



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

August 8, 2018

PROJECT NAME: TORREY WIND PROJECT
RECORD ID: PDS2018-MUP-18-014
ENVIRONMENTAL LOT NO.: PDS2018-ER-18-21-001
PROJECT ADDRESS: MCCAIN VALLEY ROAD AND RIBBONWOOD ROAD
APNs: 529-050-01, 529-060-01, 529-090-02, 529-100-01, 529-100-02, 529-100-03, 529-120-01, 529-120-03, 529-130-01, 611-010-01, 611-010-02, 611-010-03, 611-020-01
TRUST ACCOUNT NO.: 2081172-D-05265

Dear Mr. Wagner:

Planning & Development Services (PDS) has reviewed your application for a Major Use Permit and is providing you with the attached package of information as a guide for further processing your application.

PROJECT DESCRIPTION

Below is the project description that staff has generated from the information provided in the application package. Please review this project description and verify with staff that the project description is correct:

The applicant is requesting a Major Use Permit (MUP) for a 126-megawatt (MW) Wind Turbine Renewable Energy Facility. The Torrey Wind Project is a wind energy generation project which would produce up to approximately 126 MW of renewable energy. The Project proposes the construction and operation of approximately 30 new wind turbines (rated up to 4.2 megawatts (MW) each), an underground electrical collection system, a Project collector substation, a new 500 kV substation/switchyard located adjacent to the Sunrise Powerlink, an operations and maintenance (O&M) building, a temporary staging area, a batch plant, meteorological towers, and various access roads. Project construction is anticipated to last approximately 9-12 months. Eventual decommissioning would occur at the end of the Project's useful life. The Project site is located on approximately 2,041 acres consisting of 13 parcels in the southeastern portion of unincorporated San Diego County. The Project site is entirely on private land in the McCain Valley area, north of the community of Boulevard and Interstate 8 (I-8). Primary access to the Project site is and would be provided from I-8 with local access through Ribbonwood Road. The Project site is located within the Boulevard Subregional Community Plan Area.

MAJOR PROJECT ISSUES

The following project issues were identified during the project pre-application scoping and are further discussed in the attachments to this letter. These issues may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by PDS. These issues discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

1. Major Use Permit Findings:

It has been determined that the proposed project is considered Major Impact Services and Utilities pursuant to Section 1350 of the San Diego County Zoning Ordinance. A height exception request pursuant to Section 4620.g. and for the permanency for the proposed metrological (MET) towers is required for this project. Before any use permit may be granted or modified, the following findings need to be made, including

- a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:
 - Harmony in scale, bulk, coverage and density;
 - The availability of public facilities, services and utilities;
 - The harmful effect, if any, upon desirable neighborhood character;
 - The generation of traffic and the capacity and physical character of surrounding streets;
 - The suitability of the site for the type and intensity of use or development which is proposed; and to
 - Any other relevant impact of the proposed use; and
- b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.
- c. That the requirements of the California Environmental Quality Act have been complied with.

2. 7359 Findings Required for Particular Use Permits:

- b. Large Wind Turbine. In lieu of the findings required by Section 7358, it shall be found that the location, size and design of the proposed large wind turbine project will not adversely affect or be materially detrimental to the surrounding community with consideration given to:
 1. The physical suitability of the site for the type and intensity of the wind turbine project which is proposed;

2. Any harmful effect from the wind turbine project on desirable neighborhood character;
3. The availability of public facilities, services and utilities to serve the wind turbine project;
4. The generation of traffic and the capacity and physical character of surrounding streets;
5. The requirements of the California Environmental Quality Act;
6. The wind turbine project's contribution to the renewable energy and sustainability goals of the San Diego region; and
7. The San Diego County General Plan.

It is recommended that Draft Major Use Permit Findings be provided with the formal application submittal. Ongoing coordination between County staff and the applicant will be required to adequately address the Major Use Permit findings.

3. Groundwater Resources:

The proposed project is located east of the San Diego County Water Authority (CWA) in an area dependent on groundwater resources. A more detailed project description will be required before the groundwater resource investigation requirements for this project can be fully scoped and will be required to comply with the County's Groundwater Ordinance. Please see Attachment **K** for additional scoping requirements.

4. Noise Analysis:

The project must clearly demonstrate how the project will comply with the temporary construction equipment hours of operations. Additional noise assessment and review is required if extended hours are required outside of the County jurisdictional process. Note that this may require an EIR and may result in noise impacts that would be significant and unmitigable. Based on the above information, an acoustical (noise) study for this project is required.

The noise generated from the wind turbines must comply with The Zoning Ordinance Section 6952.f related to C-weighted low frequency requirements also known as the Spectra Imbalance (which often leads to rumbling and other low frequency concerns). This requires the project C-weighted levels not to exceed the pre-existing Residual Background Sound Criterion by more than 20 decibels. Further within this section, Pure Tone requirements must also be discussed within the report. See Attachment **L** for scoping requirements.

5. Biological Resources:

The site contains drainages that likely support jurisdictional waters of the U.S./State. Impacts to jurisdictional waters of the U.S./State will likely require permits from federal and state water resource agencies, including U.S. Army Corps of Engineers 404 Permit (USACE), Regional Water Quality Control Board (RWQCB) 401 Water Quality

Certification, and California Department of Fish and Wildlife (CDFW) Fish and Game Code 1602 Streambed Alteration Agreement.

The project site contains drainages that may qualify as Resource Protection Ordinance (RPO) wetlands. These natural features are a significant constraint for land uses on the project site and may affect project design. RPO wetlands must be protected with a 50-200 foot buffer. The required width depends on the sensitivity of the resource and existing site conditions.

The project site may contain endangered and/or threatened species that are protected by the U.S. Endangered Species Act, including but not limited to, Quino checkerspot butterfly, southwestern willow flycatcher, and Stephen's kangaroo rat. Impacts to such species would require a Section 7 consultation or Section 10 permit from the U.S. Fish and Wildlife Service. See Attachment F for scoping requirements.

6. Fire Services Agreement:

This project, along with all other development, has a cumulative impact on the emergency services for this community. Also: Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. Please see project issue checklist for additional fire comments.

In addition to the issues outlined in this letter, it is strongly recommended that you contact other agencies to determine additional project requirements. The following link provides an Agency Contact List to assist in your due diligence efforts: <http://www.sdcounty.ca.gov/pds/docs/pds804.pdf>

ESTIMATE OF DISCRETIONARY PROCESSING COSTS AND SCHEDULE

It is estimated that **\$750,000.00-\$950,044.00** of County fees and deposits will be required to get the project through to a hearing. The estimated hearing date for this project is in **2019**. Please note that the estimated cost and hearing date is based on certain assumptions and could be more or less than the estimate provided. If the cost and schedule assumptions prove to be incorrect, the estimate will be revised. The estimate includes only the costs to get your present application to hearing and does not include additional post discretionary processing costs such as condition satisfaction and building permit fees.

Should your application be approved, there will be additional processing costs in the future (e.g., Condition Satisfaction, Final Grading processing costs, park fees, drainage fees, building permit fees). To obtain an estimate of future building permit and plan check fees, parks fees, and Traffic Impact Fees, see <http://www.sdcounty.ca.gov/PDS/bldgforms/index.html#fees>.

Please note that building permits are required to construct, enlarge, alter, repair, move, improve, remove, convert, or demolish a building or structure. Permits are also required for plumbing, electrical, and mechanical work. A permit must be obtained prior to construction and prior to occupancy. Failure to obtain a building permit is a violation of the County of San Diego Ordinances.

The Department's goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or

account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcounty.ca.gov/luegdocs/PDS%20FORMS/Cover%20Sheets/Zoning%20Forms/PDS-907,%20processing%20inactive,%20deficit%20projects.pdf> for the Processing of Inactive and Deficit Projects.

DEFENSE AND INDEMNIFICATION

The Board of Supervisors may require a defense and indemnification agreement from the project owner and/or applicant on a case-by-case basis where significant risk to the County is identified in connection with the processing of a discretionary land use development project. The County will notify applicants of the requirement for a defense and indemnification agreement as early in the project processing as possible. Please see the Defense and Indemnification FAQ sheet (<http://www.sdcounty.ca.gov/pds/zoning/formfields/PDS-209.pdf>) for more information.

DEPARTMENT RECOMMENDATION

Comments and information in this letter, or lack thereof, should not be construed as the Department implying an overall recommendation or decision on your project. Planning & Development Services generally makes a final recommendation or decision to approve or deny a project when all planning analysis and environmental documentation is complete and, if applicable, Boulevard Planning Group input is received.

DETERMINATION OF COMPLETENESS

Completeness Determination – Section 65943 of the Government Code

PDS has reviewed your application and has determined that it is complete pursuant to Section 65943 of the Government Code.

Completeness Determination – California Environmental Quality Act (CEQA)

Planning & Development Services has completed its review of your AEIS and determined it not to be “complete” as defined by the CEQA. Additionally, it has been determined that there is substantial evidence that your project may have a significant adverse effect on the environment. It will be necessary to prepare and submit a draft EIR to satisfy the requirements of the CEQA.

The County of San Diego’s environmental review guidelines require that EIRs be prepared by a consultant from the County’s List of Environmental Consultants (available at Planning & Development Services – Zoning Counter). Furthermore, the guidelines require that environmental technical studies be prepared by a California Licensed professional (i.e., engineer, geologist) qualified to complete the study or a consultant from the County’s List of Environmental Consultants (available at Planning & Development Services – Zoning Counter).

Attached is a generalized listing of the issues and the rationale for determining that your project may have a significant effect on the environment.

RECORDATION OF PERMIT

Pursuant to the San Diego County Zoning Ordinance Section 7019, Permit Decisions for Administrative Permits, Density Bonus Permits, Site Plans, Use Permits, Variances, Reclamation Plans, or any modifications to these permits shall be recorded to provide constructive notice to all purchasers, transferees, or other successors to the interests of the owners named, of the rights and obligations created by this permit. The Recordation form, with

Decision attached, will be provided immediately after the Decision determination for this project and must be signed, notarized and returned to PDS at the initiation of the Condition Satisfaction Process, or as otherwise specified. Once received, PDS staff shall have the document recorded at the County Recorder's Office.

PROJECT PROCESSING GUIDANCE

Planning & Development Services (PDS) has reviewed your pre-application submittal for a Major Use Permit and is providing you with the attached package of information as a guide for further processing your application. A Project Issues Checklist for all issues, revisions or processing requirements has been prepared for your project and is included in this letter as Attachment A. **This checklist shall be used by the County and the applicant as the checklist of project issues that must be resolved and revisions that must be completed prior to public review under the California Environmental Quality Act (CEQA), or decision if no circulation of environmental documentation is required pursuant to CEQA.** In response to the Project Issues Checklist, the applicant is expected to include a letter with every submittal made to the Department stating how each item number in the Checklist has been addressed.

CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)

Certain technical studies must be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.sdcounty.ca.gov/luegdocs/PDS%20PROCEDURES/REGULATORY%20PLANNING/REFERENCE%20DOCUMENTS/CEQA%20CONSULTANT%20LIST.pdf>. No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found on the Department's website at: <http://www.sdcounty.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

GUIDELINES FOR DETERMINING SIGNIFICANCE & REPORT FORMAT AND CONTENT REQUIREMENTS

Technical studies must be prepared using the Guidelines for Determining Significance and Report Format & Content Requirements. The Guidelines and Report Format & Content Requirements can be found on the Department's website at <http://www.co.san-diego.ca.us/PDS/procguid.html> (listed in alphabetical order).

SUBMITTAL REQUIREMENTS

To assure timely cost-effective processing of your project, all items must be submitted concurrently. The submittal must be made to the PDS Zoning Counter at 5510 Overland Avenue, Suite 110, San Diego, CA 92123. **For fastest service when submitting information requested in this letter, arrive at the PDS Zoning Counter between 8:00 a.m. and 10:00 a.m. Please note that all Public Counters at PDS are closed daily from 11:45 a.m. through 12:30 p.m. Expect longer wait times before and after the lunchtime closure.**

The submittal must include the following items:

1. Submit a copy of this letter.
2. **SUBMIT AN APPLICATION FOR A MAJOR USE PERMIT.** Please contact the zoning counter at 858-694-2262 to verify your submittal requirements and schedule an appointment for the submittal of your application(s). Please make the appointment as soon as possible, as the wait time for appointments fluctuates.
3. **SUBMIT A SEPARATE LETTER ADDRESSING EACH ITEM IN THE ATTACHED PROJECT ISSUE CHECKLIST (Attachment A), BY REFERENCE NUMBER.** This letter is required to detail how every unresolved item has been addressed in the resubmittal package.
4. In addition to the applications noted in #2 above, the following information and/or document(s) with the requested number of copies shall be provided.

Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Project Issue Checklist Response Letter	3	PDF	Bronwyn Brown (1) Darin Neufeld (1), LD (1) Business Rule: Project Issue Checklist Response Letter
Revised Project Description	3	PDF	Bronwyn Brown (1) Darin Neufeld (1), Boulevard CPG (1)
Revised Plot Plan <ul style="list-style-type: none"> • Plans must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed • If multiple pages, sheets must be stapled together. 	8	PDF	Bronwyn Brown (1), Susan Harris (1), Dave Kahler (1), Fire Marshal (1), DEH (1), LD (1) Noise Specialist (1) Boulevard CPG (1)

Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
<ul style="list-style-type: none"> Must include Elevations 			Business Rule: Plot Plan
Turbine Manufacture Specifications	3	PDF	Bronwyn Brown (1), Susan Harris (1), Noise Specialist (1)
Conceptual Landscape Plan (if staff determines one is required)	3	PDF	Bronwyn Brown (1), Dave Kahler (1) Boulevard CPG (1) <i>Business Rule: Landscape Plans</i>
Preliminary Grading Plan (with Supporting Information)	8	PDF	Bronwyn Brown (1), Susan Harris (1), Dave Kahler (1) Fire Marshal (1), DEH (1), LD (1) Noise Specialist (1) Boulevard CPG (1) <i>Business Rule: Grading Plan</i>
Draft Major Use Permit Findings	1	1 PDF	Bronwyn Brown (1)
Resource Protection Study	2	1 PDF	Bronwyn Brown (2) <i>Business Rule: Resource-Protection-Study)</i>
Visual Impact Analysis	2	1 PDF	Bronwyn Brown (1), Darin Neufeld (1) <i>Business Rule: Visual-Impact-Report</i>
Agricultural Analysis	2	Word & PDF	Bronwyn Brown (1), Agriculture Specialist (1) <i>Business Rule: Agricultural Study</i>
Air Quality Information/Study	2	Word & PDF	Bronwyn Brown (1), Air Quality Specialist (1) <i>Business Rule: Air Quality Report</i>
Biological Resources Letter Report/Study	2	Word & PDF	Bronwyn Brown (1), Biologist (1) <i>Business Rule: Biological-Resource-Report and/or Biological Resource Easement Map and/or Biology Resource (map)</i>

Information/Document	# of Copies	CD or Flash Drive with Word <u>and</u> PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Open Space, Fence and Sign Exhibit (if applicable)	2	PDF	Bronwyn Brown (1), Biologist (1)
Off-Site Mitigation Information	2	PDF	Bronwyn Brown (1), Biologist (1)
Conceptual Resource Management Plan	2	Word & PDF	Bronwyn Brown (1), Biologist (1)
Conceptual Revegetation Plan	3	PDF	Bronwyn Brown (1), Biologist (1), Dave Kahler (1)
Cultural Resource Report	2	Word & PDF	Bronwyn Brown (1), Cultural Resources Specialist (1) <small>Business Rule: Business Rule: Cultural-Resource-Report</small>
Cultural Resource Report Confidential Appendix	1	1 PDF	Cultural Resources Specialist (1) <small>Business Rule: Arch Survey Confidential</small>
Geologic Investigation Report	2	Word & PDF	Bronwyn Brown (1), Geologist (1) <small>Business Rule: Geology Report</small>
Additional Hazards Information	2	1 PDF	Bronwyn Brown (1), Hazards Specialist (1) <small>Business Rule: Hazardous Materials Information</small>
Fire Protection Plan	3	Word & PDF	Bronwyn Brown (1), Land Development (1) PDS Fire Marshal (1) <small>Business Rule: Fire Protection Plan</small>
Stormwater Management Plan	3	Word & PDF	Bronwyn Brown (1), Land Development (2) <small>Business Rule: Major –SWMP</small>
Drainage/Flooding	3		Bronwyn Brown (1), Land Development (2)

Information/Document	# of Copies	CD or Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
		Word & PDF	Business Rule: Hydrology
Groundwater Investigation	2	Word & PDF	Bronwyn Brown (1), Groundwater Geologist (1) Business Rule: Groundwater Report
Noise Analysis	2	Word & PDF	Bronwyn Brown (1), Noise Specialist (1) Business Rule: Acoustical/Noise Report
Climate Change Analysis/Information	2	Word & PDF	Bronwyn Brown (1), GHG Specialist (1) Business Rule: Climate Change Analysis
Traffic Impact Analysis	3	Word & PDF	Bronwyn Brown (1), Land Development (2) Business Rule: Traffic-Impact
Completed FAA Form 7460-1 (Copy of form and FAA Determination) (Provide proof of completed Aeronautical Studies from the FAA for the parcels with Wind Turbines)	2	PDF	Bronwyn Brown (1) Airport Specialist (1) Business Rule: FAA FORM 7460-1
Draft Decommissioning Plan	3	Word & PDF	Bronwyn Brown (1), Land Development (1) PDS Fire Marshal (1) Business Rule::
Title Report (showing all easements color coded)	2	PDF	Bronwyn Brown (1), Land Development (1) Business Rule::
Memorandum(s) of Understanding according to Attachment C	10 Subject Areas (1 Copy each)	PDF	Bronwyn Brown (1) Business Rule: MOU
The staff turnaround goal for review of the requested information/document is 30 days.			

