrounding the line would not provide any appreciable minimization of environmental impacts. To the contrary, undergrounding would increase impacts due to increased land disturbance causing associated impacts to cultural resources, biological floral and fauna, jurisdictional waters, and possible increase in construction air impacts.</p> <p>In addition, identified “sensitive viewing locations located on BLM lands are classified as a Class IV for visual classification, which takes into consideration reduced visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified.</p>
37.	Visual Resources	D.3-68	<p>Although Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. Consequently, there are no identifiable state scenic highway visual impacts for the Proposed Project including the Campo, Manzanita, and Jordan wind energy projects. <u>Under CEQA, no impact is identified.</u></p>	<p>Please update to reflect a significance determination.</p>
38.	Visual Resources	D.3-80 Paragraph 1	<p>Turbine and Met Tower Short-term visibility of construction activities.</p> <p><u>Construction activities will occur in phases and will not happen concurrently in one area. Views of construction activities will be limited due to topography and line of sight.</u> Turbine components including nacelles, towers, and blades would be delivered to the project site on large trailers using Ribbonwood Road and McCain Valley Road, and</p>	<p>Construction of the project will happen in phases over a period of two years and will happen over a large geographic area. Area residents will not be subject to much of the construction as it will occur on BLM and tribal lands. BLM has classified the McCain Valley area as a Class IV, which takes into consideration reduced visual classification for renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given</p>

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			<p>vehicles and equipment would be highly visible to residences in the surrounding area. Activities at the on-site cement batch plant would primarily be visible to recreationists near the Lark Canyon OHV Area. The duration of construction impacts associated with the wind turbines would be approximately 2 years. <u>Based on the VRM classification for the BLM jurisdiction area, this visual impact is acceptable.</u> Construction activities would generally occur during daytime hours (7 a.m. to 7 p.m.) but could involve extended hours to complete certain construction activities. In these instances, night lighting would <u>may</u> be required, <u>although unlikely.</u> Although considered short-term impacts, due to the anticipated length of construction; the high visibility (proposed turbine locations are at higher elevations than surrounding rural residences) of construction vehicles, equipment, and personnel; and the scale and extent of the project area, identified impacts would be adverse, and therefore, Mitigation Measures VIS-3a, VIS-3b, and VIS-3c have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be <u>considered less than significant with mitigation and cannot be mitigated to a level that is considered less than significant</u>(Class III).</p>	<p>the BLM visual classification, impacts will be less than significant. Please consider changing determination to reflect this information.</p>
39.	Visual Resources	D.3-81	<p><i>Turbine and Met Tower Long-term landscape alterations</i></p> <p>The development of temporary work areas around each turbine and the construction of new access roads would result in the removal of existing natural vegetation cover (temporary work areas and new access roads would be cleared and leveled). In arid to semiarid environments where precipitation is low and vegetation establishment and growth are slow, the visual change resulting from the removal of vegetative cover can be relatively long term and would be noticeable where vegetation clearing</p>	<p>Please update language to include a reference to the revegetation plan that will be prepared for the project.</p>

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			produces strong contrasts between the soil and natural vegetation. <u>A revegetation plan is proposed as part of the APMs and will be implemented upon completion of the Tule Project construction to revegetate areas to the greatest extent possible.</u>	
40.	Visual Resources	D.3-81 Paragraph 2	<p><i>Turbine and Met Tower Long-term landscape alterations</i></p> <p>Access roads would, however, be located at highly visible elevated locations (such as ridgelines and their slopes), and given the numerous sightlines to these access road locations, these features would be visible from numerous off-site locations. <u>Although visible from County lands, these alterations would be completed on BLM and Tribal lands which allow for a high level of visual change due to renewable energy projects.</u> Due to the location of access roads and landscape alterations atop prominent ridgelines and slopes, identified impacts would <u>not</u> be considered adverse, and therefore, Mitigation Measures <u>VIS-3d, VIS-3e, and VIS-3f would further assist in reducing impacts regarding vegetation removal.</u> have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be <u>considered less than significant with the proposed mitigation and cannot be mitigated to a level that is considered less than significant (Class I II).</u></p>	Any new access roads will follow natural contours and minimize side hill cuts to the extent possible. New roads will create exposed soil routes that follow the surface contour of the landscape. Impacts to the existing visual character and quality of the site and the surroundings during construction are less than significant with mitigation (Class II). Please consider changing the determination to reflect this information.
41.	Visual Resources	D.3-82 Paragraph 3	<p><i>Turbine and Met Tower Long-term Visual Contrasts</i></p> <p>As shown in these figures, the turbines would become the visual focal point in the seen landscapes and would substantially change the visual character of the existing natural landscapes, which are typified by boulder- and shrub-covered hilltops, exposed tan soils, and desert scrub vegetative cover over valley plains. <u>Impacts due to the wind turbines are identified for areas located on County of San Diego jurisdictional lands, and not BLM jurisdictional lands.</u></p>	Please revise.

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42.	Visual Resources	D.3-82 Paragraph 4	<i>Turbine and Met Tower Long-term Visual Contrasts</i> As shown in Figure D.3-17C, at this viewing distance the individual turbine components (tower, nacelle, and blades) are more distinct than when viewed at greater distances, and the resulting visual contrast with the existing characteristic desert landscape is strong. <u>As discussed previously, this type of visual change would be permitted as a BLM VRM Class IV.</u>	Please revise.
43.	Visual Resources	D.3-82 Paragraph 5	<i>Turbine and Met Tower Long-term Visual Contrasts</i> Although existing wind turbines are located in the general vicinity of the project area (the existing Kumeyaay wind farm can be seen in the background of Figure D.3-19B), the proximity and visibility of the proposed turbines would create an overpowering visual change. <u>As discussed previously, this type of visual change would be permitted as a BLM VRM Class IV.</u>	Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV, which takes into consideration reduced visual classification for renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified.
44.	Visual Resources	D.3-82 Paragraph 3	<i>Turbine and Met Tower Long-term Visual Contrasts</i> Wind turbines would also be visible from KOP 16, <u>located on BLM land</u> (Figure D.3-21B), however, a visual simulation has not been prepared. Due to proximity of the KOP to proposed wind turbines and due to similar location, the resulting strong visual contrast between wind turbines and the natural landscape would be similar to the strong visual contrast visible from KOP 14 (Figure D.3-19B). <u>As discussed previously, this type of visual change would be permitted as a BLM VRM Class IV.</u>	Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV, which takes into consideration reduced visual classification for renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified.
45.	Visual Resources	D.3-81-88 Paragraph 1	<i>Turbine and Met Towers Long-term visual contrasts.</i> Identified long-term visual contrast impacts assessed at <u>areas identified to be located on County lands each of the previously identified locations</u> and for each of the identified viewer types would be adverse; therefore, APM TULE AES-1 (the selection of uniform turbine components for aesthetic	Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV, which takes into consideration reduced visual classification for renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are

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			<p>consistency) and Mitigation Measure VIS-3n (APM TULE-AES-2 is folded into and superseded by Mitigation Measure VIS-3n) have been provided. However, the identified impact cannot be mitigated. There is no mitigation available to reduce the severity of the visual impact resulting from the proposed wind turbines <u>located on County lands</u> to a level that would be less than significant, aside from selecting an entirely different location for the development. Under CEQA, impacts would be significant <u>on County lands</u> and cannot be mitigated to a level that is considered less than significant (Class I) <u>and less than significant on BLM lands (Class III).</u></p>	<p>identified.</p> <p>The McCain Valley area is identified for the construction of the approved Sunrise Powerlink 500 kV 90-170 feet high transmission line. If constructed, this power line will be the dominant feature in the area. The proposed 138 kV transmission line will be approximately 75 feet, or 15 to 95 feet shorter than the 500 kV line.</p>
46.	Visual Resources	D.3-83 Paragraph 3	<p>MM VIS-3n: Reduce potential visual impacts of wind turbines and ancillary facilities. The project applicant will treat shall submit to the appropriate land use jurisdiction agency a Surface Treatment Plan describing the design and application of colors and textures to all new wind turbine facilities, structure buildings, walls, fences, and components comprising all ancillary facilities including the collector station substation. The Surface Treatment Plan must to reduce glare and minimize visual intrusion and contrast to the degree feasible. The Surface Treatment Plan shall be submitted to the appropriate land use jurisdiction agency for approval at least 90 days prior to either (a) ordering the first structures that are to be color treated during manufacture or (b) construction of any of the ancillary facility components, whichever comes first. If the appropriate land use jurisdiction notifies the project applicant that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, the project applicant shall prepare and submit for review and approval a revised Surface Treatment Plan.</p>	<p>Please consider revising to reflect the project design, by which the O&M/Substation building will be painted in low-reflectivity neutral color finish to match the surrounding area. The turbines will be painted in a low-reflectivity, neutral white finish to minimize contrast with the sky backdrop and reflections. Additionally, small cabinets containing pad-mounted equipment located at the base of each turbine will be painted a neutral gray, white, off-white, or earth tone finish.</p> <p>This mitigation measure would be similar to the APMs already presented in the project design.</p>
47.	Visual Resources	D.3-83	<p><i>Tule Collector Cable System, Collector Substation, and O&M Facility</i></p>	<p>Please update language to reflect the BLM VRM Class IV.</p>

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			<p><i>Short-term visibility of construction activities.</i> Visual impacts from construction activities would primarily be to recreationists within the McCain National Cooperative Land and Wildlife Management Area and would affect views within both foreground and middle-ground viewing distances (up to 5.0 miles away), <u>which is permitted as a BLM VRM Class IV.</u> In addition, construction vehicle activity along Ribbonwood Road and the resulting short-term visual impacts would also be experienced by residents and motorists along Ribbonwood Road. Construction impacts to recreationists and motorists would be of short duration and intermittent. Impacts to local residents would be ongoing for the entire construction phase, and although short term, identified impacts would be adverse, and therefore, Mitigation Measures VIS-3a, VIS-3b, and VIS-3c have been provided and would mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II).</p>	
48.	Visual Resources	D.3-84	<p><i>Collector System, Substation, and O&M Long-term landscape alterations.</i> Construction activities including excavation and trenching for the collector cable system and grading for the collector substation/O&M facility site (and associated access roads) would result in the removal of existing natural vegetation cover. <u>As discussed in the Fire and Fuels Management Section D.15, MM FF-7, upon completion of project construction, a revegetation plan will be completed to reduce temporary impacts.</u> Due to the strong contrast between exposed soils and natural vegetation that vegetation removal can produce, identified long-term landscape alterations impacts would be adverse, and therefore, Mitigation Measure VIS-3d, VIS-3e, and VIS-3f have <u>has</u> been provided and would mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is</p>	Please update to reflect this language and change to identified mitigation measures.

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			considered less than significant (Class II).	
49.	Visual Resources	D.3-84	<p><i>Collector System, Substation, and O&M</i> <i>Long-term visual contrasts</i> Due to the presence of large, visually dominating wind turbines (which the collector cable system would be located behind when viewed from KOP 14), <u>in addition to the presence of the Sunrise Powerlink</u>, the visual contrast created by the collector cable system would not be overly strong.</p>	Please update to reflect the approved Sunrise Powerlink, which, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
50.			<p>As discussed previously, this level of visual change is consistent with a BLM VRM Class IV. Although views of the collector substation and O&M facility would be short term, intermittent, and experienced by a limited number of viewer types, identified impacts would be adverse; therefore, APM TULE-AES-9 (requires that insulators at the collector substation be porcelain and dull gray in color) and Mitigation Measures VIS 3g and VIS 3h (these measures would supersede APMs TULE-AES-6, AES-8, AES-10) has been provided to further reduce visual impacts and would mitigate this impact. Under CEQA, impacts would be less than significant but can be mitigated to a level that is considered less than significant (Class III).</p>	Based on the revised analysis, the significance determination should be changed to a Class III.
51.	Visual Resources	D.3-85	<p><i>Tule Wind 138 kV Transmission Line</i> <i>Short-term visibility of construction activities and long-term visibility land alterations.</i> Construction activities would generally occur during daytime hours; however, where nighttime work is necessary, construction night lighting would be required, <u>although unlikely.</u></p>	Please update to reflect this language.
52.	Visual Resources	D.3-85	<p><i>Tule Wind 138 kV Transmission Line</i> <i>Short-term visibility of construction activities and long-term visibility land alterations.</i> <u>Construction activities will occur in phases and will not happen concurrently in one area. Views of construction activities will be limited due to topography and line of sight. Identified s</u> Short-term</p>	Based on the revised analysis, the significance determination should be changed to a Class III. Construction activities will not happen concurrently in one area and due to topography and line-of-sight visual impacts due to construction and long-term land alterations will be limited.

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			visibility of construction activities impacts would <u>not</u> be <u>considered</u> adverse, and therefore, Mitigation Measures VIS 3a, VIS 3b, and VIS 3c have been provided and would mitigate this impact. Under CEQA, impacts would be <u>less than</u> significant but can be mitigated to a level that is considered less than significant (Class III).	
53.	Visual Resources	D.3-85	Identified long-term visibility land alterations impacts would also be adverse, and therefore, Mitigation Measures VIS 3d, VIS 3e, and VIS 3f have <u>has</u> been provided and would mitigate this impact.	Please update to reflect this mitigation measure.
54.	Visual Resources	D.3-85-86	<i>Transmission Line Long-term visual contrasts</i> Long-term visual contrasts would occur <u>but would be consistent with BLM VRM Class IV visual classification. Impacts to transmission lines located on County lands in the area would be lessened if the approved Sunrise Powerlink's 500 kV transmission line is constructed prior to the Tule Wind Project, as Tule would no longer where the overhead Tule Wind 138 kV transmission line would introduce an industrial utility feature into landscapes that are currently natural or a mixture of natural and community elements and the Sunrise Powerlink 500 kv transmission line would dominate the area and Tule Wind 138 kV transmission line. In the event that Sunrise Powerlink is not constructed, in settings where the 138_ kV line would be within 0.5 mile (foreground viewing distance) of sensitive viewing locations and result in strong visual contrasts, adverse impacts would occur. These instances include roadside views from I-8, McCain Valley Road, and Old Highway 80, where the 138_ kV transmission line would establish a new utility corridor and alter predominantly natural landscape settings. Residential views would be similarly affected near the community of Boulevard. Recreationists' views would also be affected within the BLM's managed Lark Canyon OHV area.</u>	Please update to reflect the BLM VRM Class IV. Also, consider revising to reflect that the approved Sunrise Powerlink, if constructed, would result in a reduction of the impacts of the Tule Wind Project.

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55.	Visual Resources	D.3-86	<p>Although the Tule Wind Project Therefore, since the 138 kV transmission line would produce strong long-term visual contrasts that would be visible to a variety of viewer types including residents, recreationists, and motorists, identified impacts would be adverse, SDG&E's approved Sunrise Powerlink transmission line, if constructed, will dominate the landscape and supersede any visual impacts due the Tule Wind Project, and Mitigation Measures VIS-1e, VIS-3i, VIS-3j, VIS-3l, and VIS-3m (VIS-3m would supersede APM TULE-AES-11) have been provided. However, the identified impact of the Tule Wind 138 kV transmission line (primarily the segment located adjacent to McCain Valley Road and within the McCain Valley National Cooperate Land and Wildlife Management Area) cannot be mitigated. Under CEQA, impacts would be considered less than significant (Class III).</p>	Please update to reflect the approved Sunrise Powerlink, which, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
56.	Visual Resources	D.3-86	<p>Identified impacts associated with the visibility of the 138 kV transmission line as viewed from <u>the County portions of the project on Old Highway 80</u> and rural residences within foreground to middle-ground viewing distances would also be adverse; therefore, Mitigation Measures, VIS-1e, VIS-3i, VIS-3j, and VIS-3l, VIS-3m have been provided and would mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II).</p>	Please update to reflect the identified mitigation measures.
57.	Visual Resources	D.3-93 Paragraph 1	<p>Impact VIS-4</p> <p>Although rResidences would not be located immediately adjacent to the collector substation and O&M facility, and nighttime lighting at these facilities would not be visible to residences in the general area due to <u>location on BLM land and topography</u> the general lack of existing nighttime lighting in the area. Temporary Llighting would also be visible to recreationists in the general project area</p>	The operation of the project would not affect the nighttime views. The O&M/Substation facility would utilize fully shielded low pressure sodium lamp types not to exceed 4050 lumens output. Please consider changing the determination to reflect this information.

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			<p>and to motorists on I-8 and local roadways in the Boulevard area <u>during construction</u>. Also, although obstruction lighting would be required for the proposed wind turbines (per FAA regulations), the height of the turbines and the repetitive flashing of obstruction lighting would make these lights a strong and highly visible, constant source of annoyance for residents in the McCain Valley and Boulevard areas, and nighttime views for these residents would <u>may</u> be affected, <u>given the general topography and the limited amount of turbines visible to Boulevard residents. The turbines will require FAA lighting at the beginning and end of a string or every one-half mile. This will distribute the lighting source over a large geographic area with varied topography.</u> Therefore, <u>†</u>The long-term effects to nighttime views resulting from the Tule Wind Project would be <u>less than significant. Identified</u> Impacts associated with night lighting at the O&M facility would <u>not</u> be adverse, although and therefore, Mitigation Measure VIS 4a (this measure would supersede APM TULE-AES-7 has been provided to further assist in reducing any potential impacts and would mitigate this impact. Under CEQA, impacts would be <u>considered less than significant but can be mitigated to a level that is considered less than significant (Class III).</u></p> <p>Identified impacts associated with nighttime wind turbine obstruction lighting would be adverse, and therefore, Mitigation Measure VIS 4b (this measure would supersede APM TULE-AES-3) has been provided. However, the identified impact cannot be mitigated. There is no mitigation available that would further reduce the visual intrusion of FAA-required lighting on project area residential properties. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	

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58.	Visual Resources	D.3-93	<p>MM VIS-4b</p> <p>Incorporate Obstacle Collision Avoidance System (OCAS) onto Tule Wind Project wind turbines. The project applicant shall install the OCAS lighting system on all proposed wind turbines in order to minimize nighttime lighting impacts attributed to the operation of FAA-required obstruction lighting. As the OCAS and other Audio Visual Warning Systems (AVWS) have been approved by the FAA and are considered to be suitable alternatives to the marking and lighting requirements as recommended in FAA Advisory Circular (AC) 70/7460-1K, installation of this system would be compatible with FAA requirements.</p> <p>When the Tule Wind Project is decommissioned, all project components would be removed and areas disturbed by construction and operation of the project would be restored to pre-project conditions. Removal of wind turbines and project facilities would reduce glare occurring in the project area, and dismantling of wind turbines would also entail the removal of OCAS installed on wind turbines. Therefore, instances of project nighttime lighting would no longer occur.</p>	Please consider removing this mitigation measure because OCAS has not been approved by the FAA for use in the Tule Wind Project. See Attachment D.3.2, FAA Letter (November 2010) and Attachment D.3.3, FAA Memo (June 15, 2009).
59.		D.3-94	<p>While some of the n Nighttime lighting impacts associated with operation of the Proposed PROJECT including the Campo, Manzanita, and Jordan wind energy projects could be reduced through the implementation of <u>APMs</u> and a Light Mitigation Plan (Mitigation Measure VIS-4a) at substation and ancillary facilities, <u>and</u> the impacts associated with the installation and operation of FAA-required lighting atop wind turbines would result in <u>substantial less than significant</u> impacts to nighttime views. The introduction of additional obstruction lighting (obstruction lighting is currently installed atop existing Kumeyaay wind farm turbines) to the</p>	Please consider updating the significance determination for the Proposed PROJECT based on the analysis provided in previous comments.

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			<p>existing dark sky environment around the Boulevard community would further <u>is not anticipated to</u> affect nighttime views in the area and would <u>or</u> result in a constant source of annoyance for area residents during the life of the project. Obstruction lights would operate nightly, as required by the FAA, <u>and would result in a</u> could not be further reduced in number so as to render the resulting visual impact less than significant visual impact. Even with implementation of the OCAS (Mitigation Measure VIS-4b), illumination of nighttime skies could not be entirely avoided. Due to the numerous residences that would have unobstructed views of the wind turbines and associated lighting, the impact would be far reaching. Plus, with <u>The addition of between 500 and 625 turbines as proposed by the project applicant of the ESJ Phase 1 Wind Project, residents in the project area would be subjected to red-flashing and other forms of obstruction lighting in their western-, northern-, and eastern-facing nighttime views. Therefore, identified impacts would be significant and Mitigation Measure VIS-4a and APM TULE-AES-7 have</u> has been provided for the ECO and Tule Wind projects, and Mitigation Measure VIS-4b has been provided solely for the Tule Wind Project. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot <u>but can</u> be mitigated to a level that is considered less than significant (Class III).</p>	
60.	Visual Resources	D.3-97 Paragraph 1 3 bullet points	<p>Tule-VIS-5 As demonstrated in Appendix 6 (Table 7-2), Visual Resource Consistency Tables, the proposed Tule Wind Project would not be consistent with all applicable plans, policies, and regulations relevant to the project area. Components of the Tule Wind Project located on County jurisdictional lands were determined to be inconsistent with visual resource goals and policies established in the plans and regulations identified in the following (the specific</p>	<p>Please consider revising to reflect these changes of the area proposed O&M/Substation will be located on BLM jurisdictional land and would not be subject to county ordinances or guidelines.</p> <p>Moreover, even if the County of San Diego plan, policies, or zoning guidelines would be applicable, no inconsistency should be identified because:</p> <ul style="list-style-type: none"> • The Draft General Plan Update is currently

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			<p>policy/section with which project components would be inconsistent is also identified as follows:</p> <ul style="list-style-type: none"> • County of San Diego Draft General Plan Update – Conservation and Open Space Element (Policies COS-11.1 and COS-11.2) (County of San Diego 2010) • County of San Diego Existing General Plan – Mountain Empire Subregional Plan (Scenic Highway Goal) • <u>County of San Diego County General Plan - Scenic Highway Element, Part VI, Policy 1 (1986).</u> • <u>Mountain Empire Subregional Plan – Conservation Environmental Resources, Policy 4 Protection of the Dark Sky Environment.</u> • County of San Diego Zoning Ordinance (Section 6324) (County of San Diego 2010d). 	<p>in draft form and has not been formally adopted by the County of San Diego. Therefore, no impact is identified.</p> <ul style="list-style-type: none"> • 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. • Zoning ordinance 6324 would limit illumination of outdoor public recreational facilities, unless a specific recreational activity requiring the lighting is already in progress. Security lights are excepted.
61.	Visual Resources	D.3-97	<p>As identified in Appendix 6, Visual Resource Consistency Tables, the construction and operation of large wind turbines openly visible from I-8 would conflict with the <u>Part VI, Scenic Highway Element of the San Diego County General Plan (1986) and Scenic Highway Goal of the Mountain Empire Subregional Plan (I-8 is a County-designated third-priority scenic route, and development of wind turbines along the corridor would not protect or enhance existing scenic resources).</u> Lastly, while nighttime lighting at the collector substation and O&M facility would be consistent (with implementation of Mitigation Measure VIS 4a) with Section 6324 of the County Zoning Ordinance, operation of the OCAS and resulting light trespass could likely extend beyond the spill light thresholds identified by the County and would not be consistent with Section 6324. Interstate 8 currently is not</p>	<p>Please update significance criteria to reflect the guidelines current scenic highway eligibility of I-8 according to CALTRANS and the lowest status rating as a third-priority listing for the County of San Diego.</p>

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			<p><u>designated as a state scenic highway or scenic corridor, although it is eligible route for California Department of Transportation, CALTRANS Scenic Highway Program. The Scenic Highway Element, Policy 1 supports the ongoing County scenic highway system, of which roadways are rated in three categories (first, second, and third priority). Currently the County has six first priority routes, 16 second priority routes, and 35 third-priority routes listed, of which I-8 is identified as a third-priority. The Mountain Empire Community Plan has scenic highways listed as a goal, of which I-8 from SR-79 east to the Imperial County Line. Considering the Mountain Empire Subregional Plan and the Scenic Highway Element list this highway as the lowest priority roadway, it is unlikely that I-8 will be designated as a scenic highway in the near future.</u></p> <p>Identified impacts are assessed as adverse, and implementations of Mitigation Measures VIS 4a and VIS 4b have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I). Implementation of the additional lighting sources due to the FAA lighting is not anticipated to contribute a significant light source that will impact night skies to the area. The outdoor lighting will comply with the San Diego Light Pollution code for lamp type and shielding requirements. Impacts due to compliance to the Mountain Empire Dark Sky polices would be consistent. Considering this information, u<u>nder CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class III).</u></p>	
62.	Visual Resources	D.3-98	As identified in Appendix 6, the Tule Wind Project would not be consistent with all local policies and regulations relevant to the project area guiding the	Please update to be consistent with the previous significance criteria regarding local policies and regulations.

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			<p>protection of visual resources (see previous discussion for individual projects). Although project-specific information has not been developed, the Jordan wind energy project would be located on County jurisdictional lands and may result in similar consistency determinations with respect to local plans and policies as previously identified for the Tule Wind Project. Because the Campo and Manzanita wind turbines would be located on tribal lands, these components would not be subject to local plans and policies. Therefore, because the Proposed PROJECT including the Campo, Manzanita, and Jordan wind energy projects would not be consistent with all local plans, policies, and regulations, identified impacts would not be adverse. M and mitigation has been provided; however, the identified impact cannot be mitigated. Under CEQA, impacts would be significant, and cannot but can be mitigated to a level that is considered less than significant (Class II).</p>	
63.	Visual Resources	<p>D.3-110</p> <p>Section D.3.5 Alternatives</p> <p>Table D.3-4</p>	<p>Alternatives Analysis</p> <p>TULE-VIS-1 The project would have a substantial adverse effect on a scenic vista. Class <u>I (County)</u> Class III (BLM)</p> <p>TULE-VIS-3 The project would substantially degrade the existing visual character or quality of the site and its surroundings. Class I (<u>County</u>) Class III (BLM)</p> <p>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. Class <u>III</u></p> <p>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</p>	<p>GLOBAL COMMENT: The alternatives propose underground transmission lines. If the 138 kV transmission lines were placed sub terrain, this would result in additional miles of above ground collector system lines, from 9.4 miles (proposed) to 9.2 miles (modified) to 17 miles of overhead collector lines. This would result in an overall increase in the overall amount of poles required. . Although the 34.5 kV lines may be lower in stature, this would not decrease the visual impact to the area.</p> <p>Furthermore, the McCain Valley area is identified for the construction of the approved Sunrise Powerlink 500 kV 90-170 feet high transmission line. If constructed, this power line will be the dominant feature in the area. The proposed 138 kV transmission line will be approximately 75 feet, or 15 to 95 feet shorter than the 500 kV line, as shown</p>

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			visual resources. Class <u>III</u> .	<p>in Attachment F.1, Revised Visual Simulation with Sunrise 500kV Line (February 2011).</p> <p>The change in significance determination in impact alternatives impact VIS-1 and VIS-2 for the alternatives reflect a less than significant impact on BLM jurisdictional lands, which is similar to the proposed project. Please update language to Alternatives 2 and 4 to reflect this information.</p>
64.	Visual Resources	D.3-112	<p>In addition, since this alternative would not result in the removal of wind turbines, the visual quality and viewer sensitivity conclusions made in Section D.3.1.3 for KOPs 14, 13, 15, and 16 would also describe the existing visual setting associated with this alternative.</p> <p><u>The overhead collector line system would increase by 7.7 miles from 9.3 miles (proposed) to 17 miles and would also necessitate the construction of 202 extra collector line poles from 250 to 452 poles. The underground collector lines would decrease in distance approximately 6.2 miles from 35.1 miles (proposed) to 28.9 miles. The 138 kV transmission line would decrease in distance as a result of this alternative by approximately 5.4 miles from 9.2 miles (proposed) to 3.8 miles and would decrease the amount of transmission line poles from 80 poles (proposed) to 44 poles. This alternative would increase the total land disturbance by 49.3 acres, from 725.3 acres (proposed) to 774.6 acres.</u></p>	<p>GLOBAL COMMENT: The alternatives propose underground transmission lines. If the 138 kV transmission lines were placed sub terrain, this would result in additional miles of above ground collector system lines, from 9.2 miles (modified) to 17 miles of overhead collector lines. This would result in an overall increase in the overall amount of overhead pole required.</p> <p>Although the 34.5 kV lines may be lower in stature, this would not decrease the cumulative visual impact to the area due to the approved 500 kV Sunrise Powerlink, if constructed, as shown in Attachment F.1, Revised Visual Simulation with Sunrise 500kV Line (February 2011).</p> <p>Please update language to Alternative 2 and 4 to reflect this information.</p>
65.	Visual Resources	D.3-112	<p><u>Regardless of whether the Tule project will construct a 138 kV or 34.5 kV line in the area, the approved Sunrise Powerlink transmission line, if constructed, will be located in this area and would become the dominant feature (90 to 170 feet in height). Because wind turbines would still result in significant scenic vista impacts as viewed from the Carrizo Overlook and from the from Ribbonwood Trail and</u></p>	<p>Please update to describe the existing and cumulative conditions.</p>

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			Ribbonwood Road Pathway- <u>areas located on County lands</u> , overall impacts to scenic vistas would be similar to those identified for the proposed Tule Wind Project.	
66.	Visual Resources	D.3-113, D.3-116, D.3-120	Although Old Highway and I-8 <u>is</u> are classified as eligible state scenic highway, it has been officially designated; therefore, similar to the proposed Tule Wind Project and all other project alternatives, no impacts (No Impact) to scenic resources within a state scenic highway would occur under this alternative.	Please update language to reflect the correct state scenic highway.
67.	Visual Resources	D.3-113	Under this alternative, the collector substation/O&M facility would be located on a disturbed site on Rough Acres Ranch, and due to existing development surrounding the alternate site (KOP 12 Figure D.3-17D), the resulting visual contrast would be less pronounced than if the collector substation/O&M facility were sited on primarily natural BLM-administered land (as proposed in Section B for the Tule Wind Project), <u>which allows for a high level of visual contrast</u> . However, locating the collector substation/O&M facility and rerouting the 138 kV transmission line off BLM-administered land would not substantially affect the short-term visibility of construction activities. In addition, this alternative would still construct wind turbines that would result in significant short-term visibility of construction activities impacts. Therefore, similar to the proposed Tule Wind Project , identified impacts would be adverse, and Mitigation Measures VIS-3a <u>and through</u> VIS-3c have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to reflect this language and mitigation measures.
68.	Visual Resources	D.3-114	Since the alternate collector substation/O&M facility site on Rough Acres Ranch is already disturbed, long-term landscape alteration impacts would be	Please update to reflect this language and mitigation measures.

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			<p>slightly reduced. Overall, however, impacts would be similar to the proposed Tule Wind Project. Considering the facility would be located on County of San Diego lands, identified impacts would be adverse, and therefore, Mitigation Measure VIS-3d, VIS-3e, and VIS-3f have been provided. However, because of the numerous access roads that would be constructed and visible from numerous viewing angle, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	
69.	Visual Resources	D.3-114	<p>In addition, the approved Sunrise Powerlink's 500 kV transmission line, if constructed, would remain visible to rural residential viewers and motorists along McCain Valley Road (KOP 11, Figure D.3-16B) and motorists along Old Highway 80 (KOP 15, Figure D.3-20C). Similar to the proposed Tule Wind Project, identified long-term visual contrasts associated with the Tule Wind turbines, collector substation and O&M facility, collection cable system, and the 138 kV transmission line would be adverse; therefore, mitigation measures have been provided for the wind turbines (APM TULE-AES-1 Mitigation Measure VIS-3n), collector substation and O&M facility (APM TULE-AES-9 and Mitigation Measures VIS-3f and VIS-3h), collection cable system (APM TULE-AES-5), and the 138 kV transmission line (Mitigation Measures, VIS-3i, VIS-j, VIS-3l, and VIS-3m).</p>	<p>Please update to reflect this language and mitigation measures. Also consider revising to reflect that Sunrise Powerlink is not yet constructed and consider its cumulative impact to visual resources.</p>
70.	Visual Resources	D.3-114	<p>Similar to the proposed Tule Wind Project, the lighting for the substation/O&M facility will follow the County lighting standards. Identified impacts would not be adverse, and therefore, Mitigation Measure VIS-4a has been provided and would mitigate this impact. Under CEQA, impacts would be less than significant but can be mitigated to a level that is considered less than significant (Class III).</p>	<p>The Tule Wind Project will comply with the County of San Diego dark sky ordinance (APM TULE-AES-7) for lighting at the substation and O&M facility, and due to topography and elevation, the FAA lighting would not be considered a significant impact, given these are federal requirements. Based on these considerations, in evaluation of Impact VIS-4, a recommendation to change the impact significance determination from Class II to Class III</p>

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				is provided.
71.	Visual Resources	D.3-115	<p>Since This alternative would not reduce the amount of proposed turbines, nighttime lighting impacts associated with turbine obstruction lighting would be similar to those identified in Section D.3.3.3 for the proposed Tule Wind Project. Similar to the proposed Tule Wind Project, Due to topography and elevation, turbine lighting will not be highly visible. Identified impacts would not be adverse, and therefore, and Mitigation Measure VIS 4b have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be less than significant and cannot be mitigated to a level that is considered less than significant (Class III).</p>	Please update to reflect this language, mitigation measures, and significance determination to be consistent with the proposed project.
72.	Visual Resources	D.3-115	<p>Impact VIS-5: Similar to the proposed Tule Wind Project, this alternative would not be consistent with all applicable local visual resource plans, policies, and regulations relevant to the project area: specifically, the County of San Diego Draft General Plan Update—Conservation and Open Space Element (Policy COS-11.1 and COS-11.2); the County of San Diego Existing General Plan Conservation Element (Scenic Highway Goal); and the County of San Diego Zoning Ordinance (Section 6324). While this alternative was determined to be consistent (with implementation of <u>APM AES-7 and mitigation</u>) with all other local visual resources plans and policies, similar to the proposed Tule Wind Project, identified impacts would <u>not</u> be adverse, and mitigation has been provided. <u>Considering the Mountain Empire Subregional Plan and the Scenic Highway Element list this highway as the lowest priority roadway, it is unlikely that I-8 will be designated as a scenic highway in the near future. Considering this information, under CEQA, impacts would be considered less than significant (Class III).</u> However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is</p>	Please update to reflect this significance criteria from a Class I to a Class III based on the I-8 categorized as a third priority listed roadway and unlikely to be designated as a scenic highway in the near future.

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			considered less than significant (Class I).	
73.	Visual Resources	D.3-116	Section D.3.5.1 describes the environmental setting associated with relocation of the collector substation and O&M facility to Rough Acres Ranch, and the subsequent shortened 138 kV transmission line route and extended collector cable system (<u>202 extra poles</u>).	Please update to reflect this language.
74.	Visual Resources	D.3-116	Under this alternative, scenic vista impacts associated with the alternative gen-tie at proposed I-8 and Old Highway 80 crossings would be avoided by undergrounding the transmission and removing support poles from the scenic landscape visible from these facilities (KOP 9, Figure D.3-14G, for approximate underground gen-tie alignment as viewed from south of the Boulevard Substation Rebuild site, <u>although the approved Sunrise Powerlink, if constructed, would still be the visible and the dominant feature crossing I-8 and Old Highway 80.</u> This alternative would not, however, reduce the severity of scenic vista impacts anticipated to occur at the Carrizo Overlook, Ribbonwood Trail, or Ribbonwood Road Pathway <u>as the approved Sunrise Powerlink would be located in this area.</u> In addition, the second 34.5 kV collector cable system to be installed under this alternative, <u>which although present, would not obstruct the view of Carrizo Gorge Overlook (to the east) could potentially be visible from the Carrizo Overlook and could obstruct scenic views.</u> Therefore, overall scenic vista impacts <u>due to the wind turbines located on County lands</u> would be adverse, and Mitigation Measure VIS-1b and 3n <u>has</u> been provided.	Please update to reflect this language.
75.	Visual Resources	D.3-117	Similar to the proposed Tule Wind Project, identified impacts would be adverse; therefore, Mitigation Measures VIS-3a though <u>and</u> VIS-3c have been provided.	Please update to reflect these mitigation measures.
76.	Visual Resources	D.3-117	Identified impacts would be adverse, and Mitigation Measures VIS-3d, VIS-3e, and VIS-3f <u>has</u> been	Please update to reflect these mitigation measures.

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			provided.	
77.	Visual Resources	D.3-117	...introduction of a highly visible, industrial element to the existing visual landscape) (KOP 12, Figure D.3-17D; KOP 9, Figure D.3-14G; and KOP 15, Figure D.3-20C), <u>although the approved Sunrise Powerlink 500 kV transmission line, if constructed, would remain the dominant industrial element in the area.</u>	Please update to reflect the approved Sunrise Powerlink, which, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
78.	Visual Resources	D.3-118	While the visual contrasts associated with wind turbines would clearly be noticeable from surrounding communities, the long-term visual contrasts associated with the underground transmission line would <u>not be</u> greatly reduced under this alternative <u>due to the approved Sunrise Powerlink 500 kV transmission line, if constructed.</u> Identified long-term visual contrasts associated with the Tule Wind turbines, collector substation and O&M facility, and collection cable system would be adverse, and therefore, mitigation measures have been provided for the wind turbines (APM TULE-AES-1 Mitigation Measure VIS-3n), collector substation and O&M facility (APM TULE-AES-9 and Mitigation Measures VIS-3g and VIS-3h), and collection cable system (APM TULE-AES-5), and the 138 kV transmission line (Mitigation Measure VIS-3m).	Please update to reflect the approved Sunrise Powerlink and the mitigation measures. The Sunrise Powerlink, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
79.	Visual Resources	D.3-118	Similar to the proposed Tule Wind Project, identified impacts would be adverse, and therefore, Mitigation Measure VIS 4a has been provided and would mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II). The lighting for the substation/O&M facility will follow the County lighting standards. Identified impacts would be not be adverse. Under CEQA, impacts would be less than significant (Class III).	Please update to reflect this significance determination regarding lighting for the substation/O&M facility.

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80.	Visual Resources	D.3-118	<p>Since This alternative would not reduce the amount of proposed turbines, nighttime lighting impacts associated with turbine lighting would be similar to those identified in Section D.3.3.3 for the proposed Tule Wind Project under this alternative. Similar to the proposed Tule Wind Project, Due to topography and elevation, turbine lighting will not be highly visible. Identified impacts would not be adverse APM TULE-AES-7-adverse, and therefore, Mitigation Measure VIS 4b has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be less than significant and cannot be mitigated to a level that is considered less than significant (Class III).</p>	Please update this language to reflect impacts due to turbine lighting and a reduced significance determination.
81.	Visual Resources	D.3-119	<p>Similar to the proposed Tule Wind Project, this alternative would not be consistent with all applicable local visual resource plans, policies, and regulations relevant to the project area: specifically, the County of San Diego Draft General Plan Update, conservation and Open space Element (Policy COS-11.1 and COS-11.2); the County of San Diego Existing General Plan Conservation Element (Scenic Highway Goal); and the County of San Diego Zoning Ordinance (Section 63240. While this alternative was determined to be consistent (with implementation of APM AES-7 mitigation) with all other local visual resources plans and policies, similar to the proposed Tule Wind Project, identified impacts would not be adverse and mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be less than significant and cannot be mitigated to a level that is considered less than significant (Class III).</p>	Please update this language to reflect impacts a reduced significance determination.
82.	Visual Resources	D.3-119	<p>This alternative would decrease the distance of 138 kV transmission line by 3.8 miles from 9.2 miles (proposed) to 5.4 miles. However, the length of the overhead collector line system would increase in distance by 7.7 miles from 9.2 miles (proposed) to</p>	Please update section to include this additional information relative to Tule Wind Project Alternative #3.

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			<u>17 miles. Additionally, under this alternative, transmission line poles would decrease from 80 poles (proposed) to 60 poles, but collector line poles would increase by 202 poles from 250 poles to 452 poles. This alternative would increase the total land disturbance by 54.7 acres, from 725.3 acres (proposed) to 780.0 acres.</u>	
83.	Visual Resources	D.3-120	This alternative would not, however, reduce the severity of scenic vista impacts anticipated to occur at the Carrizo Overlook, Ribbonwood Trail, or Ribbonwood Road Pathway <u>area located on County lands</u> . In addition, the second 34.5 kV collector cable system to be installed under this alternative could potentially be visible from the Carrizo Overlook. <u>Regardless if the Tule project will construct a 138 kV or 34.5 kV line in the area, the approved Sunrise Powerlink will be located in this area and, if constructed, would become the dominant feature (90 to 170 feet in height).</u> Overall, scenic vista impacts would be similar to those identified in Section D.3.3.3 for the proposed Tule Wind Project. Identified impacts would be adverse, and Mitigation Measures VIS-1a <u>and through VIS-1b</u> has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to reflect the presence of the approved Sunrise Powerlink, if constructed, as the dominant feature in the area and the mitigation measures. The Sunrise Powerlink would result in a reduction of the impacts of the Tule Wind Project.
84.	Visual Resources	D.3-122	Although Old Highway 80 and I-8 <u>is</u> classified as eligible state scenic highways, neither it has been officially designated; therefore, similar to the proposed Tule Wind Project and all other project alternatives, no impacts (No Impact) to scenic resources within a state scenic highway would occur under this alternative.	Please update language to clarify status of Old Highway 80.
85.	Visual Resources	D.3-122	Similar to the proposed Tule Wind Project identified impacts would be adverse, and therefore, Mitigation Measures VIS-3a through and <u>and</u> VIS-3c have been provided.	Please update to reflect these mitigation measures.

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86.	Visual Resources	D.3-122	Identified impacts would be adverse, and Mitigation Measures VIS-3d, VIS-3e, and VIS-3f <u>have</u> been provided. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to reflect these mitigation measures.
87.	Visual Resources	D.3-122	<u>Regardless of whether the Tule project will construct a 138 kV in the area, the approved Sunrise Powerlink 500 kV transmission line will be located in this area and, if constructed, would become the dominant feature (90 to 170 feet in height).</u> Identified long-term visual contrasts associated with the Tule Wind turbines, collector substation and O&M facility, collection cable system, and the 138 kV transmission line would be adverse, and therefore mitigation measures have been provided for the wind turbines (APM TULE-AES-1 and Mitigation Measure VIS-3n); collector substation and O&M facility (APM TULE-AES-9 and Mitigation Measures VIS-3g and VIS-3h); collection cable system (APM TULE-AES-5); and the 138 kV Transmission Line (Mitigation Measures VIS-1e, VIS-3i, VIS-j, and VIS-3l, and VIS-3m).	Please update to reflect cumulative impacts that would result if the approved Sunrise Powerlink is constructed.
88.	Visual Resources	D.3-122	<p>Similar to the proposed Tule Wind Project, identified impacts would be adverse, and therefore, Mitigation Measure VIS-4a has been provided and would mitigate this impact. The project will comply with the County of San Diego dark sky ordinance as presented in APM TULE-AES-7. Under CEQA, impacts would be less than significant but can be mitigated to a level that is considered less than significant (Class III).</p> <p><u>Similar to the proposed Tule Wind Project, identified wind</u> The wind turbine nighttime lighting impacts would <u>not</u> be adverse <u>due to topography and elevation</u> and therefore, Mitigation Measure <u>VIS-4b</u> has been provided. However, the identified impact <u>cannot be mitigated</u>. Under CEQA, impacts would be <u>less than</u> significant and cannot be mitigated to a</p>	Please update to reflect impacts due to dark skies and change the significance determination from a Class I to a Class III.

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			level that is considered less than significant (Class III).	
89.	Visual Resources	D.3-122	<p>Similar to the proposed Tule Wind Project, this alternative would not be consistent with all applicable local visual resource plans, policies, and regulations relevant to the project area: specifically, the County of San Diego Draft General Plan Update – Conservation and Open Space Element (Policy COS-11.1 and COS-11.2); the County of San Diego Existing General Plan Conservation Element (Scenic Highway Goal); and the County of San Diego Zoning Ordinance (Section 6324). While t this alternative was determined to be consistent (with implementation of <u>APM AES-7 mitigation</u>) with all other local visual resources plans and policies, similar to the proposed Tule Wind Project, identified impacts would <u>not</u> be adverse and mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I). <u>Considering the Mountain Empire Subregional Plan and the Scenic Highway Element list this highway as the lowest priority roadway, it is unlikely that I-8 will be designated as a scenic highway in the near future. Considering this information, under CEQA, impacts would be considered less than significant (Class III).</u></p>	Please update the impacts to County guidelines and the significance determination.
90.	Visual Resources	D.3-123	<p>Section D.3.5.3 describes the existing environmental setting associated with the Tule Wind Alternative Gen-Tie Route 3 with Collector Substation/O&M Facility of Rough Acres Ranch. Because this alternative would only underground the 138 kV transmission line, the existing environmental setting would be the same as described in Section D.3.5.3.</p> <p><u>This alternative would also increase the potential for impacts resulting from a longer 34.5 overhead collector line system and 202 extra collector lines</u></p>	Please update to include this additional information to reflect the Modified Project Layout.

