

Response to Document No. H1

Steve Washer

Dated March 10, 2011

- H1-1** The commenter's opposition to the project is noted and will be included in the administrative record. Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors; common response CUM1 regarding cumulative projects; and EIR/EIS Section F, Cumulative Scenario and Impacts, for a full analysis of cumulative projects (including the Sunrise Powerlink Project). Please also refer to response F65-4 regarding traffic and access. EIR/EIS Section D.9, Transportation and Traffic, provides a full evaluation of potential impacts to traffic in the project area.
- H1-2** Please refer to common responses FIRE1, FIRE2, FIRE3, FIRE4 and FIRE5 for response to the comments on fire insurance rates, reduced firefighting effectiveness, limited ingress/egress, and limited firefighting availability and funding. The comment will be included in the administrative record.
- H1-3** The EIR/EIS evaluates impacts to public health in Section D.10, Public Health and Safety, and to noise in Section D.8, Noise. Please refer to common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both; common responses PHS3 and NOI5 regarding the relationship between low frequency noise generated by wind turbines and adverse health effects; and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors. The comment is noted and will be included in the administrative record.
- H1-4** Please refer to common responses PHS3 and NOI12 regarding setbacks from wind turbine to sensitive receptors.
- H1-5** Please refer to common response PHS2 regarding stray voltage.
- H1-6** Please refer to common response PHS1 regarding the potential for shadow flicker to occur as a result of the proposed Tule Wind Project, as well as the potential health effects or safety concerns related to shadow flicker.
- H1-7** Please refer to common response SOC1 regarding property values.
- H1-8** Please refer to common response NOI1 regarding the calculation of existing ambient sound levels for the project, taking into consideration short-term events or background wind noises in calculating ambient conditions, as well as common

responses NOI7 through NOI9 regarding the procedures and guidelines utilized for measuring sound generated by the proposed wind turbines and attenuation of sound generated by wind turbines, including the consideration of atypical operational conditions in the performed noise modeling. Please also refer to common response NOI13 regarding appropriate noise control considerations, common response PHS6 regarding complaint resolution, common response PHS2 regarding stray voltage, and common responses PHS3 and NOI12 regarding setbacks from wind turbines to sensitive receptors.

- H1-9** Please refer to response H1-8 above, as well as common response NOI2 regarding the characteristics of audible and inaudible sound and the appropriate measurements of both, and common response NOI1 regarding the significance thresholds utilized in the EIR/EIS.
- H1-10** Please refer to common response WR1 regarding groundwater resources.
- H1-11** Please refer to common response VIS4 regarding new sources of light and potential effects to the nighttime views.
- H1-12** The comment summarizes the issues raised previously in the commenter's letter. Please refer to the responses to comments above, notably response H1-3, H1-8, and H1-11. The commenter's opposition to the Proposed PROJECT is noted and will be included in the administrative record.
- H1-13** The comment is noted and will be included in the administrative record. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

Response to Document No. H2

K.G. Golly

Dated March 22, 2011

H2-1 The commenter's support of the project is noted and will be included in the administrative record.

Response to Document No. H3

Victoria Hernandez Raya
Dated March 28, 2011

H3-1 The commenter's support of the project is noted and will be included in the administrative record.

Response to Document No. H4

County of San Diego, Department of Planning and Land Use (Richard Haas)
Dated March 30, 2011

- H4-1** The comment indicates San Diego County’s review of the Draft EIR/EIS and specifically Section D.15 and a revised Fire Protection Plan (FPP) for the Tule Wind Project. The comment is noted and will be included in the administrative record.
- H4-2** The comment provides notification of meetings held to discuss the Class I designation for Impact Tule-FF-2 and provides 11 mitigation measures that resulted from those meetings. The commenter indicates that these measures mitigate the potential impact to not adverse and below a level of significance (Class II). Refer to common response FIRE5 regarding impact classification updates for the Tule Wind Project.
- H4-3** The commenter accurately describes the fire environment of the area as a “Very High Fire Hazard Severity Zone” and provides fire history that is consistent with the EIR/EIS. The commenter further indicates that off-site mitigation to reduce the potential for damage to existing structures was evaluated and based on County Fire input, determined that weed abatement is an effective method of providing defensible space, which is included in the FPP as Mitigation Measure FPP-15 (Funding for Fire Protection). The comment is noted and will be included in the administrative record.
- H4-4** The comment describes an agreement between the applicant and the San Diego County Fire Authority (SDCFA) for ongoing funding to provide one full-time and four part-time code inspectors to enforce weed abatement codes in the area (FPP Mitigation Measure FPP-15). Total cost for the positions in 2011 dollars is \$138,000 per year, and each project would provide proportional funding. The comment indicates that this measure would significantly reduce the baseline fire risk in the areas where inspections would occur (FPP Mitigation Measure FPP-15). The comment is noted and will be included in the administrative record.
- H4-5** The commenter indicates San Diego County’s review of the revised FPP prepared by RC Biological Consulting for the Tule Wind Project and agrees with the conclusion that impacts have been mitigated to below a level of significance. Consequently, the County has accepted the FPP (February 2011). This comment is noted and will be included in the administrative record. Referenced letters from the San Diego Rural Fire Protection District (SDRFPD) and SDCFA accepting the project FPPs and outlining development agreements between the project applicants for Tule Wind and ESJ Gen-Tie and the fire agencies form the basis for