4. Deposits:

TRUST ACCOUNT ID#: 2081172-D 05265	
DEPARTMENT	DEPOSIT AMOUNT
PDS	\$50,178.00
DEH	\$1,434.00
TOTAL DEPOSITS:	\$51,612.00

* Refer to the attached "Estimate of Discretionary Processing Time and Cost" for a complete estimate of project costs through hearing /decision.

SUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimate of Discretionary Processing Time and Cost (attached), PDS recommends that all of the information requested in this letter be submitted by **September 12, 2018**. If you are unable to submit the requested information by the above date, please contact your PDS Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension.

The Department's goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcounty.ca.gov/PDS/docs/907.pdf> for the Processing of Inactive and Deficit Projects.

If you have any questions regarding this letter or other aspects of your project, please contact me at (858) 495-5516.

Sincerely,



Bronwyn Brown, Project Manager
Project Planning Division

cc: GM Gabrych, 2006 Old Highway 395, Fallbrook, CA 92028
Ken Wagner, 11455 El Camino Real, Suite 160, San Diego, CA 92103
Matt Valerio, 605 Third Street, Encinitas, CA, 92024

email cc:

Benjamin Mills, Planning Manager, PDS
Darin Neufeld, Planning Manager, PDS
Bronwyn Brown, Project Manager, PDS
Boulevard Community Planning Group

SCOPING LETTER MATRIX

Attachment	Item
A	Project Issue Checklist
B	Memorandums of Understanding
C	Scope for Visual Resources, Aesthetics & Photometric
D	Scope for Agricultural Resources
E	Scope for Air Quality Analysis
F	Scope of Biological Resources Report/Letter Report
G	Scope for Cultural Resources
H	Scope for Geologic Investigation/Reconnaissance Report
I	Scope for Hazardous Materials Use/Storage Onsite
J	Scope for Fire Protection Plan
K	Scope for Groundwater Resources
L	Scope for Noise Issues
M	Scope for Climate Change
N	Scope for Traffic Impact Analysis
O	Trails
P	Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration
Q	Boulevard Community Planning Group Recommendation and Letter, dated July 22, 2018