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			<u>poles required for the overhead collector lines, as well as increase the amount of permanent impacts to cultural resources.</u>	
91.	Visual Resources	D.3-123	Ribbonwood Road Pathway <u>area located on County lands</u> . In addition, the second 34.5 kV collector cable system to be installed under this alternative could potentially be visible from the Carrizo Overlook. <u>Regardless of whether the Tule project will construct a 138 kV or 34.5 kV line in the area, the approved Sunrise Powerlink will be located in this area and, if constructed, would become the dominant feature (90 to 170 feet in height).</u> Similar to the proposed Tule Wind Project, overall scenic vista impacts would be adverse, and therefore, Mitigation Measures-VIS-1a and VIS-1b <u>have</u> has been provided.	Please update to reflect the approved Sunrise Powerlink, which, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
92.	Visual Resources	D.3-124	Mitigation Measures VIS-3a and through VIS-3c have been provided.	Please update to reflect these mitigation measures.
93.	Visual Resources	D.3-124	Identified impacts would be adverse and Mitigation Measures VIS-3d, VIS-3e, and VIS-3f <u>has</u> have been provided. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to reflect these mitigation measures.
94.	Visual Resources	D.3-125	<u>Regardless of whether the Tule project will construct a 138 kV or 34.5 kV line in the area, the approved Sunrise Powerlink, if constructed, will be located in this area and would become the dominant feature (90 to 170 feet in height).</u> Identified long-term visual contrasts associated with the Tule Wind turbines, collector substation and O&M facility, collection cable system, and the 138 kV transmission line would be adverse, and therefore, mitigation measures have been provided for the wind turbines (APM TULE-AES-1 and Mitigation Measure VIS-3n), collector substation and O&M facility (APM TULE-AES-9 and Mitigation Measure 3g and VIS-3h), collection cable system (APM TULE-AES-5), and the 138 kV Transmission Line (Mitigation Measures VIS-1c, VIS-3i, VIS-j, and VIS-3l and	Please update to reflect the presence of the Sunrise transmission line and these mitigation measures. The approved Sunrise Powerlink, if constructed, would result in a reduction of the impacts of the Tule Wind Project.

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			VIS 3m).	
95.	Visual Resources	D.3-125	<p>Identified impacts associated with the collector substation and O&M facility would <u>not</u> be adverse; and therefore, Mitigation Measure VIS 4a has been provided and would mitigate this impact. Under CEQA, impacts would be <u>less than significant but can be mitigated to a level that is considered less than significant (Class II)</u>. Identified impacts associated with wind turbines would be adverse, and therefore, Mitigation Measure VIS 4b has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I). <u>The lighting for the substation/O&M facility will follow the County lighting standards identified impacts would be not be adverse. Under CEQA, impacts would be less than significant (Class III).</u></p>	Please update to reflect this significance determination.
96.	Visual Resources	D.3-125-126	<p>Similar to the proposed Tule Wind Project, this alternative would not be consistent with all applicable local visual resource plans, policies, and regulations relevant to the project area: specifically, the County of San Diego Draft General Plan Update – Conservation and Open Space Element (Policy COS 11.1 and COS 11.2); the County of San Diego Existing General Plan Conservation Element (Scenic Highway Goal); and the County of San Diego Zoning Ordinance (Section 6324). While this alternative was determined to be consistent (with implementation of APM AES-7 mitigation) with all other local visual resources plans and policies, similar to the proposed Tule Wind Project, identified impacts would <u>not</u> be adverse and mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I). <u>Considering the Mountain Empire Subregional Plan and the Scenic Highway Element list this highway as</u></p>	Please update to reflect this significance determination.

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			<u>the lowest priority roadway, it is unlikely that I-8 will be designated as a scenic highway in the near future. Considering this information, under CEQA, impacts would be considered less than significant (Class III).</u>	
97.	Visual Resources	D.3-126	Overall scenic vista impacts would be adverse, and therefore, Mitigation Measure VIS-1a, VIS-1b and VIS-1c have been provided.	Please update to reflect these mitigation measures.
98.	Visual Resources	D.3-127	The Tule Wind Reduction in Wind Turbines Alternatives would remove 62 of the proposed 134 <u>28</u> wind turbines from the project.	Please update to reflect the Modified Project Layout.
99.	Visual Resources	D.3-127	Mitigation Measures VIS-3a and through VIS-3c have been provided as a result. However, the identified impact cannot be mitigated, and under CEQA, the impact would be significant and cannot be mitigated to a level that is less than significant (Class I). Long-term landscape alteration impacts are anticipated to be reduced because of fewer overall access roads, a shorter underground collector cable system, and less grading for wind turbine foundations, etc., <u>although the approved Sunrise Powerlink 500 kV transmission line, if constructed, would still be visible.</u> However, because of the anticipated impacts attributed to wind turbines, identified impacts would be adverse, and Mitigation Measures VIS 3d, VIS 3e, and VIS-3f has been provided. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Please update to reflect the approved Sunrise Powerlink, which, if constructed, would result in a reduction of the impacts of the Tule Wind Project.
100.	Visual Resources	D.3-127	Although fewer wind turbines are proposed under this alternative, similar to the proposed Tule Wind Project long-term visual contrast impacts would be significant due to the high-visibility of wind turbines <u>on County lands and the numerous access roads that would be required to access wind turbines.</u> Therefore, identified long-term visual contrasts associated with the Tule Wind turbines, collector	Please update to reflect these mitigation measures.

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			substation and O&M facility, collection cable system, and the 138 kV transmission line would be adverse, and mitigation measures have been provided for the wind turbines (APM TULE-AES-1 and Mitigation Measure VIS-3n), collector substation and O&M facility (APM TULE-AES-9 and Mitigation Measures VIS-3g and VIS-3h), collection cable system (APM TULE-AES-5), and the 138 kV transmission line (Mitigation Measures VIS-1c, VIS-3i, VIS-j, <u>and</u> VIS-3l and VIS-3m).	
101.	Visual Resources	D.3-128	Similar to the proposed Tule Wind Project and all project alternatives, nighttime lighting would be installed at the collector substation and O&M facility under this alternative, and potential impacts would be reduced to less than significant (Class II) with implementation of AES-7 Mitigation Measure VIS-4a . Although the visual impacts associated with turbine obstruction lighting would be reduced under this alternative (due to an overall reduction in the number of wind turbines), overall identified impacts would <u>not</u> be adverse <u>due to topography and elevation</u> and therefore Mitigation Measure VIS-4b has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be <u>less than significant and cannot be mitigated to a level that is considered less than significant</u> (Class III). Regarding the collector substation and O&M facility, <u>County lighting standards for dark sky will reduce impacts to a less than significant impact.</u> identified impacts would be adverse, and Mitigation Measure VIS-4a has been provided and would mitigate this impact. Under CEQA, impacts would be <u>less than significant but can be mitigated to a level that is considered less than significant</u> (Class III).	Please update to reflect impacts to night skies and the change in the significance determination.
102.	Visual Resources	D.3-128	Similar to the proposed Tule Wind Project, this alternative would not be consistent with all applicable local visual resource plans, policies, and regulations relevant to the project area: specifically,	Please update to reflect the impacts to County guidelines and regulations and the change in the significance determination.

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			<p>the County of San Diego Draft General Plan Update – Conservation and Open Space Element (Policy COS 11.1 and COS 11.2); the County of San Diego Existing General Plan Conservation Element (Scenic Highway Goal); and the County of San Diego Zoning Ordinance (Section 6324). While this alternative was determined to be consistent (with implementation of APM AES-7 mitigation) with all other local visual resources plans and policies, similar to the proposed Tule Wind Project, identified impacts would <u>not</u> be adverse and mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be <u>less than</u> significant and cannot be mitigated to a level that is considered less than significant (Class III).</p>	
103.	Visual Resources	<p>D.3-142</p> <p>Table D.3.8 Mitigation Monitoring, Compliance, and Reporting.</p>	<p>VIS 1a. Reduce impacts at scenic highway and trail crossings. At highway and trail crossings, structures shall be placed at the maximum feasible distance from the crossing to reduce visual impacts as long as other significant resources are not negatively affected.</p>	<p>This mitigation measure is unnecessary. There are no designated state scenic highways listed within the project area. Interstate 8 is designated a third priority for the County scenic highways and it has not been approved in the Draft General Plan update . Considering the lowest rating of I-8, it is unlikely that it will become a scenic highway in the near future; therefore, a less than significant impact is identified. In addition, Old highway 80 is designated a historic highway, not a scenic highway.</p> <p>Additionally, there are no laws or regulations that prohibit visual impacts to trail crossings. Therefore, this mitigation measure is not applicable. Moreover, the approved 500 kV Sunrise Powerlink, if constructed, will be the dominant transmission line feature. Please consider removing based on this information.</p>
104.	Visual Resources	<p>D.3-143</p> <p>D.3.8 Mitigation Monitoring, Compliance, and</p>	<p>VIS 1b. Reduce impacts at scenic view areas. In scenic view areas, as designated by the BLM and County of San Diego structures would be placed to avoid sensitive features and/or allow conductors to clearly span the features, within limits of standard</p>	<p>The BLM has identified the McCain Valley area as a VRM Class IV for visual resources to accommodate wind energy projects, therefore, impacts are identified as less than significant on BLM jurisdictional lands. In addition, Old Highway</p>

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		Reporting.	design where feasible.	80 is designated a historic highway, not a scenic highway. Therefore, no impact is identified which would require this mitigation measure. Please consider removing based on this information.
105.	Visual Resources	D.3-143	VIS-1c. Avoid potential visibility of transmission structures and related facilities from sensitive viewing locations. Underground portions of the 138 kV transmission line and/or collector system to avoid visual impacts to scenic highways, scenic vistas, or scenic resources.	<p>The BLM has identified the McCain Valley area as a Class IV for visual resources to accommodate wind energy projects, therefore, impacts are identified as less than significant on BLM jurisdictional lands. The McCain Valley area is identified for the construction of the approved Sunrise Powerlink 500 kV 90-170 feet high transmission line. If constructed, this cumulative project will be the dominant feature in the area. The proposed 138 kV transmission line will be approximately 75 feet, or 15 to 95 feet shorter than the 500 kV line.</p> <p>Interstate 8 has not been approved in the Draft General Plan update or by CALTRANS as a scenic highway and is currently not considered an impact. Old highway 80 is designated a historic highway, not a scenic highway.</p> <p>This mitigation measure is therefore not applicable. Please consider removing based on this information.</p>
106.	Visual Resources	D.3-143	VIS-3a. Reduce visibility of construction activities and equipment. Construction sites and all staging and material and equipment storage areas including storage sites for excavated materials shall be appropriately located away from areas of high public visibility. If visible from nearby roads, residences, public gathering areas, recreational areas, facilities, or trails, construction sites and staging areas and fly yards shall be visually screened using temporary screening fencing. Fencing will be of an appropriate design and color for each specific location. Where practical, construction staging and storage will be screened with opaque fencing from close-range residential views. Additionally,	<p>A construction plan will be submitted as part of the project design. Recreational use has not been sufficiently defined. Please consider revising this mitigation measure based on this information.</p> <p>In the event mitigation measure Vis-3a is applied, a shorter comment period is appropriate, because the project is a BLM Fast Track project, so designated to meet ARRA funding deadlines before the end of 2011. Depending on the date of approval, the lengthy comment period could preclude meeting the deadline.</p>

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			<p>construction in areas visible from recreation facilities and areas during holidays and periods of heavy recreational use shall be avoided. Applicant will coordinate with BLM regarding holidays and heavy recreational use periods. Tule Wind, LLC shall submit final construction plans demonstrating compliance with this measure to the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians for review and approval at least 60 days before the start of construction. In the event mitigation measure Vis-3a is applied, a shorter comment period is appropriate, because the project is a BLM Fast Track project, so designated to meet ARRA funding deadlines before the end of 2011. Depending on the date of approval, the lengthy comment period could preclude meeting the deadline.</p>	
107.	Visual Resources	D.3-144	<p>VIS 3b. Reduce construction night lighting impacts. Pacific Wind Development shall design and install all lighting at construction and storage yards and staging areas and fly yards such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Construction Lighting Mitigation Plan shall be reviewed for consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6322 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. Pacific Wind Development shall submit a Construction Lighting Mitigation Plan to the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed) for review and approval at least 90</p>	<p>The operation of the project would not affect the nighttime views in the Boulevard area. The O&M/Substation facility is proposed to be located on BLM jurisdictional lands and would not be subject to County requirements. However, 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 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. This light source is not considered significant. 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, thus not requiring mitigation. Please consider removing this mitigation measure based on</p>

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			<p>days before the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. Pacific Wind Development shall not order any exterior lighting fixtures or components until the Construction Lighting Mitigation Plan is approved by the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed). The Plan shall include but is not necessarily limited to the following:</p> <ul style="list-style-type: none"> • Lighting shall be designed so exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary. • All lighting shall be of minimum necessary brightness consistent with worker safety. • High illumination areas not occupied on a continuous basis shall have switches or Visual Resources motion detectors to light the area only when occupied. 	this information.
108.	Visual Resources	D.3-145	<p>VIS 3d. Reduce in-line views of land scars. Construct access or spur roads at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain. Contour grading should be used where feasible to better blend graded surfaces with existing terrain. Pacific Wind Development shall submit final construction plans demonstrating compliance with this measure to the appropriate land use jurisdiction agency for review and approval at least 60 days before the start of construction.</p>	Please consider removing this unnecessary mitigation measure. The Applicant has already committed to designing roadways that contour existing terrain as part of the project design (APM TULE-HYD-4). In addition, the project would be required to submit a final construction plan.

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109.	Visual Resources	D.3-145	<p>VIS 3e. Reduce visual contrast from unnatural vegetation lines. In those areas where views of land scars are unavoidable, the boundaries of disturbed areas shall be aggressively revegetated to create a less distinct and more natural appearing line to reduce visual contrast. Furthermore, all graded roads and areas not required for ongoing operation, maintenance, or access shall be returned to preconstruction conditions. In those cases where potential public access is opened by construction routes, Pacific Wind Development shall create barriers or fences to prevent public access and patrol construction routes to prevent vandalized access and litter cleanup until all vegetation removed returns to its preproject state. Pacific Wind Development shall submit final construction and restoration plans demonstrating compliance with this measure to the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed) for review and approval at least 60 days before the start of construction.</p>	Please consider removing this unnecessary mitigation measure. As part of the project design features (APM TULE-BIO-4), a habitat restoration plan will be implemented upon completion of construction.
110.	Visual Resources	D.3-146	<p>VIS 3g. Reduce visual contrast associated with substation and ancillary facilities. Pacific Wind Development shall submit to the BLM a Surface Treatment Plan describing the application of colors and textures to all new facility structure buildings, walls, fences, and components comprising all ancillary facilities including substations. The Surface Treatment Plan must reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The Surface Treatment Plan shall be submitted to the BLM for approval at least 90 days before (a) ordering the first structures that are to be color treated during manufacture or (b) construction of any of the ancillary facility components, whichever comes first. If the BLM notifies Pacific Wind Development that revisions to the Plan are</p>	Please consider removing this unnecessary mitigation measure. A Surface Treatment Plan was not proposed by the Applicant in the AED. As part of the project design, all facility structure building, walls, fences, and components will be submitted to the BLM and County for review.

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			<p>needed before the Plan can be approved, within 30 days of receiving that notification, Pacific Wind Development shall prepare and submit for review and approval a revised Plan. The Surface Treatment Plan shall include:</p> <ul style="list-style-type: none"> • Specification and 11" x 17" color simulations at life-size scale of the treatment proposed for use on project structures, including structures treated during manufacture • A list of each major project structure, building, tower and/or pole, and fencing specifying the color(s) and finish proposed for each (colors must be identified by name and by vendor brand or a universal designation) • Two sets of brochures and/or color chips for each proposed color • A detailed schedule for completion of the treatment • Procedures to ensure proper treatment maintenance for the life of the project. Pacific Wind Development shall not specify to vendors the treatment of any buildings or structures treated during manufacture or perform the final treatment on any buildings or structures treated onsite, until Pacific Wind Development receives notification of approval of the Surface Treatment Plan by the BLM. Within 30 days following the start of commercial operation, Pacific Wind Development shall notify the BLM that all buildings and structures are ready for inspection. 	
111.	Visual Resources	D.3-147	<p>VIS-3h. Screen substations and ancillary facilities. Pacific Wind Development shall provide a Screening Plan for screening vegetation, walls, and fences that reduce visibility of ancillary facilities and</p>	<p>Please consider removing this mitigation as project has already proposed the facility to be constructed to blend into the environment as part of the project design.</p>

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			<p>helps the facility blend in with the landscape. The use of berms to facilitate project screening may also be incorporated into the Plan. Pacific Wind Development shall submit the Plan to the BLM for review and approval at least 90 days before installing the landscape screening. If the BLM notifies Pacific Wind Development that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, Pacific Wind Development shall prepare and submit for review and approval a revised Plan. The Plan shall include but not necessarily be limited to:</p> <ul style="list-style-type: none"> An 11"x 17" color simulation of the proposed landscaping at 5 years A plan view to scale, depicting the project and the location of screening elements A detailed list of any plants to be used; their size and age at planting; the expected time to maturity, and the expected height at 5 years and at maturity <p>Pacific Wind Development to complete installation of the screening before the start of project operation Pacific Wind Development shall notify the BLM within 7 days after completing installation of the screening that the screening components are ready for inspection.</p>	
112.	Visual Resources	D.3-149	<p>MM VIS-3m: Reduce visual impacts resulting from landscaping and native tree removal. In the event that ornamental or native trees within the project area will be removed due to project design and grading, the project applicant shall prepare a Landscape Treatment Plan to be submitted with the Surface Treatment Plan. The Landscape Treatment Plan shall include but is not limited to the following:</p> <ul style="list-style-type: none"> • Tree Removal Locations: Indicate the size, type, and location of each tree (additional items, such as a tree survey by a professional engineer or licensed land survey, may be required.) • Tree Replacement Plan: The Tree 	<p>Please consider removing this unnecessary mitigation measure. This mitigation measure is presented as part of the project design (APM TULE-BIO-13 and AES-11).</p> <p>The AED presented mitigation to reduce impacts of coastal live oak woodlands and oakwood protection zones in accordance with the County of San Diego. Any removed trees due to the project would be mitigated at a 3:1 ratio based on permanent impacts. A tree replacement plan would not be required if the AED mitigation was utilized as proposed.</p>

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			<p>Replacement Plan shall assess the health and structural conditions, soils, tree size (trunk diameter, basal diameter, height, canopy spread), pest and disease presence, and accessibility of native oak trees to be removed due to project design and grading in order to determine whether existing trees can be transplanted outside the project footprint post construction. If the assessment determines native oak trees can be transplanted, the oaks would be augmented with additional oak plantings in case the larger trees decline and are lost as a result of the relocation process. If native oak trees cannot be transplanted, the Tree Replacement Plan shall indicate the size, type, and location of each proposed replacement tree (additional items, such as a tree survey by a professional engineer or licensed land survey, may be required).</p> <ul style="list-style-type: none"> • Photos of the site and/or trees to be removed. • Oak replacement plan focusing on oak tree planting with smaller container trees at higher numbers, recommended at least 5:1 with 15 gallon size trees. <p>The Landscape Treatment Plan must minimize mature tree loss to the degree feasible. The Landscape Treatment Plan shall be submitted to the appropriate land use jurisdiction agency for approval at least 90 days prior to planned tree removal. If BLM, San Diego County, CSLC, BIA, and/or the Ewiiapaayp Band of Kumeyaay Indians notifies the Pacific Wind Development that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, Pacific Wind Development shall prepare and submit the revised</p>	

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			Landscape Treatment Plan for review and approval.	
113.	Visual Resources	D.3-149	<p>VIS-3n. Reduce potential visual impacts of wind turbines and ancillary facilities. The project applicant will treat shall submit to the appropriate land use jurisdiction agency a Surface Treatment Plan describing the design and application of colors and textures to all new wind turbine facilities, structure buildings, walls, fences, and components comprising all ancillary facilities including the collector station substation. The Surface Treatment Plan must to reduce glare and minimize visual intrusion and contrast to the degree feasible. The Surface Treatment Plan shall be submitted to the appropriate land use jurisdiction agency for approval at least 90 days prior to either (a) ordering the first structures that are to be color treated during manufacture or (b) construction of any of the ancillary facility components, whichever comes first. If the appropriate land use jurisdiction notifies the project applicant that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, the project applicant shall prepare and submit for review and approval a revised Surface Treatment Plan. Pacific Wind Development shall submit to the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed) a Surface Treatment Plan describing the design and application of colors and textures to all new wind turbine facilities, structure buildings, walls, fences, and components comprising all ancillary facilities including the collector station substation. The Surface Treatment Plan must reduce glare and minimize visual intrusion and contrast to the degree feasible. The Treatment Plan shall be submitted to the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the</p>	Please consider revising this mitigation measure. A Surface Treatment Plan was not presented as a mitigation measure in the AED. The project will comply with FAA regulations relative to obstruction marking and lighting. See Attachment D.3.2, FAA Letter (November 2010) and Attachment D.3.3, FAA Memo (June 19, 2009).

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			<p>construction activities are being completed) for approval at least 90 days before (a) ordering the first structures that are to be color treated during manufacture or (b) construction of any of the ancillary facility components, whichever comes first. If the BLM, San Diego County, CSLC, BIA, and Ewiiapaayp Band of Kumeyaay Indians (depending on the jurisdiction where the construction activities are being completed) notifies Pacific Wind Development that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, Pacific Wind Development shall prepare and submit for review and approval a revised Plan.</p>	
114.	Visual Resources	D.3-150	<p>VIS 4a. Reduce long term night lighting impacts from substations and ancillary facilities.</p> <p>Pacific Wind Development shall design and install all permanent lighting such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Construction Lighting Mitigation Plan shall be reviewed for consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6322 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. Pacific Wind Development shall submit a Lighting Mitigation Plan to the BLM for review and approval at least 90 days before ordering any permanent exterior lighting fixtures or components. Pacific Wind Development shall not order any exterior lighting fixtures or components until the Lighting Mitigation Plan is approved by the BLM. The Plan</p>	<p>Please consider removing this unnecessary mitigation measure. This mitigation measure is identified as part of the project design in the AED (APM TULE-AES-7).</p>

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			<p>shall include but is not necessarily limited to the following:</p> <ul style="list-style-type: none"> • Lighting shall be designed so exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary. • All lighting shall be of minimum necessary brightness consistent with worker safety. • High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied. 	
115.	Visual Resources	D.3-151	<p>VIS 4b. Incorporate Obstacle Collision Avoidance System (OCAS) onto Tule Wind Project wind turbines. The project applicant shall install the OCAS lighting system on all proposed wind turbines in order to minimize nighttime lighting impacts attributed to the operation of FAA required obstruction lighting. As the OCAS and other Audio Visual Warning Systems (AVWS) have been approved by the FAA and are considered to be suitable alternatives to the marking and lighting requirements as recommended in FAA Advisory Circular (AC) 70/7460-1K, installation of this system would be compatible with FAA requirements.</p>	<p>This mitigation measure cannot be implemented for the project at this time. Please consider removing the mitigation due to this presented information confirming the mitigation is not feasible.</p> <p>The OCAS system is not approved by the FAA and is unable to approve requests for this system; therefore, it cannot be implemented at this time. See Attachment D.3.2, FAA Letter (November 2010) and Attachment D.3.3, FAA Memo (June 19, 2009).</p>
116.	Visual Resources	D.3-151	<p>TULE AES 5. To minimize the collector cable system's visual impacts, a portion of the system would be installed underground.</p>	<p>Please consider removing this APM from the mitigation measure table or include all APMs for visual resources. APMs are presented in the Project Description Section B, Table B-12.</p>
117.	Visual Resources	D.3-152	<p>TULE AES 9. Dull gray porcelain insulators would be installed at the collector substation to reduce insulator visibility.</p>	<p>Please consider removing this APM from the mitigation measure table or include all the APMs for visual resources. APMs are presented in the Project</p>

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				Description Section B, Table B-12.
118.	Visual Resources	D.3-157 Significant and Unmitigable Impacts Table D.3-8 and following discussion	<p>TULE-VIS-1 The project would have a substantial adverse effect on a scenic <u>vistas located on County lands.</u></p> <p>Wind turbines would be located in the foreground viewing distance from the Carrizo Overlook and highly visible from the Ribbonwood Trail and Ribbonwood Road Pathway. There is no feasible mitigation that could screen views of wind turbines or better blend the wind turbines into the existing environment such that scenic views from these locations would not be obstructed or degraded.</p> <p>TULE-VIS-1. Feasible alternatives are not available to reduce visual contrasts caused by the installation of wind turbines in the project area. Due to their large size and striking color, wind turbines could not be effectively screened from the views afforded to visitors at the Carrizo Gorge or recreationist's utilizing the Ribbonwood Trail and Ribbonwood Road Pathway. Turbines would be highly visible in the project area and would dominate the visual landscape. Therefore, there is no feasible mitigation that could reduce anticipated scenic vista impacts to a level that is less than significant.</p>	<p>This impact is overstated. Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV for visual classification, which takes into consideration reduced visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, visual impacts located on BLM jurisdictional lands are less than significant.</p> <p>As presented in the AED, the area of Ribbonwood Road north of I-8 is the only identified area to have significant impacts to scenic vistas. Class I impact should only pertain to KOP 10 (Tule KOP 2), with the remaining KOP identified as a Class III.</p>
119.	Visual Resources	D.3-157 Table D.3-8 and following discussion	<p>TULE-VIS-3 The project would substantially degrade the existing visual character or quality of the site and its surroundings.</p> <p>The Tule wind turbines would cause profoundly strong visual contrasts up to 5 miles away due to the more than 400-foot tall scale and vertical form of the turbine towers, their light color, and the movement of blades.</p>	<p>This impact is overstated. Many of the KOPs identified are located on BLM lands. BLM has classified the McCain Valley area as a Class IV for visual classification, which takes into consideration reduced visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, visual impacts located on BLM jurisdictional lands are less than significant.</p> <p>Furthermore, the McCain Valley area is identified for the construction of the approved Sunrise</p>

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				<p>Powerlink 500 kV 90-170 feet high transmission line. If constructed, this power line will be the dominant feature in the area. Once constructed, the proposed 138 kV transmission line will be approximately 75 feet, or 15 to 95 feet shorter than the 500 kV line.</p> <p>As presented in the AED, the area of Ribbonwood Road north of I-8 is the only identified area to have significant impacts to scenic vistas. Class I impact should only pertain to KOP 10 (Tule KOP 2), with the remaining KOP identified as a Class III.</p>
120.	Visual Resources	D.3-157 Table D.3-8 and following discussion	<p>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.</p> <p>Obstruction lighting would be required for the proposed wind turbines (per FAA regulations). Although the implementation of Mitigation Measure VIS-4b would minimize nighttime lighting impacts by incorporating the OCAS on proposed wind turbines, the potential for nighttime lighting would not be avoided entirely and lighting would be a source of annoyance for residents in the McCain Valley and Boulevard areas, and nighttime views for these residents would be affected.</p>	<p>The O&M/Substation facility is proposed to be located on BLM jurisdictional lands and would not be subject to County requirements. However, 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 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).</p> <p>The OCAS system is not approved by the FAA; therefore, it cannot be implemented at this time. See Attachment D.3.2, FAA Letter (November 2010) and Attachment D.3.3, FAA Memo (June 19, 2009).</p> <p>Please consider revising to reflect this information.</p>
121.	Visual Resources	D.3-157 Table D.3-8 and following	<p>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.</p>	<p>As stated previously, these County ordinances would not apply to the proposed project. The following goals and polices are considered consistent with the project; therefore, no impact is identified. Please consider changing the</p>

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		discussion	Inconsistency with the Scenic Highway Goal of the Mountain Empire Subregional Plan stems from the project's overall visibility from I-8 and the inconsistency with Zoning Ordinance Section 6324 relates to the inability to ensure that light trespass resulting from nighttime wind turbine lighting would not spill over into adjacent residential properties.	determination to reflect this information.
122.	Visual Resources	D.3-239	Figure D.3-15A KOP 10–Existing Setting (ES)	This view contains cloudy conditions. Please consider changing to cloudless sky condition.
123.	Visual Resources	D.3-241	Figure D.3-15B KOP 10–Visual Simulation of Proposed Tule Wind Project (VS)	This view contains cloudy conditions. Please consider changing to cloudless sky condition.
124.	Visual Resources	D.3-243	Figure D.3-15C KOP 10–Visual Simulation of Tule Wind Alternative Project (AVS)	This view contains cloudy conditions. Please consider changing to cloudless sky condition.
125.	Visual Resources	D.3-249	Figure D.3-16C KOP 11–Visual Simulation of Proposed Tule Wind Project (VS2)	Please consider removing KOP 11- VS2. No existing condition for this simulation was presented in the AED and it uses cloudy conditions which does not present the worst case scenario as a sunny cloudless view.
126.	Visual Resources	D.3-259	Figure D.3-18A KOP 13–Existing Setting (ES)	Please consider revising KOP 13 – ES and VS to be consistent and use the same scale to avoid overstating project impacts.
127.	Visual Resources	D.3-261	Figure D.3-18B KOP 13–Visual Simulation of Proposed Tule Wind Project (VS)	Please consider revising KOP 13 – ES and VS to be consistent and use the same scale to avoid overstating project impacts.
128.	Visual Resources	D.3-263	Figure D.3-19A KOP 14–Existing Setting (ES)	Please change the Class A rating to a Class C as the view of Carrizo Gorge to the east is considered the Class A which will not be impacted due to the wind

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				<p>turbines.</p> <p>Cloudy conditions do not depict the view of the Campo turbines sufficiently. Please consider updating view to a cloudless condition.</p>
129.	Visual Resources	D.3-265	Figure D.3-19B KOP 14–Visual Simulation of Tule Wind Project (VS)	<p>Please change the Class A rating to a Class C as the view of Carrizo Gorge to the east is considered the Class A which will not be impacted due to the wind turbines.</p> <p>Cloudy conditions do not depict the view of the Campo turbines sufficiently. Please consider updating view to a cloudless condition.</p>
130.	Visual Resources	D.3-275	Figure D.3-21A KOP 16–Existing Setting (ES)	Please consider removing this KOP. No simulation was produced for this view, therefore no determinations can be made.
131.	Visual Resources	D.3-277	Figure D.3-21B KOP 16–Proposed Tule Wind Project Component Location	Please consider removing this KOP. No simulation was produced for this view, therefore no determinations can be made.

Attachments

D.3.1 - Table Comparing Tule and Draft EIR/EIS Key Observation Points (KOPs)

D.3.2 - Federal Aviation Administration (Sheri Edgett Baron). Letter to American Wind Energy Association (Mr. Tom Vinson, Director of Federal Regulatory Affairs) (November 2010)

D.3.3 - Federal Aviation Administration (Kevin Haggerty, Manager). Memorandum to Obstruction Evaluation Services Personnel (June 15, 2009)

D.3.4 - Dark Sky Memo

F.1 - Revised Visual Simulation with Sunrise 500kV Line (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.4: Land Use

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1.	Land Use	General Comment throughout document	<p><i>Add after mention of County of San Diego Draft General Plan Update add:</i></p> <p>(April 2, 2010), this plan has not yet been adopted</p>	<p>This textual revision should be made throughout the Land Use section and will specify the version of the Draft General Plan Update that was used for analysis in the DEIR/DEIS. In addition, it is important to note that the General Plan Update has not yet been adopted, and there is no specific anticipated date of adoption.</p>
2.	Land Use	D.4-1	<p><i>Third paragraph</i></p> <p>Pacific Wind Development's <u>Tule Wind LLC's</u> Environmental Document for the Tule Wind Project (Iberdrola Renewables, Inc. 2010) and Energia Sierra Juarez (ESJ) U.S. Transmission, LLC's, Major Use Permit Package (submitted to the County of San Diego in October 2008) and Initial Study (March 2010) were also reviewed.</p>	<p>Global Comment- Project assets have been transferred from Pacific Wind Development, LLC to Tule Wind, LLC. Both are wholly owned subsidiaries of Iberdrola Renewables, Inc.</p> <p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p>
3.	Land Use	D.4-2	<p><i>Second paragraph</i></p> <p>Existing and proposed land use information was obtained from the Regional Land Use Element of the County of San Diego General Plan (County of San Diego 2003), applicable General Plan maps for the communities of Jacumba and Boulevard, and the <u>Draft Mountain Empire Subregional Plan (County of San Diego 2010a), including the Draft Boulevard Subregional Planning Area Community Plan.</u></p>	<p>Please specify that the Draft Mountain Empire Subregional Plan and Draft Boulevard Subregional Plan were used as a basis for analysis within the DEIR/EIS.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
4.	Land Use	D.4-5 Table D.4-1	<p><i>Project Component, Jurisdiction & Miles/Acres under Jurisdiction (2nd thru 4th columns, Tule Wind Project Rows 6 thru 15)</i></p> <p><i>Wind Turbines and 34.5 kV Overhead and Underground Collector Cable System</i></p> <p>Ewiiapaay Band of Kumeyaay Indians (47<u>18</u> wind turbines) - 20.2 <u>51.6</u> acres BLM (97 <u>96</u> wind turbines) - 280 <u>277.9</u> acres CSLC (7 wind turbines) - 37.5 <u>20.7</u> acres County of San Diego (13 <u>7</u> wind turbines) - 49 <u>19.1</u> acres</p> <p><i>Collector Substation</i></p> <p>BLM - 5 acres</p> <p><i>Operations & Maintenance Facility</i></p> <p>BLM - 5 acres</p> <p><i>Meteorological Towers <u>and SODAR/LIDAR</u></i></p> <p>BLM - 0.062 <u>83</u> acres</p> <p><i>138 kV Transmission Line</i></p> <p>BLM - 7.42 <u>5.91</u> miles County of San Diego - 1.96 <u>3.05</u> miles State of California - 0.36 <u>0.26</u> miles</p> <p><i><u>New Roadways/Improved Roadways</u></i></p> <p><u>Ewiiapaay Band of Kumeyaay Indians - 12.3 miles</u> <u>BLM - 36.2 miles</u> <u>CSLC - 3.3 miles</u> <u>County of San Diego - 8.4 miles</u></p>	Please reflect the maximum potential impacts for all project components and update calculation of impacts for all project components accordingly using the data and analysis for the Modified Project Layout provided.
5.	Land Use	D.4-6	<p><i>Planned Land Uses fourth paragraph:</i></p> <p>Started in 1998, preparation of this plan has been a multiyear effort. Although the date of adoption of the plan is <u>was</u> anticipated in the fall of 2010; <u>it has yet to be adopted at the time of preparation of this DEIR/DEIS.</u></p>	Please consider the following textual revision. The fall of 2010 has passed and the County General Plan is yet to be adopted.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
6.	Land Use	D.4-7	<p><i>Second paragraph (added)</i></p> <p>Additionally, the Draft General Plan Update modifies, and in some cases, omits existing goals and policies of the Existing General Plan and Mountain Empire Subregional Plan. For example, Policy (18) Multiple Rural Use of the existing General Plan is proposed to be deleted in the most recent version of the Draft General Plan Update (Oct. 2010, see http://www.sdcounty.ca.gov/dplu/gpupdate/docs/bos_oct_2010/B1_02_landuse.pdf). In addition, Policy and Recommendation 11 of the Mountain Empire Subregional Plan is proposed to be deleted in the most recent version of the Draft General Plan Update (Oct. 2010).</p> <p>A description of the new land use designations is provided in Table D.4-2.</p>	Please consider adding proposed text to give the reader an understanding of the proposed changes to the applicable land use policies and provisions of the Draft General Plan Update.
7.	Land Use	D.4-7 Table D.4-2	<p><i>Column 1 – (Land Use Designation)</i></p> <p>Federal and State <u>Public Agency</u> Lands (State Parks and National Forests)</p>	Please revise the land use designation per the Proposed General Plan Update - Recommended Project (October, 2010)
8.	Land Use	D.4-11	<p><i>Third paragraph</i></p> <p>The Ewiiapaayp Band of Kumeyaay Indians has developed an Integrated Resource Management Plan (IRMP) that governs (among other issues) development activities on the reservation. Currently, tribal lands do not have land use designations (Iberdrola Renewables, Inc. <u>Tule Wind, LLC 2010</u>).</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
9.	Land Use	D.4-11 and D.4-12 Table D.4-4	<p><i>Second Column – (Permitted Uses)</i></p> <p>S80 (Open Space) - This zone is intended to provide controls for land identified as unsuitable for intense development; permitted uses include those having a minimal impact on the natural environment. All development projects occurring within the S80 zone are subject to site plan review. <u>Minor and major impact utilities are conditionally permitted uses in the zone.</u></p>	Please consider including similar language for the S80 and A72 zoning classification description of permitted uses as stated for the S92 description of permitted uses.

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			A72 (General Agriculture) - This zone is intended to “create and preserve areas for the raising of crops and animals.” In addition, supportive residential uses, the processing of products produced on the premises, and limited commercial activities are also permitted. <u>Minor and major impact utilities are conditionally permitted uses in the zone.</u>	
10.	Land Use	D.4-32	In addition to BLM-administered lands, components of the Tule Wind Project would be located on lands owned by the CSLC and the Ewiiapaayp Band of Kumeyaay Indians, <u>the Campo and Manzanita Reservations (access only)</u> , as well as on privately owned County of San Diego jurisdictional lands.	Please update language to reflect all jurisdictions involved.
11.	Land Use	D.4-32	Clover Flat Elementary is located <u>approximately 1.25 miles</u> west of the proposed 138 kV transmission line interconnect in Boulevard, and the existing 50-megawatt (MW) Campo wind farm is located east <u>west</u> of McCain Valley on the Campo Indian Reservation.	Please update language to reflect accurate distance to Clover Flat Elementary and location of Campo wind farm relative to McCain Valley.
12.		D.4-33	<p><i>First paragraph</i></p> <p>The County would, however, have land use jurisdiction over proposed turbines in the R turbine string and approximately 2 <u>3</u> miles of the 138 kV transmission line traversing County land.</p> <p><i>Second paragraph</i></p> <p>...As shown on Figure D.4-1, Vicinity/Overview Map, components of the Tule Wind Project would not be located within designated wilderness areas or wilderness study areas; however, several turbines within the proposed J <u>H</u> turbine string would be located on Ewiiapaayp Band of Kumeyaay Indians tribal lands within 100 feet of the Sawtooth Mountains Wilderness. Also, 4 <u>5</u> proposed turbines in the R turbine string would be located east of McCain Valley Road on a discontinuous island of private County of San Diego jurisdictional land surrounded by the In-Ko-Pah ACEC...</p>	Please update language to reflect the Modified Project Layout.

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13.	Land Use	D.4-34	<p><i>First paragraph</i></p> <p>Several turbines would be located on land under the jurisdiction of the CSLC and Ewiiapaayp Band of Kumeyaay Indians. To construct and operate wind turbines and the associated underground collector cable system on these lands, Pacific Wind Development <u>Tule Wind, LLC</u> would enter into lease agreements for the land in question with the CSLC and Ewiiapaayp Band of Kumeyaay Indians.</p> <p><i>Second paragraph</i></p> <p>To reiterate, although the County has applied land use and zoning designations, these lands are the majority of the project area is under sole land use jurisdiction of the BLM. Only those project components under the land use jurisdiction of the County would be subject to the County's General Plan and Zoning Ordinance.</p> <p><i>Third paragraph</i></p> <p>With the adoption of the County's Draft General Plan Update, the General Plan land use designation of lands underlying nearly all of the proposed wind turbines and associated overhead and underground collector cable system locations would be redesignated Public Agency Lands. Lands underlying turbines R1 through R10 and R13 in the R-string (R7 through R11 and R1 and R2) would be redesignated Rural Lands (RL 80).</p> <p><i>Fourth paragraph</i></p> <p>As shown on Figure D.4-8, Tule Wind Project Existing Land Use Overview, and Figures D.4-8a through D.4-8c, sensitive receptors (primarily residences) would be located within the vicinity of project components. Although no residences would be located within 1,000 <u>2,000</u> feet of a proposed turbine location, several</p>	<p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p> <p>Please update language to clarify land use designations and jurisdiction over the project area.</p> <p>Please update language to clarify distances to sensitive receptors per the Modified Project Layout.</p>

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			<p>residences/structures <u>properties</u> would be located within approximately 2,000 feet of turbines (G18, R2, K5)¹. In addition, w Wind turbines would also be located within 1,300 feet of the Lark Canyon and Cottonwood campgrounds (both located on BLM-administered land within the McCain Valley National Cooperative Land and Wildlife Management Area).</p> <p>The number of residences <u>with property boundaries located</u> within approximately 2,000 feet of proposed wind turbines is provided in Table D.4-8.</p> <p><i>Please insert footnote:</i></p> <p>¹See Section D.8, Noise (Table D.8-12)</p>	
14.	Land Use	D.4-35 – D.4-45 Figures D.4-8 through D.4-10	<p>Please update the Tule Wind Project Figures D.4-8 through D.4-10 with the modified project layout.</p> <p>In addition, in the legend for “Tule Wind Project Components” in Figures D.4-8 through D.4-10, please indicate that the following project features are temporary:</p> <ul style="list-style-type: none"> * 2-acre <u>Temporary Laydown Areas</u> * 5-acre <u>Temporary Concrete Batch Plant</u> * 10-acre <u>Temporary Parking Area</u> 	Please consider making the textual changes suggested to the legend to accurately reflect the extent of permanent and temporary project impacts
15.	Land Use	D.4-43 Figure D.4-9	<p><i>Please identify the Ewiiapaayp Reservation as “<u>Indian Reservation</u>”</i></p> <p><i>“Indian Reservation” should be red to match legend</i></p>	“Indian Reservation” should be red to match legend.
16.	Land Use	D.4-47 - D.4-48 Table D.4-7	<p><i>Table D.4-7, Existing and Designated Land Uses – Tule Wind Project</i></p> <p>Please see edits made in track changes to Table D.4-7 reflecting changes resulting from the Modified Project Layout. Clarifications and revisions are imbedded within the document and should be included in the Final EIR/EIS.</p>	The Modified Project Layout includes changes to the turbine strings and associated project components. Please update table to reflect corrected analysis, turbine strings, and land use designations per the Modified project Layout.

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17.	Land Use	D.4-49 Table D.4-8	<p>Closest Turbine Approx. Distance from <u>Property Line</u> to Turbine (feet) Number of Residences/ Structures Orientation from the Turbine</p> <table border="1"> <tr> <td>G1819</td> <td>9061,800</td> <td>4424</td> <td></td> </tr> <tr> <td>(Rough Acres Ranch)</td> <td></td> <td>southeast</td> <td></td> </tr> <tr> <td>R21</td> <td>1,5292,100</td> <td>1</td> <td>northeast</td> </tr> <tr> <td>K5</td> <td>2,080</td> <td>1</td> <td></td> </tr> </table> <p>Source: Section D.8, Noise (Table D.8-12) Note: distance measured from the property line to turbine</p> <p>As shown in Table D.4-8 and on Figure D.4-8, Tule Wind Project Existing Land Use Overview, approximately 2645 residences/structures would be with property boundaries located within approximately 2,000 feet of a proposed wind turbine; however, no residences/structures would be located within 2,000 feet of a proposed turbine. Most <u>Although not located within 2,000 feet of a proposed turbine, most (4424) of the nearest</u> residences/structures identified are the main lodge, duplexes, and other structures (e.g., a bunkhouse, ranch facilities) located on Rough Acres Ranch (SDG&E is proposing to use the duplex structures during construction of the Sunrise Powerlink Project). The remaining residences/structures is a <u>are</u> single-family homes.</p>	G1819	9061,800	4424		(Rough Acres Ranch)		southeast		R21	1,5292,100	1	northeast	K5	2,080	1		Please update table and analysis to reflect the Modified Project Layout. It should be noted that no residences would be located within 2,000 feet of a proposed turbine location. The nearest residence would be located approximately 2,400 feet away from Turbine R2. The revisions to Table D.4-8 indicate that distance to turbines is measured from the property line, and as shown in Table D.4-8, no residence would be located within 2,000 feet of a proposed turbine.
G1819	9061,800	4424																		
(Rough Acres Ranch)		southeast																		
R21	1,5292,100	1	northeast																	
K5	2,080	1																		
18.	Land Use	D.4-49 – D.4-50	<p><i>Fourth paragraph</i></p> <p>Meteorological Towers and Sonar/<u>LIDAR</u> Detecting and Ranging Unit</p> <p>As shown on Figures D.4-8, Tule Wind Project Existing Land Use Overview, and D.4-8b, Tule Wind Project Existing Land Uses, two three meteorological towers and one Sonar Detecting and Ranging (SODAR) <u>or Light Detecting and Ranging (LIDAR)</u> unit would be installed on the Tule Wind Project site to monitor wind speed and direction (two three alternate meteorological tower locations are also depicted on Figure D.4-8). Proposed meteorological (PM) tower PM E-1 would be</p>	Three MET towers are proposed for the Tule Wind Project. Please update the discussion for the Tule Wind Project using the data and analysis for the Modified Project Layout provided. Additionally, Tule Wind, LLC would like the flexibility to utilize a LIDAR unit in place of a SODAR unit if feasible.																