impact classification reductions to adverse but mitigable (Class II under CEQA); refer to common response FIRE5 for details.

H4-6

These comments are noted and will be included in the administrative record. The commenter indicates that the EIR/EIS and the latest approved FPP should be made consistent with regard to Applicant Proposed Measures (APMs) and FPP mitigation measures. Please refer to common response INT3 regarding the deferral of mitigation measures and common responses FIRE1 and FIRE5 regarding the FPP mitigation measures for the Tule Wind and ESJ Gen-Tie projects. At the time the Draft EIR/EIS was circulated for public review, SDG&E, Tule Wind, LLC, and ESJ U.S. Transmission, LLC, were updating their respective project FPPs and negotiating with local fire agencies regarding development agreements. Since the FPPs and agreements were in development, the Draft EIR/EIS included Mitigation Measures FF-3, Development Agreement, and FF-4, Customized Fire Protection Plan, to ensure the latest plans will be incorporated into project design/project development. It should be noted that in the Final EIR/EIS, Mitigation Measure FF-3 has been clarified (see Section D.15, Fire and Fuels Management) to ensure that the measure is general in the body of the section so as to be applicable to all three projects. In Table D.15-8, Mitigation, Monitoring, Compliance, and Reporting – ECO Substation, Tule Wind, and ESJ Gen-Tie Projects-Fire and Fuels Management, Mitigation Measure FF-3 (Provide Assistance to San Diego Rural Fire Protection District (SDRFPD) and San Diego County Fire Authority (SDCFA)) is specifically tailored for each project and project applicant. It should also be noted that SDG&E will not be required to enter into development agreements with SDRFPD and SDCFA as the County of San Diego has no jurisdiction over the ECO Substation Project (the Tule Wind and ESJ Gen-Tie Project are subject to development agreements).

H4-7

This comment is noted. The commenter indicates that the three project components are consistent with the County General Plan response travel time standards, except for remote portions of the Tule Wind Project. The portions of Tule not consistent with the response standards have been provided mitigation measures and an approved FPP, indicating that fire agencies servicing the project and these areas are on land outside the General Plan application area (such as BLM land). The EIR/EIS has been updated in Section D.15.3.1 (Definition and Use of the California Environmental Quality Act Significance Criteria) of the Final EIR/EIS to reflect the status of the response travel time conformance. Final EIR/EIS modifications are in accordance with 40 CFR 1502.9(b). These changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in

Section 15088.5(b) of the CEQA Guidelines and under NEPA do not result in new significant circumstances or information relevant to environmental concerns or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

H4-8 The commenter indicates San Diego County’s concurrence with the applicant regarding the number of wind turbine fires in California annually. The commenter indicates a request to delete the fire total from the EIR/EIS. The research provided by the applicant has been incorporated into the EIR/EIS in Section D.15.3.3 of the Final EIR/EIS and will provide a counter analysis to the Draft EIR/EIS fire statistics. Final EIR/EIS modifications are in accordance with 40 CFR 1502.9(b). Such changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA do not result in new significant circumstances or information relevant to environmental concerns or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

H4-9 The commenter indicates a “dramatic” understatement of risk in the Draft EIR/EIS based on the actual 16,680 structures (as opposed to the “more than 2,000 structures”) that are potentially affected by wildfire in this particular wildfire corridor. The comment is noted and the EIR/EIS incorporates this clarifying information in Sections D.15.1.2, Project-Specific Environmental Setting/Affected Environment, and D.15.3.3, Direct and Indirect Effects, of the Final EIR/EIS. Final EIR/EIS modifications are in accordance with 40 CFR 1502.9(b). Such changes and additions to the EIR/EIS do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines and under NEPA do not result in new significant circumstances or information relevant to environmental concerns or require analysis of a new alternative (40 CFR 1502.9(c)(1)(ii)).

H4-10 This comment of conclusion is noted. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR/EIS; therefore, no additional response is provided or required.

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