ATTACHMENT A
PROJECT ISSUE CHECKLIST

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001				
Planning & Development Services (PDS) Planning and CEQA Comments						
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1	1	CEQA	<p>California Environmental Quality Act: The proposed project appears to have the potential to result in significant direct and cumulative impacts under the California Environmental Quality Act (CEQA) and an EIR will be required.</p>		12/15/2017	N/A
1	2	Major Project Issue	<p>Major Use Permit Findings Before any use permit may be granted or modified, the following findings need to be made if the project is determined to be Section 1350 Major Impact Services and Utilities and if a height exception request pursuant to Section 4620.g. can be supported for permanent metrological (MET) towers:</p> <p>a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:</p> <ul style="list-style-type: none"> • Harmony in scale, bulk, coverage and density; • The availability of public facilities, services and utilities; • The harmful effect, if any, upon desirable neighborhood character; • The generation of traffic and the capacity and physical character of surrounding streets; • The suitability of the site for the type and intensity of use or development which is proposed; and to • Any other relevant impact of the proposed use; and <p>b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.</p> <p>c. That the requirements of the California Environmental Quality Act have been complied with.</p> <p>It is recommended that Draft Major Use Permit Findings be provided with the formal application submittal. Ongoing coordination between County staff and the applicant will be required to adequately address the Major Use Permit findings.</p> <p>Second Request.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 3	Major Project Issue	<p>7359 Findings Required for Particular Use Permits:</p> <p>b. Large Wind Turbine. In lieu of the findings required by Section 7358, it shall be found that the location, size and design of the proposed large wind turbine project will not adversely affect or be materially detrimental to the surrounding community with consideration given to:</p> <ol style="list-style-type: none"> 1. The physical suitability of the site for the type and intensity of the wind turbine project which is proposed; 2. Any harmful effect from the wind turbine project on desirable neighborhood character; 3. The availability of public facilities, services and utilities to serve the wind turbine project; 4. The generation of traffic and the capacity and physical character of surrounding streets; 5. The requirements of the California Environmental Quality Act; 6. The wind turbine project's contribution to the renewable energy and sustainability goals of the San Diego region; and 7. The San Diego County General Plan. <p>Second Request.</p>		12/15/2017 8/8/18	
1- 5	Major Project Issue	<p>Groundwater Resources:</p> <p>The proposed project is located east of the San Diego County Water Authority (CWA) in an area entirely dependent on groundwater resources. A more detailed project description will be required before the groundwater resource investigation requirements for this project can be fully scoped. Please see Attachment K for additional scoping requirements. Groundwater Investigation needs to be submitted.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 9	Major Project Issue	<p>Noise Analysis: The noise generated from the wind turbines must comply with The Zoning Ordinance Section 6952.f related to C-weighted low frequency requirements also known as the Spectra Imbalance (which often leads to rumbling and other low frequency concerns). This requires the project C-weighted levels not to exceed the pre-existing Residual Background Sound Criterion by more than 20 decibels. Further within this section, Pure Tone requirements must also be discussed within the report. The project must clearly demonstrate how the project will comply with the temporary construction equipment hours of operations. Additional noise assessment and review is required if extended hours are required outside of the County jurisdictional process. Note that this may require an EIR and may result in noise impacts that would be significant and unmitigable. Based on the above information, an acoustical (noise) study for this project is required. Please see Attachment L for scoping requirements. Noise Impact Report needs to be submitted.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 10	Major Project Issue	<p>Biological Resources: The project site contains sensitive habitat communities. It also likely supports a number of sensitive plant and animal species, some of which may be protected by the U.S./State under their respective Endangered Species Acts. GIS data indicates that several sensitive species have historically been detected on site, including Bell's sage sparrow, southern grasshopper mouse, and Dulzura pocket mouse. The biology report shall include focused surveys and/or site assessment for the following rare and endangered species: rare plants, arroyo toad, Stephens kangaroo rat, southern willow flycatcher, Quino checkerspot butterfly, Peninsular bighorn sheep, Laguna mountain skipper, California red-legged frog. The focused surveys must be done by biologists with demonstrable knowledge in field detection of the subject species (focused surveys for Federally listed species shall be in compliance with USFWS protocol, when such protocol exists, and must be done by a USFWS permitted biologist -- contact the USFWS at (760) 431-9440).</p> <p>On-site and/or off-site habitat preservation would be required to mitigate for impacts to these sensitive biological resources in accordance with federal, state, and regional regulations, including the California Environmental Quality Act (CEQA). The site contains drainages that likely support Resource Protection Ordinance (RPO) wetlands and/or jurisdictional waters of the U.S./State. These natural features are a significant constraint for land uses on the project site and may affect project design. Drainages may support See Attachment F for scoping requirements. Biological Resources Report and items identified in the Submittal Table need to be submitted.</p>		12/15/2017 8/8/18	
1- 11	Major Project Issue	<p>Fire Services Agreement: This project, along with all other development, has a cumulative impact on the emergency services for this community. Also: Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. Second Request: A FPP should be submitted asap and work meetings with staff and the County Fire Authority should start early on in the process.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 1	Project Description	<p>At this time, the project description is inadequate and requires revisions as outlined within the project issue checklist under project description. After a revised project description, plot plan, landscaping plan and preliminary grading plan are received, a working meeting will then be set up between county staff and the applicant to finalize the project description and elements within the plot plan/landscaping plan/grading plan. It is strongly recommended that no technical studies be generated until the project description has been adequately revised to the satisfaction of PDS staff through the working meeting process.</p> <p>Please provide further information within the project description. Please outline project objectives, consistency with California Global Warming solutions Act of 2006 (AB 32), project location, lifespan of project, decommissioning and repowering, transmission line engineering and safety and total water usage for construction and operations. Second Request: There are items discussed above and below that have not been provided by the applicant. Please provide.</p>	Project objectives are in progress; Lifespan and decommissioning (Project Description page 16); Transmission line engineering and safety (Project Description page 9); and water usage for construction and operation (TBD).	12/15/2017 8/8/18	
2- 2	Project Description	Please provide a project site history outlining previous discretionary approvals. Second Request.	TBD	12/15/2017 8/8/18	
2- 3	Project Description	Please outline conformance with Section 6952 of the Zoning Ordinance. Please provide details about setbacks, barriers, signage, noise, height, manufacture specifications, decommissioning plan, secured agreement, design and property maintenance. Second Request.	In progress	12/15/2017 8/8/18	
2- 4	Project Description	Project Components: Please elaborate on how many wind turbines are proposed.	30 Turbines are proposed. See Project Description page 5.	12/15/2017	8/8/2018
2- 5	Project Description	Project Components: There appears to be an inconsistency with the maximum height of the wind turbines - 500 feet or 676 feet? Please revise.	Total height of turbine may be approximately 586 feet. See Project Description page 6.	12/15/2017	8/8/2018
2- 6	Project Description	Project Components: There appears to be an inconsistency with the maximum diameter of the wind turbine blades - 400 feet or 492 feet? Please revise.	Rotor diameter may be approximately 450 feet, blades approximately 225 feet. See Project Description page 6.	12/15/2017	8/8/2018
2- 7	Project Description	Project Components: Please elaborate square footage and dimensions of project collector substation, operations & maintenance buildings, lay down areas, staging areas, meteorological towers. Second Request: Please confirm square footage for all structures. Please elaborate on permanant MET facilities.	Substation/switchyard approx. 1,056,786.5 sf; O&M Building approx. 176,000 sf area (actual building may be approx. 4,000-5,000 sf); Batch plant approx. 129,600 sf; Temporary staging Area approx. 378,078 sf	12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 8	Project Description	Project Components: The Wind Turbine Foundation outlines there will be a 2.9 acres of temporary construction area - does that include the horizontal laydown of the blades during installation (after the tower has been installed) and the permanent crane pad for on-going maintenance of each turbine and MET tower? Second Request: The construction work area requires a 250-foot by 350-foot area for each turbine and includes the temporary construction crane pad. The turbines require on-going maintenance which requires a crane. Will this crane pad be permanent for the on-going maintenance?	As stated on page 14 of the Project Description: "The turbine work area is necessary for foundation excavation and construction, assembling turbine sections, and also to stage the construction crane, which would hoist tower sections, nacelle, and blades into place. The turbine construction work area would not be paved."	12/15/2017 8/8/18	
2- 9	Project Description	Project Components: Operations and Maintenance facility proposes a parking area. Please outline how many parking spaces are being proposed. Second Request; Please update project description once the amount of parking has been determined and provide on plot plan.	See PD Section 1.2.4 and 1.4, parking is to be provided # spaces TBD	12/15/2017 8/8/18	
2- 10	Project Description	Project Components: Operations and Maintenance facility proposes a staging area. Please outline acreage of staging area. Second Request.	TBD	12/15/2017 8/8/18	
2- 11	Project Description	Project Components: Operations and Maintenance facility proposes fencing. Please outline type and height. Second Request: section states there will be 6-foot chainlink fencing. Please clarify if it is 6 or 8.	As stated on page 11-12 of the Project Description: "Security fencing (8 feet tall) would be installed around the perimeter of the substation and O&M facility." Switchyard fencing is TBD to SDG&E standards.	12/15/2017 8/8/18	
2- 12	Project Description	Project Components: Electric Collector System - Transformers at the base or within the proposed turbines. Is the project proposing both options?	Both options could potentially be used. As stated on page 8 in the Project Description: "The transformer may either be contained within the wind turbine unit itself or may be pad-mounted next to the base of the wind turbine."	12/15/2017	8/8/2018
2- 13	Project Description	Project Components: Electric Collector System - please outline dimensions for all above ground components.	In progress TBD	12/15/2017 8/8/18	
2- 14	Project Description	Project Components: Please outline if the proposed Collector Substation is manned or unmanned. The project description describes permanent parking of utility vehicles.	As stated on page 10 of the PD: "The substation would generally be an un-staffed facility, except in cases of maintenance and repair activities." Please update Parking locations on Plot Plan.	12/15/2017 8/8/18	
2- 15	Project Description	Project Components: Will cranes be permanently proposed on-site and stored at a location on-site while not being used? Please elaborate on how many and their storage location. Second Request: Please elaborate.	TBD	12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 16	Project Description	Project Components: Permanent meteorological (MET) towers are proposed with a height of 310 feet. Pursuant to Section 6123 200 feet is the maximum height for temporary MET towers. A permanent MET tower over 200 feet will be subject to 4260.g. of the Zoning Ordinance. Please outline how many permanent MET towers will be required.	As shown on the Plot Plans on page 2 of 11, two MET towers are proposed and they may be approximately 361 feet in height. MET towers would comply with Zoning Ordinance 4260.g.	12/15/2017	8/8/2018
2- 17	Project Description	Project Components: Within the road way network discussion detail dimensions on improved width, graded width and un-improved shoulders as well as the 30-foot wide fuel modification area.	See expanded discussion of roadway network in Section 1.2.7 Roads of the Project Description.	12/15/2017	8/8/2018
2- 18	Project Description	Construction: Identify how many site laydown areas are required for turbine and tower deliveries. One Laydown area is being proposed for the project. Total area should be mentioned in project description.	One in southern portion of site. See Sheet 10 of 11 on Plot Plans	12/15/2017 8/8/18	
2- 19	Project Description	Construction: Please elaborate on how many temporary versus permanent crane pads are proposed. Second Request.	TBD	12/15/2017 8/8/18	
2- 20	Project Description	Construction: Will any proposed work be within the Public Right of Way. Please elaborate on off-site construction activities.	No work is proposed in the public-right-of-way	12/15/2017	8/8/2018
2- 21	Project Description	Construction: Is blasting and rock crushing being proposed? It should be evaluated during the construction phase. The construction equipment and vehicle Table A-1 should be updated. Second Request.	TBD	12/15/2017 8/8/18	
2- 22	Project Description	Construction: Flagging and staking is proposed to identify the limits of construction and to avoid sensitive resources. It is recommended that temporary fencing also be installed to prevent construction activities from extending outside the approved disturbance limits. Second Request: Ongoing coordination with staff and applicant needs to occur on this item.	Flagging and staking to avoid resources as discussed at the Major Pre-Application meeting. Temporary fencing TBD	12/15/2017 8/8/18	
2- 23	Project Description	Construction: Total cubic yards of cut and fill needs to be added to the site clearing, grading and excavation discussion. Second Request.	TBD - In progress of determining	12/15/2017 8/8/18	
2- 24	Project Description	Construction: Will the project require any temporary stockpiling of earthwork? Please refer to Section 87.218 of the County's Grading Ordinance for regulations on temporary stockpiling.	As stated on page 11 of the Project Description: "Sand, aggregate, concrete, and water would be delivered to the temporary batch plant and stored in stock-piles until use."	12/15/2017	8/8/2018
2- 25	Project Description	Construction: Construction of the collector substation identifies subgrade excavation. Please describe grading quantities and dimensions of subgrade elevation and dimensions of above ground structures (fencing, buildings, utilities). Second Request.	As stated on page 9 of the PD: "Each collection circuit would consist of three 34.5 kV cables direct buried on a trench with at least 4 feet of cover and with sizes that would vary with the designed electrical load." Regarding dimensions of above ground structures - TBD	12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 26	Project Description	Construction: The construction schedule outlines extended hours. Please elaborate on extended hours and clarify days of week for construction. Second Request: Extended hours need to be included and evaluated as part of the Noise Analysis. Please provide.	As stated on page 13 of the PD in Section 1.3.1: "Construction activities would occur during daytime hours, at least 6 days per week, but may involve extended hours, as needed, to complete certain construction activities." Extended hours - TBD	12/15/2017 8/8/18	
2- 27	Project Description	Construction: Please outline the scope of testing required prior to going online with the project. Describe if it will involve testing of all turbines and components and provide a timeframe.	As facilities are constructed, commissioning will would take place to ensure all facilities are operating per applicable specifications. Each wind turbine will would be tested and commissioned individually along with associated equipment. Note: Further discussion on this will be required with staff.	12/15/2017 8/8/18	
2- 28	Project Description	Operations and Maintenance: Please revise full time employee count to the maximum.	As stated on page 15: "To operate the existing wind energy facilities, the Project applicant would employ approximately 12 staff. Employees would be present on site during normal business hours and would work out of the O&M building."	12/15/2017	8/8/2018
2- 29	Project Description	Operations and Maintenance: The wind turbines would be serviced by service activities involving deploying a crane within the construction easement. Please elaborate if this crane will be stored onsite and describe the size of the construction easement. The area for service activities (i.e. area for crane and any other maintenance equipment) should be considered permanently disturbed. Second Request.	TBD	12/15/2017 8/8/18	
2- 30	Project Description	The project description should discuss the Decommissioning Plan.	See PD Section 1.5 Facility Decommissioning	12/15/2017	8/8/2018
2- 31	Project Description	Decommissioning Activities and Methods - please identify the estimated lifespan of the wind facility. Please elaborate on the long term power-purchase agreement (PPA) and what the initial term of the PPA is for this facility. Second Request: Please disclosure the long term PPA.	The Project lifespan would be at least 30 years (PD page 16). Regarding the PPA - TBD	12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 32	Project Description	The Decommissioning Plan shall at a minimum identify and require removal of all above-grade structures from the site and any non-shared transmission facilities, associated decompaction activities, recontouring, application of hydroseeding, and, if necessary, installation of any necessary permanent best management practices (BMPs) required by the Minor Stormwater Management Plan (SWMP) to prevent significant impacts to water quality. These include but are not limited to: erosion controls, sediment controls, off-site sediment tracking controls, general site and materials management, minimize impervious surfaces, and outlet protection.	Regarding permanent BMPs, see added test to page 16: "At a minimum, the Decommissioning Plan would identify and require all above-grade structures and facilities be removed from the site. Decompaction, recontouring, hydroseeding and if necessary, installation of BMPs would be performed as required by the Minor Stormwater Management Plan to prevent significant impact to water quality."	12/15/2017	8/8/2018
2- 33	Project Description	Pending additional comments in this letter, the project description should be updated to reflect the most current project description. As outlined above there are still comments that have not been addressed yet and are to be determined. Please provide an updated project description.	PD Has been updated.	12/15/2017 8/8/18	
3- 1	General Plan Conformance	Land Use Map: The General Plan Designation for the Project Site is RL-80. A major use permit is required for a proposed wind energy project which is allowed in the RL-80 General Plan land use designation.		12/15/2017	N/A
3- 2	General Plan Conformance	Please provide analysis on how the MUP is consistent with the below General Plan policies.		12/15/2017 8/8/18	
3- 3	General Plan Conformance	Policy LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety.		12/15/2017 8/8/18	
3- 4	General Plan Conformance	Policy LU-5.3: Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.		12/15/2017 8/8/18	
3- 5	General Plan Conformance	Policy LU-5.5: Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.		12/15/2017 8/8/18	
3- 6	General Plan Conformance	Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 7	General Plan Conformance	Policy LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.		12/15/2017 8/8/18	
3- 8	General Plan Conformance	LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.		12/15/2017 8/8/18	
3- 9	General Plan Conformance	Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.		12/15/2017 8/8/18	
3- 10	General Plan Conformance	Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.		12/15/2017 8/8/18	
3- 11	General Plan Conformance	Policy LU-8.2: Groundwater Resources. Require development to identify adequate groundwater resources in groundwater-dependent areas, as follows: <ul style="list-style-type: none"> • In areas dependent on currently identified groundwater over drafted basins, prohibit new development from exacerbating overdraft conditions. • Encourage programs to alleviate overdraft conditions in Boulevard. • In areas without current overdraft groundwater conditions, prohibit new groundwater-dependent development where overdraft conditions are foreseeable. 		12/15/2017 8/8/18	
3- 12	General Plan Conformance	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.		12/15/2017 8/8/18	
3- 13	General Plan Conformance	Policy LU-10.2: Development–Environmental Resource Relationship. Require development in semi-rural and rural areas to respect and conserve the unique natural features and rural character and avoid sensitive or intact environmental resources and hazard areas.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 14	General Plan Conformance	Policy LU-12.1: Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.		12/15/2017 8/8/18	
3- 15	General Plan Conformance	Policy LU-12.2: Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved Level of Service (LOS) but do not achieve a LOS of D or better.		12/15/2017 8/8/18	
3- 16	General Plan Conformance	Policy LU-13.2: Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with state law, to support the development prior to approval.		12/15/2017 8/8/18	
3- 17	General Plan Conformance	Policy M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law, and local regulations.		12/15/2017 8/8/18	
3- 18	General Plan Conformance	Policy M-4.4 Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.		12/15/2017 8/8/18	
3- 19	General Plan Conformance	Policy M-10.7 Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.		12/15/2017 8/8/18	
3- 20	General Plan Conformance	Policy COS-2.2 Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.		12/15/2017 8/8/18	
3- 21	General Plan Conformance	Policy COS-3.1 Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 22	General Plan Conformance	Policy COS-3.2: Minimize Impacts of Development. Require development projects to: • Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and • Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.		12/15/2017 8/8/18	
3- 23	General Plan Conformance	Policy COS-4.1 Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.		12/15/2017 8/8/18	
3- 24	General Plan Conformance	COS-4.2 Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.		12/15/2017 8/8/18	
3- 25	General Plan Conformance	Policy COS-5.2 Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.		12/15/2017 8/8/18	
3- 26	General Plan Conformance	Policy COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.		12/15/2017 8/8/18	
3- 27	General Plan Conformance	Policy COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.		12/15/2017 8/8/18	
3- 28	General Plan Conformance	Policy COS-7.1 Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.		12/15/2017 8/8/18	
3- 29	General Plan Conformance	Policy COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.		12/15/2017 8/8/18	
3- 30	General Plan Conformance	Policy COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.		12/15/2017 8/8/18	
3- 31	General Plan Conformance	Policy COS-9.2 Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 32	General Plan Conformance	Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.		12/15/2017 8/8/18	
3- 33	General Plan Conformance	Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: <ul style="list-style-type: none"> • Creative site planning • Integration of natural features into the project • Appropriate scale, materials, and design to complement the surrounding natural landscape • Minimal disturbance of topography • Clustering of development so as to preserve a balance of open space vistas, natural features, and community character. • Creation of contiguous open space networks 		12/15/2017 8/8/18	
3- 34	General Plan Conformance	COS-13.1 Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.		12/15/2017 8/8/18	
3- 35	General Plan Conformance	Policy COS-14.7: Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.		12/15/2017 8/8/18	
3- 36	General Plan Conformance	COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.		12/15/2017 8/8/18	
3- 37	General Plan Conformance	Policy COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.		12/15/2017 8/8/18	
3- 38	General Plan Conformance	Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.		12/15/2017 8/8/18	
3- 39	General Plan Conformance	Policy COS-14.11 Native Vegetation. Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.		12/15/2017 8/8/18	
3- 40	General Plan Conformance	Policy COS-15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 41	General Plan Conformance	Policy COS-17.2 Construction and Demolition Waste. Require recycling, reduction and reuse of construction and demolition debris.		12/15/2017 8/8/18	
3- 42	General Plan Conformance	Policy COS-18.1: Alternate Energy Systems Design. Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.		12/15/2017 8/8/18	
3- 43	General Plan Conformance	Policy S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.		12/15/2017 8/8/18	
3- 44	General Plan Conformance	Policy S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.		12/15/2017 8/8/18	
3- 45	General Plan Conformance	Policy S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.		12/15/2017 8/8/18	
3- 46	General Plan Conformance	Policy S-3.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas.		12/15/2017 8/8/18	
3- 47	General Plan Conformance	Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.		12/15/2017 8/8/18	
3- 48	General Plan Conformance	Policy S-6.3: Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.		12/15/2017 8/8/18	
3- 49	General Plan Conformance	Policy S-7.1 Development Location. Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 50	General Plan Conformance	Policy S-9.2: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.		12/15/2017 8/8/18	
3- 51	General Plan Conformance	Policy S-10.4 Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.		12/15/2017 8/8/18	
3- 52	General Plan Conformance	Policy S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.		12/15/2017 8/8/18	
3- 53	General Plan Conformance	Policy S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.		12/15/2017 8/8/18	
3- 54	General Plan Conformance	Policy N-1.1: Noise Compatibility Guidelines. Use the Noise Compatibility Guidelines (Table N-1) and the Noise Standards (Table N-2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.		12/15/2017 8/8/18	
3- 55	General Plan Conformance	Policy N-1.2: Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: <ul style="list-style-type: none"> o Avoid placement of noise sensitive uses within noisy areas o Increase setbacks between noise generators and noise sensitive uses o Orient buildings such that the noise sensitive portions of a project are shielded from noise sources o Use sound-attenuating architectural design and building features o Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways) 		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 56	General Plan Conformance	Policy N-2.1 Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.		12/15/2017 8/8/18	
3- 57	General Plan Conformance	Policy N-3.1: Groundborne Vibration. Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.		12/15/2017 8/8/18	
3- 58	General Plan Conformance	Policy N-4.1: Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.		12/15/2017 8/8/18	
3- 59	General Plan Conformance	Policy N-6.2 Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2.		12/15/2017 8/8/18	
3- 60	General Plan Conformance	Policy N-6.4 Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance.		12/15/2017 8/8/18	
4- 1	Mountain Empire Subregional Plan	Please provide analysis on how the MUP is consistent with the below Mountain Empire Subregional Plan policies.		12/15/2017 8/8/18	
4- 2	Mountain Empire Subregional Plan	Land Use (Policy and Recommendation 1). 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.		12/15/2017 8/8/18	
4- 3	Mountain Empire Subregional Plan	Land Use (Policy and Recommendation 2). 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.		12/15/2017 8/8/18	
4- 4	Mountain Empire Subregional Plan	Land Use (Policy and Recommendation 3). 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, owner may apply for a waiver from complying with the setback as provided for Section 7060 of The Zoning Ordinance.		12/15/2017 8/8/18	
4- 5	Mountain Empire Subregional Plan	Land Use (Policy and Recommendation 4). Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 6	Mountain Empire Subregional Plan	Energy Conservation (Policy and Recommendation 8.1). New development should utilize alternative energy technologies, especially active and passive solar energy systems.		12/15/2017 8/8/18	
4- 7	Mountain Empire Subregional Plan	Public Facilities and Services (Policy and Recommendation 5.4). Uses proposed for the property adjacent to substations or transmission line rights-of-ways should be reviewed for possible impacts to the power facilities and vice versa.		12/15/2017 8/8/18	
4- 8	Mountain Empire Subregional Plan	Environmental Resources (Policy and Recommendation 1). All development shall demonstrate a diligent effort to retain as many native oak trees as possible.		12/15/2017 8/8/18	
4- 9	Mountain Empire Subregional Plan	Environmental Resources (Policy and Recommendation 4). The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.		12/15/2017 8/8/18	
4- 10	Mountain Empire Subregional Plan	Environmental Resources (Policy and Recommendation 5). Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.		12/15/2017 8/8/18	
5- 0	Boulevard Community Planning Group	This project was heard at the July 12th Community Planning Group Meeting. The CPG recommended denial by a vote 4-0-0-3. A comment letter dated July 22, 2018 was received. Please see attached.		12/15/2017	8/8/2018
5- 1	Boulevard Community Plan	Please provide analysis on how the MUP is consistent with the below Boulevard Community Plan policies.		12/15/2017 8/8/18	
5- 2	Boulevard Community Plan	Policy LU 1.1.1. Prohibit higher density, clustered subdivisions, or industrial-scale projects or facilities that induce growth and detract from or degrade the limited groundwater resources, water and air water quality, visual and natural resources, abundant wildlife, and historic rural character of the Boulevard area. Renewable energy projects, such as solar and wind projects, are not "industrial-scale projects or facilities" for purposes of this Community Plan.		12/15/2017 8/8/18	
5- 3	Boulevard Community Plan	Policy LU 1.1.2 Encourage development to protect the quality and quantity of ground and surface water resources, air quality, dark skies, visual resources, and low ambient noise levels, as well as retain and protect the existing natural and historic features characteristic of the community's landscape and natural environment.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5- 4	Boulevard Community Plan	Policy LU 1.1.3. Encourage development to respectfully incorporate existing topography and landforms, watersheds, riparian areas, oaks, and other native vegetation and wildlife, ridgelines, historic and cultural resources, views, and sustainability design factors.		12/15/2017 8/8/18	
5- 5	Boulevard Community Plan	Policy LU 1.1.6 Require landscaping in new development to emphasize the use of xeriscape design with native, drought-tolerant, and fire-resistant plants to conserve water resources and help prevent the spread of fire.		12/15/2017 8/8/18	
5- 6	Boulevard Community Plan	Policy LU 1.2.1 Encourage and promote local and onsite energy conservation, residential scale renewable energy production, and zero waste recycling goals that will help eliminate the need for industrial projects and facilities.		12/15/2017 8/8/18	
5- 7	Boulevard Community Plan	Policy LU 1.2.2 Require development, including regional infrastructure and public facilities, to comply and maintain a rural bulk and scale in accordance with Boulevard's community character. Renewable energy projects, such as wind and solar projects, are not "regional infrastructure or public facilities" for purposes of this policy.		12/15/2017 8/8/18	
5- 8	Boulevard Community Plan	Policy LU 3.1.1. Encourage development to preserve dark skies with reduced lighting and increased shielding requirements.		12/15/2017 8/8/18	
5- 9	Boulevard Community Plan	Policy LU 3.2.1. Require development to minimize impacts to the native and riparian habitat.		12/15/2017 8/8/18	
5- 10	Boulevard Community Plan	Policy LU 3.3.1. Encourage the designation, protection, and long-term management of historic sites in the Boulevard area.		12/15/2017 8/8/18	
5- 11	Boulevard Community Plan	Policy LU 6.1.1. Require commercial, industrial development and large scale energy generation projects to mitigate adverse impacts to the rural community character, charm, quiet ambiance and lifestyle, or the natural resources, wildlife, and dark skies of Boulevard, if feasible, in accordance with the California Environmental Quality Act.		12/15/2017 8/8/18	
5- 12	Boulevard Community Plan	Policy LU 6.1.2. Encourage commercial, industrial development and large scale energy generation projects to create and maintain adequate buffers between residential areas and incompatible activities that create heavy traffic, noise, infrasonic vibrations, lighting, odors, dust and unsightly views and impacts to groundwater quality and quantity.		12/15/2017 8/8/18	
5- 13	Boulevard Community Plan	Policy LU 6.1.3. Encourage commercial, industrial development and large scale energy generation projects to provide buffers from public roads, adjacent and surrounding properties and residences, recreational areas, and trails.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5- 14	Boulevard Community Plan	Policy CM 8.1.1. Prohibit development and the exportation or sale of groundwater that would adversely impact the ground and surface water resources.		12/15/2017 8/8/18	
5- 15	Boulevard Community Plan	Policy CM 8.3.1 Require that the source and quality of water that is imported into the area via tanker trucks or other means, for use on major construction projects, will be verified and validated to avoid contamination of local surface and groundwater resources.		12/15/2017 8/8/18	
5- 16	Boulevard Community Plan	Policy CM 8.5.1. Prohibit development from altering natural drainage patterns.		12/15/2017 8/8/18	
5- 17	Boulevard Community Plan	Policy CM 8.6.1. Encourage the use of existing right-of-way when construction of new transmission lines is required, where technically and economically feasible. Additionally, encourage existing right-of-way over new right-of-way alignments for construction of new transmission lines when existing right-of-way is insufficient.		12/15/2017 8/8/18	
5- 18	Boulevard Community Plan	Policy CM 8.6.2 Encourage the use of solar and residential scale wind turbines.		12/15/2017 8/8/18	
6- 1	Zoning Ordinance	Zoning for the site is S-92, General Rural Use Regulations which allows Major Impact Utilities and Services with approval of a Major Use Permit.	Ongoing	8/8/2018	**
6- 2	Zoning Ordinance	7359 FINDINGS REQUIRED FOR PARTICULAR USE PERMITS. b. Large Wind Turbine. In lieu of the findings required by Section 7358, it shall be found that the location, size and design of the proposed large wind turbine project will not adversely affect or be materially detrimental to the surrounding community with consideration given to: 1. The physical suitability of the site for the type and intensity of the wind turbine project which is proposed; 2. Any harmful effect from the wind turbine project on desirable neighborhood character; 3. The availability of public facilities, services and utilities to serve the wind turbine project; 4. The generation of traffic and the capacity and physical character of surrounding streets; 5. The requirements of the California Environmental Quality Act; 6. The wind turbine project's contribution to the renewable energy and sustainability goals of the San Diego region; and 7. The San Diego County General Plan.	Ongoing	8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 3	Zoning Ordinance	6952 LARGE WIND TURBINE Any number of large wind turbines may be allowed as a Major Impact Services and Utilities use type with a Major Use Permit approved in accordance with the Use Permit Procedure commencing at Section 7350 and subject to the following requirements - Section 6952.a. - 6952.m. Please provide a response on how the project is in compliance with Section 6952.a. - 6952.m.	Ongoing	8/8/2018	
6- 4	Zoning Ordinance	6952.a. Lot size and status. The lot on which the large wind turbine(s) is to be located shall be at least five acres in size and shall be a legal lot.		8/8/2018	
6- 5	Zoning Ordinance	6952.b. Location. The lot shall be located in a wind resources area shown on the Wind Resources Map approved by the Board of Supervisors on May 15, 2013 (Item 8) on file at the Clerk of the Board of Supervisors.		8/8/2018	
6- 6	Zoning Ordinance	6952.c. Setbacks. The minimum setbacks listed below shall apply. All setbacks shall be measured from the property line to the closest point on the base or support structure of each tower. 1. From private road easements, open space easements, conservation easements and public roads, the minimum setback shall be a distance equal to 1.1 times the wind turbine height. The proposed height of the Turbines is 586 feet tall. 586 feet x 1.1 = 644.6. The plot plan shows a setback from the property lines of 644.16. Please update. Please ensure plot plan delineates all private road easements, open space easements, conservation easements and public roads as it is not clear if the project meets the setback requirements from those easements.		8/8/2018	
6- 7	Zoning Ordinance	6952.c.2. From all property lines and existing residences or buildings occupied by civic use types, the minimum setback shall be a distance equal to 1.1 times the wind turbine height. The proposed height of the Turbines is 586 feet tall. 586 feet x 1.1 = 644.6. The plot plan shows a setback from the property lines of 644.16. Please update.		8/8/2018	
6- 8	Zoning Ordinance	6952.c.3. Additional setbacks may be required to meet the Noise Ordinance, County Code section 36.401 et seq. and/or the noise requirements in subsection "f" below. A noise study has not been submitted to staff to confirm if additional setbacks are required. Please submit the Noise Study so staff can determine if additional setbacks are required.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 10	Zoning Ordinance	<p>6952.c.4. Setback Reduction. If the noise levels resulting from a proposed large turbine exceed the requirements of Noise Ordinance, County Code section 36.401 et seq., and/or the noise requirements in subsection "f" below, the setback requirements in subsections 6952.c.2 and 3 may be reduced in accordance with the following provisions:</p> <p>i. A minimum setback equal to 1.1 times the wind turbine height shall be maintained from all existing residences or buildings occupied by civic use types, private road easements, open space easements, conservation easements and public roads; and</p> <p>ii. The applicant has submitted to the Department of Planning and Development Services a document titled, "Consent to Reduce Setbacks" from the owner of each property affected by the proposed setback reduction. The Consent to Reduce Setbacks shall identify the affected property, the owner of the affected property, the property line(s) to which the reduced setback would apply, the reduced setback distance to which the property owner consents and shall include any other information specified by the Director. The property owner's signature shall be acknowledged. The Consent to Reduce Setbacks shall meet the requirements of state law for a recordable document and will be recorded by the Department of Planning and Development Services with the San Diego County Recorder's Office if the provisions of section 6952c.4 are met.</p> <p>iii. If the adjoining property that would be affected by a setback reduction is not subject to the County's land use regulations, the applicant shall submit documentation to the satisfaction of the Director that the adjoining property owner does not object to the setback reduction. Section 6952.c.4.i shall apply, but section 6952c.4.ii shall not apply.</p> <p>If a setback reduction is being proposed, please provide the above information including adjacent property owners approval of the setback reduction. This shall include a letter by the property owner and recorded.</p>		8/8/2018	
				8/8/2018	
6- 11	Zoning Ordinance	<p>6952.d. Barriers. Public access to a large wind turbine shall be restricted through the use of a fence with locked gates, non-climbable towers or other suitable measures. Please provide elevations of proposed fencing and gating and turbines to Plot Plan. Confirm the turbine towers are non-climbable.</p>		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 12	Zoning Ordinance	6952.e. Signs. A warning sign containing only a telephone number and an address for emergency calls and informational inquiries shall face each vehicular access point to the turbine. Individual signs shall be between five and 16 square feet in size. Please provide elevation drawing of signage.		8/8/2018	
6- 13	Zoning Ordinance	6952.f. Noise. The following noise provisions shall apply: 1. Acoustical Study. The applicant shall prepare and submit an acoustical study. The study shall be conducted by a County-approved acoustical consultant and shall demonstrate that (a) each large wind turbine complies with all applicable sound level limits in the Noise Ordinance, County Code section 36.401 et seq.; and (b) the C-weighted sound level from each large wind turbine while operating does not exceed the Residual Background Sound Criterion for Wind Energy Facilities by more than 20 decibels as both sound levels are measured at each property line of the lot on which the large turbine is located.	Ongoing - Please provide Noise Study	8/8/2018	
6- 14	Zoning Ordinance	6952.f.2. Noise Waiver. An increase in the C-weighted sound level limit specified in subsection 6259.f.1 for one or more turbines may be approved as part of the Major Use Permit for turbines located within the designated Noise Waiver Area on the Wind Resources Map in accordance with the following provisions: i. The large wind turbine complies with all other applicable sound level limits in the Noise Ordinance, County Code section 36.401 et seq.; and ii. The decision maker finds that the higher C-weighted sound limit is acceptable due to specific economic, social, technological or other benefits that will result from approval of the Major Use Permit and implementation of the Proposed Project,	Ongoing - Please provide Noise Study	8/8/2018	
6- 15	Zoning Ordinance	6952.f.3. Pure Tone. If the sound from a large wind turbine while operating contains a steady or intermittent pure tone, such as a whine, screech or hum, the applicable standards for noise set forth in County Code section 36.404 shall be reduced by five dBA. A "pure tone" exists if one-third of the octave band sound pressure level in the band, including the tone, exceeds the arithmetic average of sound pressure levels of the two contiguous one-third octave bands by five dBA for center frequencies of 500 Hz or more, by eight dBA for center frequencies between 160 Hz and 400 Hz, or by 15 dBA for center frequencies less than or equal to 125 Hz...	Ongoing - Please provide Noise Study	8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 16	Zoning Ordinance	6952.f.4. Compliance Review. A Major Use Permit for a large turbine shall be conditioned to require the submittal of a compliance report to the Department of Planning and Development Services once every two years (from the date of approval of the Use Permit) that demonstrates, to the satisfaction of the Director, that the use meets the requirements of section 6952 and all applicable noise related conditions of the Major Use Permit. The compliance report shall describe any complaints filed with the County during the previous two year period and all corrective actions taken if the use was found to be out of compliance with the requirements of section 6952 and/or the applicable noise related Major Use Permit conditions. As a result of this review, the Director shall determine that the use is in compliance with the requirements of this section and the applicable noise related Major Use Permit conditions or that the Major Use Permit shall be subject to review by the Planning Commission. If the Planning Commission finds that the use no longer complies with the requirements of section 6952 and/or the applicable noise related conditions of the Major Use Permit, the Planning Commission may initiate modification or revocation of the permit in accordance with section 7382.c.	Ongoing	8/8/2018	
6- 17	Zoning Ordinance	6952.g. Height. A large wind turbine shall comply with Federal Aviation Administration height requirements and day and night marking requirements and shall not create an airport hazard or interfere with military or emergency services aviation operations, such as aerial firefighting. Please provide Completed FAA Form 7460-1 (Copy of form and FAA Determination) (Provide proof of completed Aeronautical Studies from the FAA for the parcels with Wind Turbines)		8/8/2018	
6- 18	Zoning Ordinance	6952.h. Turbine Description. The Major Use Permit shall include the following information: 1. The wind turbine manufacturer(s), model(s), power rating(s) and blade dimensions. 2. The tower manufacturer and model. 3. The Director may authorize the use of different turbines and towers than those specified in the Major Use Permit if the Director determines that the different turbines and towers would cause the same or fewer impacts compared to the turbines and towers listed in the Major Use Permit. A request to use different turbines and/or towers under this subsection shall not require approval of a Major User Permit Modification under section 7358. Please provide information on Plot Plan.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 19	Zoning Ordinance	6952.i. Manufacture Specifications. An application for a Major Use Permit for one or more large wind turbine(s) shall include a copy of the manufacturer's specifications for each proposed wind turbine. The application may include multiple manufacturers' specifications. Please provide.		8/8/2018	
6- 20	Zoning Ordinance	6952.j. Nonoperational Wind Turbine. Except for periods of maintenance, a large wind turbine that meets the definition of "Wind Turbine, Non-Operational" in Section 1110 for 180 consecutive days shall be decommissioned in accordance with the plan specified in subsection 2 below. 1. Operational Data. Upon written request by the Department of Planning and Development Services, the Permittee of a Major Use Permit for a large wind turbine shall provide data to the satisfaction of the Director to allow the Director to determine the operational status of the large wind turbine. 2. Decommissioning Plan. The applicant shall prepare and submit a decommissioning plan to the Director for his review and approval. The plan shall provide for the removal of all components of each large wind turbine and the restoration of the site to a condition compatible with surrounding properties within 180 days of the start of the decommissioning period. The decommissioning period begins after a wind turbine has been non-operational for 180 consecutive days as specified in subsection 6952j above. 3. Secured Agreement. The applicant shall also enter into a secured agreement with the County that requires the decommissioning plan to be implemented and completed. The terms and conditions of the agreement shall be to the satisfaction of the Director and subject to the review and approval of County Counsel. The Director is authorized to sign the agreement on behalf of the County. The security provided with the agreement shall be in an amount sufficient to cover the County's costs, as determined by the Director, to implement and complete the decommissioning plan in case the owner or operator fails to implement and/or complete the plan. The security shall be in a form approved by the Director. Typical forms of security include a surety bond, irrevocable letter of credit or trust funds. The security shall remain in effect for the entire time that the large wind turbine is operational and for any additional time until the decommissioning has been completed in accordance with the decommissioning plan. 4. Building Permit. No building permit for any component of a large wind turbine may be issued until the Director approves the decommissioning plan, signs the secured agreement and accepts the security.	Information Only	8/8/2018	" "