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			<p>installed approximately 2,600 feet northeast of the collector substation, and PM W-2 would be installed within the Lark Canyon Off-Highway-Vehicle (OHV) Area, approximately 2,600 feet west of the Lark Canyon Campground and <u>PM-X1 would be installed on the ridge in the northern portion of the project area.</u> As proposed, the SODAR/<u>LIDAR</u> unit would be installed within the Lark Canyon OHV Area, approximately 2,600 feet west of the Lark Canyon Campground. The SODAR/<u>LIDAR</u> unit would be installed immediately west of meteorological tower PM W-2. These project components would be entirely under the land use jurisdiction of the BLM; however, as shown on Figures D.4-9, Tule Wind Project General Plan Land Use Designations, and D.4-10, Tule Wind Project Zoning Map, PM E-1 and <u>PM-X1</u> would be located on land designated Public/Semi-Public Lands and zoned S80 (Open Space); and <u>PM W-2</u> (and the SODAR/<u>LIDAR</u> unit) would be located on land designated General Agriculture and zoned A72 (General Agriculture) by the County.</p>	
19.	Land Use	D.4-50 – D.4-51	<p><i>Second paragraph</i></p> <p>With adoption of the County’s Draft General Plan Update, the General Plan land use designation of the proposed meteorological towers and SODAR/<u>LIDAR</u> unit sites would be redesignated Public Agency Lands.</p> <p><i>Third paragraph</i></p> <p>As shown on Figure D.4-8, Tule Wind Project Existing Land Use Overview, the proposed meteorological towers and SODAR/<u>LIDAR</u> unit would be located on land ...</p> <p><i>Fourth paragraph (Overhead 138 kV Transmission Line)</i></p> <p>As shown on Figures D.4-1, Vicinity/Overview Map, D.4-8, Tule Wind Project Existing Land Use Overview, and D.4-8b and D.4-8c (Tule Wind Project Existing Land Uses), the overhead 9.79.2-mile, 138 kV</p>	<p>Please consider updating language to include the option for a LIDAR unit.</p> <p>Please revise language to reflect corrected analysis per the Modified Project Layout. Please consider updating language to include all underlying land use designation for each project component in discussion.</p>

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			<p>transmission line route would travel in a southwestern direction from the collector substation through vacant, undeveloped BLM-administered lands (within the McCain Valley National Cooperative Land and Wildlife Management Area) and vacant, undeveloped County jurisdictional land (a discontinuous swath of Rough Acres Ranch property) abutting McCain Valley Road. East of Rough Acres Ranch, the transmission line would traverse undeveloped land including BLM-administered land abutting the In-Ko-Pah Mountains ACEC, an isolated parcel of Rough Acres Ranch, and the easternmost portion of the CAL FIRE/California Department of Corrections McCain Valley Conservation Camp prior to crossing I-8. To span I-8, Pacific Wind Development <u>Tule Wind, LLC</u> would obtain an Encroachment Permit from Caltrans (permits required for spanning roadways is further discussed in Section D.9, Transportation and Traffic). After crossing I-8, the transmission line would travel in a southwesterly direction adjacent to Old Highway 80 and toward the Boulevard Substation where it would interconnect. As shown on Figure D.4-9, Tule Wind Project General Plan Overview Map, and Figure D.4-10, Tule Wind Project Zoning Map, the proposed transmission line would traverse land designated <u>Public/Semi-Public Lands</u>, General Agriculture, Multiple Rural Use (1 DU/4, 8, 20 AC), and land zoned <u>S80 (Open Space)</u>, <u>A72 (General Agriculture)</u> and <u>S92 (General Rural)</u> by the County (the approximate 23-mile segment of the proposed transmission line under the land use jurisdiction of the County would traverse land designated <u>General Agriculture (A72)</u>, Multiple Rural Use (1 DU/4, 8, 20 AC) and zoned <u>S92 (General Rural)</u>).</p>	

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20.	Land Use	D.4-54 Table D.4-11	<p><i>Applicable Regulations, Plans, and Standards (Third Column, Second Row)</i></p> <p>County of San Diego (turbines R1, <u>R2</u>, and <u>R7</u> through R13<u>R11</u>)</p> <ul style="list-style-type: none"> • County of San Diego Existing General Plan • County of San Diego Zoning Ordinance • Mountain Empire Subregional Plan • County of San Diego Draft General Plan Update <p><i>Project Component (Second Column, Fourth Row)</i></p> <p>Collector Substation, O&M Facility, Meteorological Towers, and SODAR/<u>LIDAR</u> Unit</p> <p><i>Applicable Regulations, Plans, and Standards (Third Column, Fifth and Sixth Row)</i></p> <p>Bureau of Land Management (7-4-5.9 mile segment):</p> <ul style="list-style-type: none"> • Eastern San Diego County RMP/ROD <p>County of San Diego (2-mile <u>3-mile</u> segment):</p> <ul style="list-style-type: none"> • County of San Diego General Plan • County of San Diego Zoning Ordinance • Mountain Empire Subregional Plan • County of San Diego Draft General Plan 	Please revise language to reflect corrected analysis per the Modified Project Layout. Please remove the County of San Diego Draft General Plan from the applicable plans columns as this document is in Draft form and has not been adopted by the County Board of Supervisors. Therefore, regulations, plans, and standards contained therein are not applicable to the proposed Tule Wind Project.
21.	Land Use	D.4-61	<p><i>Third paragraph</i></p> <p>In 2005, Congress established a renewable energy goal of at least 10,000 MW of renewable energy projects located on public lands by 2015 (Iberdrola Renewables, Inc. <u>Tule Wind, LLC</u> 2010).</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
22.	Land Use	D.4-69	<p><i>Fourth paragraph</i></p> <p>In addition, 13 <u>7</u> wind turbines and an approximate 2 <u>3</u> mile segment of the 138 kV transmission line of the Tule Wind Project would be under the land use jurisdiction of the County; therefore, County of San Diego policies and plans are listed as follows to assist in determining land use compatibility.</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.

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23.	Land Use	D.4-70	<p><i>Third paragraph and bulleted items</i></p> <p>The following goals and policies of the Existing General Plan Land Use Element are applicable to the Proposed PROJECT (County of San Diego 2003):</p> <ul style="list-style-type: none"> • Land Use Goal 2.1: Promote wise uses of the County's land resources, preserving options for future use. • Land Use Goal 2.3: Retain the rural character of non-urban lands. • Land Use Environmental Goal 3.1: Protect lands needed for preservation of natural and cultural resources; managed production of resources; and recreation, education, and scientific activities. • Land Use Environmental Goal 3.2: Promote the conservation of water and energy resources. • Regional Categories Policy 1.4 (Rural Development Area): Proof of long-term groundwater supply is provided. • <u>Non-Urban Residential Designation Policy 18 (Multiple Rural Use):</u> <u>Other than a single-family home on an existing lot, it is not intended that any development occur unless the proposed development has been carefully examined to assure that there will be no significant adverse environmental impacts, erosion and fire problems will be minimal, and no urban levels of service will be required.</u> 	Please add the additional land use policy applicable to the gen-tie portion of the Tule Wind Project.
24.	Land Use	D.4-74	<p><i>Last three paragraphs</i></p> <p>County of San Diego Draft General Plan Update</p> <p>Originally undertaken in 1988, the comprehensive Draft General Plan Update (County of San Diego 2010a) is still being prepared. The current project schedule has the General Plan Update going to the County Board of Supervisors for <u>adoption in late 2010 hearings</u></p>	Please clarify the status of the Draft General Plan Update and consider adding language to indicate that the policies and goals contained within the Draft General Plan Update are not applicable to the Proposed PROJECT because they have yet to be adopted and are subject to change. Please also consider adding proposed text to give the reader an understanding of the proposed changes to the applicable land use policies and provisions of the Draft General Plan Update.

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			<p>throughout 2011; however, the adoption date is <u>unknown</u>. Although the Draft General Plan Update and updated elements are not yet approved, the existing General Plan Land Use Element was reviewed during preparation of this section. It should be noted that the Draft General Plan Update also contains the Draft Boulevard Subregional Planning Area Community Plan, which contains goals and policies specifically related to wind and/or renewable energy projects. It should be noted that the goals and policies of the Draft General Plan Update have not been formally adopted and are subject to change in future iterations of the plan, and are therefore not applicable to the Proposed PROJECT.</p> <p><u>It should be noted that Draft General Plan Update modifies, and in some cases, omits existing goals and policies of the Existing General Plan and Mountain Empire Subregional Plan that are currently applicable to the Tule Wind Project. For example, Policy (18) Multiple Rural Use of the existing General Plan is proposed to be deleted in the most recent version of the Draft General Plan Update (Oct. 2010, see http://www.sdcounty.ca.gov/dplu/gpupdate/docs/bos_oct2010/B1_02_landuse.pdf). In addition, Policy and Recommendation 11 of the Mountain Empire Subregional Plan is proposed to be deleted in the most recent version of the Draft General Plan Update (Oct. 2010).</u></p> <p>A review of the Draft General Plan Update indicated that Many goals and policies from several plan elements of the Draft General Plan Update would be applicable to the Proposed PROJECT if it were adopted. Therefore, the following policies and goals identified are presented by plan element.The following goals and policies of the County of San Diego Draft General Plan Update and Draft Boulevard Subregional Planning Area Community Plan are associated with land use <u>are presented by element for informational purposes; however, the</u></p>	

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			<p>following goals and policies <u>and</u> are <u>not</u> applicable to the Proposed PROJECT because <u>the Draft General Plan and Draft Boulevard Subregional Plan have not yet been adopted and remain subject to change:</u></p>	
25.		D.4-76	<p><i>Sixth bullet (Policy LU-8.3)</i></p> <p>Policy LU-8.3: Groundwater Dependent Habitat. Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat, except in the Borrego Valley.</p>	<p>Please consider modifying language to be consistent with policies outlined within the Draft General Plan Update - Recommended Project (October 2010).</p>
26.		D.4-78	<p><i>Sixth bullet (Policy COS-6.2)</i></p> <p>Policy COS-6.2 Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:</p> <ul style="list-style-type: none"> • Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations • Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses • Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development • Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture • <u>Supporting local and State right-to-farm regulations</u> • <u>Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process</u> 	<p>Please consider including language to be consistent with policies outlined within the Draft General Plan Update - Recommended Project (October 2010).</p>

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27.	Land Use	D.4-83	<p><i>County of San Diego Draft General Plan Update, <u>Draft Boulevard Subregional Planning Area Community Plan (County of San Diego 2010b 2010a)</u></i></p> <p>The following goals and policies of the <u>Draft Boulevard Subregional Planning Area Community Plan</u> are <u>not</u> applicable to Proposed PROJECT components located within the Boulevard Plan Area <u>as it is yet to be adopted and remains subject to change</u>, but are provided for <u>informational purposes</u>:</p>	Please clarify the status of the Draft General Plan Update and consider adding language to indicate that the policies and goals contained within the Draft General Plan Update are not applicable to the proposed PROJECT because they have yet to be adopted.
28.	Land Use	D.4-84 to D.4-85	<p><i>Policy 6.1.4 bullets</i></p> <p>Policy LU 6.1.4: Prohibit industrial or commercial development with unmitigated and unmitigable impacts to the Boulevard area, such as:</p> <ul style="list-style-type: none"> ○ <u>Unregulated maintenance and operation of equipment that poses health and safety concerns to the general public, including fires ignited from malfunctioning industrial wind turbines, and related equipment</u> Health and safety of the general public, including fires ignited from malfunctioning industrial wind turbines, and related equipment, blade shedding, shadow flicker and tower collapse, and as well as construction and maintenance equipment ○ <u>Insufficient setbacks to minimize shadow flicker</u> ○ <u>Inadequate setbacks from adjacent private property relative to tower height to mitigate against tower collapse and blade shedding</u> ○ Impairment of visual resources and the rural community character ○ <u>Insufficient setbacks to mitigate noise impacts, as defined by Safety Element Table N-1, Noise Compatibility Guidelines, and Table N-2, Noise Standards.</u> Noise pollution, ultrasonic and infrasonic vibrations, emanating from the site as it creates great human discomfort and adversely affects the health of impacted humans, wildlife, and livestock, and the tranquility and quiet 	Please update the provisions of Policy LU 6.1.4 of the Draft Boulevard Subregional Planning Area Community Plan to reflect the most updated language presented within the Draft General Plan Update - Recommended Project (October 2010).

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			<p>ambiance and enjoyment of the rural environment, the quality of life, and property values</p> <ul style="list-style-type: none"> ○ Seismic wave impacts, ground vibrations, and chemical and oil spills ○ Light pollution of dark sky resources and shadow flicker effect that create a nuisance, and result in negative impacts to health and quality of life ○ Economic devaluation of impacted properties regardless of the proximity 	
29.	Land Use	D.4-85	<p><i>Policy CM 3.1.1</i></p> <p>Policy CM 3.1.1: Require secondary fire access/egress routes to connect to a public road, when feasible unless the approval of the Boulevard Planning Group and all impacted property and road owners is granted, along with the legally required deeded easement grants.</p>	Please update the provisions of Policy CM 3.1.1 of the Draft Boulevard Subregional Planning Area Community Plan to reflect the most updated language presented within the Draft General Plan Update - Recommended Project (October 2010).
30.	Land Use	D.4-86	<p><i>Policy COS 1.5.1</i></p> <p>Policy COS 1.5.1: Discourage any project that has the propensity to release pollutants into the air, such as landfills, aggregate mining, the grading and maintenance of new access and easement roads for industrial scale renewable energy and utility transmission projects, clear grading pads for industrial scale wind turbines and related infrastructure, improperly sited and managed OHV activity areas and uses.</p>	Please strike language as this policy is no longer included within the Draft General Plan Update - Recommended Project (October 2010).
31.	Land Use	D.4-86	<p><i>County of San Diego Existing General Plan, Mountain Empire Subregional Plan (third and fourth paragraphs down)</i></p> <p>The Mountain Empire Subregional Plan contains nine elements, including community character, land use, housing, mobility, public facilities and services, conservation, recreation, energy conservation, and scenic highways. Each element contains goals and policies intended to responsibly direct the development of the subregion. The General Goal of the Land Use Element is to provide a land use pattern consistent with the subregional population forecast (County of San</p>	<p>Please correct reference to Existing Mountain Empire Subregional Plan (last amended in 1995) as noted in the header to the discussion.</p> <p>Please consider clarifying the recommendation to include exact language and provisions as stated within the Existing Mountain empire Subregional Plan.</p>

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			<p>Diego 2010a1995). The Land Use Element recommends that future industrial <u>or commercial development that adversely impacts the Mountain Empire Subregional area, such as wind turbine generators,</u> be denied if the development would affect the general safety of <u>the general public people,</u> create unmitigated visual impacts to the rural environment, create noise pollution <u>emanating from the site exceeding 65 (decibels) dBs at the property line,</u> as it creates <u>great human discomfort and adversely affects</u> affecting the tranquility of the existing rural environment, or if the development results in <u>the economic devaluation of contiguous properties</u> property devaluation (County of San Diego 19952010a).</p> <p>The following policies and recommendations of the Mountain Empire Subregional Plan are applicable to the Proposed PROJECT (County of San Diego 1995 2010a):</p>	
32.		D.4-87	<p><i>Second through sixth bullet items)</i></p> <p><u>Land Use (General Goal, Policy, Recommendation 1):</u> The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.</p> <p><u>Land Use (General Goal, Policy, Recommendation 2):</u> Create a buffer area of one hundred and fifty (150) feet in width along the international boundary line inclusive of the existing sixty-foot (60') Public Reserve owned by the Federal Government.</p> <p><u>Land Use (General Goal, Policy, Recommendation 3):</u> Apply a ninety (90') foot setback within which no new permanent building may be built northerly of the existing sixty (60') foot Public Reserve line. Where such ninety (90') foot setback can be shown to adversely impact a property, the owner may apply for a waiver from complying with the setback as provided for in Section 7060 of The Zoning Ordinance.</p>	<p>Please consider revising the language as modified. The provisions identified within the Draft EIR/EIS are not identified as goals within the Mountain Empire Subregioanl Plan, but rather, as Policies and Recommendations. Please consider updating the text to correctly describe the provisions stated within the Existing Mountain Empire Subregional Plan (1995).</p> <p>Additionally, it should be noted that the provisions of “Industrial Policy, Recommendation 11” and “Conservation Policy, Recommendation 7” are not included in the list of applicable policies and recommendations within the Draft EIR/EIS. Please include these provisions, as they are applicable to the Tule Wind Project.</p>

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			<p>Land Use (Industrial Goal, Policy, Recommendation 2): New industrial development should be clean, non-polluting and complementary to a rural area.</p> <p>Land Use (Industrial Goal, Policy, Recommendation 4): Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.</p> <p>Land Use (Industrial Policy, Recommendation 11): <u>Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for any of the following reasons:</u></p> <ul style="list-style-type: none"> a) <u>Safety of the general public;</u> b) <u>Unmitigated visual impact on the rural environment;</u> c) <u>Noise pollution emanating from the site exceeding 65 (decibels) dBs at the property line, as it creates great human discomfort and adversely affects the tranquility of the rural environment;</u> d) <u>Such development may lead to the economic devaluation of contiguous properties.</u> <p>Conservation (Policy, Recommendation 1): All development shall demonstrate a diligent effort to retain as many native oak trees as possible.</p> <p>Conservation (Policy, Recommendation 6 4): The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.</p> <p>Conservation (Policy, Recommendation 7): <u>Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.</u></p> <p>Facilities (Policy, Recommendation 1): Maintain unobstructed access to and along the path of existing power transmission facilities and lines.</p>	

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			<p>Facilities (Policy, Recommendation 2): Any proposed grading, improvements or other encroachments to the substation or transmission rights-of-way must be reviewed by SDG&E.</p> <p>Facilities (Policy, Recommendation 3): Any alteration of drainage patterns affecting the substation or transmission line rights-of-way should be reviewed and approved by SDG&E.</p> <p>Facilities (Policy, Recommendation 4): Uses proposed for property adjacent to substations or transmission line rights-of-way should be reviewed for possible impacts to the power facilities and vice versa.</p>	
33.	Land Use	D.4-90	<p><i>Last paragraph</i></p> <p>The requirements set forth previously are the current zoning regulations per the County of San Diego Zoning Ordinance. It should be noted, however, that the County Department of Planning and Land Use staff is actively working on amendments to the Zoning Ordinance that would alter existing County wind turbine system regulations and add new requirements associated with the siting and permitting of solar energy systems and facilities (Iberdrola Renewables, Inc Tule Wind, LLC 2010). <u>Ordinance 10072, the Solar Energy Ordinance was approved by the Board of Supervisors on September 15, 2010. However, at the time of preparation of this Draft EIR/EIS, the Wind Ordinance was still undergoing development by County staff, and the approval date is unknown. The Solar and Wind Energy Ordinance will be presented to the Planning Commission and Board of Supervisors in 2010 (County of San Diego 2010b).</u> Once adopted, the regulations set forth in this <u>the wind energy ordinance</u> would be applicable to all <u>new wind renewable</u> energy projects in the unincorporated portions of the County.</p>	Please consider modifying language to clarify the approval date of the Solar Energy Ordinance and the ongoing development of the Wind Ordinance.

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34.	Land Use	D.4-94	<p><i>Applicant Proposed Measures</i></p> <p>Tule Wind Project No APMs were proposed by Pacific Wind Development <u>Tule Wind, LLC</u> to reduce impacts related to land use.</p>	Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
35.	Land Use	D.4-98	<p><i>First paragraph</i></p> <p>Land uses at or near project components that could be temporarily disturbed during construction (and decommissioning) activities include wilderness and recreational lands (BLM McCain Valley National Cooperative Land and Wildlife Management Area including the In-Ko-Pah ACEC, Carrizo Gorge Wilderness, Lark Canyon OHV Area, and the Lark Canyon and Cottonwood Campgrounds), forest and recreational lands (Cleveland National Forest), public roadways, an airstrip, a school (Clover Flat Elementary), and rural residences. As stated previously, impacts to wilderness and recreation, agricultural resources, and transportation facilities are discussed in Sections D.5 (Wilderness and Recreation), D.6 (Agriculture), and D.9 (Transportation and Traffic), respectively. Therefore, sensitive land uses that could be temporarily disturbed during construction consist of a school (Clover Flat Elementary School) and rural residences.</p> <p><i>Fifth paragraph</i> In support of construction activities, Pacific Wind Development <u>Tule Wind, LLC</u> is proposing to improve 27.62- <u>23.44</u> miles of existing access roads in the vicinity of Rough Acres Ranch, through the Campo and Manzanita Indian reservations, and near the proposed wind turbines, collector cable system, and 138 kV transmission line...</p>	<p>Clover Flat Elementary is not anticipated to be disturbed as a result of construction or operation of the Proposed Tule Wind project, because the school is located approximately 1.25 miles west of the proposed interconnect with the rebuilt Boulevard Substation. Construction associated with the alternative transmission line (if constructed) would have construction related activity that could impact Ribbonwood Road south of Interstate 8, but not the school.</p> <p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p> <p>Please update language to reflect corrected analysis per the Modified Project Layout.</p>
36.	Land Use	D.4-102	<p><i>Second paragraph</i></p> <p>Project components including proposed wind turbines, project collector cable system (overhead and underground), collector substation, O&M building site, meteorological towers, and SODAR/<u>LIDAR</u> unit would</p>	<p>Please consider modifying language to allow option for a LIDAR unit to be used instead of a SODAR unit.</p> <p>Depending upon jurisdiction, roads may be restored up to a width of 24 feet to comply with County and fire requirements.</p>

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			<p>adjoin or traverse BLM-administered land used primarily for wilderness and recreational purposes and agriculture.</p> <p><i>Third paragraph</i></p> <p>Once construction is complete, all roads will be restored to the standard 16- to 24-20-foot width, <u>consistent with jurisdictional requirements</u>, and any temporary access restrictions would be fully restored.</p>	
37.	Land Use	D.4-106 – D.4-107	<p><i>Second paragraph (D.4-106)</i></p> <p>As demonstrated in Appendix 7 (Table 7-2), the proposed Tule Wind Project would not be consistent with all applicable policies, goals, and regulations established in land use plans relevant to the project area. While the Tule Wind Project would be consistent with applicable federal land use plans, including the Eastern San Diego County Resource Management Plan (BLM 2008a), the Final Programmatic EIS on Wind Energy Development on BLM-administered lands occurring in the Western United States (BLM 2005a), Wind Energy Development Policy Instructional Memorandum (IM 2009-043) (BLM 2008b), and all Ewiiapaayp Band of Kumeyaay Indians land use laws, components of the Tule Wind Project under the jurisdiction of the County of San Diego (43 <u>7</u> R-string turbines and an approximate 2-mile <u>3-mile</u> segment of the 138 kV transmission line) would not be consistent with all <u>adopted and</u> applicable policies and goals, <u>or proposed draft policies and goals that may become applicable to the Project</u> established in the following County of San Diego documents:</p> <ul style="list-style-type: none"> • <u>County of San Diego General Plan: Part II Regional Land Use Element (County of San Diego 2010a), Regional Land Use Element Non-Urban Residential Designation Policy (18) Multiple Rural Use</u> • <u>County of San Diego General Plan: Part XX Mountain Empire Subregional Plan (County of San Diego 1995)</u> 	<p>The Draft EIR/EIS cannot treat the County of San Diego Draft General Plan Update policies and goals as an applicable land use plan, because it has not yet been adopted. The County Board of Supervisors is still in the process of hearing public comments on these draft policies, and they may change significantly before they are approved by the Board of Supervisors. The document should clarify that draft policies are currently not applicable to the Proposed Project. Please consider the textual revision provided.</p> <p>The Tule Wind Project is also currently processing a General Plan Amendment with the County of San Diego which will remove the inconsistency with the General Plan Policy (18) Multiple Rural Use. The Project cannot be approved without approval of this General Plan Amendment and therefore, the General Plan Amendment is considered a Project feature.</p> <p>Mountain Empire Subregional Plan Land Use Element Industrial Policy/Recommendation 11 only prohibits unmitigated visual impacts, not visual impacts that have been mitigated but cannot be mitigated below a level of significance. Policy and Recommendation 11 is vague and does not recognize industrial development with significant visual impacts that have been mitigated, nor does it prohibit such development. The Tule Wind Project is consistent with the Mountain Empire Subregional Plan Policy 11 because impacts are being mitigated. However, in an abundance of caution, the Tule Wind Project is currently processing an amendment to the Mountain Empire Subregional Plan</p>

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			<ul style="list-style-type: none"> • <u>County of San Diego Zoning Ordinance, Section 6951</u> • <u>County of San Diego Draft General Plan Update, Land Use, Safety and Noise elements (County of San Diego 2010a-2010b)</u> • <u>County of San Diego Draft General Plan Update, Draft Boulevard Subregional Planning Area Community Plan (County of San Diego 2010a-2010b).</u> <p><i>Third paragraph</i></p> <p>Although the Tule Wind Project was found to be inconsistent with policies and regulations contained in the above local land use plans, these <u>it should be noted that the policies that were determined to be inconsistent with the Tule Wind Project identified within the County of San Diego General Plan Regional Land Use Element (Policy (18) Multiple Rural Use and the Mountain Empire Subregional Plan (Industrial Policy/ Recommendation 11) are proposed to be deleted in the most recent version of the Draft General Plan Update (Recommended Project, October 2010). It should also be noted that the County's Draft Wind Ordinance (currently under development and environmental review) will amend the current and antiquated definition and height and setback regulations for "large wind turbines" in the County's jurisdiction within the Zoning Ordinance.</u></p> <p><u>Although provisions and regulations contained within Draft land use plans and ordinances (as described above) have not been formally adopted by the County of San Diego and are therefore subject to change, it is important to note the proposed deletion of such restrictive policies toward the development of the Proposed PROJECT. B</u> <u>However, b</u>Because these plans <u>and ordinances</u> are still draft versions, no impact determination has been made with regards to inconsistencies with these plans.</p> <p><i>Added paragraph</i></p> <p><u>A project feature of the Tule Wind Project is the processing of a General Plan Amendment to amend</u></p>	<p>which will remove the potential for inconsistency with the Project. Tule Wind, LLC, however, believes that the Tule Wind Project is currently consistent with the Subregional Plan.</p> <p>Finally, the Tule Wind Project is currently processing a change to the County Wind Ordinance Section 6951 that is specific to the Project which will make the Project consistent with the height and setback provisions of the Ordinance.</p>

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			<p><u>General Plan Policy (18) Multiple Rural Use and the Mountain Empire Subregional Plan (Industrial Policy/Recommendation 11) to be consistent with the Project. The Tule Wind Project is also processing a Project specific change to Ordinance 6951 that will eliminate the inconsistency between the Ordinance and the Project. These Amendments are integral Project features and the Project components within the jurisdiction of the County of San Diego cannot be approved without these amendments.</u></p> <p><i>Fourth paragraph (D.4-106) through second paragraph (D.4-107)</i></p> <p><u>In addition, w</u>With the implementation of mitigation measures identified in various parts of Section D, e.g., Biological Resources, Visual Resources, Public Services and Utilities, and Fire and Fuels Management, project components under the jurisdiction of the County of San Diego were determined to <u>will</u> be consistent with the plans and policies established in the following County of San Diego documents:</p> <ul style="list-style-type: none"> • Mountain Empire Subregional Plan (1995 <u>2010a</u>) • County of San Diego Existing General Plan Land Use Element (County of San Diego 2003 <u>2010a</u>), Energy Element (1977), Conservation Element (County of San Diego 2002), Public Facility Element (County of San Diego 2005), and Seismic Element (County of San Diego 1991) • County of San Diego Draft General Plan Update (Conservation and Open Space, and Mobility elements) (<u>County of San Diego 2010b</u>). • County of San Diego Zoning Ordinance. <p><i>Second paragraph (D.4-107)</i></p> <p>Therefore, because impact determinations have not been made with regards to local land use plans that have not been formally adopted by the County of San Diego, <u>and</u> because a Project feature of the Tule Wind Project is the</p>	

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			<p><u>processing of amendments to land use plans and the zoning ordinance to make the Project consistent with all adopted and applicable local land use plans and policies.</u> and because project components of the Tule Wind Project were determined to be consistent with all adopted and applicable local land use plans and policies (with implementation of mitigation measures identified in other parts of Section D), identified impacts would be adverse and mitigation has been provided to mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II).</p>	
38.	Land Use	D.4-117	<p><i>Second paragraph</i></p> <p>Under this alternative the Tule Wind Project’s collector substation and O&M facility would be relocated from BLM-administered land in the McCain Valley National Cooperative Land and Wildlife Management Area to a <u>co-located location on</u> County of San Diego jurisdictional land on Rough Acres Ranch. Proposed turbines would be located in the same location as identified in the proposed Tule Wind Project. Relocation of the collector substation and O&M facility to Rough Acres Ranch would result in a shorter proposed 138 kV transmission line route and a longer overhead cable collector system. Upon exiting the alternate collector substation site, the alternate 138 kV transmission line would travel east for approximately 2,000 feet, traversing Rough Acres Ranch land and BLM land. At this point the alternative gen-tie would then turn south and follow the same route to the rebuilt Boulevard Substation as the proposed Tule Wind Project 138 kV transmission line. This alternative would extend the overhead collector cable system from its end point in the proposed Tule Wind Project (near proposed turbine R5) to the relocated collector substation, <u>an increase of approximately 7.7 miles...</u></p>	<p>Please update language to clarify that the proposed substation and O&M facility will be a co-located facility on Rough Acres Ranch. Please also consider adding language to identify the increased distance of the collector line system.</p>

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39.	Land Use	D.4-118	<p><i>Third paragraph</i></p> <p>With the adoption of the County's Draft General Plan Update, the General Plan land use designation of the relocated collector substation and O&M facility would be redesignated Rural Lands (RL-80 1 DU/80 acres), <u>and the alternate transmission line and collector cable system would traverse lands redesignated Public Agency Lands Open Space (Conservation) and Rural Lands (RL-80 1 DU/80 acres); and the collector cable system would traverse lands redesignated Open Space (Conservation).</u></p> <p><i>Fourth paragraph</i></p> <p>...Relocating the collector substation and O&M facility and reducing the length of the proposed 138 kV transmission line from 9.7 <u>9.2</u> to 4.1 <u>3.8</u> miles would not reduce the number of residences located within 1,000 feet of project components, and when compared with the proposed Tule Wind Project, the collector substation and the O&M facility would actually be closer to residences/structures located on Rough Acres Ranch.</p>	Please update language to reflect land use designations presented within the Draft General Plan Update (Recommended Project October 2010). Please correct length of alternative transmission line distances per the Modified Project Layout.
40.	Land Use	D.4-120	<p><i>Third paragraph (New Development Policy 5)</i></p> <p>... However, although the potential for impacts is low, Pacific Wind Development <u>Tule Wind, LLC</u> would implement Mitigation Measure GEO-3 and would perform geotechnical studies to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities...</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
41.	Land Use	D.4-121	<p><i>Policy S-3-7</i></p> <p>... The pre-engineered O&M facility would be under the jurisdiction of the County, and Pacific Wind Development <u>Tule Wind, LLC</u> would be required to ensure that fabrication of the facility meets current ignition resistant construction codes. Once the County reviews the O&M facility plans and approves of its fabrication, this alternative would be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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42.	Land Use	D.4-122	<p><i>Fourth paragraph (Impact LU-1)</i></p> <p>During construction and decommissioning, temporary disturbance of existing land uses between the relocated collector substation and the rebuilt Boulevard Substation would be greater under this alternative (when compared with the proposed Tule Wind Project) due to open trenching for approximately 4.1<u>3.8</u> miles along the gen-tie line alignment.</p>	Please revise to reflect corrected analysis.
43.	Land Use	D.4-125	<p><i>Second paragraph</i></p> <p>With adoption of the County's Draft General Plan Update, the General Plan land use designation of the relocated collector substation and O&M facility would be redesignated Rural Lands (RL-80 1 DU/80 acres), the alternate gen-tie line would traverse lands redesignated Open Space (Conservation)-Public Agency Lands, Rural Lands (RL-80 1 DU/80 acres), Semi-Rural Residential (SR-4 SU/4,8,16 acres), Semi-Rural Residential (SR-10 1 DU/10,20 acres), and General Commercial; the collector cable system would traverse lands redesignated Open Space (Conservation)-Public Agency Lands.</p>	Please revise language to reflect the most recent version of the Draft General Plan Update Recommended Project October 2010.
44.	Land Use	D.4-125	<p><i>Third paragraph</i></p> <p>Land uses at or near project components that could be temporarily disturbed during construction of the Tule Wind Route 3 alternative with collector substation/O&M facility on Rough Acres Ranch include wilderness and recreational lands (BLM McCain Valley National Cooperative Land and Wildlife Management Area including the Lark Canyon OHV Area), public roadways, a private airstrip, commercial businesses, public facilities (Boulevard Volunteer Fire Department and San Diego County Sheriff's Department Substation-Boulevard), an airstrip, a school (Clover Flat Elementary), an inn (Lux Inn), and rural residences. Impacts to wilderness and recreation, agricultural resources, transportation facilities, and public services are discussed in Sections D.5 (Wilderness and</p>	Clover Flat Elementary is not anticipated to be temporarily disturbed during construction. Please revise language as suggested.

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			Recreation), D.6 (Agriculture), D.9 (Transportation and Traffic), and D.14 (Public Services and Utilities), respectively. Therefore, sensitive land uses that could be temporarily disturbed during construction consist of a school (Clover Flat Elementary School), an inn (Lux Inn), and rural residences. Other uses that would be temporarily impacted by construction of the alternative include commercial uses adjacent to Old Highway 80 in Boulevard.	
45.	Land Use	D.4-128	<i>Fourth paragraph (Impact LU-1)</i> ...Sensitive land uses that could be temporarily disturbed during construction and decommissioning consist of a school (Clover Flat Elementary), an inn (Lux Inn), rural residences, and commercial uses adjacent to the transmission line alignment.	Clover Flat Elementary is not anticipated to be temporarily disturbed during construction. Please revise language as suggested.
46.	Land Use	D.4-130	<i>Fourth paragraph (Impact LU-1)</i> Similar to the proposed Tule Wind Project, uses at or near project components that could be disturbed by construction (and decommissioning) activities include wilderness and recreational lands, public roadways, an airstrip, a school (Clover Flat Elementary), and residential uses. Refer to Section D.5, Wilderness and Recreation, for an analysis of construction-related impacts to recreational uses, and Section D.9, Transportation and Traffic, for an analysis of construction-related impacts to public roadways. Sensitive land uses in the area include a school and rural residential uses.	Clover Flat Elementary is not anticipated to be temporarily disturbed during construction. Please revise language as suggested.
47.	Appendix 7	7-37	<i>Leases/Permits/Easements Subsection (Consistency Determination)</i> Pacific Wind Development Tule Wind, LLC has coordinated with local tribes and Section 106 of the NHPA will be completed and documented by the project applicant. Once the historic preservation review process has been completed and documented and the Advisory	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			Council on Historic Preservation has been afforded a reasonable opportunity to comment, the Tule Wind Project would be consistent with this policy.	
48.	Appendix 7	7-40	<p><i>Consistency Determination (Row 2, Column 2)</i></p> <p>Pacific Wind Development Tule Wind, LLC has been in consultation with appropriate federal, state, and local agencies regarding the Tule Wind Project. Specific project issues have been identified in the Plan of Development (POD) and are analyzed in this EIR/EIS. Therefore, the Tule Wind Project would be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
49.	Appendix 7	7-41	<p><i>(Rows 3 and 4, Column 2)</i></p> <p>Pacific Wind Development Tule Wind, LLC has prepared a POD and has submitted it to the BLM for review. APMs were identified by <u>Tule Wind, LLC</u> Pacific Wind Development in the Tule Wind Project environmental document, and additional mitigation will be identified in the various sections of this EIR/EIS. Therefore, the Tule Wind Project would be consistent with this policy.</p> <p>Pacific Wind Development Tule Wind, LLC has prepared a POD for the Tule Wind Project and has and will continue to consult with the BLM and other appropriate federal, state, and local agencies regarding the project. Therefore, the Tule Wind Project will be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
50.	Appendix 7	7-42	<p><i>County of San Diego Existing General Plan – Land Use Element (Column 2, Consistency Determination)</i></p> <p>... Although construction and operation of turbines in the R turbine string and the 2-mile <u>3-mile</u> segment of the 138 kV transmission line located under County of San Diego land use jurisdiction would result in impacts to the natural environment, these project components would indirectly work toward preserving the natural</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.

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			environment by producing and transmitting renewable energy. In addition, these components of the Tule Wind Project would help the County of San Diego accomplish its renewable energy goals as established in the County General Plan (Energy Element). Therefore, the Tule Wind Project would be consistent with this policy.	
51.	Appendix 7	7-43	<p><i>Land Use Goal 2.3 (Column 2, Consistency Determination)</i></p> <p>Pacific Wind Development Tule Wind, LLC would construct and operate 437 wind turbines and a segment of the 138 kV transmission line on rural County of San Diego jurisdictional lands. Eleven Five of the thirteen seven wind turbines under the County's jurisdiction would be located approximately 4.5 miles northeast of the community of Boulevard and would be surrounded by BLM jurisdictional land. The two remaining wind turbines under the County's jurisdiction would be located on a disturbed site (Rough Acres Ranch) and would be sited approximately 2,000 feet from the nearest residence. The 2.03.0-mile segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley Road and east along Old Highway 80 prior to interconnecting with the rebuilt Boulevard Substation...</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
52.	Appendix 7	7-44	<p><i>Land Use Environmental Goal 3.2 (Column 2, Consistency Determination)</i></p> <p>Construction of project components on County of San Diego jurisdictional land would require a fraction of the overall construction water needs of the entire project and operation of these specific components would not <u>require</u> excessive amounts of water.</p>	Please consider noting the textual revisions.
53.	Appendix 7	7-44	<p><i>Regional Categories Policy 1.4</i></p> <p>Operation of project components associated with the <u>Tule Wind Project under the jurisdiction of the County</u></p>	For the purposes of groundwater, please consider using project assumptions of the entire Tule Wind Project versus County jurisdictional land only.

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			<p>of San Diego would not require excessive volumes of water. Regular applications of water at the 13-7 turbine locations and along the 2-mile segment of the transmission line under County jurisdiction would not be required. In addition, Pacific Wind Development Tule Wind, LLC has received confirmation from local water districts (will serve letters from the Jacumba Community Services District and the Live Oak Springs Water Company) that water would be available for construction of the Project. Lastly, as indicated within the Groundwater Investigation Report (dated December 2010), with implementation of Mitigation Measure HYD-3, Pacific Wind Development would be required to perform a groundwater study to ensure that groundwater use during construction would not substantially impact the local aquifer. Therefore, these components would be consistent with this policy.</p>	<p>Please revise language to reflect consistency with Groundwater Investigation Report dated December 2010, which correlates to Mitigation Measure HYD-3. Please revise language and mitigation measures accordingly.</p>
54.	Appendix 7	7-44	<p><i>Applicable Land Use Plan, Policy, or Regulation (Column 1)</i></p> <p>Multiple Rural Use <u>Policy</u> (18) Land Use Designation & The General Agriculture <u>Policy</u> (20) Land Use Designation</p> <p><i>Consistency Determination (Column 2)</i></p> <p>The Multiple Rural Use <u>Policy</u> (18) and General Agriculture (20) designation does not specifically exclude wind turbine or electrical transmission line development. <u>However, the Multiple Rural Use Policy (18) Land Use Designation prohibits development “unless the proposed development has been carefully examined to assure that there will be no significant adverse environmental impacts, erosion and fire problems will be minimal, and no urban levels of service will be required.”</u> Rather, because these The land use designations are consistent with the use regulations of the S92 and A72 (zones which conditionally permit Major Impact <u>Services and Utilities</u>), <u>however the</u></p>	<p>Please update language to reflect corrected analysis. The Tule Wind Project is currently processing a General Plan Amendment with the County of San Diego which will remove the inconsistency with the General Plan Policy (18) Multiple Rural Use. The Project cannot be approved without approval of this General Plan Amendment and therefore, the General Plan Amendment is considered a Project feature.</p> <p>Tule Wind, LLC is also currently processing a change to the County Wind Ordinance Section 6951 that is specific to the Project which will make the Project consistent with the height and setback provisions of the Ordinance.</p>

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			<p>installation of the wind turbines (<u>proposed at a height up to 492 feet</u>) would necessitate a <u>Zoning Ordinance Amendment to County Zoning Ordinance § 6951 to allow the same height and setback limitations for the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects that are being considered in the County’s proposed revised wind ordinance.</u> and † The 138 kV transmission line would be consistent with the applicable land use designations (Major Impact Utilities would, however, require with the approval of a Major Use Permits) to operate in the S92 and A72 zones. <u>Because the Tule Wind Project will recognize significant, adverse, immitigable environmental impacts, an amendment to the Regional Land Use Element Policy (18) Multiple Rural Use of the County of San Diego General Plan (last amended September 3, 2010) would be required for those portions of the 138 kV transmission line and roadways for which Policy (18) Multiple Rural Use applies.</u> Upon obtainment of Major Use Permits <u>and Zoning Ordinance Amendment to County Zoning Ordinance § 6951 for the wind turbines and a General Plan Amendment for the portions of the 138 kV transmission line and roadways for which Policy (18) Multiple Rural Use applies.</u> 138 kV transmission line (the turbines and 2-mile segment of the 138 kV transmission line under the jurisdiction of the County of San Diego), the Tule Wind Project would be consistent with the use regulations of the Multiple Rural Use (18) an General Agriculture (20) General Plan Land Use designations.</p>	
55.	Appendix 7	7-44 thru 7-45	<p><i>Policy 4 (X-22)</i></p> <p>Pacific Wind <u>Tule Wind LLC</u> Development has identified three existing groundwater wells on Rough Acres Ranch that could provide water for construction of project components under County jurisdiction. While project components under County land use jurisdiction (43 <u>7</u> wind turbines and a 23 <u>2</u>-mile segment of the 138 kV transmission line) would require a fraction of the</p>	<p>Please revise language to reflect consistency with Groundwater Investigation Report dated December 2010, which correlates to Mitigation Measure HYD-3. Please revise language and mitigation measures accordingly.</p>

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			<p>approximate 17.5-19 million gallons of water required for the entire project, the construction of these components would require a constant water source for dust suppression, turbine foundation construction, and miscellaneous activities. Although the applicant has identified groundwater as the sole source for construction needs, if the The required groundwater study (Mitigation Measure HYD-3) concludes that the use of groundwater is not viable for construction purposes, imported Imported water would may also be trucked to the project site from local sources including the Jacumba Community Services District, the Live Oak Springs Water Company, and/or the McCain Valley Conservation Camp, <u>if necessary</u>. The use of imported water would be project-specific and would not affect regional policies seeking to reduce reliance on imported water. Therefore, project components under the County's jurisdiction would be consistent with this policy.</p>	
56.	Appendix 7	7-45	<p><i>Policy 6 (X-22) (Column 2, Consistency Determination)</i></p> <p>See response to Policy 4, above. Pacific Wind Development Tule Wind, LLC proposes to use groundwater during construction <u>and operation of the</u> Tule Wind Project components under the land use jurisdiction of the County of San Diego. <u>The</u> Groundwater <u>Investigation Report</u> would only be used during construction if the required groundwater study (Mitigation Measure HYD-3) determines concludes that groundwater to be <u>is</u> a viable source. <u>Additionally,</u> i imported water is anticipated to be available for construction for construction purposes <u>if necessary</u> (see Section D.12, Water Resources). Therefore, project components under the County's jurisdiction <u>the Tule Wind Project</u> would be consistent with this policy.</p>	<p>Minimal amounts of groundwater will be required throughout operation.</p> <p>For the purposes of groundwater, please consider using project assumptions of the entire Tule Wind Project versus County jurisdictional land only.</p>

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57.	Appendix 7	7-45 through 7-46	<p><i>Policy 17 (X-54) (Column 2, Consistency Determination)</i></p> <p>Because wind turbines and a 2-mile 3-mile segment of the 138 kV transmission line would be subject to the County of San Diego environmental review process, this policy would be applicable to components of the Tule Wind Project...</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
58.	Appendix 7	7-46	<p><i>Goal 4 (Column 2, Consistency Determination)</i></p> <p>To minimize environmental impacts associated with the construction and operation of project components, Pacific Wind Development Tule Wind, LLC has proposed APMs and would implement mitigation measures. Therefore, the Tule Wind Project would be consistent with this policy.</p>	Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
59.	Appendix 7	7-48	<p><i>Fire Protection and Emergency Services Goal (Column 2, Consistency Determination)</i></p> <p>The 13 7 turbines and 2-3-mile segment of the 138 kV transmission line under County of San Diego jurisdiction would be located within 6.5 miles of the Boulevard Fire and Rescue Department...</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
60.	Appendix 7	7-48	<p><i>Water Provisions Systems Policy 1.2 (Column 2, Consistency Determination)</i></p> <p>Pacific Wind Development Tule Wind, LLC has indicated that groundwater extracted from wells located on Rough Acres Ranch would be utilized for use during construction. However, if the required groundwater study The Groundwater Investigation Report (Mitigation Measure HYD-3) concludes that groundwater is not a viable source for use during construction, then and water from a local source (Pacific Wind Development Tule Wind, LLC has identified the Jacumba Community Services District, the Live Oak Springs Water Company and the McCain Valley Conservation Camp as potential water sources) would be hauled to the project site for</p>	Please update language to include the information contained within the Groundwater Investigation Report and conclusions therein.

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			use, if deemed necessary . Therefore, because the project applicant would be required to identify <u>has identified</u> reliable source(s) of water prior to construction of the Project (see Section D.12, Mitigation Measure HYD-3), with implementation of mitigation project components under the County's jurisdiction would be consistent with these policies.	
61.	Appendix 7	7-48	<p><i>County Trails Program Policy 3.7 (Column 2, Consistency Determination)</i></p> <p>As proposed, the 13 <u>7</u> wind turbines and segment of the 138 kV gene-tie under the jurisdiction of the County of San Diego would not be located on lands upon which a trail or pathway identified in the Regional Trail Plan or Boulevard Community Trails and Pathway Plan occurs. Therefore, wind turbines and the 2-mile <u>3-mile</u> segment of the transmission line under the jurisdiction of the County would be consistent with this policy.</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
62.	Appendix 7	7-49	<p><i>Fault Rupture Policy 2 (Column 2, Consistency Determination)</i></p> <p>The proposed Tule Wind Project site does not cross any mapped Alquist-Priolo Earthquake Hazard Zones. The closest active fault to the Tule Wind Project is the Coyote Mountain section of the Elsinore Fault, located approximately 7.1 miles to the northeast. One potentially active fault transects the project area near Turbines Q1 and Q2 (Pacific Wind Development <u>Tule Wind, LLC 2010b</u>), however, these turbines would be under the jurisdiction of the BLM and no <u>not</u> the County...</p>	Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
63.	Appendix 7	7-50	<p><i>Landslide Policy 4 (Column 2, Consistency Determination)</i></p> <p>... project components under the jurisdiction of the County (13 <u>7</u> wind turbines in the R-turbine string and a 2 <u>3</u>-mile segment of the 138 kV transmission line) is relatively low because these areas are underlain by tonalite...</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.

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64.	Appendix 7	7-50	<p><i>New Development Policy 1 (Column 2, Consistency Determination)</i></p> <p>As proposed, the Tule Wind Project would not construct buildings on County of San Diego jurisdictional lands and, therefore, these policies are not applicable. <u>However, if an Alternate O&M Building is constructed on County land, the building would be constructed in accordance with the Uniform Building Code.</u></p>	Please consider adding in language to include the potential for O&M Buildings on County land.
65.	Appendix 7	7-51	Please consider deleting reference to the County of San Diego Draft General Plan Update—Land Use Element. It is not an adopted document, and none of its goals or policies apply to the Proposed Project.	The DEIR/DEIS provides analysis relative to the April 2, 2010 County of San Diego Draft General Plan Update. The April 2, 2010 document has been significantly altered in response to public testimony and concerns raised by members of the Board of Supervisors. Drafts marked October 2010 are the current versions of the Draft General Plan Update and any discussion of Draft policies, although they should not be analyzed, should be based on the most recent version of the Draft. The significant changes that have occurred from the April to October Drafts of the General Plan Update illustrate the inherent problem with analyzing the Project relative to a draft document that has not been adopted and is subject to change. We would again request that you please consider deleting analysis based upon the County of San Diego Draft General Plan Update.
66.	Appendix 7	7-51	<p><i>Goal LU-2 (Column 2, Consistency Determination)</i></p> <p>Implementation of the Tule Wind Project would not significantly impede on the rural character of the project area. Five Eleven of the thirteen seven wind turbines under the County’s jurisdiction would be located approximately 4.5 miles northeast of the community of Boulevard and would be surrounded by BLM jurisdictional land. The two remaining wind turbines under the County’s jurisdiction would be located on a disturbed site (Rough Acres Ranch) and would be sited approximately 2,000 feet from the nearest residence. The 2.03 0-mile segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.

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			Road and east along Old Highway 80 prior to interconnecting with the rebuilt Boulevard Substation...	
67.	Appendix 7	7-51	<i>Policy LU.2-7 (Column 2, Consistency Determination)</i> Pacific Wind Development Tule Wind, LLC has proposed APMs and would implement mitigation measures to minimize environmental impacts associated with the construction and operation of the wind turbines and the 23 -mile segment of the 138 kV transmission line under County of San Diego jurisdiction...	Please revise language to reflect corrected analysis per the Modified Project Layout.
68.	Appendix 7	7-51 thru 7-52	<i>Policy LU.5-3 (Column 2, Consistency Determination)</i> The 3 2 -mile segment of the Tule Wind Project (the 138 kV transmission line) traversing County of San Diego-designated rural land would be linear in nature, would travel adjacent to an existing paved roadway, and would not result in an excessive amount of surface disturbance. Implementation Construction of the turbines and transmission line would not jeopardize the preservation of existing open space and rural areas in the project area. The project would not conflict with the County's goal of preserving open space and rural lands and would be consistent with this policy.	Please revise language to reflect corrected analysis per the Modified Project Layout.
69.	Appendix 7	7-52	<i>Policy LU-6.1 (Column 2, Consistency Determination)</i> ... Wind turbine development would affect other issue areas including visual resources (see Section D.3, Visual Resources) and impacts would be significant and unmitigable. While impacts would be significant, mitigation measures would be implemented by Pacific Wind Development Tule Wind, LLC and would minimize environmental impacts to the extent feasible.	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
70.	Appendix 7	7-52	<i>Policy LU-6.5 (Column 2, Consistency Determination)</i> ... Implementation of Mitigation Measure HYD-6 (Preparation of a Stormwater Management Plan) would require Pacific Wind Development Tule Wind, LLC to incorporate Low-Impact Development Features into the	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			project design to ensure that existing drainage patterns are not significantly altered.	
71.	Appendix 7	7-52 thru 7-53	<p><i>Policy LU.6-9 (Column 2, Consistency Determination)</i></p> <p>The presence of up to 13 <u>7</u> wind turbines and a 32-mile segment of a new overhead transmission line in rural southeastern San Diego on County lands would increase the probability of wildfire in the area. The project would also increase the probability of other public safety-related impacts resulting from wind turbine operation (see Section D.10, Public Health and Safety, of this EIR/EIS). Tule Wind, LLC Pacific Wind Development would implement mitigation (see Section 10, Public Health and Safety, and Section D.15, Fire and Fuel Management) including implementation of a hazardous materials management plans and incorporation of wind turbine generator fire protection systems which would minimize impacts to the extent feasible. Therefore, with implementation of mitigation and APMs, project components under County land use jurisdiction would be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
72.	Appendix 7	7-53	<p><i>Policy LU-8.3 (Column 2, Consistency Determination)</i></p> <p>Construction of project components under the jurisdiction of the County of San Diego would require a fraction of the water necessary for construction of the entire Tule Wind Project. Tule Wind, LLC Pacific Wind Development has identified three on-site groundwater wells that could supply water during construction. Excessive amounts of groundwater would not be required for construction of components of County jurisdictional land and water for these components is not expected to significantly draw down the groundwater table. Therefore, the components of the Tule Wind Project on County jurisdictional lands would be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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73.	Appendix 7	7-53 thru 7-54	<p><i>Policy LU.10-2 (Column 2, Consistency Determination)</i></p> <p>The Tule Wind Project, which includes 7⁴ wind turbines and a 3²-mile segment of the proposed transmission line on County of San Diego lands, would be located in an area of the County identified by CAL FIRE as a very high and high fire hazard area. Implementation of APMs and mitigation measures identified in Section D.15, Fire and Fuels Management, would reduce wildfire related impacts to the extent feasible. In addition, project components under County of San Diego Land use jurisdiction would not significantly alter the rural character of the project area (see response to Goal LU-2, above). However, because project components under the County's jurisdiction would be located in high and very high hazard areas, project components under the County's jurisdiction would not be consistent with this policy. Therefore, the components of the Tule Wind Project on County jurisdictional lands would be consistent with this policy.</p>	<p>Consider clarifying the conclusion to state that the proposed project is not subject to the policies included in the DRAFT General Plan Update. If the DEIR continues to analyze the Draft Plan we believe that a consistency finding can be made per the discussion below.</p> <p>This interpretation of the Draft General Plan policy treats the phrase “avoid...hazard areas” as an absolute prohibition, when it is provided in the context of best efforts to avoid these hazard areas. Draft General Plan Update page 2-11, Guiding Principal 5, upon which Policy LU.10-2 is based states: “New development should be located and designed to protect life and property from these and similar hazards. In high risk areas, development should be prohibited or restricted in type and/or density. In other areas, structures, properties, infrastructure, and other improvements should be designed to mitigate potential risks from these hazards. <u>Development that cannot avoid high risk areas should be carefully reviewed for consistency with County building codes and development regulations to eliminate or minimize potential risks.</u>” (Emphasis added).</p> <p>Wind turbines must be located in areas where high wind activity exists and therefore cannot avoid high risk areas that coincide with high wind resource areas. Since the Tule Wind Project cannot avoid these high risk areas they must be “carefully reviewed for consistency with County building codes and development regulations or minimize potential risks.” The DEIR/DEIS text indicates that the Project will meet all building codes and states in the consistency determination for this policy that “Implementation of APMs and mitigation measures identified in Section D.15, Fire and Fuels Management, would reduce wildfire related impacts to the extent feasible.” Therefore, the Project has avoided the hazard area by minimizing the potential risk.</p> <p>The DEIR/DEIS interpretation of this policy would mean that <u>any</u> type of development in a high fire hazard area</p>

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				would be inconsistent with this policy, which clearly cannot be correct, because the County allows housing and agricultural operations in this area.
74.	Appendix 7	7-54	<p><i>Policy LU.10-4 (Column 2, Consistency Determination)</i></p> <p>Pacific Wind Development <u>Tule Wind, LLC</u> proposes APMs and would implement mitigation measures to minimize environmental impacts associated with components of the Tule Wind Project located on County of San Diego jurisdictional lands. Therefore, with implementation of mitigation measures and APMs, project components under County jurisdiction would be consistent with this policy.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
75.	Appendix 7	7-54	<p><i>Policy LU-11.2 (Column 2, Consistency Determination)</i></p> <p>The bulk, scale, and design of project components under County land use jurisdiction (437 wind turbines and a 23-mile segment of the 138 kV transmission line) would not significantly impact the rural character of the Boulevard community (see response to Goal LU-2, above). Therefore, project components under County land use jurisdiction would be consistent with this policy.</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
76.	Appendix 7	7-54	<p><i>Policy LU-12.1 and 12.2 (Column 2, Consistency Determination)</i></p> <p>For components under the jurisdiction of the County of San Diego, Pacific Wind Development <u>Tule Wind, LLC</u> would be required to comply with all conditions of approval identified by the County of San Diego DPLU. At this time it is unknown as to whether the County would require the provision of infrastructure, facilities, or services due to the operation of 437 wind turbines and the 32-mile segment of the 138 kV transmission line under County jurisdiction. As discussed in Section D.15 Fire and Fuel Management, mitigation including funding for the training and acquisition of necessary firefighting equipment and services to the local fire authority to improve the response and firefighting effectiveness near electrical transmission lines would be implemented by</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			<p>Tule Wind, LLC Pacific Wind Development (this mitigation would apply to the entirety of the Tule Wind Project). In addition, Tule Wind, LLC Pacific Wind Development would enhance existing County roadways as well as access/patrol roads along the proposed wind turbine grid and transmission lines (see Section D.15 Fire and Fuels Management for additional information). Therefore, with implementation of mitigation as identified in Section D.15 (and with the construction of adequately sized access roads), the Tule Wind Project would be consistent with these policies.</p>	
77.	Appendix 7	7-54	<p><i>Policy LU.13-2 (Column 2, Consistency Determination)</i></p> <p>... Prior to construction, Pacific Wind Development <u>Tule Wind, LLC</u> would be required to provide documentation identifying reliable water sources and that identified sources could provide the entire anticipated construction water needs of the Project (see Section D.12, Water Resources, Mitigation Measure HYD-3).</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
78.	Appendix 7	7-56	<p><i>Policy COS-4.1 (Column 2, Consistency Determination)</i></p> <p>Proposed project components under the County's jurisdiction (437wind turbines a 23-mile segment of the 138 kV transmission line) would not require the regular application or use of water during operations. Therefore, development of the Tule Wind Project on County jurisdictional lands would be consistent with this policy.</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
79.	Appendix 7	7-56	<p><i>Policy COS-5.3 (Column 2, Consistency Determination)</i></p> <p>As discussed in Section D.12, Water Resources, the required Stormwater Management Plan (Mitigation Measure HYD-6) would require Pacific Wind Development <u>Tule Wind, LLC</u> to incorporate measures into the project design to ensure that existing drainage patterns are not significantly altered such that occurrences of erosion or siltation would substantially increase...</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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80.	Appendix 7	7-57	<p><i>Policy COS-5.5 (Column 2, Consistency Determination)</i></p> <p>Pacific Wind Development Tule Wind, LLC has stated that groundwater would be used during construction of the Tule Wind Project and would be provided by three existing wells located on Rough Acres Ranch. However, if the required groundwater study (Mitigation Measure HYD-3) determines The Groundwater Investigation Report concludes that the use of groundwater would not be is viable and that proposed groundwater production would not result in impacts to the affected aquifer, then water would be imported to the site (Mitigation Measure HYD-5). Therefore, with implementation of Mitigation Measure HYD-3, the Tule Wind Project would be consistent with this policy.</p>	Please revise analysis to include conclusions of the Groundwater Investigation Report prepared for the Tule Wind Project.
81.	Appendix 7	7-57	<p><i>Policy COS-7.1 (Column 2, Consistency Determination)</i></p> <p>As discussed in Section D.7 Cultural Resources, mitigation would be implemented by Pacific Wind Development Tule Wind, LLC to minimize potential impacts to archaeological resources.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
82.	Appendix 7	7-58	<p><i>Policy COS-17.1 (Column 2, Consistency Determination)</i></p> <p>Wastes generated during construction would be minimized by estimating material needed in advance. Construction wastes will be recycled when feasible. Any non-recyclable wastes would be collected and transported to a local landfill. Because construction wastes would be recycled to the extent feasible and because (other than waste associated with maintenance and the replacement of malfunctioning or old part) project components under County of San Diego jurisdiction would not generate solid waste, development of project components under County jurisdiction would be consistent with theses these policies.</p>	Please revise as suggested

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83.	Appendix 7	7-59	<p><i>Goal COS-19 (Column 2, Consistency Determination)</i></p> <p>If groundwater is found to be infeasible for use during construction of the Tule Wind Project then imported water would be hauled to the site. Minimal amounts of water would be used by the project during operations. Because Pacific Wind Development <u>Tule Wind, LLC</u> has identified several local water purveyors as potential sources of construction water (see Section D.12 Water Resources), development of the Tule Wind Project (including project components under the jurisdiction of the County of San Diego) would be consistent with this goal.</p> <p><i>Goal S-3 (Column 2, Consistency Determination)</i></p> <p>Development of the Tule Wind Project would increase the probability of wildfires occurring in the project area. Pacific Wind Development <u>Tule Wind, LLC</u> implement mitigation to provide funding and training for the local fire authority to aid in response and firefighting capabilities (see Section D.15 Fire and Fuel Management). Therefore, with implementation of mitigation, fire hazards would be minimized to the extent feasible and project components of the Tule Wind Project under County land use jurisdiction would be consistent with this goal.</p> <p><i>Policy S-3.1 (Column 2, Consistency Determination)</i></p> <p>... In addition, to further minimize the probability for wildland fires, mitigation including Mitigation Measure FF-5 (Wind Turbine Generator Fire Protection Systems) would be implemented by Pacific Wind Development <u>Tule Wind, LLC</u>. Mitigation Measures FF-1 through FF-4, which provides fire safety procedures for ongoing maintenance of the transmission line and related component, would also minimize impacts resulting from wildland fires. Therefore, with implementation of</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			<p>mitigation, project components under County land use jurisdiction would be consistent with this policy.</p> <p><i>Policy S-3.3(Column 2, Consistency Determination)</i> See response to Policy S-3.1, above. In addition to providing a cleared, 200 foot radius area around each wind turbine, the transmission line would primarily be located adjacent to an existing roadway and mitigation (for example, Mitigation Measure FF-1 through FF-4) would be implemented by Pacific Wind Development <u>Tule Wind, LLC</u> to minimize the likelihood of wildfire spreading. Therefore, with implementation of mitigation, project components under County land use jurisdiction would be consistent with this policy.</p>	
84.	Appendix 7	7-59	<p><i>Goal COS-21 (Column 2, Consistency Determination)</i></p> <p>Although project operation would require up to 12 full time workers and the addition of this requirement could add new permanent residents to the project area, the addition of up to 12 families to the project area would not substantially affect existing park and recreation ratios such that additional addition local and regional park land would be required to serve new residents generated by the Tule Wind Project. Development of project components on County jurisdictional lands would <u>not</u> substantially increase the local population and, therefore, the Tule Wind Project would be consistent with this goal.</p>	Please update the language to reflect corrected analysis.
85.	Appendix 7	7-60	<p><i>Policy S-3.4 Column 2, Consistency Determination)</i></p> <p>The Boulevard Fire and Rescue Department, CAL FIRE, and the San Diego Rural Protection Fire District are all located in the project <u>vicinity</u>. To help respond to wildland fires resulting from operation of project components, Pacific Wind Development <u>Tule Wind, LLC</u> would implement Mitigation Measure FF-3 (Development Agreement with Rural Fire Protection District) which would provide...</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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			<p><i>Policy S-3-6 Column 2, Consistency Determination)</i></p> <p>See Section D.15, Fire and Fuel Management. In order to minimize the risk of wildland fires, Pacific Wind Development-Tule Wind, LLC would implement mitigation measures...</p> <p><i>Policy S-3-7 Column 2, Consistency Determination)</i></p> <p>... Under the proposed Tule Wind Project, Pacific Wind Development-Tule Wind, LLC would not construct structures (with the exception of wind turbine towers and transmission line support structures) on County jurisdictional lands...</p>	
86.	Appendix 7	7-60 – 7-61	<p><i>Goal S-4 (Consistency Determination last sentence)</i></p> <p>Pacific Wind Development-Tule Wind, LLC would not install ornamental vegetation in support of project components under the County’s jurisdiction (43 7 wind turbines and a 23 mile segment of the 138 kV transmission line). However, Potentially flammable vegetation would be located near wind turbines and the transmission line. Wind turbines and related facilities include electrical moving parts, flammable liquids, transmission lines, and transformers. Routine maintenance and operation of the overhead transmission line would present an ongoing source of potential wildfire ignitions for the life of the project. Because of these features, wind energy projects have the potential to spark vegetation fires in high fire risk/hazard areas. In addition, the area’s fire history indicates that fires have burned through the area and will likely burn again and therefore, project components under the County’s jurisdiction would not be consistent with this goal. <u>Tule Wind, LLC would implement mitigation that would provide funding for the training and acquisition of necessary firefighting equipment and services to the local fire authority. In addition, Tule Wind, LLC would prepare a customized fire protection plan for the project)</u></p>	<p>Consider clarifying the conclusion to state that the proposed project is not subject to the policies included in the DRAFT General Plan Update.</p> <p>In addition, please incorporate a discussion as to the mitigation measures that will be implemented to reduce the level of impacts to achieve consistency with applicable goals policies, including Goal S-4</p> <p>As shown in the proposed text, Tule Wind, LLC will provide significant mitigation against fire risk and will provide adequate fuel management around turbines and structures. This Goal (S-4) does not prohibit any uses in high fire areas. The Goal is to manage fuel loads and not to prohibit wind turbines.</p>

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			<p>for the Tule Wind Project which would include (at minimum) San Diego County FPP content requirements, San Diego County Fire Authority content requirements, and Rural Fire Protection District content requirements (see Section D.15 for additional information). Therefore, with implementation of mitigation discussed in Section D.15, the Tule Wind Project would be consistent with this policy.</p>	
87.	Appendix 7	7-61	<p><i>Goal S-6 (Column 2, Consistency Determination, fourth sentence)</i></p> <p>...In addition, Pacific Wind Development <u>Tule Wind LLC</u>, would prepare a customized Fire Protection Plan (FPP) for the Tule Wind Project which would include (at minimum) San Diego County FPP content requirements, San Diego County Fire Authority content requirements, and Rural Fire Protection District content requirements (see Section D.15 for additional information)...</p>	Please revise language to include the content requirements of the San Diego County Fire Authority, as this agency has partial jurisdiction over the Tule Wind project area.
88.	Appendix 7	7-61	<p><i>Policy S-6.1 (Column 2, Consistency Determination)</i></p> <p>See Section D.15 Fire and Fuels Management. Mitigation measure FF-4 (Customized Fire Protection Plan for Project) has been proposed and would include provisions requiring Pacific Wind Development <u>Tule Wind, LLC</u> to identify an adequate water supply to combat wildland fires....</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
89.	Appendix 7	7-62	<p><i>Policy S-7.2 (Column 2, Consistency Determination)</i></p> <p>...Mitigation has been proposed which would require Pacific Wind Development <u>Tule Wind, LLC</u> to conduct geotechnical investigations to evaluate the potential for liquefaction, lateral spreading...</p> <p><i>Policy S-10.4 (Column 2, Consistency Determination)</i></p> <p>Mitigation Measure HYD-6 (Preparation of a Stormwater Management Plan) would require Pacific Wind Development <u>Tule Wind, LLC</u> to incorporate</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			Low-Impact Design Features into the Tule Wind Project including project components under the jurisdiction of the County of San Diego...	
90.	Appendix 7	7.65	<p><i>Goal N-6 (Second Row, Consistency Determination)</i></p> <p>... Although the resulting noise impacts would b significant, Pacific Wind Development <u>Tule Wind, LLC</u> would implement Mitigation Measures NOI-2 to minimize construction noise to the extent feasible...</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
91.	Appendix 7	7.65	<p>Policy N-6.4 Hours of Construction</p> <p>As discussed in Section B, Project Description, Pacific Wind Development <u>Tule Wind, LLC</u> anticipates that construction activities would occur between 7 a.m. and 7.p.m, Monday through Saturday, but may involve extended hours as needed to complete certain construction activities. Where construction would occur outside of the hours permitted by the County of San Diego, Pacific Wind Development <u>Tule Wind, LLC</u> would follow established protocol and <u>seek a variance from the County noise requirements consistent with County Code section 36.423. Tule Wind, LLC would also provide advanced notice to property owners within 300 feet of planned activities. The advanced notice would include the start and completion dates of construction and the hours of construction. In addition, implementation of APM TULE NOI-4 (decrease the amount of noise during construction to the greatest extent possible by limiting the hours of construction) would further minimize noise impacts associated with construction. If a variance from the construction hours of 7 a.m. to 7 p.m. cannot be obtained from the County, no construction will occur outside the normal hours of construction. However, since work potentially occurring outside of Noise Ordinance limits would not be considered emergency work, Therefore, the Tule Wind Project (including components under the County’s jurisdiction) would not be consistent with this policy.</u></p>	<p>The Proposed Project will likely comply with the 7am to 7pm construction schedule requirements. However, the DEIR/EIS consistency determination does not take into consideration the words “as appropriate” following the phrase, “to limit the hours of operation.” Construction for non-emergency construction and maintenance would be “appropriate” if the appropriate County procedures were followed to allow for construction outside of the normally allowed construction hours. County code section 36.423(a) provides that “A person who proposes to perform non-emergency work on a public right-of-way, public utility facility, public transportation facility or some other project for the benefit of the general public, who is unable to conform to the requirements of this chapter may apply to the County for a variance authorizing the person to temporarily deviate from the requirements of this chapter.” The Tule Wind Project will follow this variance procedure if non-emergency construction work is required outside of normal construction hours. The granting of the variance would make the construction noise “appropriate” and therefore, consistent with this policy. If a variance cannot be obtained, however, the Project will conform to the normal hours of construction.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
92.	Appendix 7	7.65	Please consider deleting reference to the County of San Diego Draft General Plan Update—Boulevard Subregional Planning Area Community Plan. It is not an adopted document, and none of its goals or policies apply to the Proposed Project.	This is a general comment that pertains to the consistency findings for all policies contained in the Draft General Plan Update – Draft Boulevard Subregional Plan. In the comments below, we are able to show that the Tule Wind Project will be consistent with most of the goals and policies of the Draft Boulevard Subregional Plan. It must be noted, however, that even if the Draft Boulevard Subregional Plan were adopted in its current form, these policies may only be applied to those wind turbines within the Boulevard Subregional Plan area. These turbines only include R-1 and R-2. Other turbines within the jurisdiction of the County are located in the Mountain Empire Balance area and are subject to the policies of its subregional plan.
93.	Appendix 7	7.65	<p><i>Banner Heading:</i></p> <p>County of San Diego Draft General Plan Update– Boulevard Subregional Planning Area Community Plan. <u>(These policies are only applicable to wind turbines R-1 and R-2, and other portions of the Tule Wind Project, such as the transmission line, within the Boulevard Subregional Planning Area.)</u></p>	These policies may only be applied to those wind turbines within the Boulevard Subregional Plan area. These turbines only include R-1 and R-2. Other turbines within the jurisdiction of the County are located in the Mountain Empire Balance area and are subject to the policies of its Subregional Plan.
94.	Appendix 7	7.65 and 7.66	<p><i>Goal LU 1.1(Consistency Determination)</i></p> <p>Eleven <u>Five</u> of the thirteen <u>seven</u> proposed wind turbines under the County’s jurisdiction would be located approximately 4.5 miles northeast of the existing Boulevard Substation (located south of Old Highway 80 at Tule Jim Road) and would be surrounded by BLM jurisdictional land. The two remaining wind turbines under the County’s jurisdiction would be located on a disturbed site (Rough Acres Ranch) and would be sited approximately 2,000 feet from the nearest residence. The 2.03 <u>0.3</u>-mile segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley Road and east <u>west</u> along Old Highway 80 prior to interconnecting with the rebuilt Boulevard Substation. Existing distribution lines are located along McCain Valley Road and Old Highway 80. Therefore, while the project components under the County’s jurisdiction</p>	<p>The non-industrial lifestyle of the community will be maintained, because the Tule Wind Project wind turbines do not disrupt the pace of life in the community or add to the urbanization of the community. An industrialized lifestyle is characterized by urbanization of the community, expansion of an industrial base (like the opening of a manufacturing facility), or the parallel expansion of jobs and housing in a given area. The wind turbines are passive generators that operate without significant human intervention. Although the Project will add to the number of jobs and economic vitality in the community, the Project will only employ a small staff during operation, which will not significantly expand the population or the need for housing in the area. Therefore, the pace or lifestyle within the community will be unchanged by the construction of the Project.</p> <p>In addition, the area already contains wind turbines, some transmission lines (including the 500KV Sunrise</p>

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			<p>would not significantly impact the rural character of the Boulevard community, the The Project would introduce industrial elements to the project area; however, the project components under the County’s jurisdiction would not significantly impact the rural character of the Boulevard community as the industrial elements would be passive in nature and therefore not impact the lifestyle of the community; Therefore, because the Tule Wind Project would construct and operate industrial elements in the community the nonindustrial lifestyle of the area would not be maintained and the Tule Wind Project would not be consistent with this goal.</p>	<p>Powerlink), phone lines, and other industrial elements. The consistency determination would make the addition of any development, including a cellular or radio tower inconsistent with this policy. Consider revising language as the discussion appears contradictory.</p> <p>Please consider revising analysis to conclude with same consistency determinations made for LU 1.1-2 and LU 1.1-3 made in Table 7-2 of the Draft EIR/EIS. In addition, all references to the conclusions made for Goal LU 1.1 should be verified</p>
95.	Appendix 7	7-66	<p><i>Policy LU 1.1 .1 (Consistency Determination)</i></p> <p>While the Tule Wind Project would not significantly induce population growth (up to 12 permanent staff members would be required at the O&M facility), construction of the Project would potentially impact groundwater resources (see Section D.12 Water Resources), air quality (see Section D.11 Air Quality), visual resources (see Section D.3 Visual Resources), and biological resources (see Section D.2 Biological Resources) but these impacts are being mitigated to the maximum extent feasible, and will not degrade the overall character of the resources. As identified in Section D. APMs and mitigation measures would be implemented by Tule Wind LLC. to protect the quality and quantity of ground and surface water resources (see Section D.12 Water Resources), air quality (see Section D.11 Air Quality), dark skies and visual resources (see Section D.3 Visual Resources), and low ambient noise levels (see Section D.8 Noise). In addition, project components under County of San Diego land use jurisdiction are not anticipated to significantly impact the rural character of the Boulevard area. Therefore, project components under the County’s land use jurisdiction would be consistent with this policy. Therefore, because construction and operation of the Tule Wind Project would result in impacts to the</p>	<p>The policy is aimed at those Projects that would “degrade or detract” from groundwater sources, water, air quality, visual and natural resources, wildlife and historic rural character. The Tule Wind Project will have “impacts” under CEQA, but those impacts are being mitigated so that they will not “degrade” the resources. The Project may impact the area, as any development would have some sort of impact on an area with no development. However, this should not be confused with a degradation of resources. After construction, most impacts will be eliminated, notably air quality, and because wind turbines are passive features on the landscape, there will be few ongoing impacts that would “degrade” resources.</p> <p>The consistency determination correctly points out that the Project will not induce population growth. Consistency Determination for Goal LU-2 has previously stated that the rural character of the Boulevard area will not be degraded by the Tule Wind Project. Consider revising language as the discussion appears contradictory with other policies and conclusions made in Table 7-2 of the Draft EIR/EIS.</p> <p>Please consider revising analysis to conclude with same consistency determinations made for LU 1.1-2 and LU 1.1-3 made in Table 7-2 of the Draft EIR/EIS.</p>

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			identified issue areas, the Tule Wind Project would not be consistent with this policy.	
96.	Appendix 7	7-66	<p><i>Policy LU 1.1.2 (Consistency Determination)</i></p> <p>As identified in Section D, APMs and mitigation measures would be implemented by Pacific Wind Development <u>Tule Wind, LLC</u> to protect the quality and quantity of ground and surface water resources...</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
97.	Appendix 7	7-66	<p><i>Goal LU-1.2 (Consistency Determination)</i></p> <p>See response to Goal LU 1.1 and Policy LU 1.1.1, above. Project components under County of San Diego land use jurisdiction are not anticipated to significantly impact the rural character of the Boulevard area. In addition, mitigation has been proposed to minimize impacts to groundwater resources (see Section D.12, Water Resources) and visual resources (see Section D.12, Visual Resources). Therefore, with implementation of mitigation, project components under the County's jurisdiction would be consistent with this goal.</p>	Please consider striking sentence as the analysis provided for LU 1.1 and LU1.1.1 provides an inaccurate analysis, as noted in the Consistency Determinations made for LU 1.1.2, LU 1.1.3, and LU 1.2.
98.	Appendix 7	7-66 – 7-67	<p><i>Goal LU 1.2 (Consistency Determination)</i></p> <p>Although implementation of the Tule Wind Project would result in significant and unmitigable visual impacts (see Section D.3, Visual Resources for discussion of visual impacts), Pacific Wind Development <u>Tule Wind, LLC</u> would implement APMs and mitigation measures that would protect visual resources to the extent feasible. In addition, <u>Tule Wind, LLC</u> Pacific Wind Development has proposed APMs and mitigation measures to address anticipated impacts to Cultural and Natural Resources (see Section D.7 Cultural Resources and Section D.2 Biological Resources). Therefore, with implementation of mitigation measures, project component under County jurisdiction would be consistent with this goal.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.

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99.	Appendix 7	7-67	<i>Policy LU 1.2.2 (Consistency Determination)</i> See response to Goal LU 1.1 above. Project components under the County's jurisdiction would not significantly impact the rural character of the Boulevard community and would, therefore, be consistent with this policy.	Please strike sentence. The analysis for LU 1.1 provides an inaccurate analysis, as noted in the Consistency Determinations made for LU 1.1.2, LU 1.1.3, LU 1.2, and LU 1.2.2.
100.	Appendix 7	7-67	<i>Goal LU 3.2 (consistency Determination)</i> See Section D.2, Biological Resources which provides a detailed discussion regarding impacts to the native and riparian habitat resulting from construction of the Tule Wind Project. As discussed in Section D.2, a total of 17 native vegetation communities were mapped within the Tule Wind Project area. Section D.2 concludes that a total of 203.8 <u>214.5</u> acres of native vegetation would be temporarily impacted by construction and a total of 456 <u>485.2</u> acres of native vegetation communities would be permanently impacted by the Tule Wind Project (a fraction of these impacts would occur on County of San Diego jurisdictional lands)....	Please revise language to reflect corrected analysis per the Modified project Layout.
101.	Appendix 7	7-67 – 7-68	<i>Goal LU 5.1 (Consistency Determination)</i> As discussed in Section D.15 Fire and Fuels Management, the Tule Wind Project (including 7 <u>13</u> wind turbines and the 2-3 mile segment of the transmission line under the County's jurisdiction) would increase the probability of wildfire in the Boulevard area. To combat this increased risk, Pacific Wind Development <u>Tule Wind, LLC</u> would implement mitigation including the provision of funding for the training and acquisition of necessary firefighting equipment and services to the local fire authority to improve the response and firefighting effectiveness near the electrical substation....	Please update language to reflect corrected analysis per the modified Project Layout. Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
102.	Appendix 7	Appendix 7-68	<i>Policy LU 6.1 (Consistency Determination)</i> Although The Tule Wind Project would not significantly impact the community character of Boulevard (see	Please strike sentence and revise per corrected analysis. Please revise conclusion in accordance with other conclusions made in Table 7-2 of the Draft EIR/EIS.

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			<p>response to Goal LU 1.1, above), project components including wind turbines and the 138 kV transmission line would result in significant visual contrasts (see Section D.3 Visual Resources) and significant wildfire impacts (see Section D.15 Fire and Fuels Management). However, as identified in Section D, APMs and mitigation measures would be implemented by Tule Wind, LLC to protect the environment to the maximum extent. In addition other mitigation measures have been imposed to reduce impacts, and the project will bring significant benefits to the community and the San Diego region. Therefore, because construction and operation of Tule Wind Project (including project components under the County's jurisdiction) would result in significant environmental impacts that would negatively impact the community, the Tule Wind Project would not be consistent with this policy.</p>	<p>The Tule Wind Project will have significant positive impacts on the Boulevard community and communities throughout the San Diego region. These positive impacts include the development of renewable energy to curb greenhouse gas emissions, the economic impacts to the community of construction jobs and the ancillary economic activity created, construction of new roads that will enable firefighters to reach backcountry areas to put out wildfires, new roads which will provide a second evacuation route from the McCain Valley, and improvements to local campgrounds.</p> <p>In addition the Tule Wind Project has created a Fire Prevention Plan, as well as design features for the wind turbines, in consultation with CAL FIRE and the San Diego County Rural Fire Protection District which will mitigate fire risk to below a level of significance.</p> <p>Visual resources may be impacted by the Project, but cannot be considered “negative” with respect to the Goal, due to the offsetting benefits to the community and the region at large.</p>
103.	Appendix 7	Appendix 7-68	<p><i>Policy LU 6.1.1: (Consistency Determination)</i></p> <p>See response to Goal LU 1.1 The installation and operation of 137 turbines and a 32-mile segment of a 138 kV transmission line and support structures would not significantly impact the existing character of the project area. Turbines would, however, be equipped with obstruction lighting that would operate during the nighttime. However, the dark skies policy relates to light pollution impacting the Palomar and Mount Laguna Observatories. The minimal FAA lighting for the wind turbines would not impact these facilities and would therefore not impact the dark skies of the area. and would impact the dark skies of the Boulevard area. As discussed in Section D.3, Visual Resources, mitigation would be implemented by Pacific Wind Development to minimize the anticipated visual resource impacts of the</p>	<p>The policy calls for development to mitigate adverse impacts. The Tule Wind Project provides mitigation and project design features to minimize adverse impacts to the area, consistent with the policy. The DEIR/DEIS reading of the policy would preclude all development with any impact, even if mitigation were applied. This would be a virtual prohibition on development, which is not intended by the Draft General Plan Update.</p> <p>In addition, the dark skies policy for the Boulevard Subregional Plan comes from the larger dark skies goal in the Draft General Plan Update which states at Goal COS - 13: “Dark Skies. Preserved dark skies that contribute to rural character and are necessary for the local observatories.” This goal is in place to minimize light pollution for the Mount Laguna and Palomar Observatories. The FAA lighting required for airplane protection from the</p>

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			<p>Project to the extent feasible. While dark sky impacts would be minimized through the implementation of mitigation, the addition of turbine night lighting would negatively impact the dark skies of Boulevard and, therefore, Therefore, the Tule Wind Project would not be consistent with this policy.</p>	<p>wind turbines is very small and does not emit the amount of light necessary to interfere with observatory operations. Since the wind Turbine lighting will not impact these observatories then there would be no inconsistency with this policy.</p>
104.	Appendix 7	Appendix 7-68	<p><i>Policy LU 6.1.2: (Consistency Determination)</i></p> <p>See response to Goal LU 1.1. Project components under the County's jurisdiction would be consistent with this policy.</p>	<p>Please strike sentence. The analysis for LU 1.1 provides an inaccurate analysis, as noted in the Consistency Determinations made for LU 1.1.2, LU 1.1.3, LU 1.2, and LU 1.2.2.</p>
105.	Appendix 7	Appendix 7-69	<p><i>Policy LU 6.1.4 (Column 1, Applicable Land Use Plan, Policy, or Regulation)</i></p> <p>Policy LU 6.1.4.: Prohibit industrial or commercial development with unmitigated and unmitigable impacts the Boulevard area, such as:</p> <ul style="list-style-type: none"> • Health and safety of the general public, including fires ignited from malfunctioning industrial wind turbines, and related equipment, blade shedding, shadow flicker and tower collapse, and as well as construction and maintenance equipment. • <u>Unregulated maintenance and operation of equipment that poses health and safety concerns to the general public, including fires ignited from malfunctioning industrial wind turbines, and related equipment.</u> • <u>Insufficient setbacks to minimize shadow flicker</u> • <u>Inadequate setbacks from adjacent private property relative to tower height to mitigate against tower collapse and blade shedding.</u> • Impairment of visual resources and the rural community character • <u>Insufficient setbacks to mitigate noise impacts, as defined by Safety Element Tables N-1, Noise Compatibility Guidelines, and Table N-2, Noise Standards.</u> • Noise pollution, ultrasonic and infrasonic vibrations, emanating from the site as it creates 	<p>Please revise Policy to reflect Draft General Plan Update Recommended Project - October 2010.</p>

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			<p>great human discomfort and adversely affects the health of impacted humans, wildlife, and livestock, and the tranquility and quiet ambiance and enjoyment of the rural environment, the quality of life, and property values.</p> <ul style="list-style-type: none"> • Seismic wave impacts, ground vibrations, and chemical and oil spills • Light pollution of dark sky resources and shadow flicker effect that create a nuisance, and result in negative impacts to health and quality of life. • Economic devaluation of impacted properties regardless of the proximity. 	
106.			<p><i>Policy LU 6.1.4 (Column 2, Consistency Determination)</i></p> <p>The introduction of wind turbines and the overhead 138 kV transmission line on County of San Diego jurisdictional land would result in significant and unmitigable impacts related to Public Health and Safety (see Section D.10), Visual Resources (see Section D.3), and Noise-Air Quality (see Section D.118). Therefore, because project components under the County's jurisdiction would result in significant and unmitigable impacts the Tule Wind Project would not be consistent with this policy.</p>	Please update language to reflect conclusions made in Sections D.2 through D.18.
107.	Appendix 7	Appendix 7-69	<p><i>Policy CM 2.1.3 (Consistency Determination)</i></p> <p>As discussed in Section D.12, Water Resources, Pacific Wind Development <u>Tule Wind, LLC</u> would prepare a Stormwater Management Plan (SWMP) for the Tule Wind Project. As required by Mitigation Measure HYD-6 (see Section D.12) Pacific Wind Development <u>Tule Wind, LLC</u> would be required to implement Low-Impact Development Features which could include the use of permeable pavement...</p>	Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
108.	Appendix 7	Appendix 7-70	<p><i>Policy CM 3.1.1 (Consistency Determination)</i></p> <p>Project components under County jurisdiction (43 <u>7</u> wind turbines and a 23-mile segment of the 138 kV</p>	Please update language to reflect corrected analysis per the Modified Project Layout.

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			transmission line) would be unmanned and would not required access/egress routes. Therefore, this policy would not be applicable to the proposed Tule Wind Project.	
109.	Appendix 7	Appendix 7-70	<p><i>Policy CM 8.1.1 (Consistency Determination)</i></p> <p>Construction of wind turbines and the 23-mile segment of transmission line under County jurisdiction would use a fraction of the overall construction water requirements of the Tule Wind Project. To ensure that impacts to the local groundwater during construction would be less than significant, Pacific Wind Development <u>Tule Wind, LLC</u> would implement Mitigation Measures HYD-3, HYD-4, and HYD-5 (see Section D.12, Water Resources)....</p>	<p>Please update language to reflect corrected analysis per the Modified Project Layout.</p> <p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p>
110.	Appendix 7	Appendix 7-70	<p><i>Policy CM 8.6.2: Consistency Determination</i></p> <p>The Tule Wind Project would include the establishment of new ROW for a 138 kV transmission line. <u>Although the policy discourages new transmission corridors it does not prohibit them. Therefore, the County of San Diego's issuance of a Major Use Permit for the development of wind turbines and a transmission line will make the Project consistent with this policy.</u> and therefore would not be consistent with this policy.</p>	<p>The Sunrise Powerlink traverses this area and has made the area a “used” energy corridor and not a “new” energy corridor which is discouraged in the policy.</p> <p>In addition, the policy is permissive and is not a prohibition on the development of new energy corridors. Although the policy “discourages” the establishment of these new corridors, it does not prohibit them. Therefore, if the San Diego County Board of Supervisors grants the MUP for the turbines on land in the County’s jurisdiction, then the Project would comply with this policy.</p>
111.	Appendix 7	Appendix 7-70	<p><i>Policy COS 1.5.1: Consistency Determination</i></p> <p>Because development of proposed wind turbines and the overhead transmission line would require grading at proposed turbine locations and along turbine access roads, the Tule Wind Project would not be consistent with this policy.</p>	<p>This policy has been deleted from the October 2010 Draft of the Boulevard Subregional Plan.</p>
112.	Appendix 7	Appendix 7-71	<p><i>Goal SI.1</i></p> <p>See Section D.15, Fire and Fuel Management. While the Tule Wind Project would add multiple ignition sources to the project area and would increase the probability of</p>	<p>Please revise as noted to clarify content requirements of affected fire agencies</p>

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			wildfire in the area, Pacific Wind Development <u>Tule Wind, LLC</u> would implement mitigation that would provide funding for the training and acquisition of necessary firefighting equipment and services to the local fire authority. In addition, Pacific Wind Development <u>Tule Wind, LLC</u> would prepare a customized fire protection plan for the project) for the Tule Wind Project which would include (at minimum) San Diego County FPP content requirements, <u>San Diego County Fire Authority content requirements</u> , and Rural Fire Protection District content requirements (see Section D.15 for additional information). Therefore, with implementation of mitigation discussed in Section D.15, the Tule Wind Project would be consistent with this policy.	
113.	Appendix 7	7-71	Banner Heading: County of San Diego Existing General Plan – Mountain Empire Subregional Plan	The DEIR / DEIS appears to mix policies from the County of San Diego Draft General Plan Update – Mountain Empire Subregional Plan with the existing Subregional Plan. The comments that follow make corrections. Please refer to the October 2010 Draft of the Mountain Empire Subregional Plan.
114.	Appendix 7	7-71	<i>Community Character (Overall Goal)</i> The predominant land use character of the Mountain Empire subregion is overwhelmingly rural residential. The Tule Wind Project would introduce 7 <u>13</u> wind turbines and a segment of the 138 kV transmission line to the Mountain Empire Subregion. Turbines in the R turbine string would be located approximately 4.5 miles northeast of the community of Boulevard and would be surrounded by turbines of similar size and color. The segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley Road and east <u>west</u> along Old Highway 80 prior to interconnecting with the Boulevard Substation.	Please revise language to reflect corrected analysis per the Modified Project Layout.