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 21	Zoning Ordinance	6952.k. Existing Administrative Permits for Wind Turbine Projects - Modification or Revocation. Administrative permits for wind turbine projects granted pursuant to Section 7060 prior to January 1, 1986, shall be treated for all purposes as if they are Major Use Permits and shall be subject to all the provisions of the Zoning Ordinance which apply to Major Use Permits for purpose of modification or revocation. This section does not apply.	Information Only	8/8/2018	
6- 22	Zoning Ordinance	6952.l. Design. When a Major Use Permit authorizes more than one large wind turbine, all of the large wind turbines subject to the Major Use Permit shall be uniform in color and tower and turbine design (pole, nacelle, etc.). In addition if there are existing large wind turbines on a lot that abuts the lot on which proposed large wind turbines would be located, the color and tower and turbine design of the proposed large wind turbines shall be uniform with that of the existing large wind turbines. Tower and turbine design does not include turbine height which may vary. Please provide information.		8/8/2018	
6- 23	Zoning Ordinance	6952.m. Property Maintenance. Except for periods of maintenance the property on which a large turbine is located shall be kept clean of turbine parts and or debris associated with the turbine operation. Please provide information.		8/8/2018	
6- 24	Zoning Ordinance	4620 PERMITTED EXEMPTIONS FROM HEIGHT LIMITS. The following structures shall be exempt from the maximum height provisions of an applicable height designator: g. Any structure for which a Major Use Permit is granted pursuant to other provisions of this ordinance, when the Major Use Permit authorizes an exemption to the height regulations. It is noted that 361-foot tall permanent MET facilities are proposed that exceed the height regulations of 35 feet for this project site.	Ongoing	8/8/2018	
7- 1	Board Policies	The following County Board of Supervisors Land Use Policies apply to this project: I-17 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Zone reclassifications), I-18 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Major and Minor Use Permits), and I-136 (Comprehensive Goals and Policies for Community Facilities Districts) J-17 Undergrounding of Existing Overhead Utility Facilities	Ongoing	8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8- 1	Legal Lot & Legal Access	There are 13 APNs tied to the proposed project. A Grant deed has been provided confirming Legal Access. And CC-76-109618, dated 4/13/1976 confirms legal lot for the majority of the below APNs.		8/8/2018	8/8/2018
8- 2	Legal Lot - 529-050-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 3	Legal Lot - 529-060-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 4	Legal Lot - 529-090-02	Legal per CC76-109618		8/8/2018	8/8/2018
8- 6	Legal Lot - 529-100-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 7	Legal Lot - 529-100-02	Legal per CC76-109618		8/8/2018	8/8/2018
8- 8	Legal Lot - 529-100-03	Legal per CC76-109618		8/8/2018	8/8/2018
8- 9	Legal Lot - 529-120-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 10	Legal Lot - 529-120-03	Legal per CC76-109618		8/8/2018	8/8/2018
8- 11	Legal Lot - 529-130-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 12	Legal Lot - 611-010-01	Legal per CC76-109618		8/8/2018	8/8/2018
8- 13	Legal Lot - 611-010-02	Legal per CC76-109618		8/8/2018	8/8/2018
8- 14	Legal Lot - 611-010-03	Legal per CC76-109618		8/8/2018	8/8/2018
8- 15	Legal Lot - 611-020-01	Legal per BC79-0192		8/8/2018	8/8/2018