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115.	Appendix 7	7-72	<p><i>Land Use (Industrial Goal, Policy 4):</i></p> <p>Land Use (Industrial Goal, Policy 4): Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.</p> <p><i>The Existing Mountain Empire Subregional Plan, Industrial Goal, Policy 4 is:</i></p> <p><u>Protect areas designated for industrial use from encroachment by incompatible, non-industrial uses.</u></p>	This Policy comes from the Draft Mountain Empire Subregional Plan:
116.	Appendix 7	7-72	<p><i>Add policy from Existing Mountain Empire Subregional Plan:</i></p> <p><u>Land Use (Industrial Goal, Policy 11): Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area such as wind turbine generators, for any of the following reasons:</u></p> <p>a) <u>Safety of the general public</u> b) <u>Unmitigated visual impact on the rural environment.</u> c) <u>Noise pollution emanating from the site exceeding 65 (decibels) (dBs at the property line, as it creates great human discomfort and adversely affects the tranquility of the rural environment.</u> d) <u>Such development may lead to economic devaluation of contiguous properties.</u></p>	This is an applicable policy from the Industrial Land Use section of the existing Mountain Empire Subregional Plan.
117.	Appendix 7	7-72	<p><i>Consistency determination for Land Use (Industrial Goal, Policy 11) shown above:</i></p> <p>a) <u>Development of the Tule Wind Project would increase the probability of wildfires occurring in the project area, however, Tule Wind, LLC will implement APMs TULE-PDF-1 through TULE-PDF-26, and mitigation measures that will reduce this risk below a</u></p>	This consistency analysis draws conclusions from the Fire & Fuels Management, Public Safety, Socio-Economic, Noise, and Visual impacts sections.

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			<p><u>level of significance. On November 3, 2010, the San Diego Rural Fire Protection District approved Tule Wind, LLC's Fire Protection Plan for the project, which concluded that the project had reduced fire risk to a less than significant level. Tule Wind, LLC will implement mitigation to provide funding and training for the local fire authority to aid in response and firefighting capabilities (see Section D.15 Fire and Fuel Management). In addition, a primary safety hazard that may occur during operation of a wind turbine project is breaking of a rotor blade, which is typically referred to as a "blade throw." Breaking of a rotor blade or other similar damage may occur as a result of rotor over speed. The project would implement the latest in modern wind turbine technology, which includes a safety system ensuring that the wind turbine shuts down immediately at the onset of mechanical disorders, such as nacelle vibration, over speed, grid electrical disorders, or loss of grid power. Moreover, the project would ensure that a sufficient safety zone or setback exists from wind turbine generators to residents and occupied buildings, any structures, roads, transmission lines, and other public access areas as provided for in APM TULE-PHS-3 and superseded by Mitigation Measure HAZ-6. In addition there is risk of tower collapse. With the proposed design and setback features that are part of the project and described previously, impacts associated with the potential collapse of a wind turbine would not be adverse. Therefore, with implementation of mitigation, public safety impacts would be minimized to the extent feasible and project components of the Tule Wind Project under County land use jurisdiction would be consistent with this policy.</u></p> <p><u>b) Although visual impacts from the Tule Wind Project will be significant, mitigation measures have been applied to reduce the visual impacts of the Project. Therefore, with mitigation applied, the Project will be consistent with this policy.</u></p>	

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			<p>c) <u>Although construction noise would be a significant impact, this impact would be temporary. Construction noise mitigation measures will also be implemented to reduce noise. Wind turbine operational project-related noise levels range from 32 dBA to 59 dBA, as shown in Table D.8-10 and are therefore consistent with this policy.</u></p> <p>d) <u>There is no evidence that the construction of wind turbines devalues adjacent property. Property valuation is highly speculative. Please see Memorandum of HDR, Summary of Current Studies Regarding Wind Farms and Property Values, dated October 16, 2009. Attached are additional studies with similar conclusions published after that date, including, Hoen et al., The Impact of Wind Power Projects on Residential Property Values in the United States: A Multi-Site Hedonic Analysis, Ernest Orlando Lawrence Berkeley National Laboratory (December 2009). Therefore, the Project is consistent with this policy.</u></p>	
118.	Appendix 7	7-72	<p><i>Conservation (Policy 4) (Column 1, Applicable Plan, Policy, or Regulation)</i></p> <p>Conservation (Policy 4 6): The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.</p>	The existing policy shown is at Policy 6 in the Existing Subregional Plan while Policy 4 is changed in the Draft Update.

Attachments

D.16.1 - Memorandum of HDR, Summary of Current Studies Regarding Wind Farms and Property Values, dated October 16, 2009.

D.16.2 - Hoen et al., The Impact of Wind Power Projects on Residential Property Values in the United States: A Multi-Site Hedonic Analysis, Ernest Orlando Lawrence Berkeley National Laboratory (December 2009).

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.5: Wilderness and Recreation

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Wilderness and Recreation	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
2.	Wilderness and Recreation	D.5-5	<i>Cottonwood Campground (fourth paragraph)</i> Located in the northern extent of the McCain Valley National Cooperative Land and Wildlife Management Area, the Cottonwood Campground contains 30 <u>25</u> developed campsites, fire rings, tables, and numerous hiking trails connecting it to surrounding wilderness areas (BLM website , 2010 1997).	Please revise as stated within the Tule Wind Applicants Environmental Document (AED).
3.	Wilderness and Recreation	D.5-16	<i>Third paragraph</i> Wind turbines and the overhead and underground collector cable system would not be located within designated wilderness, wilderness study areas, or ACECs (renewable energy facilities and land use authorizations for commercial purposes are not permitted in wilderness areas, wilderness study areas, or ACECs (BLM 2008)). ... Several other turbine strings (D- and E-strings on BLM land and R-strings on County lands) would be located on lands bordering the In-Ko-Pah Mountains ACEC and the Carrizo Gorge Wilderness Study Area...	Consider striking language and clarifying to indicate that renewable energy may be allowed within an ACEC in accordance with policies outlined in BLM’s Instructional Memorandum (IM 2009-043) which states that “[t]he Wind Energy Programmatic EIS established the previous policy that all ACECs were to be excluded from wind development. This IM changes this policy to ensure consideration of the purpose and specific environmental sensitivities for which the area was designated. All new, revised, or amended land use planning efforts will address and analyze ACEC land use restrictions individually, including restrictions to wind energy development. For future land use planning efforts, ACECs will not universally be excluded from

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				<p>wind energy site testing and monitoring or wind energy development but will be managed consistent with the management prescriptions for the individual ACEC.”</p> <p>The project will be sited away from any critical habitat areas and appropriate mitigation measures will be implemented into project design to avoid adverse impacts to ACEC. The term “lands” is not sufficiently precise.</p>
4.	Wilderness and Recreation	D.5-17	Figure D.5-4 Tule Wind Project Wilderness and Recreation Areas	<p>Please update turbine locations as reflected in the Modified Layout.</p> <p>Please update to reflect 3 permanent and 3 alternate turbine locations.</p>
5.	Wilderness and Recreation	D.5-19	<p>As shown on Figure D.5-4, Tule Wind Project Wilderness and Recreation Area, <u>three</u> meteorological towers and <u>a one</u> sonic detecting and ranging (SODAR) <u>or LIDAR (Light Detecting and Ranging)</u> unit would be installed within the McCain Valley National Cooperative Land and Wildlife Management Area. Although four-six meteorological towers are shown on Figure D.5-4, only two-three (PM-E1 and, PM-W2, and PM-X1) are proposed locations at this time (PM-E2, and PM-W1, and PM-X1 are alternative locations). PM-E1 would be installed approximately 1,300 feet west of the Carrizo Overlook, and PM-W-2 would be installed within the Lark Canyon OHV Area, approximately 2,600 feet west of the Lark Canyon Campground, <u>and PM-X1 would be located on BLM land adjacent to turbine L-6.</u> As proposed, the SODAR <u>or LIDAR</u> unit would be installed immediately west of PM-W2.</p>	<p>Please update to reflect changes to the meteorological towers locations due to the Modified Layout.</p>

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6.	Wilderness and Recreation	D.5-28	<p><i>County of San Diego Draft General Plan Update– Conservation and Open Space Element</i></p> <p>The County of San Diego Draft General Plan Update, Conservation and Open Space Element (County of San Diego 2010b), was reviewed for parks and recreation goals and policies that would <u>may</u> be applicable. The following goals and policies <u>are presented for informational purposes; however, the following goals are not applicable to the proposed project because the Draft General Plan has not yet been adopted were found to be relevant to the Proposed PROJECT:</u></p>	Please revise language to indicate clarify the applicability of the Draft General Plan.
7.	Wilderness and Recreation	D.5-34	<p>Use of portions of Access to recreation areas including the Lark Canyon OHV Area <u>may be limited; however, use of the Lark Canyon Campground, Cottonwood Campground, Carrizo Overlook, and Sacatone Overlook will not be restricted could be reduced</u> during construction. and In some instances, access roads off McCain Valley Road to these areas may be temporarily closed (resulting in temporary closure of areas and facilities).</p>	Please revise as suggested. Use and access of Lark Canyon Campground and Cottonwood Campground would not be affected. Please see Attachment D.5.1, Ecologic OHV Support Letter to show the beneficial affect that the additional roadways will have for the Lark Canyon OHV Area.
8.	Wilderness and Recreation	D.5-35	<p><i>First paragraph</i></p> <p>Construction could also result in <u>sporadic and temporary closure for 3 to 6 months of the Lark Canyon and Cottonwood campgrounds and portions of the Lark Canyon OHV Area during construction work hours.</u></p>	Please revise as suggested to include more specific detail regarding the planned temporary closure.
9.	Wilderness and Recreation	D.5-37	<p>Also, the noise generated by construction vehicles and equipment could temporarily reduce visitation to <u>some portions of</u> wilderness and recreation areas. (Section D.8 analyzes noise impacts associated with construction of the Proposed PROJECT.) In some cases, the Proposed PROJECT would result in the temporary closure of <u>a portion of the recreation areas (such as the Lark Canyon OHV Area)</u> to accommodate construction activities.</p>	Please revise as suggested to reflect that only portions of these areas would be affected.

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10.	Wilderness and Recreation	D.5-39	<p><i>Second paragraph (Tule Wind Project-BLM Rec Areas)</i></p> <p>A significant impact to recreational activities <u>has been avoided by laying the Project out in the Lark Canyon OHV Area in a manner that minimizes impacts on OHV established routes.</u> could occur in the Lark Canyon OHV Area if wind turbines were sited on OHV trails and the trails were ultimately closed for public use. <u>A</u> However, as stated previously, the Lark Canyon OHV Area consists of miles of trails and includes four established routes (Wounded Knee, Ridge, Valley, and Big Rock Trails)....</p> <p><i>Last paragraph</i></p> <p>In addition, as discussed in Section B, Project Description, all new permanent spur access roads would be gated off the main access road <u>McCain Valley Road, where required by the BLM, in order to prevent unauthorized vehicle access.</u> The installation of gates on spur access roads <u>off of McCain Valley Road, if required,</u> would not impact the use of existing OHV roads and trails within BLM recreation areas.</p>	The Project has been designed to minimize adverse impacts to established routes within the OHV Area. Please revise language as suggested.
11.	Wilderness and Recreation	D.5-40	As proposed, several wind turbines would be located on lands bordering BLM-administered wilderness areas. For example, turbines J-H-1 through J-H-5 and J-8 <u>1</u> constructed on Ewiiapaayp tribal lands <u>and BLM lands</u> would be located less than 100 feet from the Sawtooth Mountains Wilderness. Also, the closest wind turbine (turbine R-40-11) would be located approximately 4,000 feet west of the Carrizo Gorge Wilderness.	Please update to reflect turbines identified in the Modified Layout.

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12.	Wilderness and Recreation	D.5-41	Turbines R47 through R110 and R13 would be located on County jurisdictional land bordered to the north and east by the In-Ko-Pah ACEC. Because the land on which proposed turbines would be located does not currently provide for recreational use, the development of turbines on this land would not preclude recreational activity. Wind turbines in the R-E- and G-strings would be visible from the Ribbonwood Trial Trail and Ribbonwood Road Pathway;	Please update to reflect turbine numbers as identified in the Modified Layout.
13.	Wilderness and Recreation	D.5-42	When the Tule Wind Project is decommissioned, project components under the County's jurisdiction (43-7 wind turbines and a segment of the 138 kV transmission line) would be removed from County lands, and these areas would resume prior land uses according to local regulations and designated land uses.	Please update to reflect the number of turbines as identified in the Modified Layout.
14.	Wilderness and Recreation	D.5-43	As shown on Figure D.5-4, Tule Wind Project Wilderness and Recreation Area, components of the Tule Wind Project would not traverse or be located in a designated wilderness or a wilderness study area. Although wind turbines J-H-1 through J-H-5 and J-81 would be constructed on Ewiiapaayp tribal lands within approximately 100 feet of the Sawtooth Mountains Wilderness, turbines would not be located within the wilderness area. The closest wilderness study area, the Carrizo Gorge Wilderness Study Area, would be located approximately 4,000 feet east of the nearest project component (wind turbine R10). Therefore, implementation of the project would not result in a loss of wilderness land, and no impacts would occur (No Impact).	Please update to reflect the number of turbines as identified in the Modified Layout.
15.	Wilderness and Recreation	D.5-45	<i>First paragraph</i> Although components of the Tule Wind Project would not be located within a wilderness area or an ACEC, 44 5 wind turbines (turbines R47 through R101 and R13) are located near wilderness areas and	The Project has been designed to minimize adverse impacts to established routes within the OHV Area. Please revise language as suggested.

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			<p><u>an ACEC. The project components would not result in an increase in unauthorized access to specially designated or restricted areas or cause an adverse effect to recreational users of the area that would be considered significant.</u> would be located on private County jurisdictional land that is bound to the east and north by the BLM-administered In-Ko-Pah ACEC. To access these proposed turbine locations, four <u>two</u> new access roads are proposed and would be constructed off McCain Valley Road. New access roads to turbines R47 through <u>R101</u> and R13 would be located within 1.5 miles of the Lark Canyon OHV Staging Area and could be used by OHV recreations to access the In-Ko-Pah ACEC (an existing system of nonmotorized routes is located within the In-Ko-Pah ACEC)..... However, as identified in Section B, Project Description, all new permanent spur access roads would be gated off the main access road <u>McCain Valley Road, where required by the BLM</u> to prevent unauthorized <u>vehicle</u> access. Therefore, because gates would be installed <u>where required by BLM,</u> on all new permanent spur access roads and instances of unauthorized access would be minimized through project design, identified WR-4 impacts would not be adverse, and under CEQA, impacts would be less than significant (Class III).</p>	
16.	Wilderness and Recreation	D.5-46	<p><i>Second paragraph</i></p> <p>Although Pacific Wind Development Tule Wind, LLC (Tule Wind Project) would construct <u>four</u> two new access roads off McCain Valley Road (within 1.5 miles of the Lark Canyon OHV Area) to access proposed turbines R1 through R10 and R13 <u>R7 through R11</u>, located on County land bound by the In-Ko-Pah ACEC, the potential for unauthorized access to the ACEC would be minimized by the installation of gates on all new permanent spur access roads <u>off of McCain Valley Road, where required by the BLM.</u></p>	Please update language to reflect corrected analysis.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
17.	Wilderness and Recreation	D.5-75; Table D.5-5	<p>Table D.5-5</p> <p>Tule REC-1: Pacific Wind Development shall provide improvements to the Lark Canyon and Cottonwood Campgrounds, as follows:</p> <ul style="list-style-type: none"> • Shade cabanas at all of the camp sites Roadways into the campgrounds upgraded to accommodate trailers • Trail signs and maps • Additional BBQ circles and grates. 	Please update language to reflect corrected analysis.

Attachments

D.5.1 - Ecologic OHV Support Letter

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Section D.6: Agriculture

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Agriculture	Entire Section	Please remove strikeouts and underlines in existing paragraphs accordingly.	The language in various paragraphs throughout the section includes random strikeouts and underlined words that do not reflect emphasized statements and may have been left in the discussion as mistake.
2.	Agriculture	Entire Section	Please reformat apostrophes that currently appear backwards.	Throughout the section, many apostrophes are backwards and should be reformatted. E.g., the Tule Wind Project's . . .
3.	Agriculture	Entire Section	Please replace "Pacific Wind Development" with "Tule Wind, LLC."	Tule Wind, LLC is now the Tule Wind Project applicant. "Pacific Wind Development" should be replaced throughout the document with "Tule Wind, LLC."
4.	Agriculture	D.6-3	Figure D.6-1 Department of Conservation Farmland Mapping and Monitoring Overview Map	Please update figure to reflect the Modified Project Layout.
5.	Agriculture	D.6-5	Figure D.6-2 Department of Conservation Farmland Mapping and Monitoring ECO Project Components	Please update figure to reflect the Modified Project Layout.
6.	Agriculture	D.6-7	<i>Third paragraph</i> According to the County Department of Planning and Land Use (DPLU) Geographic System Mapping data, the project extent boundary contains 202.7 acres of agricultural preserves as shown in Figure D.6-3, Williamson Act and Grazing Lands.	There are no portions of the Project under Williamson Act contract. This reflects incorrect information contained within County Geographic System Mapping data. As noted on page D.6-19, the Tule Wind Project would not impact agricultural preserves or Williamson Act contracts
7.	Agriculture	D.6-7	<i>Fourth paragraph</i> According to the Bureau of Land Management (BLM) Eastern San Diego County Proposed	Please consider revising the reference to the RMP/EIS/ROD to stay consistent with other sections

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) (2007), the McCain Valley Allotment covers 31,481 acres (including the In-Ko-Pah, Mt. Tule, Table Mountain, and Tierra Blanca sub-allotments) of grazeable land.	
8.	Agriculture	D.6-8	<i>First paragraph</i> A small portion of the Tule Wind Project's 138 kV transmission line alignment would be located on County land designated as <u>General Agriculture and Multiple Rural Use</u> (1 DU/4, 8, 20 acres), but would not be located on any lands zoned <u>designated</u> for forest use or timberland or <u>zoned as</u> Timberland Production.	Please update the language to correctly describe the General Plan and Zoning designations over County land.
9.	Agriculture	D.6-9	Figure D.6-3 Williamson Act and Grazing Lands	Please update figure to reflect the Modified Project Layout.
10.	Agriculture	D.6-19	<i>Second paragraph</i> Therefore, as the project is consistent <u>with</u> the RMP, the project would not conflict with BLM land use designation.	It appears that a word is missing from this sentence.
11.	Agriculture	D.6-29	This alternative would extend the overhead collector cable system from its end point in the proposed Tule Wind Project (near proposed turbine R5-G-18) to the relocated collector substation.	Please update figure to reflect the Modified Project Layout.
12.	Agriculture	D.6-33	In addition, this alternative would extend the overhead collector cable system from its end point in the proposed Tule Wind Project (near proposed turbine R5-G-18) to the relocated collector substation.	Please update figure to reflect the Modified Project Layout.
13.	Agriculture	D.6-37	Under this alternative, the environmental setting would be the same as described in Section B, Project Description, of this EIR/EIS with the exception that this alternative would remove 62 of the proposed 134 128 turbines associated with the Tule Wind Project.	Please update figure to reflect the Modified Project Layout.

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Section D.7: Cultural and Paleontological Resources

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Cultural and Paleontological Resources	Entire Section	Please remove strikeouts in existing paragraphs accordingly.	The language in various paragraphs throughout the section includes random strikeouts that may have been left in the discussion as mistake.
2.	Cultural and Paleontological Resources	Entire Section	Traditional Cultural Properties have not been identified to be located within the project area.	GLOBAL CHANGE: No TCPs have been identified. The recordation of a TCP is a formal process that should have documentation of a specific geographic location. This section is tied to the sacred sites identified by the NAHC, but should not be confused with formal TCP designations. Please consider revising remaining text as suggested for clarification.
3.	Cultural and Paleontological Resources	Entire Section	Please replace “Pacific Wind Development” with “Tule Wind, LLC.”	Tule Wind, LLC is now the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
4.	Cultural and Paleontological Resources	D.7-3	<p><u>Tule Wind, LLC is proposing modifications to portions of the Tule Wind Project facilities. These changes are necessitated by several circumstances, primarily updated information regarding sensitive resources or conditions on the ground, and avoiding such resources.</u></p> <p><u>Cultural surveys of the project area were completed in 2010 and modifications were made to avoid cultural or archaeological resources. Newly identified features require changes to reduce or eliminate impacts to archaeological resources.</u></p> <p><u>In anticipation of such project design modifications,</u></p>	Please update text to reflect the correct methodology and assumptions for the Tule Wind Project.

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			<p><u>Tule Wind, LLC conducted additional cultural and biological resources surveys on lands that may be impacted by relocated wind turbines, access roads, and resource avoidance. Nearly all sites eligible for listing on the National Register of Historic Places will be protected and project construction activities will impact only three such resources. Portions of eight prehistoric archaeological sites may be formally evaluated for significance.</u></p> <p><u>As described in the Draft EIR/EIS, the proposed project (including anticipated modifications) will be constructed and operated to avoid impacts to nearly all cultural and sensitive biological resources. Taking a conservative approach, IBR surveyed a larger area than is needed in an effort to encompass all land area that could potentially be affected by project modifications (e.g., wind turbine and/or access roads). As compared to the proposed project, the modified project design (based on the new surveys) demonstrates that no new significant impacts or changes to the mitigation identified in the Draft EIR/EIS are anticipated to occur as a result of the modified project design.</u></p>	
5.	Cultural and Paleontological Resources	D.7-4	Report for the Tule Wind Project prepared by ASM Affiliates (ASM Affiliates, Inc. 2010a, <u>2011a</u>)	Please update to reflect the updated version of the ASM Cultural Report.
6.	Cultural and Paleontological Resources	D.7-4	Together, the APE <u>survey</u> encompasses 3,570 <u>5,724</u> acres, including 3.6 to 4.1 miles of transmission line.	Please update to the correct survey acreage as reflected in the Modified Project Layout.
7.	Cultural and Paleontological Resources	D.7-4	An intensive inventory of an approximate 9% sample (Class II), <u>constituting 1,741 acres</u> of portions of the non-APE project right-of-way (ROW) was also completed, in accordance with Bureau of Land Management (BLM) Guidelines for renewable energy inventories. An additional 1,000 feet/300 meters (500 feet/150 meters each side of centerline) was allocated for alternative transmission line corridors south of the project ROW, spanning 1-8. Sample survey areas with a	Please consider revising text as suggested for clarification.

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			high probability of containing cultural resources and that could provide survey coverage in parts of the ROW that were not affected by the current <u>original APE</u> were selected for intensive inspection.	
8.	Cultural and Paleontological Resources	D.7-4	<ul style="list-style-type: none"> A total of approximately 4,900 <u>7,465</u> acres was subject to 100% intensive survey, including both APE (3,159 <u>5,724</u> acres) and ROW (1,741 acres) survey areas. A small portion totaling 381 acres in the southeast corner and some access roads on Indian Reservation lands of the APE were not surveyed due to private property access issues. Most of the sampled ROW survey acreage was on BLM land (1,278 acres), with 82 acres on Indian Reservation land, and 365 acres on private property. The APE inventory (including the 381 acres remaining to survey) covers 1,809 <u>3271.5</u> acres on BLM land, 167 <u>291.8</u> acres on state land, 172 <u>544</u> acres on Indian Reservation land, 5 acres on California Department of Transportation (Caltrans) land, less than 1 acre on County land, and 1,005 <u>1610.7</u> acres on private land. All anticipated impact areas were intensively surveyed in no greater than 20-meter (60-foot) transect spacing. 	Please update to the correct survey acreage as reflected in the Modified Project Layout.
9.	Cultural and Paleontological Resources	D.7-25	<ul style="list-style-type: none"> The 100% survey of the project APE and 9% sample of the ROW were completed by ASM Affiliates between January and July, 2010 <u>and January 2011</u> (ASM Affiliates, Inc. 2010a, 2011a). A total of 102 <u>166</u> new sites were identified: 68 <u>132</u> in the APE survey, while and 34 in the ROW sample survey. These <u>A total of 54 previously recorded sites were also visited and documented during fieldwork: 45 in the APE survey and nine in the ROW survey, bringing the total number of sites documented during fieldwork to 220: 177 in the APE survey and 43 in the ROW survey. All 220 field documented sites are listed in Table D.7-6.</u> 	Please update to the correct survey acreage as reflected in the Modified Project Layout and the updated ASM Report.
10.	Cultural and	D.7.25	Table D.7-6 New Archaeological Sites Recorded	Please see Attachment D.7.1 Revised Table D.7-6

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
	Paleontological Resources		During the Tule Wind Intensive Survey	(February 2011) and revise Table D.7-6 accordingly.
11.	Cultural and Paleontological Resources	D.7-31	<p><u>Based on other previously recorded archaeological sites documented in the records search completed by Tetra Tech (2008), the current sample of historic and prehistoric sites is representative of cultural resources that can be found throughout McCain Valley.</u> Prehistoric sites within the APE and ROW generally consist of lithic and aboriginal ceramic scatters, and habitation sites consist of varying combinations of milling features, artifact scatters, midden deposits, and <u>may include</u> one or more rock shelters. Based on other previously recorded archaeological sites documented in the records search completed by Tetra Tech (2008), the current sample of historic and prehistoric sites is representative of cultural resources that can be found throughout McCain Valley. Most of the hHistoric <u>archaeological</u> sites contain refuse deposits consisting of a scatter of food and beverage containers and other rubbish, or features such as a concrete cistern (Tule-EP-04), a foundation (SDI-16824). Twenty-six historic sites consist of one or more structures, including one, and a building (Tule EP-02). Another historic site (Tule CW-25) is a historic home site (P-37-031680) with a historic petroglyph reading “JD 1933.”</p>	Please update to the correct survey acreage as reflected in the Modified Project Layout and the updated ASM Report.
12.	Cultural and Paleontological Resources	D.7-31	<ul style="list-style-type: none"> • Of the 38 56 sites recorded prior to the current intensive survey, identified in the records search and documented during fieldwork, 16 sites seven prehistoric resources including rock shelters with rock art and temporary camps are considered potentially eligible. A; 10 of these were documented in the APE survey and six others in the ROW sample survey. Overall, a total of 452 222 sites were documented during fieldwork identified: 108 179 were documented in the APE survey, while and 43 were identified documented in the ROW sample. Fifteen Twenty-three archaeological sites within the project APE inventory are considered likely to meet the criteria for NRHP eligibility as “historic properties” and 	Please update to the correct survey acreage as reflected in the Modified Project Layout and the updated ASM Report.

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			<p>CRHR eligibility as “historic resources.” Thirteen <u>Twenty</u> of these are prehistoric sites (either large or small campsites); one is historic-period Highway 80; and two are historic home sites (one site has both prehistoric and historic components) (ASM Affiliates, Inc. 2010a, <u>2011a</u>) (see Table D.7-6). Of the 43 archaeological sites identified in the ROW sample inventory, 10 are likely to meet the criteria for NRHP eligibility as “historic properties” and CRHR eligibility as “historic resources”; all of these are prehistoric sites. The remaining 33 sites are either lacking sufficient artifactual density and diversity to suggest substantial subsurface components, or are a historic-era trash scatter that does not contain artifacts that can be associated with a specific historic activity/function, event, or individuals important in the area’s history (ASM Affiliates, Inc. 2010a, <u>2011a</u>).</p>	
13.	Cultural and Paleontological Resources	D.7-34	<p>Although contacts have been made with identified knowledgeable Native American tribes and individuals associated with the BLM Section 106 consultation process parties, the formal consultation process associated with the ECO Substation and Tule Wind projects is not complete. The BLM is in the process of conducting government-to-government consultation. Therefore, the scope, nature, extent, and potential significance of any TCPs associated with the APEs for the proposed projects addressed in this document are not presently known. Therefore, potential NRHP eligibility of TCPs within the project area must be assumed. <u>Should the consultation process result in the identification of TCPs, their potential NRHP eligibility should be assumed for avoidance purposes.</u></p>	<p>GLOBAL CHANGE: No TCPs have been identified. The recordation of a TCP is a formal process that should have documentation of a specific geographic location. This section is tied to the sacred sites identified by the NAHC, but should not be confused with formal TCP designations.</p> <p>Please consider revising text as suggested for clarification.</p>

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14.	Cultural and Paleontological Resources	D.57-49	<p>County of San Diego Draft General Plan Update – Conservation and Open Space Element</p> <p>The following goals and policies identified in the County of San Diego Draft General Plan Update Conservation and Open Space Element <u>are provided for informational purposes and are not applicable to the Proposed PROJECT because the Draft General Plan has not been adopted:</u></p>	Please revise to clarify the applicability of the Draft General Plan.
15.	Cultural and Paleontological Resources	D.7-50	<u>The Resource Protection Ordinance (RPO)</u>	Please consider spelling out the acronym.
16.	Cultural and Paleontological Resources	D.7-53	<p>The BLM Section 106 consultation process has not yet been concluded for this project, so the nature, extent, and potential significance of TCPs is unknown. <u>To date, no TCPs have been identified in the project area. Should the consultation process result in the identification of TCPs, their potential NRHP eligibility should be assumed for avoidance purposes.</u> Although no TCPs have been identified, potential NRHP eligibility of unknown TCPs must be assumed. 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. In this event, the residual impact on TCPs would be adverse; therefore, mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I). In other cases, efforts will be made to avoid TCP through minor project refinements that would mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II).</p>	<p>A TCP should only be assumed eligible once identified. Here, no TCP has been identified.</p> <p>The statement that “the identified impact cannot be mitigated” is not currently warranted because no impacts have been identified, nor have any resources been identified to attribute impacts to.</p> <p>Please consider revising text as suggested for clarification.</p>

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17.	Cultural and Paleontological Resources	D.7-53	Project mitigations have been incorporated that will ensure avoidance of human remains. Unlike TCPs, which can be broad land forms or use areas, avoidance of unknown Unanticipated discoveries of human remains are thought to be generally localized and <u>can be</u> feasibly avoided, if necessary, through redesign. Under CEQA, impacts would be significant but can be mitigated <u>through avoidance</u> to a level that is considered less than significant (Class II). However, <u>should human remains be identified that cannot be avoided, an any</u> adverse effect Class I under CEQA) <u>impact would occur.</u>	
18.	Cultural and Paleontological Resources	D.7-56, Table D.7-9	Construction of the project would cause an adverse change to sites known to contain human remains either in formal cemeteries or buried Native American remains <u>(if human remains are found).</u>	Please consider revising to clarify that the significance criteria applies only if human remains are found.
19.	Cultural and Paleontological Resources	D.7-56, Table D.7-9	<p>Impact TULE-CUL-3 Construction of the project would cause an adverse change to Traditional Cultural Properties.</p> <p>Class I <u>Class III (Class I if TCP is identified)</u></p> <p>Impact TULE-CUL-4 Operation and long-term presence of the project would cause an adverse change to known significant historic architectural (built environment) resources.</p> <p>Class II <u>Class III</u></p>	<p>GLOBAL CHANGE: In tables and discussions regarding specified 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.</p> <p>The Modified Project Layout avoids direct and indirect impacts to the identified historical structures. Direct and indirect impacts would be considered less than significant.</p>
20.	Cultural and Paleontological Resources	D.7-61	<u>The Modified Project Layout successfully avoided most identified cultural sites. Of the 220 identified cultural sites, only 8 will be impacted by project construction () SDI-4788, Tule-TQ-39, SDI-19301, SDI-18054, SDI-19364, SDI-19935, SDI-17817, SDI-20102/ Tule BC-72 (ASM Affiliates, Inc. 2011a). Of these eight sites, only one is potentially eligible (SDI-17817); two others listed as potentially eligible (SDI-4788 and SDI-19364) were recently tested by SDG&E across portions of each site and found to not contain deposits that could be contributing elements to NRHP</u>	<p>The EIR/EIS is considering all seven sites recommended eligible or potentially eligible that were identified during the Tetra Tech Class I records search, as presented in Table D.7-5. However, none of these sites is in the presently surveyed APE; they are in the non-APE ROW. As such, the number of potentially eligible sites stands at 15. Please consider revising to reflect this information.</p> <p>GLOBAL CHANGE: Sites with temporary site</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>or CRHR eligibility. SDI-19301 was also tested by SDGE and found to not contain significant deposits. The remaining four sites are comprised of limited artifact scatters with a low potential for buried deposits. In an effort to achieve avoidance of significant cultural deposits, the Tule Wind Project has aligned several project facilities parallel to SDG&E facilities in areas tested by SDG&E. Furthermore, seven of the eight sites to be impacted are bisected by a road that requires improvement during construction thereby limiting potential impacts to the road margin. A 138 kV tower is planned for the location of Tule-TQ-39; a small artifact scatter.</p>	<p>numbers (e.g., Tule-CW-17) should be changed to the Trinomial recently assigned by the SCIC.</p>
21.	Cultural and Paleontological Resources	D.7-63	<p>Any adverse effect to human remains would be adverse; therefore, mitigation has been provided that would mitigate this impact.</p>	<p>Please consider revising this sentence for clarity.</p>
22.	Cultural and Paleontological Resources	D.7-66	<p>The NAHC has identified numerous Native American cultural resources (i.e., sacred sites) within one-half mile of the proposed project area, although the location of these areas relative to project improvement areas has not been determined. Consultation with Native American tribes is ongoing <u>and when completed, may clarify locations of enhanced sensitivity that may be considered for avoidance.</u> <u>TCPs are recorded separately from sacred sites; the latter being recorded with and filed with the NAHC.</u> <u>No TCPs have been identified within the project ROW.</u> As such, a discussion of potential impacts to TCPs is not warranted at this time. The scope, nature, and extent of any TCPs associated with the APE are not presently known. Therefore, potential NRHP eligibility of unknown TCPs must be assumed. <u>Considering there are no TCPs identified to date, no adverse impact is identified and under CEQA, a less than significant impact is identified (Class III).</u> <u>In the event a TCP is identified, its NRHP eligibility must be assumed, and the impact determination would change and the following would apply.</u></p>	<p>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, 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.</p> <p>Please consider revising text as suggested for clarification.</p>
23.	Cultural and	D.7-68	<p>To date, the <u>The intensive archaeological-cultural</u></p>	<p>Please consider revising text as suggested to</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
	Paleontological Resources		<p>resources survey of the project area has identified two 45 historic architectural resources, recorded at 26 historic sites that have not been evaluated, potentially eligible for the NRHP and CRHR within the project area surveyed APE. While surveys have only identified two resources, the collector lines and access roads along the western side of the Tule Wind Project have not yet been surveyed for historic architectural resources. Most of the unsurveyed land lies within the Campo and Manzanita reservations, with a portion in California State Lands Commission jurisdiction. If any historic resources are found in the remaining surveys, the project could impact these resources if activities are not properly managed and project components are sited in conflict with these resources. These structures appear to be 50 years old or more, meeting the age threshold to be considered historical resources under NHPA and CEQA. The Modified Project Layout successfully avoids direct impacts to the identified historical structures. A study of visual impacts to the historic built environment was completed for the project area (ASM Affiliates, Inc. 2011a). This study identified an additional 15 historic structures within one-half mile of the surveyed APE for a total of 60 historic structures considered for visual impacts. This study found that none of the identified historic structures would suffer indirect adverse impacts to their view shed through implementation of the Modified Project Layout, since project facilities are either too distant to impact the view shed, or because the view shed is not considered a contributing element to the potential NRHP or CRHR eligibility of any identified historic structure. Therefore, identified direct and indirect impacts would not be adverse. Under CEQA, impacts would be considered less than significant (Class III). Identified impacts would be adverse and therefore mitigation has been provided to mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level less than significant (Class II) by changing</p>	<p>accurately describe the recorded historic sites throughout the project area. Please also clarify the language to state that none of the identified historic structures would suffer indirect adverse impacts to their view shed through implementation of the Modified Project Layout. A recommendation to change the impact determination to Class III, Less Than Significant is provided.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			project design or through implementation of Mitigation Measure CUL-1A.	
24.	Cultural and Paleontological Resources	D.7-74	<i>Fifth paragraph</i> When the Tule Wind Project is decommissioned, project components under the County's jurisdiction (43 7 wind turbines and a segment of the 138 kV transmission line) would be removed from County lands;	Please revise language to reflect corrected analysis per the Modified Project Layout.
25.	Cultural and Paleontological Resources	D.7-80	Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant through implementation of Mitigation Measures PALEO-1A through PALEO-1E (Class II).	Please consider explicitly stating Class II determination, for clarity and consistency with rest of Draft EIR/EIS.
26.	Cultural and Paleontological Resources	D.7-84 Table D.7-11	TULE-CUL-2 Construction of the project would cause an adverse change to sites known to contain human remains either in formal cemeteries or buried Native American remains (<u>if human remains are found</u>).	Please consider changing to clarify significance criteria for all alternatives TULE-CUL-2.
27.	Cultural and Paleontological Resources	D.7-84 Table D.7-11	TULE-CUL-3 Construction of the project would cause an adverse change to Traditional Cultural Properties. (<u>Class I if TCPs are identified</u>) Class I-III	Please consider changing the significance determination to all alternatives TULE-CUL-3 based on identified TCPs.
28.	Cultural and Paleontological Resources	D.7-84 Table D.7-11	TULE-CUL-4 Operation and long-term presence of the project would cause an adverse change to known significant historic architectural (built environment) resources. Class H-III	Please consider changing the significance determination based on the lack identified historic resources located within the project area.
29.	Cultural and Paleontological Resources	D.7-85	The 138 kV transmission line route is 5.6 5.4 miles shorter when compared with the proposed route.	Please consider changing calculations based on the Modified Project Layout.
30.	Cultural and Paleontological Resources	D.7-88	<u>Impact CUL-3: To date, no TCPs have been identified for As with the construction of the proposed Tule Wind Project. Considering no TCPs have been identified to date, no adverse impact is identified and under CEQA, a less than significant impact is identified (Class III).</u> <u>In the event a TCP is identified, its NRHP eligibility must be assumed, and the impact determination would change. In some cases, avoiding direct and indirect</u>	Please consider changing impacts due to TCPs based on the previous discussions.

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			<p>impacts to TCPs (such as traditional landscapes, topographic elements including sacred mountains, or use areas) during construction of this alternative may not be completely feasible given the geographic expanse of some of these resources occur. If identified In this event, the residual impact on TCPs would be adverse and therefore mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be considered significant and cannot be mitigated to a level that is considered less than significant (Class I), even with implementation of Mitigation Measures CUL 1A through CUL 1E, CUL 2 and CUL 3.</p>	
31.	Cultural and Paleontological Resources	D.7-90	<p>Impacts CUL-3, CUL-4, and PALEO-1: CUL-3, CUL-4, and PALEO-1 impacts under this alternative would be similar to those identified in Section D.7.3.3 for the proposed Tule Wind Project. Identified CUL-3 impacts would be adverse and therefore mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be considered significant and cannot be mitigated to a level that is considered less than significant (Class I) even with implementation of Mitigation Measures CUL 1A through CUL 1E, CUL 2, and CUL 3. impacts under this alternative would be similar to those identified in Section D.7.3.3 for the proposed Tule Wind Project. Identified CUL-3 impacts would be less than significant (Class III), unless a TCP is identified, and then it would be considered adverse, significant impact and unmitigable (Class I).</p>	Please consider changing impacts due to TCPs based on the previous discussions.
32.	Cultural and Paleontological Resources	D.7-92	<p>Impacts CUL-3, CUL-4, and PALEO-1: Although the potential for impacts would be slightly greater under this alternative because of undergrounding activities along the transmission line alignment, CUL-3, CUL-4, and PALEO-1 impacts under this alternative would be similar to those identified in Section D.7.3.3 for the proposed Tule Wind Project. Identified CUL-3 impacts would be adverse and therefore mitigation has been provided. However, the</p>	Please consider changing impacts due to TCPs based on the previous discussions.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			identified impact cannot be mitigated. Under CEQA, impacts would be considered significant and cannot be mitigated to a level that is considered less than significant (Class I) even with implementation of Mitigation Measures CUL-1A through CUL-1E, CUL-2, and CUL-3. Regarding CUL-4 impacts, Identified CUL-3 impacts would be less than significant (Class III), unless a TCP is identified, and then it would be considered adverse, significant impact and unmitigable (Class I).	
33.	Cultural and Paleontological Resources	D.7-90	<u>Impacts CUL-3, CUL-4, and PALEO-1:</u> Identified CUL-3 impacts would be adverse and therefore mitigation has been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be considered significant and cannot be mitigated to a level that is considered less than significant (Class I) even with implementation of Mitigation Measures CUL-1A through CUL-1E, CUL-2, and CUL-3. Regarding CUL-4 impacts Identified CUL-3 impacts would be less than significant (Class III), unless a TCP is identified, and then it would be considered adverse, significant impact and unmitigable (Class I).	Please consider changing impacts due to TCPs based on the previous discussions.
34.	Cultural and Paleontological Resources	D.7-113 Table D.7-14	TULE-CUL-3 Construction of the project would cause an adverse change to Traditional Cultural Properties.	Please consider changing determination based on no TCPs identified within the project area.