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
				8/8/2018	8/8/2018
9- 1	Plot Plan	An aerial of the project was submitted. Please provide a plot plan with the minimum plot plan requirements as specified in Form PDS-090. Additional details are required for staff's review. Pending resubmittal of a Plot Plan additional comments may be required. Please provide a plot plan with the minimum plot plan requirements as specified in Form PDS-090. Additional details are required for staff's review. Pending resubmittal of a Plot Plan additional comments may be required.		12/15/2017 8/8/18	
9- 2	Plot Plan	The Plot Plan should include elevations and dimensions of all above ground structures and labels the proposed height (MET towers, power line, substation, transformers, turbines). Second Request: Elevations and Floor Plans of all above ground structures are required. Pending this information additional comments may be required.		12/15/2017 8/8/18	
9- 3	Plot Plan	Please be sure that all easements and property lines are shown. Second Request: Please confirm all easements have been shown. Ensure all access easements along Ribbonwood Road have been shown clearly. Please provide on Sheet 10 or provide a separate sheet showing this information. At this time it is unclear if project is meeting the required setback requirements from private and public road easements. Please provide information and show compliance with Section 6952c.		12/15/2017 8/8/18	
9- 4	Plot Plan	A layout for all proposed structures should be included (including substation).		12/15/2017	8/8/2018
9- 5	Plot Plan	Pending submittal of Plot Plan, additional comments may be required. The plot plan should be updated to reflect the most current project description.		12/15/2017 8/8/18	
9- 6	Plot Plan	Please note that for the Tule Wind Farm project the Board of Supervisors required undergrounding south of the I-8.	Information Only	12/15/2017	N/A
9- 7	Plot Plan	The proposed substation and switchyard area is near or on the property line. Provide additional locations of all structures within this area. Please demonstrate compliance with the setback requirements.		8/8/2018	
9- 8	Plot Plan	Provide cross sections of all proposed access roads and proposed improvements to existing access roads.		8/8/2018	
9- 10	Plot Plan	Four existing wells have been identified on the plot plan. Confirm if all four are going to be used for the proposed project.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
9- 11	Plot Plan	The proposed batchplant, O&M area and laydown area are shown on Sheet 10. Please provide additional locations and dimensions of all structures within this area.		8/8/2018	
9- 12	Plot Plan	Provide a summary table of all structures, proposed square footage and height. Include parking summary.		8/8/2018	
9- 13	Plot Plan	Please provide manufaction specifications for Turbines and identify who the manufacturer(s) are.		8/8/2018	
9- 14	Plot Plan	The site has an identified trail from the Community Trails Master Plan (CTMP); #01A Ribbonwood Trail Boulevard. The project should work to find an alignment that is compatible with the project design. Please provide on Plot Plan and PGP.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
10- 1	Preliminary Grading Plan	Pending submittal of preliminary grading plan, additional comments may be required. The preliminary grading plan should be updated to reflect the most current project description. Second Request.		12/15/2017 8/8/18	
11- 1	Landscape	Provide a conceptual landscape plan with the submittal of the Major Use Permit that addresses aesthetic issues. This may include screening of the substation, operations and maintenance building, parking areas, area fencing, or laydown areas. The conceptual landscape plan shall also address any fuel modification zones required by the County, or as identified in a project specific Fire Protection Plan. Dimensions of zones shall be provided along with any maintenance notes specific to those zones. Erosion control planting shall also be identified on the conceptual landscape plan for all manufactured slopes and any bare soils to address storm water runoff control. Preliminary plant palettes shall be provided based on existing native habitat communities identified in the project description. No invasive or fire prone vegetation shall be introduced to the site. Notes shall be provided to indicate how plantings will be irrigated and maintained through plant establishment. All planting and irrigation shall be compliant with the most current version of the County's Water Conservation in Landscape Ordinance and Water Efficient Landscape Design Manual. Second Request.		12/15/2017 8/8/18	
11- 2	Landscape	Although water budget calculations are not required for projects utilizing groundwater, this project shall be required to anticipate annual irrigation amounts for landscape screening, erosion control plantings, and restoration plantings to be included with any groundwater analysis studies. Second Request.		12/15/2017 8/8/18	
11- 3	Landscape	A Conceptual Revegetation Plan shall be prepared to address mitigation measures. This may include temporary and permanent impacts associated with undergrounding of utilities, portions of the 2.9 acre temporary construction areas at each wind turbine, wetland and upland habitat vegetation removal, road construction, laydown areas, construction areas, and areas associated with ongoing maintenance activities. Second Request.		12/15/2017 8/8/18	
11- 4	Landscape	Anticipated impacts associated with service and construction activities shall be identified. The construction easements shall allow for vegetative restoration of disturbed areas. Second Request.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
11- 5	Landscape	Note: It is unclear at this time if a Tree Inventory and Replacement Plan will be required. Once additional information has been submitted regarding the layout of the roads and turbine locations additional comments will be provided. Second Request.		12/15/2017 8/8/18	
12- 1	Decommission Plan	Provide a Copy of the Draft Decommissioning Plan. Second Request.		12/15/2017 8/8/18	
13- 1	SDG&E Verification	Please provide a letter from SDG&E addressing the availability of existing infrastructures to serve the proposed project. Second Request.		12/15/2017 8/8/18	
14- 1	CEQA	The following technical studies will be required for CEQA analysis of this project.		12/15/2017 8/8/18	
15- 1	Agricultural Resources	The project site is primarily undeveloped. An existing cattle grazing operation is located on-site. Based on the potential impacts the project may have on agricultural resources, an agricultural resources technical report is required to evaluate the significance of potential impacts. The agricultural analysis must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at http://www.sdcounty.ca.gov/PDS/docs/AG-Guidelines.pdf (Guidelines) and http://www.sdcounty.ca.gov/PDS/docs/AG-Report-Format.pdf (Report Formats). A Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review. Second Request.		12/15/2017 8/8/18	
16- 1	Airport- FAA	Provide proof of completed Aeronautical Studies from the FAA for the parcels with Wind Turbines. -FAA Notification Form - http://www.faa.gov/documentLibrary/media/Form/FAA_Form_7460-1_2017.pdf Second Request.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
17- 1	Air Quality	The proposed project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, related to grading and construction activities and operational activities. Therefore, the proposed project is required to discuss the project's potential impacts to air quality by preparing an Air Quality Analysis Report. See Attachment F for scoping requirements. Second Request.		12/15/2017 8/8/18	
18- 1	Biology	<p>The project site contains sensitive habitat communities. It also likely supports a number of sensitive plant and animal species, some of which may be protected by the U.S./State under their respective Endangered Species Acts. GIS data indicates that several sensitive species have historically been detected on site, including Bell's sage sparrow, southern grasshopper mouse, and Dulzura pocket mouse. The biology report shall include focused surveys and/or site assessment for the following rare and endangered species: rare plants, arroyo toad, Stephens kangaroo rat, southern willow flycatcher, Quino checkerspot butterfly, Peninsular bighorn sheep, Laguna mountain skipper, California red-legged frog. The focused surveys must be done by biologists with demonstrable knowledge in field detection of the subject species (focused surveys for Federally listed species shall be in compliance with USFWS protocol, when such protocol exists, and must be done by a USFWS permitted biologist -- contact the USFWS at (760) 431-9440).</p> <p>On-site and/or off-site habitat preservation would be required to mitigate for impacts to these sensitive biological resources in accordance with federal, state, and regional regulations, including the California Environmental Quality Act (CEQA). The site contains drainages that likely support Resource Protection Ordinance (RPO) wetlands and/or jurisdictional waters of the U.S./State. These natural features are a significant constraint for land uses on the project site and may affect project design. Drainages may support</p> <p>See Attachment G for scoping requirements. Second Request.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
19- 1	Cultural	County records, as well as the database from the South Coastal Information Center, has been reviewed and it has been determined that cultural resources are present on site. As such, an updated cultural study will be required as outlined below. See Attachment H for scoping requirements. Second Request.		12/15/2017 8/8/18	
20- 1	Green House Gas	The proposed project has the potential to generate greenhouse gas (GHG) emissions, related to construction and operation of the proposed activities. Therefore, the project is required to discuss its potential impacts to GHG by preparing a Climate Change Analysis Report. See Attachment N for scoping requirements. Second Request.		12/15/2017 8/8/18	
21- 1	Hazards	Based on the information provided, it appears that the project would not require any additional Hazardous Materials review. However, this stage of the project is a Major Pre Application, and does not contain detailed information (e.g., location of the facilities, types of materials kept on-site, etc.). Therefore, the project will be reviewed again at the Scoping stage to ensure no major changes have been made. Second Request.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
21- 1	Hazards	<p>Staff requests the following questions be answered regarding "Attachment B – Preliminary Project Description."</p> <p>1. Section 1.4 (Land Uses), page 2 – the sentence reads "The Site is primarily undeveloped." What does this mean? Are there structures on site? Is the applicant referring to trails/roads within the project boundaries? Please explain.</p> <p>2. Section 1.5 (Site Land Uses – Wind Energy Facilities), page 2 – this paragraph notes that the turbines would be a maximum of 500 feet. However, the height of the facility is referenced as greater than 500 feet in other submitted documents. Please note that while this would not necessarily affect the Hazardous Materials review, it is important to remain consistent throughout all documents.</p> <p>3. Please specify what types of hazardous materials (if any) may be proposed to be kept on site. If a business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in quantiles greater or equal to the following, a Hazardous Materials Business Plan (HMBP) shall be prepared:</p> <p>a. 500 pounds of a solid substance b. 55 gallons of a liquid c. 200 cubic feet of a compressed gas d. A hazardous compressed gas in any amount (highly toxic gases with a Threshold Limit Value of 10 parts per million or less) e. Extremely hazardous substances in threshold panning quantifies as defined in 40 CFR Part 355</p> <p>See Attachment J for scoping requirements and draft conditions. Second Request.</p>		12/15/2017 8/8/18	
22- 1	Traffic - Project Description	Staff has reviewed the Project Description dated June 2018.	Information Only	12/15/2017 8/8/18	N/A
22- 2	Traffic - Project Description	A traffic impact Analysis is required. This should form the basis of the traffic analysis following the County's Report Format and Content Requirements. The analysis will also form the foundation of the haul permits and any oversized load documentation. http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Traffic_Report_Format.pdf Second Request.		12/15/2017 8/8/18	
22- 3	Traffic - Project Description	Table A-3 should also note that the County will also require an Oversized/Heavy Load Permit for any trips taken on County maintained roads. Second Request.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
22- 4	Traffic - Project Description	The traffic impact analysis should note that the projects cumulative impact and mitigation is based on the daily operations, which is described as 10-20 full time employees. Please see Attachment O for scoping requirements. Second Request.		12/15/2017 8/8/18	
23- 1	Trails - Community Trails Master Plan	The site has an identified trail from the Community Trails Master Plan (CTMP); #01A Ribbonwood Trail Boulevard. The project should work to find an alignment that is compatible with the project design. Second Request.		12/15/2017 8/8/18	
24- 1	Visual Resources	Based on the initial review, it appears that the proposed project may adversely affect visual resources. There may be potentially adverse impacts to visual resources from introduction of the project to the viewshed. Views from scenic vistas, scenic highways and County Scenic Routes will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from on site or from a series of sites along a scenic highway and views from above, at eye level, or from below. A full Visual Analysis will be required to evaluate the significance of the visual impacts of the proposed project and to identify potential mitigation measures to mitigate significant visual impacts (i.e.: landscaping, increased setbacks). Second Request.		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
25- 1	Fire	<ul style="list-style-type: none"> • A Site Plan for the proposed project needs to be provided. More detailed comments will be provided once a Site Plan is submitted. • County General Plan travel time requirements are not an issue for this project. • Until a Site Plan is submitted, it is unknown whether exceedance of the maximum allowable dead-end road length is an issue. • The project will be required to comply with the County Consolidated Fire Code. • The Project Description states that there will be fire detection systems in each of the turbines. PLEASE NOTE: Fire suppression systems will be required to be installed in each of the turbines. • A significant amount of water storage will be required at the O&M Building and the Collector Substation (at a minimum 30,000 gallons—to be determined when more information is provided). Also, multiple 10,000 gallon dip tanks may be required at various locations throughout the site. • This project, along with all other development, has a cumulative impact on the emergency services for this community. Also: Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. • A Fire Protection Plan-Full Report is to be provided for the project. <p>Second Request.</p>		12/15/2017 8/8/18	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
25- 2	Fire	<p>We have reviewed the Project Description and Plot Plan for the Torrey Wind project (MUP18-014). In addition to the comments provided during the Major Pre-Application (MPA17-015), please accept these additional comments:</p> <ul style="list-style-type: none"> • Provide on the Plot Plan the approximate grades of the roads providing access throughout the site. The maximum grade of roadways is not to exceed 20%, and all portions of roadways greater than 10% grade are to be paved. • Provide details of the improvements that are to be made to Ribbonwood Rd. (both onsite and offsite) to improve the road to the appropriate road standard. • Provide more detailed drawings of the Substation and O&M Building sites. • Sec. 1.4 of the Project Description states that the water storage tanks are to be maintained by the local fire agency. The water storage tanks for the project will be required to be maintained by the project owner. • As an appendix to the fire protection plan, a detailed technical report prepared by a qualified engineer, specialist, or fire safety specialty organization needs to be submitted for the proposed project. The technical report needs to address—but is not limited to—the following items: <ul style="list-style-type: none"> o Hazards of the proposed facilities to emergency responders. o Discussion on how to properly de-energize equipment. o Signage recommendations. o Recommended training for emergency personnel. Training will be provided prior to commissioning and on an as requested basis. 		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
25- 3	Fire	<p>CALFIRE - Chief Burke Kremensky reviewed this project and provided the following comments: Land ownership surrounding the Project site consists of a mixture of private, State of California, Bureau of Land Management, and tribal lands.</p> <p>The 500-kilovolt (kV) Sunrise Powerlink traverses the northeast portion of the Project site. Wind turbines associated with the Tule Wind Project are located immediately adjacent to the east, north, and northwest portions of the Project site. Wind turbines associated with the Kumeyaay Wind Project are located approximately 1 mile west of the Project site.</p> <p>Total height of wind turbine (highest point) –approximately 586 feet. The Project would also include two permanent meteorological towers within the Project limits, which would be self-supported and would not exceed 361 feet in height.</p> <p>The builder/developer will include FAA lighting and paint color. Following FAA guidelines will help reduce hazards to firefighting aircraft. Once built a request will be submitted to include this wind farm into the Forest Aviation Hazard Map.</p> <p>The wind turbines will be Consistent with Federal Aviation Administration rules established in Advisory Circular 70/7460-1L: Obstruction Marking and Lighting, all turbine components (including towers, nacelles, and rotors) would be painted or finished using low-reflectivity, neutral white colors. Exterior lighting installed on turbines would be restricted and would only include Federal Aviation Administration aviation warning lights. {Note the U.S. Forest Service was also included in this email provided by CALFIRE}</p>		8/8/2018	
26- 1	U.S. Border Patrol	<p>The proposed project was route to U.S. Border Patrol. No issues were identified. The U.S. Border Patrol may have some concerns on the operational side and it is recommended the applicant engage with the U.S. Border Patrol and resolve any items related to operations. Please contact HELMUT I SERRANO - HELMUT.I.SERRANO@CBP.DHS.GOV for further information.</p>		7/13/2018	
DEH (Department of Environmental Health) Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001				
Planning & Development Services (PDS) Planning and CEQA Comments						
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
25-	1	DEH	The Department of Environmental Health has reviewed the proposed Major Pre-application for the proposed development of a wind energy facilities over a 2246 acre area. The project was submitted to PDS on 10/20/17.		12/15/2017	N/A
25-	2	DEH	Any facilities that generate wastewater will require proposed design submittal to DEH for review and approval. Second Request; Please provide information.		12/15/2017 8/8/18	
25-	3	DEH	Potable water supply to the project must be designated on any subsequent submittals. Second Request; Please provide information.		12/15/2017 8/8/18	
25-	4	DEH	<p>Prior to issuance of Building Permits, the applicant will be required to obtain approval from the Department of Environmental Health-Hazardous Materials Division for the placement of any reportable quantities of batteries, fuel tanks, or hydrogen cylinders within the proposed facility. The contact person for this review is Joan Swanson. She can be reached via email at joan.swanson@sdcounty.ca.gov or by phone at (858)505-6880.</p> <p>DEH has no objections to the submittal of the proposed project to PDS.</p> <p>Please contact Scott Rosecrans if you have any questions: 619-208-0337 or scott.rosecrans@sdcounty.ca.gov</p>		12/15/2017	N/A

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Land Development Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
26- 1	Watercourses	<p>The subject parcel contains waterways. The applicant must put the following note on the grading plans:</p> <p>NOTICE: The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. and/or State which may be subject to regulation by State and/or federal agencies, including, but not limited to, the Regional Water Quality Control Board (RWQCB), U.S. Army Corps of Engineers (USACE) and the California Department of Fish and Wildlife (CDFW). It is the applicant's responsibility to consult with each agency to determine if a permit, agreement or other approval is required and to obtain all necessary permits, agreements or approvals before commencing any activity which could impact the wetlands, lake, stream, and/or waters of the U.S. on the subject property. The agency contact information is provided below.</p> <p>U.S. Army Corps of Engineers: 915 Wilshire Blvd., Suite 1101, Los Angeles, CA 90017; (213) 452-3333; http://www.usace.army.mil/ Regional Water Quality Control Board: 2375 Northside Drive, Suite 100, San Diego, CA 92108; RB9_DredgeFill@waterboards.ca.gov ; http://www.waterboards.ca.gov/sandiego/ California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 636-3160; AskR5@wildlife.ca.gov http://www.dfg.ca.gov/</p>		8/8/18	
27- 1	General	Comments have been provided to the extent possible with the information provided . A thorough review will commence with a formal project submittal. Additional issues may arise upon formal project review.	Comment for information only	8/8/2018	
27- 2	General	Project conditions will be provided after formal project submittal.	Comment for information only	8/8/2018	
27- 3	General/Access	Have your project reviewed and commented on by San Diego County Fire Authority . Project's conditions may be revised upon further review and input from the agencies.		8/8/2018	
27- 4	General/Project Description	Preliminary Project Development Schedule does not include timing for Resource Agency Permits from USACE, RWQCB and CDFW.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
27- 5	General/Project Description	Preliminary Project Development Schedule does not include timing for Grading and Improvement plan review and approval.		8/8/2018	
27- 6	General/Project Description	Preliminary Project Development Schedule does not include timing for ROW Encroachment Permits, Haul Route Permits and Traffic Control Permits.		8/8/2018	
28- 1	Plot Plan	Provide a plot plan that shows the proposed project features.	Submitted	8/8/2018	8/8/2018
28- 2	Plot Plan	Provide access easement documents for reference. Please included recorded easement document numbers on the plot plan. Please show access from the project to the Publicly maintained road.		8/8/2018	
28- 3	Plot Plan	The subject parcel must constitute a legally created parcel under the Subdivision Map Act, and the plot plan must match the legal lot plat/map to 100%. Please provide evidence of a legal parcel in accordance with Board of Supervisors Policy G-3. Please provide a certification from a registered civil engineer that the plot plan matches the legal lot plat/map to 100%		8/8/2018	
28- 4	Plot Plan	Show the entire parcel regardless of size and show all property line dimensions		8/8/2018	
28- 5	Plot Plan	Show the footprint of all proposed (new), as-built (non-permitted) and existing (permitted) structures, and label as either "Proposed", "As-Built", or "Existing" (do not show "Future" structures.)		8/8/2018	
28- 6	Plot Plan	Identify the use of each structure and include a summary table of square footages and show location of all existing and proposed electrical services (including size)		8/8/2018	
28- 7	Plot Plan	Show and label the height of all existing and proposed free-standing fences/walls and gates.		8/8/2018	
28- 8	Plot Plan	Indicate the required front, exterior side, interior side, and rear yard setbacks and building setbacks.		8/8/2018	
28- 9	Plot Plan	Identify and show the location of well(s) and leach lines		8/8/2018	
28- 10	Plot Plan	Indicate property owner's name, current address, and parcel address	Complete	8/8/2018	Complete
28- 11	Plot Plan	Indicate Assessor Parcel Number(s) (APN) and net area of parcel(s) exclusive of road easements		8/8/2018	
28- 12	Plot Plan	Indicate driveway(s) parking areas, paving material, slope of driveway (percentage and direction)		8/8/2018	
28- 13	Plot Plan	Show how lot will drain and all stormwater BMPs		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
28- 14	Plot Plan	Show all existing easements, roads, streets, and alleys, including names and width of easements adjacent to the propoerty. Indicate centerline of all road easements and streets, and show areas of inundation for the 100 year floodway/floodplain		8/8/2018	
28- 15	Plot Plan	Please indicate the location and square footage of new and/or modified landscape areas.		8/8/2018	
29- 1	Prelim. Grading Plan	Submit a Preliminary Grading Plan. Additional information can be obtained in the following link: Preliminary Grading Guideline http://www.sandiegocounty.gov/content/dam/sdc/pds/LandDevelopment/preliminarygradingplanguidelines.pdf Grading Ordinance http://www.sdcounty.ca.gov/dpw/land/landpdf/gradingordinance.pdf In addition to the Preliminary Grading guideline, the Plan shall include, but not limited to the following:		8/8/2018	
29- 2	Prelim. Grading Plan	Show Assessors Parcel Numbers (APNs) for all immediately contiguous adjacent parcels adjoining the subject property of this project.		8/8/2018	
29- 3	Prelim. Grading Plan	Show any existing and proposed culverts (on- and off-site which are adjacent to the project).		8/8/2018	
29- 4	Prelim. Grading Plan	Show lines of inundation for limits of the 100-year flood along watercourses which flow through the property, labeled "Subject To Inundation By The 100-Year Flood" on the Plan for drainage basins greater than 100 acres.		8/8/2018	
29- 5	Prelim. Grading Plan	Show a minimum setback for grading tops and toes of slopes from the project boundary per the Grading Ordinance section 87.412 and San Diego County Design Standard DS-11. Also note that the setback is measured from the property line. See San Diego County Design Standard Drawings DS-11.		8/8/2018	
29- 6	Prelim. Grading Plan	The project is required to relinquish access rights along Old Highway 80 and McCain Valley Road exception for County approved driveways proposed to serve the project.		8/8/2018	
29- 7	Prelim. Grading Plan	Show existing contours (max. 5'), to cover at least 50' beyond property line or sufficient for showing drainage basin.		8/8/2018	
29- 8	Prelim. Grading Plan	Show typical cross sections (existing and proposed condition) for all the public roads that are adjacent to the project and proposed on-site driveways: Old Highway 80 and McCain Valley Road .		8/8/2018	
29- 9	Prelim. Grading Plan	Show a location of the project driveway and any existing driveways, access points along both sides of Road within 300 feet radius of the project driveway.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
29- 10	Prelim. Grading Plan	Old Highway 80 and McCain Valley Road * Call out the Centerline, existing edge of pavement and existing Right-of-way (ROW) line. * Show dimensions from the centerline to: the existing edge of pavement and ROW line.		8/8/2018	
30- 1	Stormwater Quality Management Plan (SWQMP)	Submit a Storm Water Intake form and Standard SWQMP in order to be in conformance with the new municipal permit, 2013 MS4, that was implemented by the County on February 26, 2016. The BMP Design Manual and SWQMP forms are available at: http://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction.html The SWQMP is a living document to be updated to reflect any changes during the project's final plan review and construction throughout the life of the project in perpetuity.	Submitted	8/8/2018	8/8/2018
30- 2	SWQMP	The Standard SWQMP submitted for the project does not include a BMP Plan. Please provide a BMP plan showing the location of the Construction, Site Design and Source Control BMPs.		8/8/2018	
31- 1	CEQA Drainage Study	Based on the amount of impervious surfaces that are being created, the project is required to prepare and submit a CEQA Drainage Study in compliance with the documents shown below. The CEQA Drainage study shall be prepared in compliance with the documents shown below. San Diego County Hydrology Manual: http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrologymannual.html San Diego County Hydraulic Design Manual: http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontrolpdf/hydraulic_design_manual_2014.pdf		8/8/2018	
31- 2	CEQA Drainage Study	For CEQA Drainage study format, please visit a San Diego County Hydrology Manual, Section 1.6, page 1-21 and Figure 1-8 http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontroldocuments/hydro-hydrologymanual.pdf In addition to the guideline, the study shall include, but not limited to the following:		8/8/2018	
31- 3	CEQA Drainage Study	Provide DECLARATION OF RESPONSIBLE CHARGE – See San Diego County Hydrology Manual, Figure 1-9.		8/8/2018	
31- 4	CEQA Drainage Study	The final CEQA Drainage report shall be signed, stamped and dated by the responsible California Registered Civil Engineer.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
31- 5	CEQA Drainage Study	The report should have numbered pages and a corresponding Table of Contents.		8/8/2018	
31- 6	CEQA Drainage Study	In the narrative of the report please provide a summary table of: pre- and post- development C, Tc, I, A, V ₁₀₀ , Q ₁₀₀ without mitigation and Q ₁₀₀ with mitigation for each area (or point) where drainage discharges from the project. Peak runoff rates (cfs), velocities (fps) and identification of all erosive velocities (at all points of discharge) calculations for pre-development and post-development. The comparisons should be made about the same discharge points for each drainage basin affecting the site and adjacent properties.		8/8/2018	
31- 7	CEQA Drainage Study	Summary/Conclusion: Please discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Provide reasons and mitigations proposed.		8/8/2018	
31- 8	CEQA Drainage Study	Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Provide reasons and mitigations proposed.		8/8/2018	
31- 9	CEQA Drainage Study	Discuss whether or not the proposed project would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? Provide reasons and mitigations proposed.		8/8/2018	
31- 10	CEQA Drainage Study	Discuss whether or not the proposed project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? Provide reasons and mitigations proposed.		8/8/2018	
31- 11	CEQA Drainage Study	Discuss whether or not the proposed project would place structures within a 100-year flood hazard area which would impede or redirect flood flows?		8/8/2018	
31- 12	CEQA Drainage Study	Discuss whether or not the proposed project would expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?		8/8/2018	
31- 13	CEQA Drainage Study	Provide Hydrologic Soil Group Map with project footprint.		8/8/2018	
31- 14	CEQA Drainage Study	Provide Rainfall Isoplethials for 100 Year Rainfall Event - 6 Hours and 24 Hours Maps. Show project location.		8/8/2018	
31- 15	CEQA Drainage Study	Provide Intensity-Duration Design Chart-Figure 3-2.		8/8/2018	
31- 16	CEQA Drainage Study	Provide runoff coefficients for urban areas-Table 3-1.		8/8/2018	
31- 17	CEQA Drainage Study	Provide Maximum overland flow length (LM) & initial time of concentration (Ti)-Table 3-2.		8/8/2018	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