Attachments

D.7.1 - Revised Table D.7-6 (February 2011)

Technical Reports

ASM Affiliates, Draft Addendum Class III Cultural Resources Inventory Report (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.8: Noise

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Noise	D.8-3	... they nevertheless are considered adverse to public health <u>according to the County of San Diego General Plan Noise Element (San Diego County General Plan, Part VIII, Chapter 2).</u>	Please consider revising to include the County of San Diego as guidelines for noise impacts.
2.	Noise	D.8-5 Fifth paragraph	The Tule Wind Project is located within a rural area with approximately 2050 homes scattered throughout the proposed power generating/transmission corridor area.	Please consider revising the language to correctly describe the number of homes in the operational noise study area. See HDR Noise Technical Report, dated February 2011.
3.	Noise	D.8-6 Third paragraph	The greatest noise levels in the project area typically occurred during early morning <u>rush</u> -hours.	Please consider revising the language to clarify the period of greatest noise level.
4.	Noise	D.8-7	Figure D.8-1	Please consider revising to reflect the Modified Project Layout.
5.	Noise	D.8-9	...General Plan document. However, <u>In</u> 1974,	“However” appears to be a non-sequitur. The two statements it separates do not conflict. Please consider revising.
6.	Noise	D.8-10	The EPA <u>guidelines, which do not have the force of law or regulation,</u> has indicated that residential noise exposure of 55 dBA a to 65 dBA is acceptable when analyzing land use compatibility (EPA 1981); however, these guidelines are not regulatory.	Please consider revising to reflect the correct regulation.
7.	Noise	D.8-10	Generally speaking, noise levels less than ...	Please consider revising to reflect this language.
8.	Noise	D.8-12 Last paragraph	In addition, the code requires that between the hours of 7:00 a.m. and 7:00 p.m. no equipment shall be operated so as to cause an 8-hour average construction noise level in excess of 75 dBA when measured at the boundary line of the property; where the noise source is located, or on any	Please remove the comma between “property” and “where.” The comma implies a 3 rd location: “where the noise source is located.” The standard does not include this comma and should be “measured at the property line where the

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			occupied property where the noise is being received.	noise source is located.” The comma implies the noise level should not be exceeded right at the noise source- when there is no such implication within the code.
9.	Noise	D.8-13 First paragraph	The County of San Diego Noise Ordinance Section 36.410 (2009b) includes applicable limitations for impulsive noise. Specifically, except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level (as described in the following significance thresholds) when measured at the boundary line of the property, where the noise source is located, or on any occupied property..	Please remove the comma between “property” and “where.” The comma implies a 3 rd location: “where the noise source is located.” The standard does not include this comma and should be “measured at the property line where the noise source is located.” The comma implies the noise level should not be exceeded right at the noise source- when there is no such implication within the code.
10.	Noise	D.8-13 First paragraph	Specifically, except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level (as described in the following significance thresholds) when measured at the boundary line of the property, where the noise source is located, or on any occupied property where the noise is received for 25% (15 minutes) during a 1 hour time period. <u>Exceedence of the impulsive noise limit is determined with the maximum sound pressure level measured in one-minute intervals. Exceedences are not allowed for 75 percent of the minutes within a measurement period (one-hour minimum period),</u> <u>but exceedences of any level of impulsive sound are allowed for 25 percent of the minutes, as long as those impulsive sounds don’t increase the 8-hour average construction noise level to exceed limits set in Section 36.409.</u>	Please consider revising the description of the County of San Diego Noise Ordinance Section 36.410 to reflect the actual ordinance, its intent and its interpretation in enforcement.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
11.	Noise	D.8-14 First paragraph	<p>Source: FTA 2006. Notes:</p> <ol style="list-style-type: none"> 1. For Categories 2 and 3 with occupied facilities, isolated events such as blasting are significant when the peak particle velocity (PPV) exceeds 1 inch per second. Nontransportation vibration sources such as impact pile drivers or hydraulic breakers are significant when their PPV exceeds 0.1 inch per second. More specific criteria for structures and potential annoyance were developed by the California Department of Transportation (Caltrans2004) and will be used to evaluate these continuous or transient sources in San Diego County. 2. “Frequent Events” is defined as more than 70 vibration events per day. Most rapid transit projects fall into this category. 3. “Occasional or Infrequent Events” are defined as fewer than 70 vibration events per day. This combined category includes most commuter rail systems. 4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration sensitive manufacturing or research will require detailed evaluation to define acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the heating, venting, and air-conditioning (HVAC) systems and stiffened floors. 5. Vibration-sensitive equipment is not sensitive to groundborne noise. 6. There are some buildings such as concert halls, TV and recording studios, and theaters that can be very sensitive to vibration and noise but do not fit into any of these categories. The County of San Diego has established guidelines for these special buildings. 	<p>The vibration criteria stated in Table D.8-5 only apply to transportation related vibration sources. More specific criteria for blasting and structures were developed by Caltrans, as stated in Table D.8-5 footnote 1. Please consider revising to include the Caltrans vibration criteria, referred to in footnote 1, which applies to blasting and construction related vibration.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification																								
12.	Noise	D.8-14 Table to be added after Table 8.8-5 New Table D.8-6	<p><u>More specific vibration criteria to evaluate the potential for impact to structures and annoyance were developed by the California Department of Transportation (Caltrans2003). Caltrans Guidelines are provided in Tables D.8-6 and D.8-7 below.</u></p> <p><u>Table D.8-6 Vibration Induced Damage Impact Threshold</u></p> <table border="1" data-bbox="768 500 1335 824"> <thead> <tr> <th data-bbox="768 500 1045 532">Structure and Condition</th> <th colspan="2" data-bbox="1045 500 1335 532">Maximum PPV (in/sec)</th> </tr> <tr> <th data-bbox="768 532 1045 565"></th> <th data-bbox="1045 532 1150 565">Transient Sources¹</th> <th data-bbox="1150 532 1335 565">Continuous/ Frequent Intermittent Sources²</th> </tr> </thead> <tbody> <tr> <td data-bbox="768 565 1045 597"><u>Extremely fragile historic buildings, ruins, ancient monuments</u></td> <td data-bbox="1045 565 1150 597">0.12</td> <td data-bbox="1150 565 1335 597">0.08</td> </tr> <tr> <td data-bbox="768 597 1045 630"><u>Fragile buildings</u></td> <td data-bbox="1045 597 1150 630">0.2</td> <td data-bbox="1150 597 1335 630">0.1</td> </tr> <tr> <td data-bbox="768 630 1045 662"><u>Historic and some old buildings</u></td> <td data-bbox="1045 630 1150 662">0.5</td> <td data-bbox="1150 630 1335 662">0.25</td> </tr> <tr> <td data-bbox="768 662 1045 695"><u>Older residential structures</u></td> <td data-bbox="1045 662 1150 695">0.5</td> <td data-bbox="1150 662 1335 695">0.3</td> </tr> <tr> <td data-bbox="768 695 1045 727"><u>Newer residential structures</u></td> <td data-bbox="1045 695 1150 727">1.0</td> <td data-bbox="1150 695 1335 727">0.5</td> </tr> <tr> <td data-bbox="768 727 1045 760"><u>Modern industrial / commercial buildings</u></td> <td data-bbox="1045 727 1150 760">2.0</td> <td data-bbox="1150 727 1335 760">0.5</td> </tr> </tbody> </table> <p><u>Source:</u> Jones & Stokes 2004. <u>Transportation – and construction-induced vibration guidance manual. June (J&S 02-039). Sacramento, CA. Prepared for California Department of Transportation, Noise, Vibration, and Hazardous Waste Management Office, Sacramento, CA.</u></p> <p><u>Notes:</u> ¹ <u>Transient sources create a single, isolated vibration even, such as blasting or drop balls.</u> ² <u>Continuous / frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers and vibratory compaction equipment.</u></p>	Structure and Condition	Maximum PPV (in/sec)			Transient Sources ¹	Continuous/ Frequent Intermittent Sources ²	<u>Extremely fragile historic buildings, ruins, ancient monuments</u>	0.12	0.08	<u>Fragile buildings</u>	0.2	0.1	<u>Historic and some old buildings</u>	0.5	0.25	<u>Older residential structures</u>	0.5	0.3	<u>Newer residential structures</u>	1.0	0.5	<u>Modern industrial / commercial buildings</u>	2.0	0.5	Please consider revising to include vibration thresholds and CALTRANS guidelines regarding vibration annoyance potential.
Structure and Condition	Maximum PPV (in/sec)																											
	Transient Sources ¹	Continuous/ Frequent Intermittent Sources ²																										
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<u>Modern industrial / commercial buildings</u>	2.0	0.5																										
13.	Noise	D.8-14 New Table D.8-7 to be added	<p><u>Isolated vibration events such as blasting are significant when the peak particle velocity exceeds 1 inch per second. Non-transportation sources such as impact pile driver or hydraulic breakers are significant when their peak particle velocity exceeds 0.1 inch per second.</u></p> <p style="text-align: center;"><u>Table D.8-7</u></p>	The vibration criteria stated in Table D.8-5 only apply to transportation related vibration sources. More specific criteria for blasting and structures were developed by Caltrans, as stated in Table D.8-5 footnote 1. Please consider revising to include the Caltrans vibration criteria, referred to in footnote 1, which applies to blasting and construction related vibration.																								

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification																	
			<p align="center"><u>CALTRANS Guideline for Vibration Annoyance Potential</u></p> <table border="1"> <thead> <tr> <th data-bbox="785 298 1003 493" rowspan="2"><u>Structure and Condition</u></th> <th colspan="2" data-bbox="1003 298 1318 363"><u>Maximum Peak Particle Velocity (in/sec)</u></th> </tr> <tr> <th data-bbox="1003 363 1152 493"><u>Transient Sources¹</u></th> <th data-bbox="1152 363 1318 493"><u>Continuous/ Frequent Intermittent Sources²</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="785 493 1003 526"><u>Barely perceptible</u></td> <td data-bbox="1003 493 1152 526">0.04</td> <td data-bbox="1152 493 1318 526">0.01</td> </tr> <tr> <td data-bbox="785 526 1003 558"><u>Distinctly perceptible</u></td> <td data-bbox="1003 526 1152 558">0.25</td> <td data-bbox="1152 526 1318 558">0.04</td> </tr> <tr> <td data-bbox="785 558 1003 591"><u>Strongly perceptible</u></td> <td data-bbox="1003 558 1152 591">0.9</td> <td data-bbox="1152 558 1318 591">0.10</td> </tr> <tr> <td data-bbox="785 591 1003 623"><u>Severe</u></td> <td data-bbox="1003 591 1152 623">2.0</td> <td data-bbox="1152 591 1318 623">0.4</td> </tr> </tbody> </table> <p data-bbox="785 639 1318 786"><u>Source:</u> Jones & Stokes. 2004. Transportation and Construction-Induced Vibration Guidance Manual. June. (J&S 02-039.) Sacramento, CA. Prepared for California Department of Transportation, Noise, Vibration, and Hazardous Waste Management Office, Sacramento, CA.</p> <p data-bbox="785 786 1318 834"><u>Notes:</u> ¹ Transient sources create a single, isolated vibration even, such as blasting or drop balls.</p> <p data-bbox="785 834 1318 932">² Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers and vibratory compaction equipment.</p>	<u>Structure and Condition</u>	<u>Maximum Peak Particle Velocity (in/sec)</u>		<u>Transient Sources¹</u>	<u>Continuous/ Frequent Intermittent Sources²</u>	<u>Barely perceptible</u>	0.04	0.01	<u>Distinctly perceptible</u>	0.25	0.04	<u>Strongly perceptible</u>	0.9	0.10	<u>Severe</u>	2.0	0.4	
<u>Structure and Condition</u>	<u>Maximum Peak Particle Velocity (in/sec)</u>																				
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<u>Severe</u>	2.0	0.4																			
14.	Noise	D.8-15	... and will combine to exceed 60 CNEL at exterior noise NSLU.	Please remove redundant word.																	
15.	Noise	D.8-15 Paragraphs 9 through 11	<p>d. Impulsive Noise: Construction-related noise in excess of the following significance thresholds would be considered significant:</p> <p>i. More than 82 dBA maximum sound pressure level for residential, village zoning, or civic land use where the noise is received for 15 minutes or more <u>the exceedence in any whole minute does not occur for more than 15 minutes</u> during a one-hour time period</p> <p>ii. More than 85 dBA maximum sound pressure level for agricultural, commercial, or industrial land use where the noise is received for 15 minutes or more <u>the exceedence in any whole minute does not</u></p>	Please consider revising the noise impulsive significance threshold to comply with the County of San Diego Noise Ordinance Section 36.410, its intent and its interpretation in enforcement.																	

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			occur for more than 15 minutes during a 1-hour time period.	
16.	Noise	D.8-15 Last paragraph	<p>Use of Vibration Thresholds</p> <p>Project implementation-transportation related vibration sources will expose the uses previously listed in Table D.8-5 to groundborne vibration or groundborne noise levels equal to or in excess of the levels shown.</p> <p><u>Project implementation will expose structures to construction-related or blasting related groundborne vibration equal to or in excess of the levels outlined in the Caltrans Vibration Induced Damage Impact Threshold or Caltrans Guideline for Vibration Annoyance.</u></p>	Please consider revising for clarity. The vibration thresholds stated in Table D.8-5 only apply to operational vibration for transportation related sources. More specific criteria for blasting and structures were developed by Caltrans, as stated in Table D.8-5 footnote 1. Please include a discussion of the Caltrans vibration criteria, which applies to blasting and construction related vibration is the “Use of Vibration Thresholds” section.
17.	Noise	D.8-16	Tule Wind, LLC Pacific Wind Development proposed APMs TULE-NOI-1 through TULE-NOI-176 to reduce impacts related to noise (as described in Section B.4.4, Tule Wind Project Applicant Proposed Measures, of this EIR/EIS).	Please consider revising the number of proposed APMs to reflect the mitigation measures outlined within the Applicants Environmental Document (AED).
18.	Noise	D.8-17 Table D.8-6 (Renumbered Table D.8-8) Row 1, Columns 2 & 3	TULE-NOI-1 Construction noise would substantially disturb sensitive receptors and <u>temporarily violate local rules, standards, and/or ordinances during construction.</u> Class I <u>II</u>	Please consider revising classification of Tule-NOI-1 to reflect revisions requested in Comment #25, #26 and #28.
19.	Noise	D.8-17 Table D.8-6 (Renumbered Table D.8-8) Row 4 Column 3	TULE-NOI-2 Construction activity would temporarily cause groundborne vibration. Class I <u>III</u>	Please consider revising classification of Tule-NOI-2 to reflect revisions stated in the proposed project. .
20.	Noise	D.8-19 Second paragraph	The nighttime construction noise levels could be above the ambient noise level and would occur outside the hours of construction permitted under Section 36.408 of the County Noise Ordinance. Therefore, SDG&E would partially mitigate for the nighttime noise impacts with implementation of	Please consider revising to include the noise variance procedure set forth in County Code Section 36.423(a) of the County Noise Ordinance, which provides that “A person who proposes to perform non-emergency work on a public right-of-way, public utility facility, public transportation

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			<p>APM ECONOI-1, which will ensure that nighttime construction activities would not cause noise that would exceed an hourly average of 45 dB when measured at the border of the nearest residence. If this standard cannot be met, SDG&E will communicate this to the County in advance. However, since the nighttime construction impacts cannot be fully mitigated, impacts would remain adverse. Under CEQA, these impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	<p>facility or some other project for the benefit of the general public, who is unable to conform to the requirements of this chapter may apply to the County for a variance authorizing the person to temporarily deviate from the requirements of this chapter.”</p>
21.	Noise	D.8-20 Second paragraph	<p>Based upon the previous assumptions, any blasting occurring without mitigation would exceed the County’s impulsive noise standard <u>limit in any one minute</u> at the boundary of any parcel used for agricultural purposes at a distance of approximately 1,100 feet, and for residential purposes at a distance of approximately 1,550 feet.</p>	<p>Please consider revising to make clear that these levels will only exceed the level component of the county impulsive noise ordinance, irrespective of the time component. The Proposed PROJECT is allowed under county ordinance to exceed the impulsive noise standard level for a limited amount of time.</p>
22.	Noise	D.8-21	<p>MM NOI-1 Blasting Plan</p> <p>... If necessary the applicant will temporarily relocate impacted residents on an as-needed basis for the duration of the blasting activities, <u>physical damage to potentially vulnerable structures will be addressed by avoiding construction blasting near the structures wherever possible, and, if necessary, non-blasting construction methods will be evaluated.</u> To ensure that potentially impacted residents are informed, the applicant will provide notice by mail to all property owners within 300 feet of the project at least 1 week prior to the start of construction activities. Blasting would be completed between 7 a.m. and 7 p.m. to be compliant with County noise ordinances. A rock anchoring or min-pile system may be used to reduce the risk of damage to structures during blasting activities. Fair compensation for lost use will be provided to the property owner.</p>	<p>Please consider revising the text to reflect the design considerations and mitigation measures outlined on page 34 of the HDR Noise Technical Report, dated February 2011.</p>

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23.	Noise	D.8-23 Fifth paragraph	Existing traffic-related noise levels in the area range from 47 <u>18</u> to 68 <u>69</u> dBA CNEL. Project-related traffic noise levels, during the peak of project construction, would range from 47 to 57 dBA CNEL. Modeling of existing, project-related, and existing plus project-related average daily traffic volumes were calculated, and the existing plus project noise levels during the peak of the project construction are anticipated to range from 50 <u>26</u> dBA to 69 dBA CNEL at the closest noise sensitive areas of residences adjacent to McCain Valley Road, Old Highway 80, and Ribbonwood Road.	Please consider revising the existing traffic-related noise levels to reflect the results presented within HDR's Noise Technical Study, dated February 2011.
24.	Noise	D.8-24 First paragraph	The project creates an increase of more than 3 dBA CNEL along several roadway a-segments of Ribbonwood Road north of I-8 with low existing traffic , but does not increase the existing noise levels above the 60 dBA CNEL County threshold to noise-sensitive areas (HDR 2010). Based on the modeled results prepared by HDR, no traffic-related roadway impacts are anticipated due to project-related traffic (HDR 2010). <u>Under CEQA, noise impacts due to construction traffic noise activity are considered less than significant (Class III).</u>	Please consider revising the existing traffic-related noise levels to reflect the results presented within HDR's Noise Technical Study, dated February 2011.
25.	Noise	D.8-24 Third paragraph	Impacts to sensitive noise receptors along the 138 kV transmission line ROW due to blasting noise would not be adverse if <u>scheduling constraints are implemented so to comply with Sections 36.409 and 36.410 of the San Diego County Noise Ordinance</u> the residents agree to relocation , as described in APM ECO-NOI-4 <u>TULE-NOI-2, TULE-NOI-4</u> and Mitigation Measure NOI-1. However, because it is not known whether residents would agree to temporary relocation, the blasting and drill rig noise impact is considered adverse and cannot be reliably mitigated. Under CEQA, noise impacts from blasting and drill rig use are considered significant <u>but would be mitigated to a</u>	Please consider revising to reflect how the blasting will be scheduled to comply with the county ordinances as outlined in HDR's Noise Technical Study, dated February 2011.

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			<p>level that is considered less than significant (Class II) and may not be mitigated to a level that is considered less than significant (Class I).</p>	
26.	Noise	D.8-24 Fourth paragraph	<p>The resulting 8-hour average construction noise levels have been calculated to range up to 94 ⁹⁹ dBA at the property lines of nearby properties <u>without mitigation</u> and are summarized in Table D.8-8. <u>Results reported in Table D.8-8 represent construction noise levels without the implementation of the applicant proposed measures.</u> As indicated in the table, the construction noise would exceed an 8-hour average sound level of 75 dBA at several residences associated with the transmission line and roadway construction activities <u>without applicant proposed measures.</u> The construction noise would result in an adverse and unmitigable noise impact. Partial m <u>Mitigation of the noise impacts would occur with implementation of APMs Tule-NOI-2, Tule-NOI-4, and Tule-NOI-6 through Tule-NOI-16, and Mitigation Measure NOI-1. With the implementation of BMPs, APMs Tule-NOI-2, Tule-NOI-4, and Tule-NOI-6 through Tule-NOI-16, and Mitigation Measure NOI-1 construction noise will comply with Section 36.409 of the San Diego County Noise Ordinance. With the incorporation of BMPs and mitigation measures, the highest predicted construction noise level at an adjacent property boundary is reduced from 94 dBA to 74 dBA Leq, one decibel under the county limit.</u> Under CEQA, impacts would be significant but would be mitigated to a level that is considered <u>less than significant (Class II) and cannot be mitigated to a level that is considered less than significant (Class I).</u></p> <p><u>As discussed in Section B, Project Description, Tule Wind, LLC anticipates that construction activities would occur between 7 a.m. and 7.p.m.</u></p>	<p>Please consider revising the existing traffic-related noise levels to reflect the results presented within HDR’s Noise Technical Study, dated February 2011.</p> <p>Mitigation of construction noise impacts has been proposed by introduction of time constraints on the construction activities, Best Management Practices (BMPs) and movable noise barriers which would bring the closest receptors in compliance with the noise ordinance.</p> <p>County code section 36.423(a) provides that “A person who proposes to perform non-emergency work on a public right-of-way, public utility facility, public transportation facility or some other project for the benefit of the general public, who is unable to conform to the requirements of this chapter may apply to the County for a variance authorizing the person to temporarily deviate from the requirements of this chapter.” The Tule Wind Project will follow this variance procedure if non-emergency construction work is required outside of normal construction hours. The granting of the variance would reduce the impact of any construction noise below a level of significance. If a variance cannot be obtained, however, the Project will conform to the normal hours of construction.</p>

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			<p><u>Monday through Saturday, but may involve extended hours as needed to complete certain construction activities. Where construction would occur outside of the hours permitted by the County of San Diego, Tule Wind, LLC would follow established protocol and seek a variance from the County noise requirements consistent with County Code section 36.423. Tule Wind, LLC would also provide advanced notice to property owners within 300 feet of planned activities. The advanced notice would include the start and completion dates of construction and the hours of construction. In addition, implementation of APM TULE NOI-4 would further minimize noise impacts associated with construction. If a variance from the construction hours of 7 a.m. to 7 p.m. cannot be obtained from the County, no construction will occur outside the normal hours of construction. Under CEQA, impacts would be significant but would be mitigated to a level that is considered less than significant (Class II).</u></p>	
27.	Noise	D.8-25 Table D.8-8 (Renumber Table D.8-10)	Please update all tables to reflect information found in HDR Noise Technical Report, dated February 2011.	The current Table D.8-8 (renumbered Table D.8-10) is based on an out-dated noise technical report, dated June 2010. Please consider revising the construction noise levels to reflect the results presented within HDR's Noise Technical Study, dated February 2011.
28.	Noise	D.8-28 First paragraph	<p><u>Since turbine foundations would be left in place, blasting is not expected to be required. blasting may be required. Mitigation of the noise impacts would occur with implementation of APMs Tule-NOI-2, Tule-NOI-4, and Tule-NOI-6 through Tule-NOI-16, and Mitigation Measure NOI-1. With the implementation of BMPs, APMs Tule-NOI-2, Tule-NOI-4, and Tule-NOI-6 through Tule-NOI-16, and Mitigation Measure NOI-1 construction noise will comply with Section 36.409 and Section 36.410 of the San Diego County Noise Ordinance.</u></p>	Please consider revising to reflect how the blasting will be scheduled to comply with the county ordinances.

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			<p>Even if blasting is required, scheduling constraints would be implemented so to comply with Sections 36.409 and 36.410 of the San Diego County Noise Ordinance, and it is unknown whether residents close to blasting activities would agree to temporarily relocate, noise impacts would be considered adverse and unmitigable, and uUnder CEQA, <u>impacts</u> would also be significant but <u>and</u> would be <u>mitigated</u> to a level that is considered less than significant (Class II).</p>	
29.	Noise	D.8-28	APMs ECO-NOI-1 through ECO-NOI-4, TULE-NOI-2, TULE-NOI-4, TULE-NOI- 5-6 through TULE-NOI-16, and ESJ-NOI-1, along with Mitigation Measure NOI-1, would be implemented as part of the Proposed PROJECT.	Please make APMs consistent with what is presented on page D.8-24.
30.	Noise	D.8-28 Third paragraph	<p>However, even with mitigation, the construction noise from the Proposed PROJECT would result in an adverse and unmitigated noise impact as a result of nighttime construction only if variances from the County's noise ordinance cannot be obtained, and blasting, and helicopter operations associated with the ECO Substation portion of the project, and blasting and drill rig operations, and roadway and transmission line construction associated with the Tule Wind portion of the project.</p>	Please consider revising the construction noise text to reflect revisions requested in Comment #25, #26 and #28, to clarify that no nighttime construction would occur for the Tule Wind project without a variance issued by the County.
31.	Noise	D.8-28 Last paragraph	While components of the <u>Tule, Campo, and Manzanita</u> wind ...	Please consider revising to clarify that portions of the Tule project are also under sole jurisdiction and regulation by Tribal law.
32.	Noise	D.8-29 First paragraph	... project is expected to result in similar construction noise impacts <u>as</u> the Tule Wind Project.	Please correct the typographical error.
33.	Noise	D.8-29 Last paragraph	<p><u>Based on calculations, vibration levels beyond 15 feet from construction activities are below the damage threshold for older and newer residential buildings (HDR, 2010). Residences within approximately 50 feet of most construction activities could exceed the County's annoyance threshold for frequent events (HDR, 2011).</u></p>	<p>Please consider revising the text to reflect the design considerations and mitigation measures outlined on page 34 of the HDR Noise Technical Report, dated February 2011.</p> <p>The noise technical report discusses blasting as a technical source of groundborne vibration.</p>

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			<p>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).</p> <p>Construction and decommissioning could include activities that may temporarily expose people to adverse impacts resulting from groundborne vibration. Blasting may be required in some areas to remove rock. General areas or exact locations will be identified by results of a geotechnical investigation. Implementation of Mitigation Measure NOI 1 would mitigate these impacts through the preparation and implementation of a blasting plan that would ensure that potentially impacted residents were notified and that other mitigating actions are identified and implemented, such as relocating residents, anchoring structures, and/or providing compensation. The groundborne vibration from construction and decommissioning related blasting would cause adverse impacts that would be mitigated with implementation of Mitigation Measure NOI 1. However, because it is not known whether residents would agree to temporary relocation, blasting vibration impacts are considered adverse and cannot be reliably mitigated. Under CEQA, vibration impacts from blasting are considered significant and may not be mitigated to a level that is considered less than significant (Class I).</p>	<p>However, blast events are extremely short in duration, groundborne vibration dissipates very quickly in soil, and best-management practices will be in place to control airborne noise effects from blasting, which are historically much greater than vibration effects from blasting. Considering these factors, vibration due to blasting is not likely to affect residences at all. Therefore, a blast vibration analysis is not needed.</p> <p>Furthermore, the sections regarding Impact NOI-1 for both the ECO Substation Project and the ESJ Gen-Tie Project discuss airborne noise effects from blasting but do not discuss vibration effects from blasting in regard to Impact NOI-2. The impacts should be assessed consistently throughout the document. And in any case, blasting activities will have to conform to San Diego County Code of Regulatory Ordinances, Sec. 96.1.3301.2 Explosives and Fireworks – Applicability, wherein monitoring and inspection procedures are required.</p>
34.	Noise	D.8-30 Second paragraph	... a greater level than each individual project because these projects are located in different areas, <u>will be constructed during different time frames,</u> and would impact different sensitive receptors.	Please consider revising to clarify that not all projects analyzed the Proposed PROJECT will be constructed concurrently.
35.	Noise	D.8-30 Second paragraph	Therefore, groundborne vibration as a result of construction of the Proposed PROJECT would <u>not result in adverse impacts</u> be adverse, and with	Please consider revising the text to reflect the revisions requested in Comment #33.

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			<p>implementation of Mitigation Measure NOI 1 would remain adverse. Under CEQA, construction-related vibration impacts would be less than significant (Class III) and cannot be mitigated to a level that is considered less than significant (Class I) due to blasting activities.</p>	
36.	Noise	D.8-31-32	<p>The 138 kV project transmission line and poles would be located within a 400-125-foot ROW easement. The proposed transmission line would have three conductors supported by insulators on single shaft steel poles that would either be galvanized or coated with a weathered steel finish to resemble wood.</p> <p>Based on the corona noise model, using a typical 138 kV single-circuit <u>or double-circuit</u> transmission line configuration, transmission line noise would comply with the County's noise ordinance requirements at the 400 <u>125-foot</u> ROW. Corona noise levels under wet weather conditions at the ROW are calculated to be 26 <u>22</u> dBA below the County nighttime noise-level limits (HDR 2011<u>9</u>).</p>	Please consider revising the text to reflect information found in HDR Noise Technical Report, dated February 2011.
37.	Noise	D.8-32 Third paragraph	<p>In the analysis of wind turbine project-related noise, HDR modeled noise from 134 GE 1.5XLE <u>128 Gamesa G87 2.0 MW wind turbines, substation noise and a SODAR unit. A worst case scenario hot weather package based on the manufacturer's specifications was used in the modeling. The hot weather package at maximum operation adds an additional 2.6 dBA, making the total noise emissions of the G87s, 109 DBA, with an additional 2 decibels were used in the model to account for uncertainty. If the 2.0 MW turbines were utilized, approximately 100 locations would be built versus the 128 locations analyzed. Actual noise impacts utilizing a 2.0 MW turbine would be less than modeled due to fewer turbines.</u> The turbine locations include 967 wind turbines on BLM land, <u>187</u> turbines on tribal lands, 7 turbines</p>	Please consider revising the text to reflect information found in HDR Noise Technical Report, dated February 2011. The noise analysis evaluated noise impacts based on the maximum project build-out in terms of number of turbines and utilized the turbine of greatest noise emissions. All other currently considered turbines have lower noise emissions, including the 1.5 MW and 3.0 MW options. If 3.0 MW turbines were to be used it is likely that noise levels would decrease due to the greater setbacks, the reduced number of turbines and lower noise emissions.

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			<p>on state lands, and 137 wind turbines on private parcels (Rough Acres Ranch). Wind turbine Project-related noise levels range from 33 36 dBA to 49 54 dBA, as shown in Table D.8-9. Without mitigation, assuming all turbines utilized a maximum noise emissions of 111 dBA installed at 1.5 megawatt (MW), the project would exceed maximum allowable noise limits for nighttime noise of 45 dBA (refer to Table D.8-4) at two five property boundaries, Homes 1 and 2, by 2 dB and 4 5 dB, respectively. As currently modeled, daytime noise limits may be exceeded at three parcels and nighttime noise limits have the potential to be exceeded at five parcels. The noise analysis utilized the turbine of greatest noise emission, a 2.0 MW Gamesa turbine in the assessment of project-related noise. All other currently considered turbines have lower noise emissions, including the 1.5 MW and 3.0 MW options. Therefore, utilizing the currently considered 3.0 MW turbines noise levels would decrease due to larger setback distances and lower noise emissions. If 3.0 MW different wind turbines are used, additional residences may or may not be adversely impacted. Under CEQA, noise from turbine operations would be significant but would be mitigated to a less than significant level (Class II).</p>	
38.	Noise	D.8-32 Table D.8-9 (Renumber Table D.8-11)	Table D.8-9 12 Wind Turbine Noise Levels at Residences within 1 Mile of the Proposed Turbine Locations	The current Table D.8-9 (renumbered to Table D.8-12) was based on a previous version of the noise technical report, dated June 2010. Please consider revising the construction noise levels to reflect the results presented within HDR's updated Noise Technical Study, dated February 2011.
39.	Noise	D.8-33	The noise mitigation plan will ensure that operation of the turbines will comply with County General Plan Policy 4b and County Noise Ordinance Section 36.404 34.404. Mitigation of the turbine noise may include revising the turbine layout,	Please consider revising mitigation measure MM-NOI-3 to reference the applicable noise standard.

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			curtailment of nighttime use of selected turbines, utilization of an alternate turbine manufacturer, and implementation of noise reduction technology, <u>or other methods of compliance with applicable noise standards.</u>	
40.	Noise	D.8-32	[Tule Wind, LLC is aware that some individuals maintain that wind turbine operations cause health effects, generally labeled “wind turbine syndrome.” Medical experts have investigated these claims, and found them to be without scientific merit. Please accept the attached references addressing “wind turbine syndrome.”]	<p>Please find the following supporting attachments:</p> <p>D.8.1 – Colby, et al., Wind Turbine Sound and Health Effects: An Expert Panel Review (December 2009).</p> <p>D.8.2 – O’Neal, et al., A Study of Low Frequency Noise and Infrasound from Wind Turbines (July 2009).</p> <p>D.8.3 – Province of Ontario, Chief Medical Officer of Health, The Potential Health Impact of Wind Turbines (May 2010).</p> <p>D.8.4 – Public Service Commission of Wisconsin, Rebuttal Testimony of Dr. Mark Roberts on behalf of Wisconsin Electric Power Company (October 20, 2009)</p> <p>D.8.5 – Roberts, et al., Evaluation of the Scientific Literature on the Health Effects Associated with Wind Turbines and Low Frequency Sound (October 20, 2009)</p>
41.	Noise	D.8-33	<p>MM NOI-3</p> <p>Prior to construction, a site-specific noise mitigation plan will be developed to ensure that noise from turbines will not adversely impact surrounding residences. The noise mitigation plan will ensure that operations of the turbines will comply with County General Plan Policy 4b and County Noise Ordinance Section 34.404-36.404. Mitigation of the turbine noise may include revising the turbine layout, curtailment of nighttime</p>	Please consider revising MM NOI-3 as suggested in order to allow the applicant to identify measures that may not be technologically available now but may be available in the future to enable the applicant to meet the noise threshold.

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			<p>use of selected turbines, utilization of an alternate turbine manufacturer, <u>or combination of manufacturers, and implementation of noise reduction technology, or other methods of compliance with applicable noise standards.</u></p> <p>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 would not create noise levels due to deterioration that would violate County standards.</p>	
42.	Noise	D.8-57	Table D.8-14 – Mitigation Measure NOI-3	Please revise Mitigation Measure NOI-3 in Table D.8-14, as suggested in Comment # 41 above
43.	Noise	D.8-34 First paragraph	<p>There are also five two residences in the vicinity of turbines that would be adversely impacted by noise from wind turbine related noise 1.5 MW turbines, <u>as well as additional residences that may be impacted by 3.0 MW turbines.</u></p>	<p>Please consider revising the 3.0 MW turbine discussion to reflect the results presented within HDR’s Noise Technical Study, dated February 2011. The noise analysis evaluated noise impacts based on the maximum project build-out in terms of number of turbines and noise emissions. If 3.0 MW turbines were to be used it is likely that noise levels would decrease due to the greater setbacks, the reduced number of turbines and lower noise emissions.</p> <p>See also Comment #37 regarding the lack of basis for concluding that 3.0 MW turbines may impact additional residences.</p>
44.	Noise	D.8-35 Third paragraph	<p>A temporary, or periodic increase in noise from infrequent truck traffic would result from maintenance crews inspecting and maintaining the substations and turbines.</p>	Please make clarification that periodic maintenance would occur, but the impact would be negligible; accordingly there is no basis for an “increase.”
45.	Noise	D.8-41 Table D.8-11 Third Row, Third Column	Class I <u>Class II</u>	Please consider revising classification of Tule-NOI-1 under Tule Wind Alternative 1 to reflect revisions requested in Comment #53.

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46.	Noise	D.8-41 Table D.8-11 Fourth Row, Third Column	Class I <u>Class III</u>	Please consider revising classification of Tule-NOI-2 under Tule Wind Alternative 1 to reflect revisions requested in Comment #54.
47.	Noise	D.8-42 Table D.8-11 Third Row, Third Column	Class I <u>Class II</u>	Please consider revising classification of Tule-NOI-1 under Tule Wind Alternative 2 to reflect revisions requested in Comment #56.
48.	Noise	D.8-42 Table D.8-11 Eighth Row, Third Column	Class I <u>Class II</u>	Please consider revising classification of Tule-NOI-1 under Tule Wind Alternative 3 to reflect revisions requested in Comment #61.
49.	Noise	D.8-42 Table D.8-11 Ninth Row, Third Column	Class I <u>Class III</u>	Please consider revising classification of Tule-NOI-2 under Tule Wind Alternative 3 to reflect revisions requested in Comment #62
50.	Noise	D.8-42 Table D.8-11 Thirteenth Row, Third Column	Class I <u>Class II</u>	Please consider revising classification of Tule-NOI-1 under Tule Wind Alternative 4 to reflect revisions requested in Comment #65
51.	Noise	D.8-42 Table D.8-11 Eighteenth Row, Third Column	Class I <u>Class II</u>	Please consider revising classification of Tule-NOI-1 under Tule Wind Alternative 5 to reflect revisions requested in Comment #68.
52.	Noise	D.8-42 Table D.8-11 Nineteenth Row, Third Column	Class I <u>Class III</u>	Please consider revising classification of Tule-NOI-2 under Tule Wind Alternative 5 to reflect revisions requested in Comment #69.
53.	Noise	D.8-43 Second paragraph	Thus, with this alternative, the noise level <u>without mitigation</u> would exceed the County's 8-hour average sound level of 75 dBA associated with the transmission line construction noise activities at the same residential locations as the proposed Tule Wind Project. <u>With the implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1</u> would partially reduce the noise impacts resulting from this alternative. <u>construction noise</u>	Please consider revising the construction noise text to discuss mitigated noise levels as presented in the noise technical report. 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.

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			<p>levels would comply with the San Diego County noise ordinance. The highest predicted construction noise level at an adjacent property boundary is reduced from 94 dBA to 74 dBA Leq. However, the construction and decommissioning noise would remain adverse and unmitigable. Under CEQA, for this alternative, impacts would be significant but would be and cannot be mitigated to a level that is considered less than significant (Class II) (Class I).</p>	See new construction noise mitigation analysis.
54.	Noise	D.8-43 Third paragraph	<p><u>Ground-borne vibration or ground-borne noise levels under this alternative due to construction would be similar to those identified for the proposed project. The moving of the project components does not result in any significant increase in ground-borne vibration or ground-borne noise levels compared to those identified for the project. Under CEQA, for this alternative, impacts would be considered less than significant (Class III).</u></p> <p>Under this alternative, blasting during construction and decommissioning could cause groundborne vibration that would generally be short term in duration but could cause adverse impacts to nearby residents. Implementation of Mitigation Measure NOI-1 would mitigate these impacts through the preparation and implementation of a blasting plan. However, because it is not known whether residents would agree to relocate, adverse vibration impacts related to blasting activities cannot be reliably mitigated. Under CEQA, for this alternative, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	<p>Please consider revising the vibration discussion to reflect the discussion in the corresponding alternative of the Applicant's Environmental Document.</p> <p>Please omit the discussion of blasting vibration with the same justification as previously stated for the Proposed Project.</p>
55.	Noise	D.8-43 Fourth paragraph	Therefore, this alternative would not expose sensitive receptors to adverse corona noise, <u>substation noise</u> , or turbine noise impacts with implementation of Mitigation Measures NOI-2 and	Please consider revising the operational noise discussion to include transmission line, substation and wind turbine generated noise as presented in the Applicant's Environmental Document.

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56.	Noise	D.8-44 Third paragraph	<p>NOI-3 or adverse routine inspection and maintenance related noise impacts.</p> <p>Impact NOI-1 As shown in Table D.8-44 14, the construction noise level would be expected to exceed the County's construction noise ordinance criteria <u>without mitigation</u> due to transmission line construction. Implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 would partially reduce the noise impacts resulting from this alternative. However, the construction noise would remain a significant and unmitigated noise impact (Class I). With the implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 construction noise levels would comply with the San Diego County noise ordinance.</p> <p>Under CEQA, for this alternative, impacts would be significant and mitigated to a level that is considered less than significant <u>(Class II)</u>. However, the construction and decommissioning noise would remain adverse and unmitigable. (Class I).</p>	<p>Please consider revising the construction noise text to discuss mitigated noise levels as presented in HDR's Noise Technical Study, dated February 2011.</p> <p>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.</p> <p>See new construction noise mitigation analysis.</p>
57.	Noise	D.8-44 Last paragraph	<p><u>Impact NOI-2 Open trenching for the transmission line may occur closer to residences when compared to construction activities in the proposed Tule Wind Project. Groundborne vibration may be higher.</u></p> <p>Under this alternative, blasting during construction and potentially during decommissioning could cause groundborne vibration that would generally be short term in duration but could cause adverse impacts to nearby residents. Implementation of Mitigation Measure NOI 1 would mitigate these impacts through the preparation and implementation of a blasting plan. However, because it is not known whether residents would agree to relocate, adverse vibration impacts related to blasting activities cannot be reliably mitigated.</p>	<p>Please consider revising the text to discuss the vibration impact of trenching activities for this alternative.</p> <p>Please omit the discussion of blasting vibration with the same justification as for Comment #33.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
58.	Noise	D.8-45 First paragraph	NOI-3 and NOI-4 Therefore, this alternative would not expose sensitive receptors to adverse corona noise, <u>substation noise</u> , or turbine noise impacts with implementation of Mitigation Measures NOI-2 and NOI-3, or adverse routine inspection and maintenance related noise impacts.	Please consider revising the operational noise discussion to include transmission line, substation and wind turbine generated noise.
59.	Noise	D.8-45 Third paragraph	The property boundaries of all receptors (parcels) south of I-8 are located within 105 feet or less of the construction area. The noise level at all of the parcels within this analysis and south of I-8 would exceed an 8-hour average sound level of 75 dBA associated with the transmission line construction noise activities <u>without mitigation</u> .	Please consider revising the construction noise text clarify the sound levels presented in tables D.8-10 and D.8-15. Impacts have been removed due to new layout.
60.	Noise	D.8-46 First paragraph	The resulting unmitigated noise levels associated with the construction of the transmission line at all the parcels south of I-8 are shown in Table D.8-12.	Please consider revising the construction noise text clarify the sound levels presented in tables D.8-8 and D.8-12. Note that it is recommended that Table D.8-12 be renumbered to D.8-15 due to additions of additional noise tables. Impacts have been removed due to new layout
61.	Noise	D.8-46 Second paragraph	NOI-1 As indicated in Tables D.8- 810 and D.8- 4215 , the construction and decommissioning noise level would be expected to exceed the County's construction noise ordinance criteria due to transmission line construction <u>without mitigation</u> . APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 would partially reduce the adverse noise impacts resulting from this alternative. <u>With the implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 construction noise levels would comply with the San Diego County noise ordinance. The highest predicted construction noise level at an adjacent property boundary is reduced from 99 dBA to 74 dBA Leq.</u> However, construction and decommissioning noise would remain an adverse and unmitigated noise impact. Under CEQA, for this alternative,	Please consider revising the construction noise text clarify the sound levels presented in tables D.8-8 and D.8-12. Please consider revising the construction noise text to discuss mitigated noise levels as presented in the AED and noise technical report dated October 2010. 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. See new construction noise mitigation analysis.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>construction noise impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class II) (Class I).</p>	
62.	Noise	D.8-47 First Paragraph	<p><u>NOI-2 Ground-borne vibration or ground-borne noise levels under this alternative due to construction, operation and maintenance would be similar to those identified for the proposed project. The moving of the transmission line or O&M/Substation Facility does not result in any significant increase in ground-borne vibration or ground-borne noise levels. Under CEQA, for this alternative, impacts would be considered less than significant (Class III).</u></p> <p>Under this alternative, blasting during construction and decommissioning could cause groundborne vibration that would generally be short term in duration but could cause adverse impacts to nearby residents. Implementation of Mitigation Measure NOI 1 would mitigate these impacts through the preparation and implementation of a blasting plan. However, because it is not known whether residents would agree to relocate, adverse vibration impacts related to blasting activities cannot be reliably mitigated. Under CEQA, for this alternative, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	<p>Please consider revising the vibration discussion to reflect the discussion in the corresponding alternative of the Applicant's Environmental Document.</p> <p>Please omit the discussion of blasting vibration with the same justification as for Comment #33.</p>
63.	Noise	D.8-47-48	<p>Therefore, this alternative would not expose sensitive receptors to adverse corona noise, <u>substation noise</u>, or turbine noise impacts with implementation of Mitigation Measures NOI-2 and NOI-3, or adverse routine inspection and maintenance related noise impacts.</p>	<p>Please consider revising the operational noise discussion to include transmission line, substation and wind turbine generated noise.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
64.	Noise	D.8-48 Third paragraph	NOI-1 As previously shown in Table D.8-44 14 , the construction noise level would be expected to exceed the County's construction noise ordinance criteria due to transmission line construction <u>without mitigation</u> .	Please consider revising the construction noise text to discuss mitigated noise levels as presented in HDR Noise Technical Report, dated February 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. See new construction noise mitigation analysis.
65.	Noise	D.8-48 Third paragraph	NOI-1 With the implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 would partially reduce the adverse noise impacts resulting from this alternative. <u>construction noise levels would comply with the San Diego County noise ordinance. The highest predicted construction noise level at an adjacent property boundary is reduced from 99 dBA to 74 dBA Leq. However, the construction noise would remain an adverse and unmitigated noise impact.</u> Under CEQA, for this alternative, construction noise impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class II) (Class I) .	Please consider revising the construction noise text to discuss mitigated noise levels as presented in the AED and noise technical report. 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. See new construction noise mitigation analysis.
66.	Noise	D.8-48 Fourth paragraph	<u>NOI-2 Open trenching for the transmission line may occur closer to residences when compared to construction activities in the proposed Tule Wind Project. Groundborne vibration may be higher.</u> Under this alternative, blasting during construction and decommissioning could cause groundborne vibration that would generally be short term in duration but could cause adverse impacts to nearby residents. Implementation of Mitigation Measure NOI-1 would mitigate these impacts through the preparation and implementation of a blasting plan. However, because it is not known whether residents	Please consider revising the text to discuss the vibration impact of trenching activities for this alternative. Please omit the discussion of blasting vibration with the same justification as for Comment #33.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			would agree to relocate, adverse vibration impacts related to blasting activities cannot be reliably mitigated.	
67.	Noise	D.8-49 First paragraph	Therefore, this alternative would not expose sensitive receptors to adverse corona noise, <u>substation noise</u> , or turbine noise impacts with implementation of Mitigation Measures NOI-2 and NOI-3 or adverse routine inspection and maintenance related noise impacts.	Please consider revising the operational noise discussion to include transmission line, substation and wind turbine generated noise.
68.	Noise	D.8-49 Third paragraph	NOI-1 With implementation of APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16, and Mitigation Measure NOI-1 the construction and decommissioning noise would be an adverse and unmitigated noise impact. Under CEQA, for this alternative, construction and decommissioning noise impacts would be significant and cannot be mitigated to a level that is considered less than significant (<u>Class II</u>)(Class I).	Please consider revising the construction noise text to discuss mitigated noise levels as presented in the AED and noise technical report. 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. See new construction noise mitigation analysis.
69.	Noise	D.8-49-50	<u>Ground-borne vibration or ground-borne noise levels under this alternative due to construction would be similar to those identified for the proposed project. The reduction of turbines does not result in any significant increase in ground-borne vibration or ground-borne noise levels compared to those identified for the project. Under CEQA, for this alternative, impacts would be considered less than significant (Class III).</u> Under this alternative, blasting during construction and decommissioning could cause groundborne vibration that would generally be short term in duration but could cause adverse impacts to nearby residents. Implementation of Mitigation Measure NOI 1 would mitigate these impacts through the preparation and implementation of a blasting plan	Please consider revising to discuss vibration levels due to construction equipment. Please omit the discussion of blasting vibration with the same justification as for Comment #33.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			However, because it is not known whether residents would agree to relocate, adverse vibration impacts related to blasting activities cannot be reliably mitigated. Under CEQA, for this alternative, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	
70.	Noise	D.8-54 Second paragraph	The Tule Wind and ESJ Gen-Tie projects would be constructed and would interconnect with an existing substation or with a new substation expected to be proposed by SDG&E. Impacts associated with the Tule Wind and ESJ Gen-Tie projects would be expected to be similar to those described in Section D.8.3.3, including temporary construction impacts that would be considered significant and unmitigated (Class I) as a result of blasting (Class II).	Please consider revising the text to reflect the design considerations and mitigation measures outlined in the noise technical report. Both blasting and construction noise would be mitigated to comply with San Diego County ordinances.
71.	Noise	D.8-54 Last paragraph	Temporary construction impacts would still be considered significant and unmitigated (Class I) as a result of blasting, helicopter operations, and nighttime construction associated with the ECO substation, as well as roadway and transmission line construction and turbine noise associated with the Tule Wind Project.	Please consider revising the text to reflect the design considerations and mitigation measures outlined in the noise technical report. Both blasting and construction noise would be mitigated to comply with San Diego County ordinances.
72.	Noise	D.8-54 Last paragraph	Corona Project related noise from operations would be expected to be similar to that described for the Proposed PROJECT.	Please consider revising to the text to clarify or include that operations related noise includes corona noise, turbine generated noise and substation noise.
73.	Noise	D.8-55 Table D.8-14	Table D.8-14 – Mitigation Measure NOI-1	Please revise Mitigation Measure NOI-1 in Table D.8-14, as suggested in Comment # 22 above.
74.	Noise	D.8-56	Table D.8-14 – Mitigation Measure NOI-1	Please revise Mitigation Measure NOI-1 in Table D.8-14, as suggested in Comment # 22 above.
75.	Noise	D.8-57	Table D.8-14 – Mitigation Measure NOI-3	Please revising Mitigation Measure NOI-3 in Table D.8-14, as suggested in Comment # 41 above.
76.	Noise	D.8-57 Table D.8-14	Add APMs TULE-NOI-2, TULE-NOI-4, and TULE-NOI-6 through TULE-NOI-16 because they have been implemented to address Impact NOI-1.	Please consider revising to permit all methods of complying with noise regulations.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
77.	Noise	D.8-58 Table D.8-15, Tule NOI-1	Tule-NOI-1 is no longer a Class I impact, based on applied mitigation. Please see Comments # 24 through 28 above.	Mitigation of construction noise impacts has been proposed by introduction of time constraints on the construction activities, Best Management Practices (BMPs) and movable noise barriers which would bring the closest receptors within the noise ordinance.
78.	Noise	D.8-58 Table D.8-15, Tule NOI-2	Tule-NOI-2 is no longer a Class I impact, based on applied mitigation. Please see Comment # 33 above.	Except for Tule Wind Alternatives 2 and 4, groundborne vibration will not create an impact.