TORREY WIND MAJOR USE PERMIT		PDS2018-MUP-18-014, PDS2018-ER-18-21-001			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
31- 18	CEQA Drainage Study	Existing and Proposed Conditions Hydrology Maps: * Show arrows for drainage flow path direction for each sub basin and basin. * Show node for each sub basin. * Show discharge point with A & Q information for each basin. * Show entire project boundary and offsite watershed. Include topo for upstream basin. * Show lines of inundation to the limits of the 100-year flood along watercourses which flow through the property, labeled "Subject To Inundation By The 100-Year Flood" if the drainage basins are greater than 100 acres.		8/8/2018	
31- 19	CEQA Drainage Study	All maps shall: * Be at a legible scale (11"x17" is a minimum map size).		8/8/2018	
32- 1	Project Description	Staff has reviewed the Project Description dated June 2018.	Information	8/8/2018	8/8/18
32- 2	Project Description	The project description does not include the number of wind turbines. Once this is established the project description can detail the number of construction trips associated with development of the site. This should form the basis of the traffic analysis following the County's Report Format and Content Requirements. The analysis will also form the foundation of the haul permits and any oversized load documentation. http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Traffic_Report_Format.pdf		8/8/2018	
32- 3	Project Description	Table A-3 should also note that the County will also require an Oversized/Heavy Load Permit for any trips taken on County maintained roads.		8/8/2018	
32- 4	Project Description	The traffic impact analysis should note that the projects cumulative impact and mitigation is based on the daily operations, which is described as 10-20 full time employees.		8/8/2018	
32- 1	Sight Distance	Pending on the proposed driveway location, sight distance study/certification might be required.		8/8/2018	
32- 1	Improvements	The project driveway, which shall be designed and constructed per Standard Drawing G-14A or County Standard Drawing DS-7 to the satisfaction of the Director of PDS.		8/8/2018	

ATTACHMENT B
MEMORANDUMS OF UNDERSTANDING

CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)

The County of San Diego's CEQA guidelines require that environmental technical studies be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.co.san-diego.ca.us/PDS/procguid.html> (item number 4 under "General Guidance"). No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found at: <http://www.sdcounty.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

Copies must be made and signed by the applicant, consultant and firm (if applicable) for each of the following requested subject area technical studies:

- Agricultural Resources
- Air Quality
- Archaeological Resources
- Biological Resources
- Groundwater
- EIR Preparer
- Fire Protection Planning
- Noise
- Transportation & Traffic
- Visual Analysis

ATTACHMENT C
SCOPE FOR VISUAL RESOURCES & AESTHETICS

Planning & Development Services has completed review of your project application and has determined that the project may adversely affect visual resources. Visual resources can include narrow or expansive views, can be views from one site or from a series of sites (as along a scenic highway), and can be viewed from above, at eye level, or from below. A particular thing that defines a community or a region's character and identity is also a scenic resource.

The aesthetic value of visual resources is not limited to open space and rural lands, but can also be held in historic structures and districts, architectural design, streetscapes and manufactured landscapes. These valuable aesthetic elements of the human-made environment can be found throughout the unincorporated County, even though it is mostly undeveloped.

The proposed project has the potential to adversely affect visual resources. A Visual Resources Report shall be prepared to assess the impacts that will result from the construction and operation of this project.

Planning & Development Services has completed review of the project design and has determined that the project may impact dark skies or may cause significant glare. A Photometric Study shall therefore be prepared for the project. The study shall follow the County's Report Format and Content Requirements for Dark Skies and Glare (Photometric Study) (available at http://www.sdcounty.ca.gov/PDS/docs/Dark_Skies_Photometric_Study.pdf) and shall analyze impacts according to the County's Guidelines for Determining Significance (available at http://www.sdcounty.ca.gov/PDS/docs/Dark_Skies_Guidelines.pdf).

The report must be prepared by:

- A National Council on Qualifications for the Lighting Professions, Lighting Certified (NCQLP LC) Designer;
- State of California licensed electrical engineer;
- State of California licensed architect; or
- State of California licensed contractor.

The report must follow the format given in the County's Report Format and Content Requirements for Visual Resources, which can be found at: http://www.sdcounty.ca.gov/PDS/docs/Visual_Report_Formats.pdf.

The report must evaluate potentially adverse impacts to the environment according to the County's Guidelines for Determining Significance for Visual Resources, which can be found at: http://www.sdcounty.ca.gov/PDS/docs/Visual_Guidelines.pdf The report must be prepared by a visual resources analyst who is on the County's approved consultant list for completing Visual Resource Reports.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT D
SCOPE FOR AGRICULTURAL RESOURCES

The project site is primarily undeveloped. The site has been used for agricultural purposes in the past; however such lands now lie fallow. Land designated as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, as defined by California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) are present on the property. Based on the potential impacts the project may have on agricultural resources, an agricultural resources technical report is required to evaluate the significance of potential impacts. The agricultural analysis must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at:

<http://www.sdcounty.ca.gov/PDS/docs/AG-Guidelines.pdf> (Guidelines) and
<http://www.sdcounty.ca.gov/PDS/docs/AG-Report-Format.pdf> (Report Formats).

The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT E
SCOPE FOR AIR QUALITY

Project Specific Information:

The proposed project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, related to grading and construction activities and operational activities. Therefore, the proposed project is required to discuss the project's potential impacts to air quality by preparing an Air Quality Analysis Report.

General Information:

Based on the potential impacts the proposed project may have on air quality, an Air Quality Analysis Report is required. The County has approved *Guidelines for Determining Significance and Report Format and Content Requirements* dated March 19, 2007 which can be found here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf> and here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>. The Report should be prepared pursuant to these guidance documents.

The construction emissions inventory must account for all onsite and offsite construction activities associated with the project, including but not limited to clearing and grubbing, roadway and parking construction, temporary equipment staging area construction, excavation, the on-site batch plant, turbine and meteorological towers erection, trenching, building construction, and roadway grading. Additionally, emissions associated with transport of turbine and construction materials, concrete delivery truck trips, water truck trips, including soil import/export, waste export, water import, or any other traffic associated with construction activities, must be included in the analysis. Sensitive receptors within the project site or the project's vicinity should be reported and impacts to these receptors must be analyzed. The impact of construction emissions on these receptors from fugitive dust emissions, criteria pollutants, and toxic air contaminants must be addressed in the Report.

Emissions of pollutants of concern from the proposed project may occur from construction/grading activities. In general, emissions from construction activities include:

- Particulate matter less than 10 microns and 2.5 microns (PM₁₀ and PM_{2.5}) from grading and soil disturbance, road improvements, operation of construction equipment, haul trucks, vendor vehicles, worker commute vehicles, and vehicle travel on unpaved roads;
- PM₁₀ and PM_{2.5} and other criteria pollutant and precursor emissions from the on-site batch plant;

- Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur oxides (SO_x), PM₁₀, and PM_{2.5} from explosives detonation for blasting, if applicable;
- Products of combustion, including toxic air contaminants, from operation of construction equipment, drilling equipment, haul trucks (e.g., soil and excavated rock import/export), vendor vehicles (e.g., material delivery, concrete delivery, water truck trips), worker commute vehicles, and stationary sources (such as generators, if any); and
- Products of combustion, including toxic air contaminants, from mobile sources resulting from traffic during construction.

The operational emissions analysis must quantify emissions from Operation and Maintenance (O&M) activities including mobile sources and area sources. The Report must assess emissions from project components that may contribute to operational emissions.

Emissions of pollutants of concern from the proposed project may occur from project operation. In general, emissions from operational activities include:

- Products of combustion, including toxic air contaminants, from stationary sources (such as generators, if any), and traffic throughout the project site and beyond;
- Area sources such as landscaping equipment, consumer products, and architectural coatings; and
- Queuing of vehicles at traffic lights can result in concentration of emissions, known as “hot spots”. Given the status of the San Diego Air Basin, principal emissions of concern are CO, VOC, and NO_x. In order to adequately assess emissions during build-out of the area, the analysis should assess level of service impacts along major roadways.

Emissions of pollutants of concern from the proposed project may occur from decommissioning activities. Decommissioning impacts from the wind turbines include fugitive dust and exhaust emissions, which would be anticipated to be similar to those generated by construction activities. Emissions from decommissioning activities include respirable particulate matter and combustion emissions from disassembly of the wind turbines, removal or perimeter fencing, and restoration of the site. Respirable particulate matter from construction equipment, haul truck, and worker commute vehicles; products of combustion, including hazardous air pollutants, from construction equipment, haul trucks, worker commute vehicles, and stationary equipment (such as generators, if any).

Additionally, the following issues should be addressed as a part of the air quality analysis:

1. Would the proposed project conflict or obstruct the implementation of the San Diego Regional Air Quality Strategy (RAQs) or applicable portions of the State Implementation Plan (SIP)?
2. Would the proposed project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

3. Since San Diego County is presently in non-attainment for the federal and/or State ambient air quality standards for ozone (O₃), PM₁₀, and PM_{2.5}, would the proposed project result in a cumulatively considerable net increase of PM₁₀, PM_{2.5}, or exceed quantitative thresholds for O₃ precursors, NO_x, and VOCs? The analysis should also provide a detailed discussion on cumulative impacts, framed in light of past, present, and reasonable anticipated future projects in the project area. This should include a discussion on other projects contribution of PM₁₀, PM_{2.5}, and O₃ precursors.
4. Would the proposed project operational and construction activities expose sensitive receptors (residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations? This analysis should discuss the proximity of any surrounding or proposed sensitive receptors to any known point source pollutant emissions and if applicable, a screening-level health risk assessment for diesel-fired PM₁₀.
5. Would the proposed project have the potential to generate offensive odors? The analysis should discuss the potential sources of odorous emissions from the proposed project and if the project operations will cause an odor nuisance to the nearby public.

Any proposed dust control measures or project design features that may be incorporated to minimize criteria pollutant emissions should be described in the project description.

The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT F
SCOPE FOR BIOLOGICAL RESOURCES REPORT

Project Specific Information: The project proposes to construct and operate a wind energy-generating facility, including 30 new wind turbines, electrical collections systems, substation, overhead transmission lines, operations and maintenance buildings and associated access roads and parking facilities. The project has been reduced from 18 parcels to 13 parcels since the initial Major Pre-Application submitted in fall 2017. The current proposed project would occur on approximately 1,664 acres of predominantly undeveloped land located near Interstate-8 and north of the community of Boulevard. The project site is located in the draft East County Multiple Species Conservation Program (MSCP) Plan Area. Significant portions of the project site are located within the draft Focused Conservation Area (FCA).

The project site reportedly contains sensitive vegetation communities, such as chaparral, grasslands, oak woodlands, and marshes. Additionally GIS data indicates that several sensitive species have historically been detected on site, including Bell's sage sparrow, southern grasshopper mouse, and Dulzura pocket mouse. The project site may also contain threatened and/or endangered plant and wildlife species that are protected by the U.S. Endangered Species Act, including but not limited to, Quino checkerspot butterfly, southwestern willow flycatcher, and Stephen's kangaroo rat. Impacts to such species would require a Section 7 consultation or Section 10 permit from the U.S. Fish and Wildlife Service. On-site and/or off-site habitat preservation would be required to mitigate for impacts to sensitive biological resources in accordance with federal, state, and regional regulations, including the Resource Protection Ordinance (RPO) and California Environmental Quality Act (CEQA), and federal and State Endangered Species Acts.

The site contains drainages that likely support jurisdictional waters of the U.S./State. Impacts to jurisdictional waters of the U.S./State would likely require permits from federal and state water resource agencies, including U.S. Army Corps of Engineers 404 Permit (USACE), Regional Water Quality Control Board (RWQCB) 401 Water Quality Certification, and California Department of Fish and Wildlife (CDFW) Fish and Game Code 1602 Streambed Alteration Agreement. These drainages that may qualify as Resource Protection Ordinance (RPO) wetlands. RPO wetlands are a significant constraint for land uses on the project site and may affect project design. RPO wetlands must be protected, with a 50-200 foot buffer. The required width depends on the sensitivity of the resource and the existing site conditions. The project site may support groundwater-dependent vegetation. If impacts are proposed to groundwater resources, analysis of potential impacts to groundwater-dependent vegetation would be required.

A full Biological Resources Report in accordance with County guidelines is required. Please provide evidence of permits or other documentation demonstrating legal clearing of lands for existing disturbance on the project site.

General Information: A Full Biological Resource Report must be prepared in accordance with the County's Report Format and Content Requirements Biological Resources, which can be found at http://www.sdcounty.ca.gov/PDS/docs/Biological_Report_Format.pdf. The report will provide a qualitative and quantitative analysis of all on and off-site biological impacts (both direct and indirect) related to all phases of the project and include resource mapping with the most current project plan and any proposed open space and limited building zone easements. The County staff biologist reviewing the Biological Resource Report will hold an onsite meeting with the biology consultant for field verification after the first iteration report is submitted. At the discretion of the County staff biologist, the field meeting may be waived with a written explanation.

Staff has prepared and attached a comprehensive list of sensitive species that may exist on the project site. Directed and/or protocol surveys are required for species shown in **boldface** type in the list. The biology report shall address the potential for each sensitive species to occur on the project site (table format). For further guidance please see the Report Format and Content Guidelines.

PDS has also determined that the report shall include **focused surveys** and/or **site assessment** (if appropriate) for the following rare and endangered species: *rare plants*, *herpetological surveys (e.g., arroyo toad)* *butterfly surveys (e.g., Quino checkerspot butterfly and Laguna mountain skipper)*, *Stephen's kangaroo rat*, *southern willow flycatcher*, and *Peninsular bighorn sheep*. The focused surveys must be done by biologists with demonstrable knowledge in field detection of the subject species (focused surveys for Federally listed species shall be in compliance with USFWS protocol, when such protocol exists, and must be done by a USFWS permitted biologist -- contact the USFWS at (760) 431-9440). If no protocol has been established, the methods of the directed search shall be described in the report. At a minimum, focused surveys must consist of walking transects across all areas with potential habitat for the species. The point locations and inferred territories of these species shall be included on the biological resources map. Focused surveys reports may be attached to the biological survey report in appendix form, but survey results must be evaluated in the biological survey report.

The report must also propose applicable and feasible mitigation measures. Examples are listed in Appendix A of the Report Format and Content Guidelines.