Attachments

D.8.1 – Colby, et al., Wind Turbine Sound and Health Effects: An Expert Panel Review (December 2009).

D.8.2 – O’Neal, et al., A Study of Low Frequency Noise and Infrasound from Wind Turbines (July 2009).

D.8.3 – Province of Ontario, Chief Medical Officer of Health, The Potential Health Impact of Wind Turbines (May 2010).

D.8.4 – Public Service Commission of Wisconsin, Rebuttal Testimony of Dr. Mark Roberts on behalf of Wisconsin Electric Power Company (October 20, 2009).

D.8.5 – Roberts, et al., Evaluation of the Scientific Literature on the Health Effects Associated with Wind Turbines and Low Frequency Sound (October 20, 2009).

Technical Reports

HDR Engineering, Inc. Tule Wind Draft Noise Analysis Report (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section D.9: Transportation and Traffic

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
1.	Transportation and Traffic	D.9-1	<p><i>Second paragraph</i></p> <p>Existing roadway classifications and conditions identified in this section are based on review of the County of San Diego (County) General Plan Circulation Element (1994), Mountain Empire Subregional Plan (County of San Diego 1995), the Proponent’s Environmental Assessment (PEA) prepared for the ECO Substation Project (SDG&E 2009), the Applicant’s Environmental Document for the Tule Wind Project (Iberdrola Renewables, Inc. <u>Tule Wind, LLC</u> 2010), and San Diego Association of Governments (SANDAG) and California Department of Transportation (Caltrans) traffic data. In addition, a Traffic Impact Study was prepared for the Tule Wind Project (LLG 2010<u>2011</u>) and was reviewed during preparation of this Environmental Impact Report (EIR)/Environmental Impact Statement (EIS).</p>	<p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p> <p>Please revise language on the most recent version of the Traffic Impact Study prepared to reflect changes made per the Modified Project Layout.</p>
2.	Transportation and Traffic	D.9-2	<p><i>Third and fourth paragraph</i></p> <p>State Route 94 (SR-94) According to the County Draft General Plan Mountain Empire Mobility Network, SR-94 is classified within the project area as a Community Collector with Improvement Options (County of San Diego 2009<u>2010a</u>).</p> <p>Old Highway 80 is currently built as a two-lane roadway providing access between the communities of Boulevard and Jacumba in the project area. The current County General Plan classification for Old Highway 80 is Major</p>	<p>Please reference the most recent version of the Draft General Plan Update Recommended Project October 2010</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			Road with bike lanes. According to the County Draft General Plan Mountain Empire Mobility Network, Old Highway 80 (between SR-94 and Jacumba Street) is classified as a Light Collector with Improvement Options (County of San Diego 2009 2010a).	
3.	Transportation and Traffic	D.9-3	Figure D.9-1 Transportation Facilities in the Project Area Map	Please update figure to reflect the Modified Project Layout.
4.	Transportation and Traffic	D.9-8	<p><i>Third paragraph</i> Ribbonwood Road is currently classified and built as a two-lane Rural <u>Light</u> Collector roadway north of I-8. Ribbonwood Road is paved for approximately 1.65 miles north of I-8...</p> <p><i>Fifth paragraph</i> McCain Valley Road is currently built as a two-lane Rural <u>Light</u> Collector roadway north of I-8. McCain Valley Road is a paved roadway for approximately 1.8 miles north of I-8...</p>	Please consider making the textual modifications to properly identify the current road classifications per the Existing County of San Diego General Plan Circulation Element
5.	Transportation and Traffic	D.9-9	<p><i>Second paragraph</i> Crestwood Road is a north-south, two-lane <u>Rural Collector</u> roadway located off I-8. The County General Plan Circulation Element does not only assigns an official roadway classification to <u>a portion of Crestwood Road just north of I-8</u>. However, the Traffic Impact Study prepared for the Tule Wind Project (LLG 2010 2011) does assign a functional classification/designation of Rural Collector to this road; <u>and</u> for purposes of this analysis, the Rural Collector classification is used. Crestwood Road would be used as a haul route, and if utilized, construction vehicles would traverse the Campo and Manzanita Indian Reservations along Bureau of Indian Affairs (BIA) Road 12.</p> <p>“To provide additional access to the Tule Wind Project area, Pacific Wind Development <u>Tule Wind, LLC</u> is negotiating with the Manzanita and Campo Indian tribes to obtain access through tribal lands along BIA Road 12.”</p>	<p>Please consider making the textual modifications to properly identify the current road classifications per the Existing County of San Diego General Plan Circulation Element</p> <p>Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
6.	Transportation and Traffic	D.9-9 Table D.9-3	<p><i>Classification Category (Column 3, Rows 3, 4, and 5)</i></p> <p>Ribbonwood Road</p> <ul style="list-style-type: none"> - Rural <u>Light</u> Collector (north of I-8) - Rural <u>Light</u> Collector (I-8 TO Old Highway 80) <p>McCain Valley Road</p> <ul style="list-style-type: none"> - Rural <u>Light</u> Collector (north of Old Highway 80) <p>Crestwood Road</p> <ul style="list-style-type: none"> - Local Road/Unclassified⁵Rural Collector⁵ 	Please consider making the textual modifications to properly identify the current road classifications per the Existing County of San Diego General Plan Circulation Element
7.	Transportation and Traffic	D.9-10 Table D.9-3	<p><i>Table D.9-3 (Footnotes)</i></p> <p>Sources: LLG 2010<u>2011</u>; Iberdrola Renewables, Inc. 2010 <u>Tule Wind, LLC. 2011.</u></p> <p>Notes:</p> <p>¹Roadways identified as “Unclassified” do not appear on the County of San Diego Circulation Element Map.</p> <p>² Roadways designated as having one lane do not have any formal lanes, shoulders, medians, or markings. These are dirt roadways.</p> <p>³ N/A - The County of San Diego does not actively maintain traffic counts for these roadways.</p> <p>⁴Average daily traffic (ADT) identified for Old Highway 80 from Ribbonwood Road to McCain Valley Road (LLG 2010<u>2011</u>).</p> <p>⁵According to the County of San Diego General Plan Circulation Element, Crestwood Road is an undesignated roadway; however, the Traffic Impact Study prepared for the Tule Wind Project (LLG 2010<u>2011</u>) assigns a functional classification/designation of Rural Collector. ADT and LOS data were also provided by LLG (2010<u>2011</u>).</p> <p>⁶These roadways were not included in the Traffic Impact Study prepared for the Tule Wind Project. They are included here because they would be located in the project area and represent additional access routes for the Tule Wind project.</p>	Please update language to reference the most recent version of the revised Traffic Impact Study prepared for the Modified Project Layout (January 2011)

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
8.	Transportation and Traffic	D.9-10	<i>Second paragraph</i> The transmission line would span cross I-8 and Old Highway 80 before interconnecting with the rebuilt Boulevard Substation.	Please revise language as suggested.
9.	Transportation and Traffic	D.9-11	<i>Bicycle Facilities</i> Old Highway 80 is the only bicycle facility in the vicinity of the Tule Wind Project. <u>SR-94 is designated as a Class I and Old Highway 80 (from Ribbonwood Road to McCain Valley Road) is designated as a Class III bike lane in the Mobility Element of the Draft County of San Diego General Plan Update.</u>	Please revise language as suggested.
10.	Transportation and Traffic	D.9-11	<i>Third paragraph</i> Construction of the proposed Tule Wind Project would extend approximately 24 months (Iberdrola Renewables, Inc-Tule Wind, LLC 2010).	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
11.	Transportation and Traffic	D.9-11	<i>Fifth paragraph (County of San Diego)</i> “...Construction of the Tule Wind Project is anticipated to occur shortly after acquisition of all required permits and right-of-way (ROW) property acquisitions, and according to the preliminary construction schedule presented in Section B (see Table B-9) of this EIR/EIS, construction is anticipated to begin in December 2010 2011. Therefore, construction of the proposed Tule Wind Project and the Ribbonwood Road Sightline Improvement Project could are <u>not anticipated to occur within the same time frame and no conflicts would occur concurrently over a period of several months. The conflicting construction schedules would be an issue because Ribbonwood Road is one of two roads providing access to the Tule Wind Project area.</u>	The project construction schedule is not current. Consider change based on updated schedule. The delay in the Tule project construction would not conflict with the Ribbonwood Road Sightline Improvement project. Therefore, there would not be a conflict with construction schedules.
12.	Transportation and Traffic	D.9-16-18	Please consider deleting the County of San Diego Draft General Plan Update Mobility Element (D.9-16-17), and Draft Boulevard Subregional Planning Area Community Update (D.9-17-18) discussions.	Neither plan has been adopted by the County of San Diego; and the goals and policies therein are not applicable to the Proposed Project. If references to the Draft General Plan are kept within the Draft EIR/EIS, please consider making the revisions as noted below in the following comments.

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
13.	Transportation and Traffic	D.9-16	<p><i>County of San Diego Draft General Plan Update Mobility Element</i></p> <p>The following policies of the San Diego County Draft General Plan Update, Chapter 4, Mobility Element (County of San Diego 2010a) are associated with transportation and traffic and <u>are provided for informational purposes, but are not applicable to the Proposed PROJECT because they have yet to be adopted:</u></p> <ul style="list-style-type: none"> <p>Policy Mobility (M)-2.1: Level of Service Criteria. Require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). <u>When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.</u></p> <p>Criteria for Accepting A Road Classification with Level of Service E/F. Identified below are the applicable situations, and potential improvement options, for accepting a road classification where a Level of Service E/F is forecast. The instances described below <u>within the Mobility Element</u> specify when the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity.</p> <p><i>Draft Boulevard Subregional Planning Area Community Plan</i></p> <p>The following goals and policies of the Draft Boulevard Subregional Planning Area Community Plan are associated</p> 	<p>Please clarify language to reference the Mobility Element instead of saying “as described below.”</p> <p>Please clarify discussion to include language that the Draft General Plan has yet to be adopted and therefore the policies and regulations within are not applicable to the project.</p> <p>Please revise Policy CM 3.1.1 and delete Policy CM 3.1.2 to reflect the most recent version of the Draft General Plan Update – Recommended Project (October 2010).</p>

No.	Section/ Appendix	Page	Draft EIR/EIS Text Revision	Justification
			<p>with transportation and traffic and are <u>provided for informational purposes</u>, but are <u>not</u> applicable to the Proposed PROJECT (County of San Diego 2010a) <u>because they have yet to be adopted</u>:</p> <ul style="list-style-type: none"> • Goal CM 3.1: Avoid the proliferation of unauthorized access to private property via improperly located, authorized, or secured fire access routes. • Policy CM 3.1.1: Require secondary fire access/egress routes to connect to a public road, <u>when feasible unless the approval of the Boulevard Planning Group and all impacted property and road owners is granted, along with the legally required deeded easement grants.</u> • Policy CM 3.1.2: Permit secondary access road only on the condition that they must meet emergency ingress and egress requirements while remaining locked at all times, other than during an emergency. 	
14.	Transportation and Traffic	D.9-20	Iberdrola Renewables, Inc. Tule Wind, LLC has proposed APMs TULE-TRA-1 (Transportation Plan), TULE-TRA-2 (Traffic Management Plan), and TULE-TRA-3 (Caltrans Design Requirements) to reduce impacts related to transportation and traffic.	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
15.	Transportation and Traffic	D.9-22 Table D.9.4	<p>Tule-TRA-3 (Impact Classification, Column 3))</p> <p>Tule-TRA-3 Construction activities would result in unstable flow, or fluctuations in volumes of traffic that temporarily restrict flow; or in an unacceptable reduction in performance of the circulation system, as defined by an applicable plan (including a congestion management program), ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.</p> <p>Class H<u>III</u>-impact classification.</p>	Please consider changing the impact determination to Class III. The impact discussion at pg. D.9-34 states that the project falls below the County threshold of an additional 200 ADT to reduce the LOS or meet the 2,400 ADT. Therefore, the project would not be an impact during the construction phase requiring mitigation.
16.	Transportation and Traffic	D.9-27	<p><i>Second paragraph</i></p> <p>Approximately 250,000 <u>50,000 to 100,000</u> gallons of water per day over a period of 60 to 72 days is anticipated to be needed for dust suppression and for <u>road</u> construction; <u>with</u></p>	Please update language to reflect corrected analysis per the Modified Project Layout and conclusions of the Water Supply Evaluation (See Attachment D.12.2, Modified Construction Water Supply Evaluation (February 15, 2011).

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			<u>approximately 100,000 gallons per day for dust suppression alone for the remainder of the 9-month active construction period, while installation of concrete turbine foundations and road construction activities would be conducted simultaneously.</u>	
17.	Transportation and Traffic	D.9-28	<i>Third paragraph</i> The project would be accessed by trucks. No helicopter use is anticipated for turbine delivery at this time. The project proposes the construction of 90 <u>75</u> new roadways and improvements to 24 <u>15</u> existing roadways to access the project area....	Please revise number of roads affected per the Modified Project Layout.
18.	Transportation and Traffic	D.9-31	<i>Third paragraph</i> Proposed access roads are described in detail in Section B.4. In order to access proposed turbine locations and facilitate delivery of wind turbine components, approximately 27.6 <u>23.4</u> miles of existing roadways in the project area would be improved, and approximately 36.4 <u>36.8</u> miles of new access roads would be constructed.”	Please revise language to reflect corrected analysis per the Modified Project Layout.
19.	Transportation and Traffic	D.9-34	The project would require five <u>twelve</u> permanent full-time and five part-time employees during the O&M phase. These employees would be on site during regular business hours. This would only add an additional 20 <u>24</u> trips per day to the existing traffic conditions, which is considered minimal.	Please change to reflect language update.
20.	Transportation and Traffic	D.9-35	Impact TRA-3 Overall, identified impacts would <u>not</u> be adverse; therefore, Mitigation Measure TRA-1 has been provided to mitigate this impact. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II <u>III</u>).	Please consider changing the impact determination to Class III. The impact discussion at pg. D.9-34 states that the project falls below the County threshold of an additional 200 ADT to reduce the LOS or meet the 2,400 ADT. Therefore, the project would not be an impact during the construction phase requiring mitigation.
21.	Transportation and Traffic	D.9-36	<i>Fifth paragraph</i> The project proposes improvements to approximately 27.6 <u>23.4</u> miles of existing roadways and 36.4 <u>36.8</u> miles of new roads.	Please revise language to reflect corrected analysis per the Modified Project Layout.

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22.	Transportation and Traffic	D.9-37	<p><i>Second Paragraph</i></p> <p>Oversized construction trucks would be required to haul in turbine and other project components. Some construction vehicles are oversized trucks with up to 38 wheels and would require accompanying pilot trucks. Iberdrola Renewables, Inc. <u>Tule Wind, LLC</u> is required to obtain relevant encroachment and traffic permits from Caltrans and the County, and, as part of the permit process, will be required to ensure the safe travel of vehicles within construction work zones.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
23.	Transportation and Traffic	D.9-46	<p><i>Second paragraph</i></p> <p>The applicant has contacted FAA regarding the proposed Tule Wind Project to minimize any potential conflict with aviation requirements. Iberdrola Renewables, Inc. <u>Tule Wind, LLC</u> filed a Notice of Proposed Construction or Alteration (7460-1) with the FAA on December 15, 2006.</p>	Please revise all references to Pacific Wind Development to reflect Tule Wind, LLC.
24.	Transportation and Traffic	D.9-69	<p><i>Third paragraph</i></p> <p>Under this alternative, the setting would be the same as described in Section B of this EIR/EIS, with the exception that this alternative would remove 62 of the proposed 134 <u>128</u> turbines (4 <u>5</u> turbines on County jurisdictional land abutting the BLM In-Ko-Pah Mountains ACEC and 54 <u>57</u> turbines adjacent to wilderness areas on the western side of the project site).</p>	Please revise language to reflect corrected analysis per the Modified Project Layout.
25.	Transportation and Traffic	D.9-87	<p><i>References:</i></p> <p>LLG (Linscott, Law, and Greenspan Engineers). 2010. Full Traffic Impact Study for the Tule Wind Project (MUP 09-019). March 26, 2010 January 28, 2011.</p>	Please revise reference source to include latest technical study.

Technical Reports

Linscott, Law and Greenspan. Full Traffic Impact Study Tule Wind Project (February 18, 2011)

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Section E: Comparison of Alternatives

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1.	E. Comparison of Alternatives	E-12 – E-13	<p>Last paragraph</p> <p>The proposed Tule Wind Project would have significant Class I unmitigable impacts in the following issue areas: biological resources (bird/golden eagle strikes with turbines), visual resources (visual characteristics), wildland fire and fuels management, cultural resources (potential adverse change to traditional cultural properties), and short-term construction noise and air emissions (see Table E-2). Impacts in the remaining 11 <u>15</u> issue areas were either found to be not adverse and under CEQA less than significant (Class III), and/or following implementation of mitigation measures presented in this EIR/EIS to be mitigable and under CEQA less than significant with mitigation implemented (Class II).</p>	Please revise language as suggested. With implementation of mitigation measures presented in Section D.2, Biological Resources, D.15, Fire and Fuels Management, and D.7, Cultural and Paleontological Resources, it is anticipated that potentially significant impacts can be mitigated to a level less than significant.
2.	E. Comparison of Alternatives	E-13	<p>Under this alternative, the O&M facility and collector substation would be relocated to Rough Acres Ranch (private land under the jurisdiction and permitting approval of San Diego County). This alternative would also reroute the 138 kV transmission line <u>to run</u> from the relocated collector substation partially along McCain Valley Road to the <u>rebuilt</u> Boulevard Substation also under the jurisdiction and permitting approval of San Diego County. All other project components would be the same and would require approval from the BLM, BIA, Ewiiapaayp Band of Kumeyaay Indians, and CSLC. The proposed 138 kV transmission line would decrease in distance <u>by 5.4 miles as a result of this alternative</u> from 9.7 <u>9.2</u> miles to</p>	Please revise language as suggested.

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			<p>3.8 miles and would decrease the amount of transmission line poles <u>by 36 poles</u> from 46 80 poles to 44 poles. <u>However, as a result of this alternative, the 34.5 kV overhead collector lines would substantially increase in distance by 7.7 miles</u> from 9.4 9.3 miles to 17 miles, and would increase the amount of collector line poles <u>by 202 poles</u> from 250 to 452 poles. The underground collector lines would decrease in distance from 29.3 35.1 miles to 28.9 miles. Under this alternative, short-term construction impacts to air and noise would remain significant and unavoidable (Class I). The remaining short-term construction impacts would remain less than significant with implementation of mitigation measures (Class II). The impact to vegetation communities from the Tule Gen-Tie Alternative 2 would increase decrease by 8 17.4 acres (24%) more than the proposed Tule Wind Project. Although the Tule Gen-Tie Alternative 2 would result in a slight increase decrease in impacts to vegetation communities, this alternative would substantially reduce the and a reduced distance of the larger 138 kV transmission line, which would reduce potential avian collision and electrocution risk associated with the larger lines. This alternative would also relocate the substation to an area of existing development on Rough Acres Ranch, which would reduce the construction and operations related disturbance to wildlife and cultural resources associated with the substation; <u>however would increase air pollution, dust, truck traffic, and fossil fuel use because the O&M building would not be centrally located.</u> Additionally, This alternative would <u>not</u> minimize scenic vista and visual contrast impacts associated with the collector substation/O&M facility and transmission line <u>because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW would place larger transmission line facilities in the vicinity of the project area and therefore reducing the length of the 138 kV line would not reduce visual impacts in any significant manner.</u> Moving the collector station/O&M facility and transmission line off BLM land would tend to reduce</p>	

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			overall construction operations activity in the McCain National Co-op Land, which would reduce impacts to recreational activities occurring there. As summarized in Table E-2, impacts to all other issue areas would be similar to the proposed Tule Wind Project, each of the Tule Wind Project Alternatives, and the Proposed PROJECT.	
3.	E. Comparison of Alternatives	E-14 – E-20 Table E-2	Please see changes made to impact determinations for the following resource areas: Biological Resources, Visual Resources, Land Use, Cultural and Paleontological Resources, Noise, Fire and Fuels Management, and Air Quality.	Implementation of mitigation measures outlined within the Draft EIR/EIS would result in less than significant impacts to Biological Resources, Cultural and Paleontological Resources, Noise, and Fire and Fuels Management. Please consider the textual modifications and changes to impact determinations associated with the Modified Project Layout.
4.	E. Comparison of Alternatives	E-21	<p>First paragraph</p> <p>...This alternative would have similar <u>greater</u> impacts to those described previously in Section E.3.1. Additionally, because this alternative would increase the short-term construction impacts <u>and long-term permanent impacts (i.e., biological and cultural resources)</u> associated with trenching and boring activities. Short-term construction impacts from dust and air emissions would remain significant and unavoidable (Class I). The remaining short-term construction impacts would remain less than significant with mitigation (Class II). While long <u>Long-term fire and visual impacts and conflicts with the County of San Diego policies related to degradation of existing visual character rural character, wildland and visual resources</u> would remain significant and unavoidable (Class I), <u>and this alternative would not reduce some of the unmitigable fire and visual impacts associated with resulting from undergrounding the proposed 138 kV transmission line because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping right-of-way would be the dominant transmission line feature in the landscape to less than significant (Class III).</u> Since this alternative</p>	Please consider adding language that describes the tradeoff of impacts resulting from the undergrounding of the transmission line. Because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW, placing the line underground will not reduce impacts in any significant manner. Additional long-term permanent impacts to biological resources and cultural resources would also occur because of trenching and boring.

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			<p>would relocate the substation to an area of existing development on Rough Acres Ranch, construction and operations related disturbance to wildlife and cultural resources due to the substation would be reduced; <u>however would increase air pollution, dust, truck traffic, and fossil fuel use throughout operations because the O&M building would not be centrally located.</u> As summarized in Table E-2, impacts to all other issue areas would be similar to the proposed Tule Wind Project, each of the Tule Wind Project Alternatives, and the Proposed PROJECT.</p>	
5.	E. Comparison of Alternatives	E-21 – E-22	<p>Second paragraph</p> <p>...This alternative would reduce the overall length of the proposed 138 kV transmission line <u>by 3.8 miles from 9.6 9.2 to 5.4 miles; however, the length of the overhead collector line system would increase in distance by 7.7 miles from 9.3 miles (proposed) to 17 miles. and develop the O&M and collector substation on a more disturbed site.</u> This alternative would have similar and slightly greater impacts to those described in Section E.3.1 due to the increased length of the 138 kV transmission line. Short-term construction impacts to air and noise would remain significant and unavoidable (Class I). The remaining short-term construction impacts would remain less than significant with implementation of mitigation measures (Class II). Since this alternative would relocate the substation to an area of existing development on Rough Acres Ranch, construction and operations related disturbance to wildlife and cultural resources due to the substation would be reduced; <u>however would increase air pollution, dust, truck traffic, and fossil fuel use throughout operations because the O&M building would not be centrally located.</u> As summarized in Table E-2, impacts to all other issue areas would be similar to the proposed Tule Wind Project, each of the Tule Wind Project Alternatives, and the Proposed PROJECT.</p>	Please consider the revised language as suggested.

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6.	E. Comparison of Alternatives	E-22	<p>Second paragraph</p> <p>...This alternative would have similar <u>greater</u> impacts to those described previously in Section E.3.3. Additionally, because this alternative would increase the short-term construction impacts <u>and long-term permanent impacts (i.e., biological and cultural resources)</u> associated with trenching and boring activities. Short-term construction impacts from dust and air emissions would remain significant and unavoidable (Class I). The remaining short-term construction impacts would remain less than significant with mitigation (Class II). While <u>Long-term fire and</u> visual impacts would remain significant and unavoidable (Class I), <u>and this alternative would not reduce some of the unmitigable fire and visual impacts associated with resulting from undergrounding the proposed 138 kV transmission line because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping right-of-way would be the dominant transmission line feature in the existing landscape to less than significant (Class III).</u> Since this alternative would relocate the substation to an area of existing development on Rough Acres Ranch, construction and operations related disturbance to wildlife and cultural resources due to the substation would be reduced; <u>however would increase air pollution, dust, truck traffic, and fossil fuel use throughout operations because the O&M building would not be centrally located.</u> As summarized in Table E-2, impacts to all other issue areas would be similar to the proposed Tule Wind Project, each of the Tule Wind Project Alternatives, and the Proposed PROJECT.</p>	
7.	E. Comparison of Alternatives	E-22 – E-23	<p><i>Last paragraph</i></p> <p>Under this alternative, 62 of the proposed 134 <u>128</u> turbines would be removed on lands under the jurisdiction of the BIA, Ewiiapaayp Band of Kumeyaay Indians, BLM, California State Lands</p>	Please revise language as suggested.

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			<p>Commission (CSLC), and County of San Diego. As proposed, this alternative would remove 47 <u>18</u> turbines from Ewiiapaayp Indian Reservation lands, 27 <u>32</u> from lands administered by the BLM, 7 from lands administered by the CSLC, and 44 <u>5</u> from lands under the jurisdiction of the County of San Diego. All other project components would be the same and require approval from the BLM, BIA, County, and CSLC. By removing turbines presenting high risk of collision to golden eagles based on topography, landforms, and distance to known active nests, unmitigable Adverse impacts to golden eagles would be <u>are not</u> substantially reduced under this alternative <u>because the risk of collision for golden eagle is already low based on golden eagle use of the area. However,</u> the risk of mortality due to collision with the remaining operating turbines to golden eagles, albeit substantially reduced, remains significant and unmitigable despite <u>but can be mitigated to a less than significant level with implementation of the proposed mitigation measures.</u> While this alternative would reduce impacts to all other issue areas, as summarized in Table E-2, impact conclusions would be similar to the proposed Tule Wind Project, each of the Tule Wind Project Alternatives, and the Proposed PROJECT. This alternative would adversely affect the Ewiiapaayp Band of Kumeyaay Indians' wind and solar energy resources policies to develop renewable energy projects to serve economic and social benefits of its Ewiiapaayp Band of Kumeyaay Indians' Reservation as it eliminates all turbines on their lands (47 <u>18</u> turbines). This alternative would also reduce the benefits for the BLM (27 <u>32</u> turbines eliminated), CSLC (7 turbines eliminated), and the County of San Diego (44 <u>5</u> turbines eliminated).</p>	
8.	E. Comparison of Alternatives	E-23	<p><i>Second paragraph</i></p> <p>The conclusions in Sections E.4.4 <u>E.3.1</u> through E.4.5 <u>E.3.5</u> for the Tule Wind Project Alternatives result in the overall environmentally superior alternative as Tule</p>	<p>Please correct references accordingly.</p> <p>The overall ranking of alternatives has identified a combination of Alternative 2 and Alternative 5 as the overall environmentally superior alternative.</p>

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			<p>Reduction in Turbines Alternative combined with Alternative Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acre Ranch. Consideration and adoption of this alternative and/or a variation or other combination of alternatives would be at the discretion of the BLM, BIA, Ewiiapaayp Band of Kumeyaay Indians, CSLC, and County of San Diego.</p>	<p>The combination of such alternatives can not be considered “environmentally superior” for the following reasons.</p> <p>Reasons why Alternative 2 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p><i>Increased Collector Line System</i> - The analysis provided for Alternative #2 fails to recognize the tradeoff of impacts associated with a longer collector line system. The collector line system would increase by 7.7 miles and would necessitate 202 extra poles than the Modified Project Layout; thereby increasing the project footprint and the potential for additional temporary and permanent environmental impacts.</p> <p><i>Undergrounding the 138 kV Transmission Line</i> - The analysis provided for Alternative #2 fails to recognize the increased potential for permanent biological and cultural impacts associated with open trenching and boring of an underground transmission line. Open trenching along the alignment of the transmission line would result in a higher risk for discovering buried cultural deposits not indicated on the surface and permanent impacts to cultural resources where such known resources have been identified. The results of recent cultural resource surveys indicate that seven (7) sites known to have cultural resources would be permanently impacted from open trenching associated with the undergrounding of Transmission Line #2. Of the seven sites that would be permanently impacted from open trenching, one site is listed as a “Potentially Eligible Archaeological Site” under the National Historic Resource Preservation (NHRP) Assessment. Three of the remaining sites are</p>

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				<p>classified as “Likely Ineligible Archeological Site,” and the remaining three are classified as “Uncertain Eligibility Archaeological Site.” Permanent impacts to biological resources would increase along the transmission line corridor as a result of long-term maintenance requirements that would limit the habitat function provided by revegetation.</p> <p><i>Visual Characteristics</i> - The analysis provided for Alternative #2 fails to recognize that undergrounding the 138 kV transmission line would not reduce visual impacts to the surrounding area in any significant manner because the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW would be the predominant feature in the landscape. The most visible portions of the 138 kV transmission line would be from Interstate 8 at McCain Valley Road. As shown in Attachment D.3.2, Revised Visual Simulation with Sunrise 500 kV Line (February 2011), the proposed 138 kV transmission line would run parallel to the 500 kV transmission line. Visual impacts associated with the proposed 138 kV transmission line would be minimal relative to the 500 kV Sunrise transmission line.</p> <p><i>Non-Central Location</i> - Air pollution, dust, truck traffic, fossil fuel use would all increase throughout operations because the O&M building and substation facility would not be centrally located.</p> <p>Reasons why Alternative 5 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS.</p> <p><i>No reduced impacts to ACEC Areas</i> - Potential impacts to Areas of Critical Concern (ACEC) were not identified as a result of the proposed project;</p>

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				<p>and therefore are not substantially lessened as a result of the Reduced Turbine Alternative. On June 9, 2010, a meeting conducted with biologists from Tule Wind LLC's consultants (HDR) and the U.S. Fish and Wildlife Service (USFWS) concluded that the Tule Wind project (as proposed), including the 11 turbines adjacent to the BLM In-Ko-Pah Mountains Area of Critical Concern (Turbines R-1 through R-10 and R-13), is located outside of critical habitat areas and will not have any detrimental impacts on sheep, and available evidence indicates that detrimental impacts to bighorn sheep are unlikely to occur. The Biological Assessment (August 2010) concluded that the project may affect, but is not likely to adversely affect Peninsular bighorn sheep. Furthermore, the portion of the project area on private land is not subject to ACEC restrictions and regulations set forth by the BLM because the Project facilities are not located within the ACEC.</p> <p><i>No reduced impacts to Golden Eagle</i> - Potential impacts to golden eagles are not quantifiable, and there is no support that a reduced turbine alternative would substantially lessen that unquantifiable risk or reduce the risk of eagle mortality from collisions with turbines when compared with the Tule Wind Project.</p> <p>Similar to the proposed project (and Modified project Layout) Tule Wind LLC will maximize mitigation options to avoid, minimize, and mitigate potential impacts to the golden eagle through implementation of various measures, as deemed appropriate by the various agencies and/or Tule Wind, LLC. Both the proposed project and the reduced turbine alternative exhibit a similar low risk of eagle collision based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the</p>

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				<p>proposed project. Alternative 5 is not necessary because similar to the proposed Tule Wind Project, the low risk of mortality due to collision with operating turbines by golden eagle resulting from the proposed project would be potentially significant but can be mitigated to less than significant levels (Class II) through implementation of Mitigation Measures BIO-10a through BIO-10h. Specifically, BIO-10f includes requirements to construct the Tule Wind Project in two portions (phases). Construction of the first portion of the project would occur at those turbine locations deemed to present less risk to the eagle populations and would not include turbines on the northwest ridgeline. Construction of turbines in the second portion of the project will only be authorized following detailed behavioral telemetry studies and continued nest monitoring of known eagles in the vicinity of the Tule Wind Project (considered to be within approximately 10 miles of the project). Behavior studies will be used to determine eagle usage and forage areas, and authorization for construction at each turbine location in the second portion will be at the discretion of the BLM or the appropriate land management entity. The final criteria determining the risk each location presents to eagles will be determined by the BLM or the appropriate land management agency, in consultation with the required resource agencies, tribes and other relevant permitting entities and will be detailed in the Avian Protection Plan.</p> <p>Construction of the proposed project (per the Modified Project Layout) with implementation of the requirements of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without necessitating the elimination of 62 turbines. Potential impacts to golden eagles (bird strikes) would remain regardless of the reduction in turbines as proposed by the reduced turbine alternative. From a CEQA perspective both</p>

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				alternatives still represent significant unmitigable risk to eagles; and therefore this alternative is not environmentally superior.
9.	E. Comparison of Alternatives	E-32 Table E-4	Environmentally Superior Alternative/Agency Preferred Alternative	Alternative 2 or Alternative 5 should not be considered as part of the “BLM-Preferred Alternative” per NEPA requirements or the “Environmentally Superior Alternative” per CEQA requirements within the DRAFT EIR/EIS for the reasons stated above in Comment 8.
10.	E. Comparison of Alternatives	E-33	<p>As with the Proposed Project, the environmentally superior alternative would result in the following Class I impacts:</p> <ul style="list-style-type: none"> • Air Quality: Short-term construction VOC, NO_x and PM₁₀, and dust emissions associated with the Tule Wind Project, short-term construction NO_x and dust emissions associated with the ECO Substation Project, and short-term construction dust emissions associated with the ESJ Gen-Tie Project. • Noise: Short-term construction noise associated with the ECO Substation Project and Tule Wind Project. • Biological Resources: Direct loss of QCB habitat associated with the ECO Substation Project and bird/golden eagle strikes from wind turbines. • Visual Character: Scenic vistas, <u>and</u> visual character, and new sources of light associated with the ECO Substation, Tule Wind, and ESJ Wind Phase I projects. • Fire Fuels: Possibility of fire ignition from transmission lines and interference with firefighting associated with the ECO Substation Project, Tule Wind Project, and ESJ Gen-Tie Project. • Cultural Resources: Without confirmation that Traditional Cultural Properties are not in the project area, impacts to cultural resources would remain adverse and unavoidable for the ECO 	Please revise the language to reflect corrected analysis per the Modified Project Layout and revised analysis and conclusions in Section D.2 through Section D.18.

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			<p>Substation, Tule Wind, and ESJ Gen-Tie projects.</p> <p>This alternative would result in greater short-term and temporary air quality emissions and noise effects compared to the Proposed Project, but these would be during construction and short-term only. This alternative's long-term reduction in visual resource impacts and fire and fuels impacts (for the Tule Wind Project extending 25 years until project decommissioning), while still unmitigable, would result in a greater overall reduction in impacts would not be of any significant manner when compared to the Proposed Project considering the visual effects of the 500 kV Sunrise transmission line currently under construction in the adjacent and overlapping ROW.</p> <p>This alternative would <u>not</u> reduce unmitigable Class I impacts associated with bird/golden eagle strikes from wind turbines <u>because potential impacts to golden eagles are not quantifiable, and therefore, a reduced turbine alternative would not substantially lessen that unquantifiable risk or reduce the risk of eagle mortality from collisions with turbines when compared with the proposed project. Furthermore, and would reduce avian collision and electrocution risk and, therefore, from a strictly environmental perspective, ranks as the environmentally superior alternative would be reduced to a less than significant level through appropriate mitigation measures outlined in Section D.2, Biological Resources.</u> However, †This alternative would also remove 4718 turbines on the Ewiiapaayp Band of Kumeyaay Indians Reservation, thereby affecting the Ewiiapaayp Band of Kumeyaay Indians' wind and solar energy resources policies to develop renewable energy projects to serve economic and social needs of its Ewiiapaayp Band of Kumeyaay Indians Reservation. In addition, 27 32 turbines would be removed from lands administered by the BLM, 7 turbines would be removed from lands administered by the CSLC, and 4 5 from lands under the jurisdiction of the County of San Diego.</p>	

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11.	E. Comparison of Alternatives	E-34	The BLM's preferred alternative per NEPA requirements and pending public comment on the Draft EIS for the ECO Substation project component is ECO Substation Alternative Site, combined with ECO Partial Underground 138 kV Transmission Route Alternative, combined with Boulevard Substation Rebuild and for the Tule Wind Project component is the Tule Wind Alternative 5, Reduction in Turbines, combined with Tule Wind Alternative 2, Gen-Tie Route 2 Underground with Collector Substation/O&M Facility on Rough Acres Ranch. This conclusion is based on the analysis presented in Sections D.2 through D.18.	Based on the revised analysis presented in Sections D.2 through D.18, it is recommended the Modified project layout be considered as the BLM Preferred Alternative.

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Section F: Cumulative Scenario and Impacts

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1.	Cumulative Scenario and Impacts	F-2	There is discussion of two methods to meeting intent of cumulative impact assessment: “list of projects” and “summary of projects.”	GLOBAL COMMENT: The DEIS states preferred use of “list” method but does not provide any detail as to what constitutes “summary” method. Please clarify what the “summary” method entails.
2.	Cumulative Scenario and Impacts	F-3	“Applicant proposed measures (APMs) include environmental measures that are already required by existing regulations and/or requirements, or are standard practices that are already in place from San Diego Gas and Electric (SDG&E), Pacific Wind Development Tule Wind, LLC, and/or Energia Sierra Juarez (ESJ) in order to minimize or prevent any potential impacts.”	GLOBAL COMMENT: Project assets have been transferred from Pacific Wind Development, LLC to Tule Wind, LLC. Both are wholly owned subsidiaries of Iberdrola Renewables, Inc. Please revise all references to Pacific Wind development to reflect Tule Wind, LLC.
3.	Cumulative Scenario and Impacts	F-4 Table F-1	San Diego County – An Ordinance Amending the San Diego County Zoning Ordinance Related to Solar Power and Wind Power (2010).	GLOBAL COMMENT: It should be noted this ordinance has not been approved to date for the wind portion; and therefore, would not be applicable to the Tule Wind Project.
4.	Cumulative Scenario and Impacts	F-9 – F-18 Table F-2	Cumulative Scenario-Approved and Pending Projects	GLOBAL COMMENT: Table F-2 does not describe quantitative environmental impacts from each of the identified projects, only the current status.
5.	Cumulative Scenario and Impacts	F-32	The risk of mortality due to collision with operating turbines by golden eagle resulting from the Proposed PROJECT would be significant and unmitigable under CEQA, despite <u>and</u> implementation of Mitigation Measures BIO-10a through BIO-10j <u>would reduce impacts to a level of less than significant (Class II) and would therefore not</u> represent an adverse impact.	Please update language to reflect the change in impact determination regarding special status species. APMs and mitigation measures would be implemented to mitigate any adverse effects to the golden eagle, and impacts would be considered less than significant with implementation of proposed mitigation.

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6.	Cumulative Scenario and Impacts	F-32	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 (Class II) 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 and, under CEQA, would be less than significant (Class III).	<p>General Comment: There appears to be an elevated classification of impact based solely on what type of species are being impacted (Golden Eagle = Class 1 versus all other avian species = Class II). Please indicate the evidence that the BLM or FWS relies on that says direct impacts by turbines adversely impacts the golden eagle, when the population is not in severe decline.</p> <p>If there is a difference, describe why risk of electrocution and collision could be minimized to a Class II (including golden eagle) yet cumulatively is a Class I Impact when evaluated as part of the analysis.</p>
7.	Cumulative Scenario and Impacts	F-32	The energy-related reasonably foreseeable cumulative projects, which includes the Sunrise Powerlink Project, would result in a significant increase in risk of electrocution by special-status bird and bat species;...	Bats are not susceptible to electrocution by transmission lines. Please consider removing text from this section.
8.	Cumulative Scenario and Impacts	F-36	<p>Tue Wind Alternative #1 (second paragraph)</p> <p>Adverse cumulative impacts would remain regarding impacts to special-status plant and wildlife species with this alternative combined with the reasonably foreseeable cumulative projects, despite <u>however</u> species avoidance, minimization, and mitigation measures that would likely be implemented by each project. This would result in an adverse cumulative impact and under CEQA would be <u>less than</u> significant and unmitigable with mitigation (Class II). All cumulative impact categories would remain the same or similar to those evaluated under the Proposed PROJECT.</p> <p>Tule Wind Alternative #2 (third paragraph)</p> <p>Furthermore, project-specific and cumulative impacts related to Impact BIO-10 and BIO-11 would be less than what was evaluated under the Proposed</p>	See Comment #5 above.

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			PROJECT. However, this reduction in impact would not alter the cumulative impact determinations as evaluated under the Proposed PROJECT; and, in particular, the alternative coupled with the reasonably foreseeable alternatives would continue to result in a significant increase in risk of electrocution and collision by special status bird and bat species since the transmission component of the alternative would remain.	
9.	Cumulative Scenario and Impacts	F-37	<p>Tule Wind Alternative #3 (second paragraph)</p> <p>However, this reduction in impact would not alter the cumulative impact determinations as evaluated under the Proposed PROJECT; and, in particular, the alternative coupled with the reasonably foreseeable alternatives would continue to result in a significant increase in risk of electrocution and collision by special status bird and bat species since the transmission component of the alternative would remain.</p> <p>Third paragraph</p> <p>... This would result in an adverse cumulative impact and under CEQA would be <u>less than significant and unmitigable with mitigation</u> (Class II). All cumulative impact categories would remain the same or similar to those evaluated under the Proposed PROJECT.</p>	See Comment #5 above.
10.	Cumulative Scenario and Impacts	F-38	<p>Tule Wind Alternative #4 (first paragraph)</p> <p>However, this reduction in impact would not alter the cumulative impact determinations as evaluated under the Proposed PROJECT; and, in particular, the alternative coupled with the reasonably foreseeable alternatives would continue to result in a significant increase in risk of electrocution and collision by special status bird and bat species since the transmission component of the alternative would</p>	See Comment #5 above.