Open Space Easements – If biological open space is proposed, please submit a project-scale Open Space Map. The Open Space Map must show what biological resources are being protected and include a table showing the area (in acres) of land preserved according to vegetation type. All Biological Open Space Easements shall be protected from future fire-clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement prohibits the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space.

All existing and proposed open space easements (biological resource & limited building zones) must be clearly shown on the plans/map and on the preliminary grading plan.

In association with any proposed open space easements, temporary and/or permanent fencing and permanent signs may be required to protect the easements. These conditions are meant to protect from inadvertent disturbance of all open space easement(s) that do not allow grading, brushing or clearing. The open space fencing/signage plan for the proposed biological open space easement must be clearly shown on the preliminary grading plan and on the Open Space Map.

Proposed Off-site Mitigation If off-site mitigation is proposed to mitigate for significant biological impacts, please provide a statement indicating where the off-site mitigation will be located. If the off-site mitigation will be obtained in a mitigation bank, please provide the name of the bank along with evidence that such credits can be allocated for this project. If the off-site mitigation will be through the purchase and preservation of other off-site land, please provide sufficient information for staff to evaluate the off-site resources and the means to preserve the resources in perpetuity.

Draft East County MSCP – The site is located in the draft East County Multiple Species Conservation Program (MSCP) Plan Area. The project may adversely impact sensitive natural communities and/or proposed covered species identified within this draft plan. Unless it is determined that the project is exempt from California Environmental Quality Act (CEQA), the project may be subject to the Interim Review Process in order to ensure that the project would not compromise the successful implementation of the MSCP. As the project progresses, County staff will determine whether review by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (the “Wildlife Agencies”) is required.

RPO – The project site contains a natural drainage that may qualify as a wetland under the San Diego County Resource Protection Ordinance (RPO). The Resource Protection Ordinance prohibits impacts to wetlands and wetland buffers. The project site may also contain RPO Sensitive Habitat Lands that contain unique biological resources. The RPO requires avoidance of these resources. These natural features are a significant constraint for land uses on the project site and may affect project design. The biological information requested below is required for staff to determine project compliance with the RPO.

Wetlands Survey. A wetlands survey must be completed using the wetlands definition in the County’s Resource Protection Ordinance (RPO). The County’s definition of wetlands varies from the federal U.S. Army Corps of Engineers’ definition. All RPO wetlands shall be mapped on the Biological Resources Map using aerial photographs and a field site visit. Should there be a disagreement over the extent of wetlands, staff may require further surveys using the U.S. Army Corps of Engineers standards and guidance for conducting wetland delineations.

The RPO requires buffers on all RPO wetlands. The biological resources map shall designate an appropriate wetland buffer width of 50-200 feet, depending on the biological

resources present. The RPO prohibits impacts to wetlands and wetland buffers. Any part of the site that is a wetland and/or a wetland buffer must be placed into a dedicated Biological Open Space Easement. All Biological Open Space Easements shall be protected from future fire-clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement prohibits the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space. Once the wetland(s), wetland buffer(s) and limited building zone easement(s) are mapped, redesign of the proposed project may be required.

Jurisdictional Resources – PDS staff has determined that the project may disturb wetlands, lakes, streams, and/or waters of the U.S./State. Such disturbance may require notification to the Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and/or the Army Corps of Engineers (ACOE). PDS recommends that you contact the above agencies about the permitting requirements for potential disturbances to wetlands, lakes, streams, and/or waters of the U.S./State. If such permitting requirements are incorporated into the project at this time, it may prevent future delays or changes in the project design. RWQCB general information and submittal information can be obtained through the RWQCB website https://www.waterboards.ca.gov/rwqcb9/water_issues/programs/401_certification/index.html or by contacting the general information number @ (619) 521-1990. CDFW general information and submittal information can be obtained through the CDFW website <https://www.wildlife.ca.gov/Conservation/LSA> or by contacting the CDFW South Coast Regional Office at (858) 636-3160. Information for consultation and formal submittal of the 404 Permit application required by the ACOE can be obtained through their website at: <http://www.spl.usace.army.mil/regulatory/> or through the general information number at (858) 674-5387. When a formal wetland delineation is requested, the ACOE 1987 Wetland Delineation Manual and “Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)” should be used (http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/reg_su_pp.aspx).

Please be aware that the County will not issue any permit authorizing land disturbance (e.g., grading permits) which may disturb wetlands, lakes, streams, and/or waters of the U.S. until all required permits/agreements from these agencies have been obtained or are determined to be not required.

Indirect Impacts: Indirect impacts may be the result of secondary effects from direct impacts or those impacts that over time cause the degradation of a resource by changing its function, health or quality. Unlike direct impacts that are typically one-time effects, indirect impacts often continue in the long term and may actually increase.

Indirect impacts commonly result from a project’s “edge effects.” Edge effects from development may extend several hundred feet into adjacent open space areas, causing significant changes in species composition, diversity and abundance in those nearby

lands. Projects can have a wide variety of indirect impacts depending on the nature of the project, the type of resources present, and the type and degree of edge effects. Certain restrictions may be required when the project proposes significant noise within close proximity to existing or proposed open space.

Migratory Bird Treaty Act – The site appears to have mature native and/or ornamental trees which may be used for nesting by migratory birds. Any grading, brushing or clearing conducted during the migratory bird breeding season, February 1 – August 31, has a potential to impact nesting or breeding birds protected by the Migratory Bird Treaty Act. The applicant may submit evidence that nesting or breeding migratory birds will not be affected by the grading, brushing or clearing to these agencies: California Department of Fish and Wildlife, 3883 Ruffin Rd., San Diego, CA 92123, (858) 467-4201, <http://www.dfg.ca.gov/>; and United States Fish and Wildlife Service, 6010 Hidden Valley Rd, Carlsbad, CA 92011-4219, (760) 431-9440, <http://www.fws.gov/>.

The **Memorandum of Understanding** must be executed by the applicant and consultant, and subsequently submitted with the first iteration review.

Comprehensive List of Sensitive Species

Plant	Animal	Latin Name	Common Name	Directed Survey Required
X		<i>Androsace elongata acuta</i>	California rosace	
X		<i>Arabis hirshbergiae</i>	Hirshberg's rockcress	X
X		<i>Arctostaphylos otayensis</i>	Otay Manzanita	X
X		<i>Astragalus douglasii perstrictus</i>	Jacumba Milkvetch	X
X		<i>Astragalus oocarpus</i>	San Diego Milkvetch	X
X		<i>Berberis fremontii</i>	Fremont barberry	
X		<i>Boykinia rotundifolia</i>	Round leaved boykinia	X
X		<i>Brodiaea orcuttii</i>	Orcutt's brodiaea	X
X		<i>Calochortus dunnii</i>	Dunn's mariposa lily	X
X		<i>Castilleja lasiorhynchus</i>	San Bernardino Mtns. owl's clover	X
X		<i>Caulanthus simulans</i>	Payson's jewelflower	
X		<i>Chaenactis parishii</i>	Parish's pincushion flower	X
X		<i>Chamaebatia australis</i>	Southern mountain misery	
X		<i>Chorizanthe leptotheca</i>	Peninsular spine flower	
X		<i>Chorizanthe polygonoides longispina</i>	Long spined-spine flower	X
X		<i>Clarkia delicata</i>	Campo clarkia	X
X		<i>Cupressus forbesii</i>	Tecate cypress	X
X		<i>Cynanchum utahense</i>	Utah vine milkweed	
X		<i>Delphinium hesperium cuyamaca</i>	Cuyamaca larkspur	X

X	<i>Delphinium parishii subglobosum</i>	Desert larkspur	
X	<i>Downingia concolor brevior</i>	Cuyamaca downingia	X
X	<i>Dudleya alainiae</i>	Reiser's dudleya	
X	<i>Ericameria cuneata macrocephala</i>	Laguna Mountain goldenbush	X
X	<i>Galium angustifolium jacinticum</i>	San Jacinto Mountains bedstraw	X
X	<i>Geraea viscida</i>	Sticky geraea	X
X	<i>Gilia caruifolia</i>	Caraway leaved gilia	
X	<i>Grindelia hirsutula hallii</i>	Hall's gumplant	X
X	<i>Harpagonella palmeri</i>	Palmer's grappling hook	
X	<i>Hemizonia floribunda</i>	Tecate tarplant	X
X	<i>Herissantia crispa</i>	Curly herissantia	X
X	<i>Heuchera brevistaminea</i>	Mt. Laguna alumroot	X
X	<i>Horkelia truncata</i>	Ramona horkelia	X
X	<i>Hulsea mexicana</i>	Mexican hulsea	X
X	<i>Hulsea californica</i>	California hulsea	X
X	<i>Ipomopsis tenuifolia</i>	Slender leaved ipomopsis	X
X	<i>Lathyrus splendens</i>	Pride of California	
X	<i>Lepechinia ganderi</i>	Gander's pitcher sage	X
X	<i>Lewisia brachycalyx</i>	Southwestern bitterroot	X
X	<i>Lilium humboldtii ocellatum</i>	Ocellated Humboldt lily	
X	<i>Limnanthes gracilis parishii</i>	Cuyamaca meadowfoam	X
X	<i>Linanthus bellus</i>	Desert beauty	X
X	<i>Lotus crassifolius otayensis</i>	Otay mountain lotus	X
X	<i>Lotus haydonii</i>	Pygmy lotus	X
X	<i>Lupinus excubitus medius</i>	Mtn. Springs bush lupine	X
X	<i>Machaeranthera asteroides lagunensis</i>	Laguna Mountain aster	X
X	<i>Malacothamnus aboriginum</i>	Indian valley bush mallow	X
X	<i>Mimulus aridus</i>	Desert monkey flower	
X	<i>Mimulus clevelandii</i>	Cleveland's monkey flower	
X	<i>Mimulus diffusus</i>	Palomar monkey flower	
X	<i>Monardella hypoleuca lanata</i>	Felt leaved rock mint	X
X	<i>Monardella nana leptosiphon</i>	San Felipe monardella	X
X	<i>Penstemon clevelandii connatus</i>	San Jacinto beard tongue	
X	<i>Penstemon thurberi</i>	Thurber's beardtongue	
X	<i>Pentachaeta aurea</i>	Golden-rayed pentachaeta	
X	<i>Poa atropurpurea</i>	San Bernardino Bluegrass	X
X	<i>Quercus engelmannii</i>	Engelmann oak	
X	<i>Ribes canthariforme</i>	Morena currant	X
X	<i>Rorippa gambellii</i>	Gambel's watercress	X
X	<i>Rupertia rigida</i>	Parish psoralea	
X	<i>Scutellaria bolanderi austromontana</i>	Southern skullcap	X
X	<i>Selaginella asprella</i>	Bluish spike moss	
X	<i>Senecio ganderi</i>	Gander's butterweed	X
X	<i>Senna covesii</i>	Cove's cassia	X

X		<i>Streptanthus bernardinus</i>	Laguna Mtns. Jewelflower	
X		<i>Streptanthus campestris</i>	Southern jewelflower	X
X		<i>Thermopsis californica semota</i>	Velvety false lupine	X
	X	<i>Accipiter cooperi</i>	Cooper's hawk	X
	X	<i>Accipiter striatus</i>	Sharp-shinned hawk	X
	X	<i>Agelaius tricolor</i>	Tricolored blackbird	X
	X	<i>Aimophila ruficeps canescens</i>	Rufous-crowned sparrow	X
	X	<i>Ammodramus savannarum</i>	Grasshopper sparrow	X
	X	<i>Amphispiza belli belli</i>	Bell's sage sparrow	X
	X	<i>Antrozous pallidus</i>	Pallid bat	
	X	<i>Apodemia mormo peninsularis</i>	Peninsular metalmark	X
	X	<i>Aquila chrysaetos</i>	Golden eagle	X
	X	<i>Bassariscus astutus</i>	Ringtail	
	X	<i>Bufo microscaphus californicus</i>	Arroyo toad	X
	X	<i>Buteo lineatus</i>	Red-shouldered hawk	X
	X	<i>Cathartes aura</i>	Turkey vulture	X
	X	<i>Chaetodipus californicus femoralis</i>	Dulzura California pocket mouse	
	X	<i>Chaetodipus fallax fallax</i>	Northwestern San Diego pocket mouse	
	X	<i>Chaetodipus fallax pallidus</i>	Pallid San Diego pocket mouse	
	X	<i>Charadrius montanus</i>	Mountain plover (Winter)	
	X	<i>Charina trivirgata roseofusca</i>	Coastal rosy boa	
	X	<i>Cnemidophorus tigris multiscutatus</i>	Coastal western whiptail	
	X	<i>Coleonyx switaki</i>	Barefoot gecko	
	X	<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	
	X	<i>Crotalus ruber ruber</i>	Northern red diamond rattlesnake	
	X	<i>Cypseloides niger</i>	Black swift (Non-breeder)	
	X	<i>Danaus plexippus</i>	Monarch butterfly	
	X	<i>Dendroica petechia brewsteri</i>	Yellow warbler	
	X	<i>Diadophis punctatus similis</i>	San Diego ringneck snake	
	X	<i>Dipodomys stephensi</i>	Stephen's kangaroo rat	X
	X	<i>Empidonax trailii extimus</i>	Southwestern willow flycatcher	X
	X	<i>Ensatina eschscholtzii klauberi</i>	Large-blotched salamander	X
	X	<i>Eremophila alpestris actis</i>	Horned lark	
	X	<i>Euderma maculatum</i>	Spotted bat	
	X	<i>Eumops perotis californicus</i>	Greater western mastiff bat	
	X	<i>Euphydryas editha quino</i>	Quino checkerspot butterfly	X
	X	<i>Felis concolor</i>	Mountain lion	
	X	<i>Grus canadensis</i>	Sandhill crane (Now very rare)	
	X	<i>Helminthoglypta traski coelata</i>	Peninsular Range shoulderband snail	
	X	<i>Larus californicus</i>	California gull (Non-breeding)	
	X	<i>Lasiurus blossevillii</i>	Western red bat	
	X	<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	
	X	<i>Melanerpes lewis</i>	Lewis' woodpecker (Winter)	X

X	<i>Myotis ciliolabrum</i>	Small-footed myotis	
X	<i>Myotis evotis</i>	Long eared myotis	
X	<i>Myotis thysanodes</i>	Fringed myotis	
X	<i>Myotis volans</i>	Long legged myotis	
X	<i>Myotis yumanensis</i>	Yuma myotis	
X	<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	
X	<i>Nyctinomops macrotis</i>	Big free-tailed bat	
X	<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	
X	<i>Odocoileus hemionus</i>	Southern mule deer	
X	<i>Onychomys torridus ramona</i>	Southern grasshopper mouse	
X	<i>Oreortyx pictus eremophila</i>	Mountain quail	
X	<i>Ovis canadensis nelsoni</i>	Peninsular bighorn sheep	X
X	<i>Perognathus longimembris internationalis</i>	Jacumba little pocket mouse	
X	<i>Phrynosoma coronatum blainvillei</i>	San Diego horned lizard	
X	<i>Piranga rubra</i>	Summer tanager	
X	<i>Progne subis</i>	Purple Martin	X
X	<i>Pseudocopaeodes eunus eunus</i>	Alkali skipper	X
X	<i>Pyrgus ruralis lagunae</i>	Laguna Mtn. Skipper	X
X	<i>Rana aurora draytoni</i>	California red -legged frog	X
X	<i>Salvadora hexalepis virgultea</i>	Coast patch-nosed snake	
X	<i>Sceloporus graciosus vandenburgianus</i>	Southern sagebrush lizard	
X	<i>Sialia mexicana</i>	Western bluebird	
X	<i>Spea (Scaphiopus) hammondii</i>	Western spadefoot toad	
X	<i>Taricha torosa torosa</i>	California newt	
X	<i>Taxidea taxus</i>	American badger	
X	<i>Toxostoma lecontei lecontei</i>	Leconte's thrasher	
X	<i>Vireo vicinior</i>	Gray vireo	X

ATTACHMENT G
SCOPE FOR CULTURAL RESOURCES

CULTURAL SURVEY

Project Specific Information: County records, as well as the database from the South Coastal Information Center has been reviewed and it has been determined that the cultural resources are present on site. As such, an updated cultural study will be required as outlined below.

General Information: A field survey for the presence of archaeological or tribal cultural resources and/or an evaluation of the project site as a historic resource must be conducted in accordance with the Resource Protection Ordinance (RPO), Section 21083.2 of the Public Resources Code (CEQA), and the San Diego County CEQA Guidelines. The survey must include additional areas of impact such as: temporary work areas, lay-down areas, maintenance areas, etc. Staff suggests incorporating a buffer of the project area for the survey to anticipate these estimated temporary work areas. This buffer distance and survey plan shall be approved by Planning & Development Services prior to commencing fieldwork.

The survey must provide evidence in the form of a letter from the South Coastal Information Center (SCIC) that an institutional record searches has been conducted. In addition, a field survey and/or evaluation by a County approved archaeologist must be conducted. The report must follow the required report format as outlined in the Report Format and Content Guidelines. Please complete all appropriate DPR Series 123 forms and submit them to the South Coastal Information Center and PDS. A Kumeyaay Native American monitor is required during the survey for archaeological resources. The study must include a discussion of the absence or presence of tribal cultural resources and must include a Sacred Lands check with the Native American Heritage Commission (NAHC). The study must provide the results of outreach with listed tribes provided by the NAHC.