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			remain.	
11.	Cumulative Scenario and Impacts	F-38	<p>Tule Wind Alternative #5 (third paragraph)</p> <p>This alternative would reduce impacts to biological resources to all of the impact categories by reducing the number of turbines by 62 and therefore reducing both the permanent and temporary impacts to land under this alternative. This would reduce the overall cumulative impacts for Impact BIO-1 through BIO-9 and BIO-11, but would not alter the significance conclusions for all reasonably foreseeable projects as identified under the Proposed PROJECT respectively. However, the A reduction in these particular turbines, while would not altering the cumulative impact analysis for electrocution of species under Impact BIO-10, would have a more substantial reduction of impacts to collisions because this alternative exhibits a similar low risk of eagle collision, as compared to the proposed project, based upon anticipated eagle foraging patterns (i.e. over valleys and open habitat communities) and low observation rates over the proposed project area to the golden eagle in particular. Although all turbines considered high risk for golden eagle collision would be removed under this alternative and this but would not substantially reduce the risk of golden eagle mortality. As with the proposed project, implementation of Mitigation Measures BIO-10a through BIO-10h will mitigate potential impacts to golden eagles without elimination of 62 turbines the risk of mortality due to collision with operating turbines by golden eagle remains adverse and under CEQA would continue to be less than significant and unmitigable despite with implementation of the proposed mitigation measures (Class II). Therefore, while cumulative impacts from all reasonably foreseeable cumulative projects would be reduced overall, the cumulative impacts would remain adverse.</p>	See Comment #5 above.

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12.	Cumulative Scenario and Impacts	F-42	<p>As discussed in Section D.3.3.3, implementation of the Proposed PROJECT would result in significant impacts to scenic vistas occurring within the project area. Due to the large-scale size, light color, and blade movement, scenic vista impacts attributed to wind turbines viewed from the Table Mountain ACEC, Carrizo Overlook, and Ribbonwood Trail and the Ribbonwood Road Pathway (County facilities established in the Boulevard Community Trails and Pathways Plan) would be adverse and cannot be mitigated. <u>BLM jurisdictional areas fall within the Visual Resource Management (VRM) Class IV which permits major modification of the landscape, and therefore, visual impacts are considered less than significant within the BLM areas (Class III).</u></p> <p>Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant <u>for the County jurisdictional areas (Class I).</u></p>	<p>Please update to reflect the impact determination between County and BLM jurisdictional areas.</p> <p>Please consider revising to a Class III determination to avoid overstating impacts. Many of the KOPs identified are located on BLM lands. BLM has classified the McCain area as a Class IV for visual classification, which takes into consideration visual impacts due to renewable energy projects. According to this BLM classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands are identified.</p>
13.	Cumulative Scenario and Impacts	F-43 – F-44	<p>The Sunrise Powerlink transmission line would be highly visibly at foreground viewing distances along I-8 through southwestern Imperial County and southeastern San Diego County and at foreground viewing distances along Old Highway 80 in southeastern San Diego County. The transmission line would cross I-8 twice (at McCain Valley Road where the line would cross I-8 from the south and at near La Posta Road (west of the Campo Indian Reservation) where the line crosses I-8 from the north) and would cross Old Highway 80 once just north of the ECO Substation site. Based on GIS data provided by the applicant, the Sunrise Powerlink transmission line would also traverse the BLM McCain National Cooperative and Wildlife Management Area, primarily adjacent to McCain Valley Road, and would clearly be visible at foreground viewing distances from southern and</p>	<p>Please consider revising to reflect that the 138 kV line is adjacent to the route of the Sunrise Powerlink 500 kV transmission line and would not be the dominant feature if this cumulative project is constructed.</p> <p>Consider including a description of the Sunrise Powerlink as a cumulative impact in the Key Observation Points. The Sunrise Powerlink has been approved by the relevant agencies and is under construction.</p>

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			western oriented views at the Carrizo Overlook. Although <u>The approved Sunrise Powerlink transmission line</u> these features would be located “behind” adjacent to the proposed wind turbines <u>transmission line</u> of the Tule Wind Project, <u>and</u> the overall bulk and scale of the <u>500 kV</u> transmission line structures <u>is</u> <u>are</u> expected to increase <u>the visibility of these project components</u> <u>be</u> the <u>dominant feature in the landscape.</u>	
14.	Cumulative Scenario and Impacts	F-45 Table F-3	Please consider removing KOP 16 from Table F-3.	<p>No simulation was produced for this view, therefore no determination can be made.</p> <p>Please consider including the Sunrise 500 kV transmission project, its location, and depiction in the visual analysis and simulations, to accurately depict the cumulative impact of the Sunrise Powerlink. According to Table F-3, the Sunrise Powerlink is identified in the following KOPs: 1, 2, 3, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 21, and 22. Specifically, KOPs 11, 12, 14, and 15 should have additional simulations including the Sunrise Powerlink, which has been approved and is currently under construction, to accurately represent known future existing conditions. Please see Attachment F.1 Revised Visual Simulation with Sunrise 500 kV Line (February 2011) that depicts the scale of the proposed 138 kV compared to the 500 kV. The Sunrise Powerlink, once constructed, would result in a reduction of the impacts of the Tule Wind Project. Excluding the Sunrise Powerlink overstates the impacts of the Tule Wind Project.</p>
15.	Cumulative Scenario and Impacts	F-46	For the same reasons, VIS-3 long-term landscape alteration impacts were determined to be significant (Class I for County and Class III for BLM lands). Proposed PROJECT components would be highly visible from numerous sightlines throughout the project area and therefore, the long-term visual contrasts resulting from the Proposed PROJECT	Please consider changing the long-term visual contrast impacts to Class III on BLM lands and Class I on County lands.

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			were assessed as an adverse impact and under CEQA would represent a significant and unmitigable impact (Class I).	
16.	Cumulative Scenario and Impacts	F-48	<p><i>All Reasonably Foreseeable Cumulative Projects (Class I)</i></p> <p>Although nighttime lighting impacts would be minimized by incorporating the Obstacle Collision Avoidance System (OCAS) on Tule Wind Project wind turbines (the OCAS has been approved by the FAA as an alternative to typical wind turbine obstruction lighting), the Proposed PROJECT would result in significant impacts (Class I) associated with new sources of light and potential effects to the nighttime views in the project area. Given the general topography and the limited number of turbines visible to Boulevard residents, impacts from lighting sources due to the Proposed PROJECT will be minimal. According to FAA Advisory Circular 70/7460-1K wind turbine farms (wind turbine developments consisting of three or more wind turbines greater than 200 feet above ground level) must provide a site specific lighting scheme that provides for the safety of air traffic (FAA 2007). Due to proposed height of wind turbines (all wind turbines would be over 200 feet above ground level) the Tule, Campo, Manzanita, and Jordan wind energy projects would also be required to install FAA obstruction lighting on wind turbines (not all turbines within an installation need to be lighted). The addition of over 300 wind turbines and required obstruction lighting to the McCain Valley area would <u>not</u> likely result in a constant source of visual nuisance for area residents as obstruction lighting (flashing red and white lighting), which could <u>would not</u> trespass outside of the individual project boundaries and into residential areas and sensitive</p>	OCAS has not been approved by the FAA, please consider removing. See Attachment D.3.3, FAA memo (November 2010) and Attachment D.3.4, FAA Letter (June 2009). Given the general topography and the limited number of turbines visible to Boulevard residents, impacts due to lighting sources due to Proposed Project will be minimal. In addition, operation of the project would not affect nighttime views. The O&M/Substation facility would utilize fully shielded low pressure sodium lamp types not to exceed 4050 lumens output. Implementation of the additional lighting sources due to the FAA lighting is not anticipated to contribute a significant light source that will impact night skies to the area. Please consider changing the determination to reflect this information.

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			<p>nighttime viewing areas would not be altered. Since the Proposed PROJECT would <u>not</u> introduce new sources of nighttime lighting to the project area and since the wind project components would also be required to install <u>include mandatory</u> FAA nighttime obstruction lighting, the Proposed PROJECT's VIS-4 visual impacts would <u>not</u> represent an adverse cumulative impact and under CEQA would be <u>less than significant and unmitigable</u> (Class III).</p>	
17.	Cumulative Scenario and Impacts	F-49 – F-50	<p>Therefore, since the Proposed PROJECT would not be consistent with all applicable policies established for the protection of visual resources, although and since cumulative projects are also likely to result in conflicts with applicable policies and plans, the Proposed PROJECT's VIS-5 impacts would represent an adverse impact and under CEQA would be significant and unmitigable (Class I).</p>	<p>The Tule Wind Project is the portion of the Proposed PROJECT that is identified as not consistent with the identified plans and policies. Please change to reflect the change in significance determination.</p>
18.	Cumulative Scenario and Impacts	F-52 – F-53	<p>Tule Wind Alternative #1, through Alternative #4</p> <p>Furthermore, this alternative would continue to have adverse cumulative impacts related to nighttime views and inconsistencies with plans and policies established for the protection of visual resources in the project area. Thus, cumulative impacts would be anticipated to remain the same or similar to those evaluated under the Proposed PROJECT.</p>	<p>Impacts relative to Tule-VIS-4 and Impact Tule VIS-5 were determined to be less than significant. See Comment # 16 and #17 above.</p>
19.	Cumulative Scenario and Impacts	F-87	<p>As described in Section D.7.3.3, the Proposed PROJECT would have a low potential to cause an adverse effect to the characteristics of a historic property or Traditional Cultural Property (TCP) as defined by federal guidelines. Implementation of CUL-4 would reduce impacts, but in some cases given the expansive geographic nature of some of these resources, impacts to TCPs would be adverse and residually significant <u>if they are identified</u>, and under CEQA would represent a significant and unmitigable impact (Class I).</p>	<p>Class I impacts to TCPs would only be identified if TCPs are found to present. Since no TCPs have been identified to date, please clarify the language in the text for the reader to state that currently, no Class I impacts are identified due to no identified TCPs.</p>
20.	Cumulative Scenario	F-87	<p>Two <u>One</u> potentially significant historic resources—</p>	<p>Please consider removing the reference to Old</p>

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	and Impacts		the San Diego and Arizona Railroad and Old Highway 80 are <u>is</u> within the proposed ECO Substation Project 138 kV transmission line alignment; however, these resources would be spanned by the line and would not be physically altered during construction or operation.	Highway 80. This resource is considered a visual resource and not a historic architectural (built environment) resource.
21.	Cumulative Scenario and Impacts	F-94	As indicated in Section D.8.3.3, there are many sensitive receptors in the vicinity of the Proposed PROJECT site that are likely to be <u>temporarily</u> affected by construction noise related to development of the Proposed PROJECT. APMs ECO-NOI-1 through ECO-NOI-4, TULE-NOI-2, TULE-NOI-4, and TULE-NOI- 65 through TULE-NOI-16, and ESJ-NOI-1, along with Mitigation Measures NOI-1, would be implemented as part of the Proposed PROJECT. However, even with mitigation, the construction noise from the Proposed PROJECT would result an adverse noise impact and, under CEQA, a significant and unmitigated noise impact (Class I) as a result of nighttime construction, blasting, and helicopter operations associated with the ECO Substation portion of the Proposed PROJECT; and b. <u>Blasting and drill rig operations, and roadway and transmission line construction associated with the Tule Wind portion of the Proposed PROJECT would comply with San Diego Noise Ordinances and impacts due to construction noise would be considered less than significant with the proposed mitigation measure NOI-1 and APMs TULE-NOI-2, and TULE-NOI-3.</u>	Please update language to reflect changes made in Section D.8. The proposed project would be consistent with the County's Noise Ordinance during construction activities, therefore, impacts would be considered less than significant with implementation of mitigation.
22.	Cumulative Scenario and Impacts	F-95	As described in Section D.8.3.3, groundborne vibration as a result of construction of the Proposed PROJECT would result in an adverse impact and, under CEQA, would represent a significant and unmitigable impact due to blasting activities (Class D). <u>All construction noise associated with the Tule Wind Project will comply with Section 36.409 and Section 36.410 of the San Diego County Noise Ordinance. Even if blasting is required, scheduling</u>	Please clarify that construction activities associated with the Tule Wind Project would be conducted in accordance with Sections 36.409 and 36.410 of the San Diego County Noise Ordinance.

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			<u>constraints would be implemented so to comply with Sections 36.409 and 36.410 of the San Diego County Noise Ordinance.</u>	
23.	Cumulative Scenario and Impacts	F-95	There are many sensitive receptors in the vicinity of the Proposed PROJECT site, as described in Section D.8.3.3, that are likely to be affected by corona noise from operations of the transmission lines and noise from other project components. There are also two <u>three parcels exceed daytime noise and fire parcels may exceed nighttime noise limits</u> residences in the vicinity of turbines that would be adversely impacted by noise from 1.5 MW turbines, as well as additional residences that may be impacted by 3.0 MW turbines.	Please update language to reflect corrected analysis per the Modified Project Layout.
24.	Cumulative Scenario and Impacts	F-102	As indicated in Section D.9.3.3, a maximum of approximately 1,600 truck trips per day would be required to construct the Proposed PROJECT, <u>which does not exceed the 2,400 ADDT or 200 peak hour vehicle trip threshold.</u> While truck trips associated with the proposed Campo, Manzanita, and Jordan wind energy components of the Proposed PROJECT are currently unknown, they would likely use similar construction routes particularly along the I-8, Old Highway 80, and Ribbonwood Road. Impacts would be significant, but with implementation of Mitigation Measure TRA-1 requiring the preparation and implementation of a traffic control plan, <u>anticipated impacts would be adverse but mitigated further reduced, and a</u> Under CEQA would be <u>mitigated to be considered</u> less than significant (Class III).	Please update language to reflect changes per the Modified Project Layout.
25.	Cumulative Scenario and Impacts	F-104	As discussed, the maximum of approximately 1,600 truck trips per day would be required for construction of the Proposed PROJECT. This could create a substantial , short-term increase in traffic that would result in <u>a temporary unstable flow over a period of two years, although the additional traffic does not exceed the 2,400 ADT or 200 peak hour vehicle trip threshold</u> or an unacceptable reduction in	Please update language to reflect changes in the impact determinations made in Section D.9. Cumulative traffic impacts will most likely not occur, as the area projects will not occur concurrently in the same area. The additional area projects will be required to submit traffic management plans as part of the project design to reduce impacts to area

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			<p>performance of the circulation system. Implementation of Mitigation Measure TRA-1 requiring a detailed traffic control plan would <u>further reduce ensure the impacts would be adverse but mitigated, and.</u> Under CEQA would reduce the project-level impacts to be less than significant (Class III).</p>	<p>residents. In addition, this general area has a LOS of “A” throughout. Please considering revising this cumulative determination based on this information.</p>
26.	Cumulative Scenario and Impacts	F-119	<p>Blade throw is also a uniquely localized potential impact and would only have the potential to result in a cumulative impact when combined with wind projects that are located in close proximity to the Proposed PROJECT site. None of the other reasonably foreseeable cumulative projects would have the unique potential impacts related to blade throw, and therefore, would not increase the cumulative impacts. Cumulative impacts would be adverse but mitigated <u>with MM-HAZ-6 to provide proper safety zones and setbacks,</u> and under CEQA impacts would be mitigated to be less than significant (Class II).</p>	<p>Please update to reflect the mitigation measure proposed for HAZ-7 in Section D.10.</p>
27.	Cumulative Scenario and Impacts	F-119	<p>...Cumulative impacts would <u>not</u> be adverse but mitigated, and under CEQA impacts would be <u>considered mitigated</u> to be less than significant (Class III).</p>	<p>Please update to reflect the impact determination listed in Section D.10.</p>
28.	Cumulative Scenario and Impacts	F-131	<p>...Operation of the project would not require a substantial number of vehicle trips; therefore, the Proposed PROJECT is not expected to exceed the thresholds, and mitigation is not required. <u>In addition the Tule Wind Project is a clean renewable energy sources which provides a beneficial impact and will result in negative emission numbers when compared to the conventional, fossil-fuel generated 201 MW of electricity.</u></p>	<p>Please update language to reflect the benefits of the Tule Wind Project as a clean renewable energy source which offsets conventional fossil-fuel electricity.</p>
29.	Cumulative Scenario and Impacts	F-143	<p>Impact HYD-4: The project could deplete local water supplies <u>or interfere substantially with groundwater recharge such that there would be a net</u></p>	<p>Please add additional language to this impact significance criteria to clarify the basis of what “deplete local water supplies” means.</p>

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			<p>deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing adjacent wells would drop to a level that would not support existing land uses or planned land uses for which permits have been granted). According to the County of San Diego's <i>Guidelines for Determining Significance and Report Format and Content Requirements – Groundwater Resources</i>, "groundwater impacts will be considered significant if a soil moisture balance or equivalent analysis, conducted using a minimum 30 years of precipitation data including drought periods, concludes that at any given time groundwater in storage is reduced to a level of 50 percent or less as a result of groundwater extraction.</p>	
30.	Cumulative Scenario and Impacts	F-155	Mineral deposits have been found in the vicinity of the Tule Wind Project, and two active tungsten ore mines are located near proposed Turbines N-7 , N-8 , M-10 , M-11 , and P-5.	Please update language to reflect corrected analysis per the Modified Project Layout.
31.	Cumulative Scenario and Impacts	F-157	<p>Tule Wind Alternative #1</p> <p>While this alternative would increase the amount of land disturbance by 2.0 <u>49.3</u> acres, this change would not be sufficient to alter the overall impact determinations. The cumulative impacts would remain similar to those discussed under the Proposed PROJECT and would not represent any substantial new or reduced adverse cumulative impacts.</p>	Please update language to reflect corrected analysis per the Modified Project Layout.
32.	Cumulative Scenario and Impacts	F-158	<p>Tule Wind Alternative #3</p> <p>While this alternative would increase the amount of land disturbance by 7.5 <u>54.7</u> acres, this change would not be sufficient to alter the overall impact determinations. The cumulative impacts would remain similar to those discussed under the Proposed PROJECT and would not represent any substantial new or reduced adverse cumulative impacts.</p>	Please update language to reflect corrected analysis per the Modified Project Layout.

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33.	Cumulative Scenario and Impacts	F-171	<p>Reduction in Firefighting Effectiveness. Both firefighters are trained to operate both ground and aerial-based firefighting operations are significantly limited adjacent to transmission lines and other aboveground system components (turbines, collector lines). Avoidance of transmission lines and aboveground components within a 500-foot safety buffer greatly reduces the risk of electrical structure contact for firefighters but creates an indefensible corridor along the transmission line alignment where firefighting is tactically difficult or too dangerous. Avoidance of this corridor may negatively effect initial attack operations and sustained attack efforts and can exacerbate fire conditions by allowing uncontrolled spread through an area that is critical for containment. Furthermore, from a regional perspective, the proximity of transmission line projects or those with aboveground system components can create larger or contiguous avoidance corridors which negatively impact firefighting efforts across a wider geographical extent.</p>	Please consider revising the text to reflect the training that firefighters receive in operating around transmission lines.
34.	Cumulative Scenario and Impacts	F-173	<p>The two additional impacts, which are not addressed in Section D.15, include:</p> <ul style="list-style-type: none"> • Impact FF-5: The presence of the Project-related facilities would alter historic fire regimes • Impact FF-6: Project-caused wildfires would adversely affect natural resources. 	Please note that two additional significance determinations were added in the cumulative section and not in the Fire and Fuels Management Section D.15.
35.	Cumulative Scenario and Impacts	F-174	<p>...Therefore, the Proposed PROJECT will implement Mitigation Measures FF-1, FF-2, FF-3, and FF-4 through FF-6. Implementation of Mitigation Measures FF-1 and FF-2 would provide a proactive plan for educating construction and ongoing maintenance personnel about the fire hazard</p>	<p>Please update language to reflect the provisions of mitigation measures approved by the SDRFPD and SDCFA, and reflected in the Tule Wind Project Fire Protection Plan.</p> <p>Please also include a reference to additional proposed</p>

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			<p>risk associated with wind energy projects. These measures would also provide training for practices to reduce the likelihood of fire ignition and to quickly extinguish ignitions that may occur <u>utilizing Type VI firefighting equipment</u>. Furthermore, they provide for coordination with CAL FIRE and the local fire authority and restrict construction activities during the days when fire spread would be most likely (Red Flag Warning periods). Additionally, Mitigation Measures FF-3 and FF-4 would provide for better prepared and equipped responding fire fighting forces and provide additional fire prevention, protection and suppression capabilities to reduce the increased probability of a wildfire during project construction or maintenance. <u>Mitigation Measure FF-5 provides for fire suppression systems within the nacelle of each wind turbine, and Mitigation Measure FF-6 would provide funding for fire inspection to the west of the project area throughout operations. Additional mitigation measures (included in the approved Fire Protection Plan) are also proposed to further minimize potential for fire ignition throughout the project area (see Mitigation Measures FPP-4 through FPP-7).</u> This mitigation would ensure related fire safety impacts associated with the Proposed PROJECT increasing the risk of wildfire would be less than significant under CEQA (Class II) and would represent an adverse, but mitigated impact.</p>	<p>mitigation measures included in the approved Fire Protection Plan (FPP-4 through FPP-7).</p>
36.	Cumulative Scenario and Impacts	F-174 – F-175	<p>Impact FF-2: Presence of project facilities including overhead transmission lines would increase the probability of a wildfire.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class II)</i></p> <p>. . . While Mitigation Measures FF-1 through FF-5 would reduce the potential for wildfire ignitions or fire spread by requiring intensive pre-planning, fire</p>	<p>Please consider updating language to reflect the change in impact determination made in Section D.15. With implementation of proposed mitigation (including proposed Mitigation Measures FPP-8 and FPP-9) included in the approved FPP, it has been determined that the probability of a wildfire due to overhead transmission lines would be low and therefore considered less than significant.</p>

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			<p>safety procedures, customized operation and maintenance restrictions and requirements, and customized fire detection warning and suppression systems (as technology made these systems available in a tested and accepted format), <u>Mitigation Measure FF-6 would provide funding for fire inspection to the west of the project area throughout operations, and additional proposed Mitigation Measure FPP-8 includes provisions for visual inspections of project structures and overhead lines, and proposed Mitigation Measure FPP-9 requires adequate line clearance in accordance with CPUC GO 95 among other fire safety features.</u> Therefore, the Proposed PROJECT's likelihood of increasing the occurrences of wildfires is considered <u>less than significant and unmitigable with mitigation</u> (Class II) under CEQA. Therefore, despite mitigation, impacts would remain adverse.</p>	
37.	Cumulative Scenario and Impacts	F-175	<p>Based on expected increases in ignition sources within the Boulevard and La Posta Firesheds, a significant cumulative impact may exist, however, and the Proposed PROJECT would contribute to a reduction in that impact through the application of Mitigation Measure FF-6 and be cumulatively considerable. Therefore, the Proposed PROJECT's impacts under CEQA, when combined with the proposed cumulative wind energy projects, are considered <u>less than significant and unmitigable cumulative impacts</u> (Class II). Cumulative impacts would remain adverse despite mitigation.</p>	Please consider revising this impact determination to reflect revised Mitigation Measure FF-6, as proposed by the SDCFA.
38.	Cumulative Scenario and Impacts	F-175 – F-176	<p>Impact FF-3: Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class II)</i></p> <p>The transmission lines and other aboveground system components associated with the Proposed</p>	Please consider updating language to reflect the change in impact determination made in Section D.15. With implementation of proposed mitigation (including proposed Mitigation Measures FPP-11 through FPP-13) included in the approved FPP, it has been determined that the effectiveness of ground or aerial firefighting would not be jeopardized, but rather enhanced, and therefore considered less than significant.

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			<p>PROJECT and the Campo, Manzanita, and Jordan wind energy project components may result in significant conflicts with wildfire containment. Although <u>However</u>, Mitigation Measures would provide for fire protection planning, coordination and training for local fire personnel, and funding for local firesafe councils <u>fire inspection throughout the project area. Additional proposed Mitigation Measures included in the approved Fire Protection Plan include requirements to de-energize the electrical system during fire emergencies (see FPP-11), provide maps and construction drawings to appropriate fire agencies (see FPP-12) and equip operations personnel with communication devices to allow for immediate reporting of fires (see FPP-13).</u> Therefore, with proposed mitigation measures, the constraints associated with transmission lines and aboveground system components would <u>not</u> reduce the effectiveness of both ground-based and aerial firefighting capabilities over the life of the project. Based on the specialized training and equipment necessary to effectively fight fires related to electrical transmission lines, conductors, transformers, wind turbines, substations, and related components, and the obstacles that these facilities present across a naturally vegetated wildland landscape and as airborne complications, it was determined the Proposed PROJECT's direct impacts are considered <u>less than significant and unmitigable (Class II), despite with</u> the incorporation of Mitigation Measures FF-2, FF-3, FF-5, and FF-6, <u>and additional proposed Mitigation Measures FPP-11 through FPP-13.</u> Impacts would remain adverse despite the incorporation of mitigation.</p>	
39.	Cumulative Scenario and Impacts	F-177	<p>Impact FF-5: The presence of the Project-related facilities would alter historic fire regimes.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class II)</i></p>	Please consider updating language to reflect the change in impact determination made in Section D.15.

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			<p>The Proposed PROJECT would incrementally contribute to an ongoing fire regime change in this portion of San Diego County by increasing potential ignition sources, <u>however, this incremental effect would be mitigated by implementation of Mitigation Measures FF-1 through FF-6.</u> The incremental effects of the Proposed PROJECT, including the Campo, Manzanita, and Jordan wind energy projects, would <u>not</u> represent an adverse cumulative impact. This impact under CEQA would represent a <u>significant and unmitigable less than significant</u> cumulative impact (Class II).</p>	
40.	Cumulative Scenario and Impacts	F-178	<p>Impact FF-6: Project-caused wildfires would adversely affect natural resources.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class II)</i></p> <p>These potentially significant impacts to biological resources would be more severe with increases in wildfire frequency, intensity, and duration. Increased ignition sources associated with the Proposed PROJECT, as well as the Campo, Manzanita, and Jordan wind energy projects, would result in an incremental increase in fire frequency resulting in potentially significant cumulative impacts to biological resources, <u>however, this incremental effect would be mitigated by implementation of Mitigation Measures FF-1 through FF-6.</u> The incremental effects of the Proposed PROJECT would <u>not</u> represent an adverse cumulative impact and, under CEQA, would represent a <u>significant and unmitigable less than significant</u> cumulative impact (Class II).</p>	Please consider updating language to reflect the change in impact determination made in Section D.15.
41.	Cumulative Scenario and Impacts	F-179	In addition to the impacts associated with the release of particulate matter, wildfires also release significant quantities of carbon dioxide. Resulting from a release of atmospheric carbon stored in	Please consider updating language to reflect the change in impact determination made in Section D.15.

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			<p>biomass (vegetation), carbon dioxide is a significant contributor to the greenhouse gas (GHG) effect. Wildfires in shrubland vegetation types typically consume the entire aboveground portions of the plant, resulting in a potentially large short-term carbon dioxide release. Conversely, the sequestration (uptake) of atmospheric carbon occurs over a much longer time period in these vegetation types (decades). As a result, increases in wildfire frequency associated with The Proposed PROJECT would <u>not</u> result in a net increase in short-term carbon emissions over the life of the projects, <u>however, because any incremental effect would be mitigated by implementation of Mitigation Measures FF-1 through FF-6.</u> It is expected that the construction, operation, and maintenance activities associated with foreseeable cumulative projects in the southeastern portion of San Diego County would increase fire frequency through increased ignition sources. The incremental effects of the Proposed PROJECT would <u>not</u> represent an adverse cumulative impact and, under CEQA, would be a significant and unmitigable <u>less than significant</u> cumulative impact (Class II).</p>	
42.	Cumulative Scenario and Impacts	F-179 – F-180	<p>Due to varying system components, distribution and transmission lines of varying voltages are susceptible to different wildfire-causing events, including transformer or capacitor failure, vegetation and powerline conflicts, arcing, and maintenance activities. Additionally, although transmission and distribution system structures are designed to retain their structural integrity in high wind environments, high winds can (in rare cases) blow over high voltage transmission structures. Distribution line ignitions caused by high winds were responsible for four of the largest fires recorded in California between 1923 and 2007, two of which occurred within SDG&E territory. The Proposed PROJECT would, therefore, incrementally contribute to an</p>	Please consider updating language to reflect the change in impact determination made in Section D.15.

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			<p>increased risk of wildfire ignition. Even a small increase in ignitions resulting from the Proposed PROJECT could result in a catastrophic wildfire event, especially if the ignition occurred during a Santa Ana wind event. The Mitigation Measures associated with fire and fuels management presented in Section D.15.3.3 would reduce project-related ignitions <u>to a level considered less than significant, which in turn would reduce,</u> although the impacts to biological resources, air quality, and water quality would be <u>to a level that is less than</u> cumulatively considerable and when evaluated in the context of other foreseeable cumulative projects would represent an adverse cumulative impact. Under CEQA, this cumulative impact would remain significant and unmitigable <u>be less than significant (Class II).</u></p> <p>. . . As such, because the Proposed PROJECT's incremental contribution to increased probability of wildfire ignitions has been mitigated below a level of significance, it would not be <u>is</u> considered an adverse cumulative impact. Under CEQA, this cumulative impact would be less than significant <u>remain significant and unmitigable (Class II).</u></p>	
43.	Cumulative Scenario and Impacts	F-182	<p>Tule Wind Alternative 1</p> <p>However, turbines and overhead collector lines would remain, thereby providing improved potential access to some remote areas; as well as disadvantages related to the presence of turbines and overhead transmission lines that would impact firefighting operations and increase risk to firefighters and the potential for delaying initial attack capabilities. As discussed previously, Impacts FF-2 and FF-3 were found to be individually adverse and under CEQA represented a less than significant and unmitigable impact <u>with mitigation (Class II);</u> and all impacts (FF 1 through FF 6) represented an</p>	See please consider the following based on the justification presented in Comment #35 through Comment #42 above.

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			<p>adverse cumulative impact that was significant and unmitigable (Class I) under CEQA when considered with the reasonably foreseeable cumulative projects. The changes from this alternative would not alter any of these cumulative impact determinations.</p>	
44.	Cumulative Scenario and Impacts	F-182 – F-183	<p>Tule Wind Alternative 2</p> <p>However, turbines and overhead collector lines would remain, thereby providing improved potential access to some remote areas; as well as disadvantages related to the presence of turbines and overhead transmission lines that would impact firefighting operations and increase risk to firefighters and the potential for delaying initial attack capabilities. While uUndergrounding parts of the transmission line would <u>further</u> reduce impacts related to Impacts FF-2 and FF-3, these impacts would remain adverse. As discussed previously, Impacts FF-2 and FF-3 were found to be individually adverse and under CEQA represented a less than significant and unmitigable impact with mitigation (Class II), and all impacts (FF-1 through FF-6) represented an adverse cumulative impact that was significant and unmitigable (Class I) under CEQA when considered with the reasonably foreseeable cumulative projects. The changes from this alternative would not alter any of these cumulative impact determinations.</p>	See please consider the following based on the justification presented in Comment #35 through Comment #42 above.
45.	Cumulative Scenario and Impacts	F-182 – F-183	<p>Tule Wind Alternative 3</p> <p>However, turbines and overhead collector lines would remain, thereby providing improved potential access to some remote areas; as well as disadvantages related to the presence of turbines and overhead transmission lines that would impact firefighting operations and increase risk to firefighters and the potential for delaying initial attack capabilities. As discussed previously, Impacts FF-2 and FF-3 were found to be individually adverse</p>	See please consider the following based on the justification presented in Comment #35 through Comment #42 above.

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			<p>and under CEQA represented a less than significant and unmitigable impact with mitigation (Class II),⁵ and all impacts (FF 1 through FF 6) represented an adverse cumulative impact that was significant and unmitigable (Class I) under CEQA when considered with the reasonably foreseeable cumulative projects. The changes from this alternative would not alter any of these cumulative impact determinations.</p>	
46.	Cumulative Scenario and Impacts	F-183	<p>Tule Wind Alternative 4</p> <p>However, turbines and overhead collector lines would remain, thereby providing improved potential access to some remote areas; as well as disadvantages related to the presence of turbines and overhead transmission lines that would impact firefighting operations and increase risk to firefighters and the potential for delaying initial attack capabilities. As discussed previously, Impacts FF-2 and FF-3 were found to be individually adverse and under CEQA represented a less than significant and unmitigable impact with mitigation (Class II),⁵ and all impacts (FF 1 through FF 6) represented an adverse cumulative impact that was significant and unmitigable (Class I) under CEQA when considered with the reasonably foreseeable cumulative projects. The changes from this alternative would not alter any of these cumulative impact determinations.</p>	See please consider the following based on the justification presented in Comment #35 through Comment #42 above.
47.	Cumulative Scenario and Impacts	F-185	<p><i>No Project Alternative 3 – No Tule Wind Project</i></p> <p>Under the No Project Alternative 3, the Tule Wind Project would not be built and the existing conditions on the project site would remain. This alternative would <u>not</u> remove a significant source of ignitions and obstruction to firefighting effectiveness and operations <u>because those impacts have been mitigated to below a level of significance</u>; therefore, its removal from the project would <u>not</u> significantly reduce the likelihood of wildfires. Additionally, removal of the wind turbines from the landscape</p>	Please revise as suggested.

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			<p>would <u>not</u> result in substantially reduced obstructions for firefighting response and would <u>not</u> avoid a large area of disturbance that could lead to establishment of non-native, fire-prone plant species <u>because mitigation has been applied to reduce these impacts below a level of significance</u>. While this reduction would certainly lessen the overall impacts related to fire and fuels for all impacts, since the other components would remain, the cumulative impacts, when considered with the reasonably foreseeable cumulative impacts, are anticipated to remain similar as evaluated in the Proposed PROJECT. The ECO Substation component of the Proposed PROJECT would likely support similar cumulative impact conclusions when considered with the reasonably foreseeable cumulative impacts. Therefore, cumulative impacts would remain similar under this alternative.</p>	
48.	Cumulative Scenario and Impacts	F-192	<p>Additionally, project-related revenues for BLM, California State Lands Commission (CSLC), and the County of San Diego would be <u>substantially</u> reduced due to the removal of 27 <u>32</u> turbines located on BLM land, 7 turbines located on CSLC land, and 44 <u>7</u> turbines located on County of San Diego land, <u>and 18 turbines located on the Ewiiapaayp Indian Reservation. With the exception of the loss in economic benefit for the Ewiiapaayp Indian Reservation, i</u>mpacts to the revenues of these entities, as well as impacts to other business operations resulting from the construction and presence of this alternative, would be offset by the economic benefits resulting from project construction, operation, and decommissioning. <u>The tribe would be particularly impacted since this alternative would remove a funding source to the tribe as it relates to the Tule Wind component.</u> Therefore, the project would be beneficial under NEPA, and the cumulative impacts would remain similar to those discussed under the Proposed</p>	<p>Please provide a discussion regarding the tribe's loss of economic benefit resulting from the Reduced Turbine Alternative. To state that this alternative does not have fiscal impacts is inaccurate.</p>

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			PROJECT.	
49.	Cumulative Scenario and Impacts	F-200	The primary contributors to GHG emissions in California relating to existing cumulative climate change conditions include transportation, electric power production from both in-state and out-of-state sources, industry, agriculture and forestry, and other sources, which include commercial and residential activities. According to the 2004 GHG inventory data compiled by CARB for the California 1990 GHG emissions inventory, California emitted emissions of 484 million metric tons of carbon dioxide equivalent (MMTCO ₂ E), including emissions resulting from out-of-state electrical generation (CARB 2007).	GLOBAL COMMENT: Discussion of GHG emission inventory for California should be augmented with what the life of the Proposed Project (including the Tule Wind Project) is estimated to offset GHG emissions. See Attachment D.18.3.
50.	Cumulative Scenario and Impacts	F-200 – F-201	<p>Impact GHG-1: Project construction would cause a net increase of greenhouse gas emissions.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class III)</i></p> <p>Construction-related GHG emissions would be associated with the use of construction equipment and worker vehicle trips. Because GHG emissions generated during construction would contribute to a global accumulation of emissions, and are not a temporary addition to the local airshed, the extent to which these projects and the Proposed PROJECT would result in significant cumulative impacts does not depend on their proximity or time schedules. As such However, the Tule Wind Project is expected to be in operation by 2012, prior to the construction of the Jordan, Campo, and Manzanita wind energy projects, and it will be offsetting approximately 232,210 metric tons of GHG emissions per year. Accordingly, generation of these emissions would not result in an unavoidable significant cumulative impact to climate change. Although The Proposed PROJECT's construction impacts would eventually be offset resulting in a would create a net beneficial</p>	To characterize the cumulative temporary impacts as Class I is inaccurate, and is more appropriately classified as Class III. The cumulative impact analysis does not consider the temporal differences of the projects (i.e., construction not occurring at the same time, greenhouse gas offsets being generated while later projects are under construction, etc.). Secondly, even the cumulative temporary impacts do not rise to a significant level when compared with thirty years of offset greenhouse gas emissions.

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			<p>impact and its construction emissions within the cumulative study area would not exceed the significance threshold, it would be cumulatively considerable when considered with the reasonably foreseeable cumulative projects and would represent a significant and unmitigable cumulative impact under CEQA (Class I). Therefore, cumulative impacts regarding construction-related GHG emissions would <u>not</u> be adverse for the reasonably foreseeable cumulative projects coupled with the Proposed PROJECT, and would represent no impact under CEQA (Class III).</p>	
51.	Cumulative Scenario and Impacts	F-201 – F-202	<p>Impact GHG-2: Project operation would cause a net increase of greenhouse gas emissions.</p> <p><i>All Reasonably Foreseeable Cumulative Projects (Class III).</i></p> <p>. . . As discussed under Section D.18.3.3, GHG emissions during operations and maintenance of the Proposed PROJECT were estimated to be approximately 3,8193,741 <u>3,8193,741</u> MTCO2E/yr.</p> <p>. . . In addition, when combined with the amortized annual construction emissions, the Proposed PROJECT's GHG emissions would be 4,8244,514 <u>4,8244,514</u> MTCO2E/yr.</p> <p>. . . Because GHG emissions generated during operational phases would contribute to a global accumulation of emissions, and are not a temporary addition to the local airshed, the extent to which these projects and the Proposed PROJECT would result in significant cumulative impacts does not depend on their proximity. As such <u>However, the Tule Wind Project is expected to be in operation by 2012, prior to the construction of the Jordan, Campo, and Manzanita wind energy projects, and it will be offsetting approximately 232,210 metric tons of</u></p>	Please consider making the proposed change based on updated greenhouse gas emissions figures from Section D.18.

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			<p>GHG emissions per year. When the Jordan, Campo, and Manzanita wind energy projects come online, they will also offset substantial amounts of GHG emissions. Accordingly, generation of these emissions would <u>not</u> result in an unavoidable significant cumulative impact to climate change, as the Proposed PROJECT would create a net beneficial impact and would represent a significant and unmitigable cumulative impact under CEQA (Class I). Therefore, cumulative impacts regarding GHG emissions for operations of the Proposed PROJECT would <u>not</u> be adverse when considered with the reasonably foreseeable cumulative projects.</p>	
52.	Cumulative Scenario and Impacts	F-202	<p>Impact GHG-3: Project activities would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.</p>	<p>GLOBAL COMMENT: This impact should be comparing the cumulative impact of development with the proposed PROJECT approved <i>versus</i> the same growth supported by conventional fuel sources. The residential and commercial development, for example, represents foreseeable future activity that will be independent of whether the PROJECT goes forward or not. In this more accurate light, the PROJECT has a net benefit.</p>
53.	Cumulative Scenario and Impacts	F-205	<p><i>Tule Wind Alternative 5, Reduction in Turbines</i></p> <p>Cumulative impacts related to Impact GHG-1 through GHG-3 would be the same similar as those assessed for the Proposed PROJECT when combined with the reasonably foreseeable cumulative projects, <u>although Tule Wind Alternative 5 would reduce by at least 50% the amount of GHG emissions that would be offset by the Tule Wind Project.</u> While this alternative would <u>slightly</u> lessen <u>construction-related GHG emissions</u> the impacts due to reduced construction requirements for these 62 wind turbines, <u>this slight reduction amortized over the life of the project would not make up for the large decrease in the amount of GHG emissions that the Tule Wind Project would otherwise offset.</u> This change would not be sufficient to alter the overall impact</p>	<p>Please make the proposed revisions, based on the justification provided in comments to Section D.18, and the calculations provided in Attachments D.18.3, Iberdrola Renewables, Inc., Letter from Edmund V. Clark, Gennaro H. Crescenti, to Dr. Fisher and Mr. Thomsen (March 2011)</p>

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			determinations. The cumulative impacts would remain similar to those discussed under the Proposed PROJECT and would not represent any substantial new or reduced adverse cumulative impacts.	
54.	Cumulative Scenario and Impacts	F-206	<p><i>No Project Alternative 1 – No ECO Substation, Tule Wind, ESJ Gen-Tie, Campo, Manzanita, or Jordan Wind Projects</i></p> <p><i>No Project Alternative 3 – No Tule Wind Project</i></p>	The conclusion that the no action alternative would have no impact with respect to Impact GHG-3 means that required energy would come from other sources, thus there is a negative impact by virtue of increased GHG emissions.

Attachments

F.1 – Revised Visual Simulation with Sunrise 500 kV Line (February 2011)

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section G: Required CEQA/NEPA Topics

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1.	Required CEQA/NEPA Topics	G-3	Furthermore, construction of the transmission lines, wind turbines, and substation improvements would necessitate the permanent loss of <u>between 616.6 and 617.6</u> acres of native vegetation (<u>dependent on the 230 or 500 kV ESJ Gen-Tie Route</u>), which would include 1.5 2.85 acres of USFWS Quino checkerspot butterfly (<i>Euphydryas editha quino</i>) critical habitat, as well as additional suitable habitat for the Quino checkerspot butterfly that is to be determined by USFWS, as evaluated in Section D.2, Biological Resources. The permanent loss of <u>2.85</u> acres of USFWS Quino checkerspot butterfly critical habitat would be adverse and unavoidable. With the implementation of the mitigation measures provided in this EIR/EIS, adverse impacts to checkerspot butterfly critical habitat would be mitigated and permanent loss would be reduced to <u>between 616.6 and 617.26</u> acres of native vegetation (<u>dependent on the 230 or 500 kV ESJ Gen-Tie Route</u>). However, permanent impacts to habitat would remain adverse.	Please update to reflect the Modified Project Layout impacted vegetation acreages.
2.	Required CEQA/NEPA Topics	G-4	Once the project is built, public lands that are currently isolated due to inaccessible or difficult terrain would include new access roads to the turbines. <u>New permanent access roads would be gated off McCain Valley Road, where required by the BLM, in order to prevent unauthorized vehicle access. The installation of gates off of McCain Valley Road, if required, would not impact the use of existing OHV roads and trails within BLM</u>	Please refer to Tule Wind, LLC's comments to Section D.5, Wilderness and Recreation, with respect to how gates will be employed.

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			recreation areas. This increase in access to these lands accessible from new permanent access roads, if allowed by BLM, would be irreversible.	
3.	Required CEQA/NEPA Topics	G-5 Table G-1	Please see proposed edits to Table G-1.	Please see Attachment G.1, Revised Table G-1 (February 2011). The right-hand column of Attachment G.1 provides justification for the proposed changes to Class I impacts in accordance with revisions made to Sections D.2 through D.18.
4.	Required CEQA/NEPA Topics	G-10 Table G-2	The Proposed Tule Wind Project will be required to obtain a <u>USFWS incidental take permit Section 404 permit from the ACOE</u> due to proposed permanent impacts to 2.85 acres of Quino checkerspot butterfly critical habitat as designated by the USFWS.	Please update to reflect the correct agency and permit type required due to impacted QCB critical habitat.

Attachments

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

TULE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
IBERDROLA RENEWABLES
COMMENTS & SUGGESTED REVISIONS

Section H: Mitigation Monitoring & Reporting

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1.	Mitigation Monitoring & Reporting	H-1	“An MMCRP table for the Proposed PROJECT is provided at the end of each issue area in Section D (Sections D.2 through D.18) that lists each mitigation measure <u>and Applicant Proposed Measure (APM)</u> and outlines procedures for successful implementation.”	Please consider revising the text to add Applicant Proposed Measures (APMs), which also will be implemented to address potential impacts. APMs are mentioned on pg. H-4.
2.	Mitigation Monitoring & Reporting	H-2	“... Pacific Wind Development <u>Tule Wind, LLC</u> ’s proposed Tule Wind Project . . .”	Tule Wind, LLC now is the Tule Wind Project applicant. “Pacific Wind Development” should be replaced throughout the document with “Tule Wind, LLC.”
3.	Mitigation Monitoring & Reporting	H-3	“In taking actions on SDG&E’s ECO Substation Project, Pacific Wind Development <u>Tule Wind, LLC</u> ’s Tule Wind Project, and on the Energia Sierra Juarez (ESJ) U.S. Transmission, LLC’s ESJ Gen-Tie Project, the CPUC, BLM, and responsible agencies identified in Section H.1.3 will implement an MMCRP.”	See Comment #2.
4.	Mitigation Monitoring & Reporting	H-5	“Each applicant (SDG&E, Pacific Wind Development <u>Tule Wind LLC</u> , and ESJ U.S. Transmission, LLC) is responsible for successfully implementing all the adopted mitigation measures in the MMCRP.”	See Comment #2.