Guidelines for Determining Significance and Report Format and Content Guidelines can be obtained from the County website at:

<http://www.sdcounty.ca.gov/dplu/Resource/3~procguid/3~procguid.html#arch>

If the survey is positive for resources, scientific evidence must be provided to substantiate (a) the resources' significance, and (b) the boundaries of the resource(s). If the resources extend off-site, these must be shown on the map and discussed. The report must address both CEQA and County RPO significance criteria for each resource as outlined in the Guidelines for Determining Significance. The report must address the direct construction impacts to resources (both on- and off-site, and temporary impacts) and make a determination as to impact severity. Any resource(s) that will be exposed to indirect impacts from the project should be addressed as well.

All project specific archaeological/cultural site location maps and figures must be submitted under a separate confidential appendix that clearly states that the contents are not for public review. Included in the project specific maps should be a copy of the project plans with an overlay of any identified cultural resources, also to be placed within the confidential appendix.

Native American Consultation: When the project is submitted, County staff will conduct outreach with the Native American communities for the purpose of Sacred Lands and/or AB-52 consultations. The intent of Native American consultation is to allow tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting, or mitigating impacts to Native American cultural resources. Your presence at consultation meetings with the tribes may be requested to address their issues and concerns.

I. ARCHAEOLOGICAL SIGNIFICANCE TESTING

Project Specific Information: Depending on the results of the archaeological survey, significance testing may be necessary. If resources are present, avoidance must be considered as the first option. If avoidance is not feasible, then significance testing must be conducted.

General Information: If the project design will impact cultural resources, a County approved archaeologist must conduct scientific testing to determine the significance, boundaries, and area (square meters/yards) of the resource(s). A Kumeyaay Native American monitor must be present during the significance testing phase. All testing must be screened through a 1/8 inch mesh or finer screen unless the use of larger mesh has been approved by Planning & Development Services. Any faunal that is identified must be evaluated by a faunal professional. Testing shall be approved by Planning & Development Services prior to commencing fieldwork.

The project is subject to the RPO. If the cultural resources do not meet the definition of a significant prehistoric and/or historic site as defined in the RPO but do meet CEQA significance criteria, mitigation in the form of avoidance (preservation) should be considered first. However if avoidance is infeasible, then data recovery should be considered as mitigation. If the cultural resources do meet the definition of a significant prehistoric and/or historic site as defined in the RPO, avoidance is required. Dedication of open space over the resource would be required. The open space easement should be identified as an "Environmentally Sensitive Area" (ESA) open space on the plans. Depending on project characteristics, a preservation plan may be required.

II. PRESERVATION PLAN

Archaeological Resources

If significance testing produces evidence that indicates resources are to be protected pursuant to the RPO, or if preservation is the form of mitigation selected for CEQA significant sites, the project should be redesigned, if necessary, to avoid impacts and

preserve the resource(s). The report should address the need to cap the resource(s) with soil, gravel, jute landscape matting, and/or leaf compost to protect the site from indirect impacts. Open space easements or other measures should also be considered to prevent future impacts to resources.

III. HISTORIC RESOURCES

If the historic resource evaluation determines that a site is significant pursuant to CEQA, RPO, or the County's Guidelines for Determining Significance, the report must include a preservation plan. Adaptive reuse, open space easements, facade easements, and other conservation easements should be considered as mitigation. Specific performance criteria and/or easements should be proposed to guide future landowners.

Disposition of Cultural Materials

The report shall include both the curation and repatriation of artifacts as options. Any human remains identified is subject to Public Resources Code §5097.98, CEQA §15064.5, Health & Safety Code §7050.5, and the County's RPO. Disposition of human remains and associated grave goods will be determined during consultation with the Most Likely Descendant.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT H

SCOPE FOR GEOLOGIC INVESTIGATION REPORT

A Geologic Investigation Report shall be prepared to evaluate any potential to expose people or structures to potential geologic hazards concerning risks of fault rupture. The report shall conform to the California Geologic Survey's *Guidelines for Evaluating the Hazard of Surface Fault Rupture* and the California Board of Geologists and Geophysicists *Geologic Guidelines for Earthquake and/or Fault Hazard Reports* shall be prepared. The guidelines can be downloaded at the following web addresses:

http://www.consrv.ca.gov/cgs/information/publications/cgs_notes/note_49/note_49.pdf
or <http://www.geology.ca.gov/forms-pubs/earthquake.pdf>. **The report shall be prepared**

by a California Certified Engineering Geologist.

The specific requirements to be included in the Geologic Investigation are:

Liquefaction

The project site is located within a "Potential Liquefaction Area." As a first screening, the depth to groundwater should be determined for the project site. If the highest historical groundwater level for the project site is determined to be deeper than 50 feet below the existing ground surface or proposed finished grade (whichever is deeper), no further assessment of potential liquefaction is required.

For projects where the highest groundwater level for the project site is determined to be less than 50 feet, further screening of potential liquefaction is required and a Geologic Reconnaissance Report shall be prepared using the County's approved Guidelines for Determining Significance for Geologic Hazards and follow guidelines in the California Geologic Survey's *Guidelines for Evaluation and Mitigating Seismic Hazards in California, Special Publication 117, Chapter 6 – Analysis and Mitigation of Liquefaction Hazards*. These guidelines can be downloaded from the California Department of Conservation's Geologic Survey website: <http://gmw.consrv.ca.gov/shmp/webdocs/sp117.pdf>. **The report shall be prepared by a California Certified Engineering Geologist.**

Although engineering design recommendations are generally not a required component of a Geologic Reconnaissance Report, feasible measures to mitigate potential impacts from liquefaction to levels below significance and environmental design considerations (where appropriate), should be discussed. Suspected geologic problems that cannot be evaluated except through in-depth investigation should be clearly described in the report. If the Geologic Reconnaissance Report recommends further investigation, a Geologic Investigation must be prepared. The specific requirements to be included in a Geologic Investigation will be determined by the County on a project-by-project basis.

ATTACHMENT I SCOPE FOR HAZARDOUS MATERIALS USE/STORAGE ONSITE

Project Specific Information: The proposed project involves the construction, use, and maintenance of multiple wind turbines, a collector substation, operations and maintenance buildings, associated parking and roads, and other ancillary buildings. The project site is a vacant 2,041 acre property located within the unincorporated area of Boulevard, north of Interstate 8.

Project Scope for Hazardous Materials: Based on the information provided, it appears that the project would not require any additional Hazardous Materials review. However, this stage of the project is a Major Pre Application, and does not contain detailed information (e.g., location of the facilities, types of materials kept on-site, etc.). Therefore, the project will be reviewed again at the Scoping stage to ensure no major changes have been made.

In addition, staff requests the following questions answered regarding “Attachment B – Preliminary Project Description.”

1. Section 1.4 (Land Uses), page 2 – the sentence reads “The Site is primarily undeveloped.” What does this mean? Are there structures on site? Is the applicant referring to trails/roads within the project boundaries? Please explain.
2. Section 1.5 (Site Land Uses – Wind Energy Facilities), page 2 – this paragraph notes that the turbines would be a maximum of 500 feet. However, the height of the facility is referenced as greater than 500 feet in other submitted documents. Please note that while this would not necessarily affect the Hazardous Materials review, it is important to remain consistent throughout all documents.
3. Please specify what types of hazardous materials (if any) may be proposed to be kept on site. If a business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in quantities greater or equal to the following, a Hazardous Materials Business Plan (HMBP) shall be prepared:
 - a. 500 pounds of a solid substance
 - b. 55 gallons of a liquid
 - c. 200 cubic feet of a compressed gas
 - d. A hazardous compressed gas in any amount (highly toxic gases with a Threshold Limit Value of 10 parts per million or less)
 - e. Extremely hazardous substances in threshold panning quantities as defined in 40 CFR Part 355

For more information to determine what defines hazardous waste, see http://www.dtsc.ca.gov/HazardousWaste/upload/HWMP_DefiningHW111.pdf

For more information regarding HMBP, see the following links:

<http://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hmbp/hm-952-full-version.pdf>

<http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html>

Draft Conditions: If it is determined that the project would require an HMBP, the following condition would be added to the use permit:

OCCUPANCY: *(Prior to any occupancy or use of the premises in reliance of this permit).*

HAZ#X-HEALTH AND SAFETY PLAN

INTENT: In order to protect workers from hazardous chemicals and to notify the public of potential hazardous chemicals and substances and to comply with the [California Health and Safety Code, Chapter 6.95](#), a Health and Safety Plan and a Hazardous Materials Business Plan (HMBP) shall be prepared and implemented.

DESCRIPTION OF REQUIREMENT: A Health and Safety Plan and a HMBP that outlines worker safety and personal protection equipment appropriate for the chemicals of concern (i.e., TPH, VOCs, arsenic and lead) and the construction activities planned for the site regarding all on-site storage, handling, and disposal of potentially hazardous substances, such as ground fuel storage and contaminated soil storage. The plan shall be submitted on-line to the California Environmental Reporting System (CERS) reviewed and approved by [CALEPA]

<http://cers.calepa.ca.gov/>. **DOCUMENTATION**: The applicant shall acquire on-line forms

found

at

http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_forms.html, provide copies of the Health and Safety Plan into plan check at http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html for review and approval. Once plan check is complete, the forms will be submitted to CERS on-line at <http://cers.calepa.ca.gov/>. Evidence shall be in the form of a letter from CERS, stating that the appropriate State and/or Federal permits are being pursued or have been obtained or that no further permits are required.

TIMING: Prior to occupancy of the first structure built in association with this permit, the Health and Safety Plan, and HMBP shall be prepared, approved and implemented. **MONITORING**: [DEH, HMD] shall verify and approve the Health and Safety Plan, and HMBP for compliance with this condition.

If you have any questions regarding these comments, please contact Marisa Smith at (858) 694-2621.

ATTACHMENT J
SCOPE FOR FIRE PROTECTION PLAN

Planning & Development Services has completed review of the project design and has determined that the project may expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project is adjacent to and/or within wildlands that have the potential to support wildland fires. A Fire Protection Plan (FPP) shall therefore be prepared for the project. The Fire Protection Plan shall follow the Guidelines for Determining Significance for Wildland Fire and Fire Protection, available online at <http://www.sdcounty.ca.gov/PDS/docs/Fire-Guidelines.pdf>, and the County's Report Format and Content Requirements for Wildland Fire and Fire Protection, available online at: <http://www.sdcounty.ca.gov/PDS/docs/Fire-Report-Format.pdf>

The FPP shall be prepared by a wildland fire code expert included on the County's list of approved consultants. The plan will include mitigation measures consistent with the unique problems resulting from the location, topography, geology, flammable vegetation and climate of the proposed site. The FPP shall also address in terms of fire code requirements: water supply, access (including secondary access where required by code), building ignition and fire resistance, fire protection systems and equipment, defensible space and vegetation management (based on site fire behavior modeling). It is recommended that you contact the **Rural Fire District/SD County Fire Authority** for specific requirements, codes, and regulations to be incorporated into the Fire Protection Plan prior to initiation of the Fire Protection Plan.

The Fire Protection Plan shall meet all requirements of Section 4703 of the County Fire Code. The Plan shall also identify where any increases or decreases to the standard 100-foot fire-clearing zone are warranted. The Plan shall identify any special design elements or requirements associated with any increases in the fire-clearing zone. In addition, the Plan shall propose a mechanism whereby the **Rural Fire District/SD County Fire Authority** can track those lots where increases or decreases from the standard fire clearing distance of 100 feet has been approved, so that future fire clearing requirements will be consistent with approved fire clearing increases.

You may contact County Fire Marshal James Pine at (858) 495.5434 to discuss the Fire Protection Plan requirements.

An evaluation of the completed Fire Protection Plan by the local fire protection district must be obtained prior to submittal of the Fire Protection Plan. **The local fire protection district evaluation must be submitted to Planning & Development Services along with the Fire Protection Plan.** Failure to obtain this evaluation may cause delay in the review of the FPP.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT K SCOPE FOR GROUNDWATER RESOURCES

Project Specific Information: The proposed project is located east of the San Diego County Water Authority (CWA) in an area entirely dependent on groundwater resources. A more detailed project description will be required before the groundwater resource investigation requirements for this project can be fully scoped.

Additional Information Requested: In order to fully scope the groundwater investigation requirements for this project, the following information is required:

1. Detailed Water Demand: Provide a detailed description of the water demand (both construction demand and ongoing demand) for the project. All categories of water use must be identified along with backup assumptions and justification of amounts estimated. For reference, please refer to the final project description and groundwater investigation documentation for the Soitec Rugged (P12-007) and Soitec Tierra Del Sol (P12-010) projects for the level of detail necessary for water demand estimates (<http://www.sandiegocounty.gov/pds/ceqa/Soitec-Solar-EIR.html>)
2. On-Site Groundwater Wells: Any groundwater from onsite wells that is proposed, please provide well logs or any other information regarding the existing well(s) on-site. Also, please indicate whether any wells are proposed to be drilled and potential locations for new wells. Include the amount of groundwater proposed from each well and what types of use it is proposed to serve (construction demand vs. ongoing demand).
3. Proposed Water Supply Portfolio: Describe all potential sources for water supply for this project. This could include on-site groundwater wells, off-site groundwater from public or private wells, and/or imported water from CWA member water agency(ies). For offsite water source(s), provide well locations and water service availability form(s) (if applicable). A groundwater investigation will likely be required for offsite water sources that obtain water supply from groundwater well(s).
4. Groundwater Dependent Habitat and Offsite Wells Map: A map is required showing all groundwater dependent habitat and offsite production wells. The on-site production wells shall be included on the map as well. This map will be the basis for evaluating potential well interference to offsite well users and groundwater dependent habitat.

Water Supply Options: Below are options the project could consider to obtain its water supply:

On-Site Groundwater

If on-site groundwater is proposed, a groundwater investigation will be required to evaluate the significance of potential impacts. The County Groundwater Geologist would issue a detailed “scoping letter” upon receiving adequate information as requested above.

The groundwater investigation report must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at <http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Guidelines.pdf> (Guidelines) <http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Report-Format.pdf> (Report Formats).

The project is also subject to the Groundwater Ordinance. The project must meet the requirements of the SAN DIEGO COUNTY GROUNDWATER ORDINANCE NO. 10249 (NEW SERIES). This document is available at <http://www.sandiegocounty.gov/dplu/docs/GROUNDWATER-ORD.pdf>

Importation of Water from Offsite Source(s)

If water will be trucked in from off-site sources, please identify the location(s) of off-site sources of water. A groundwater investigation would likely be required for each offsite groundwater source to evaluate potential impacts to groundwater resources pursuant to CEQA. An evaluation under CEQA for truck trips, air quality, greenhouse gas emissions, and other potential impacts would also be required to be evaluated for trucked water.

1. Groundwater from Private Well Owners: Purchasing water from private well owners outside of the CWA would be considered a "groundwater extractive operation" as defined within the County Zoning Ordinance (Section 1810, 6552, and 6654). This would require obtaining a separate Major Use Permit (MUP) from the County.
2. Groundwater from Public Water Supply Systems: Purchasing water from wells serving public water supply systems, as permitted by the County of Environmental Health or the State Department of Public Health, which distribute water through pipelines for domestic purposes would not be considered a "groundwater extraction operation" as defined within the County Zoning Ordinance. Therefore, a separate MUP would not be required. However, CEQA evaluation of potential impacts to groundwater resources would likely be required.
3. Importation of Off-Site Water from CWA: If water will be trucked in from member water agency(ies) within the CWA, there are a number of water service agencies that could be considered. Potential environmental impacts from obtaining water from CWA member agencies may not include a groundwater investigation, but truck trips would need to be quantified. Once truck trips are quantified, the project would be required to evaluate potential GHG, air quality, and traffic impacts from the truck trips.

For any questions regarding these comments, please contact Jim Bennett, County Groundwater Geologist at 858-694-3820.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT L SCOPE FOR NOISE ANALYSIS

Project Specific Information:

The energy facilities being proposed will consist of wind turbines, underground and overhead electrical collection systems and overhead transmission lines, a project collector substation, operations and maintenance buildings and associated parking areas, laydown areas, meteorological towers and various access roads. The location of the on-site facilities has not been determined at this time as the developer is still evaluating potential configurations of the various facilities associated with the project. All areas located within the Site boundaries have been identified as being potentially suitable for renewable energy development at this time. The wind turbines will be most likely constructed along ridgelines in order to maximize turbine efficiency.

Preliminary noise prediction estimates indicate that without site-specific noise mitigation measures, “noise sensitive” uses off-site may be impacted by on-site operations and activities associated with wind turbines, collector substation, O&M buildings, and met tower noise levels. Project related noise source would potentially exceed the applicable sound limits of the Noise Element of the General Plan Table N1 and N2 as it relates to off-site existing residences and noise sensitive area in proximity to the project site. A noise report will be required to ensure the project demonstrates Noise Element conformance related to nearby existing noise sensitive areas and existing residences.

These same on-site exterior noise generators must also demonstrate they comply with the on-going operational sound level limits of the County Noise Ordinance Section 36.404. Operational activities from project including (but not limited to) wind turbines, O&M building, meteorological towers, and collector substation operations are subject to the one-hour average sound level limits at the project property lines. Temporary construction equipment operations are allowed during the daytime hours from Monday through Saturday pursuant to Section 36.408. Note that the current project description is requesting for extended construction equipment operational hours which staff is unable to support. **The project must clearly demonstrate how the project will comply with the temporary construction equipment hours of operations. Additional noise assessment and review is required if extended hours are required outside of the County jurisdictional process. Note that this may require an EIR and may result in noise impacts that would be significant and unmitigable.**

The project shall comply with the construction equipment hours as specified within Section 408. Temporary construction noise levels are regulated pursuant to Sections 36.409, and 410. The 75-dBA eight hour average sound level limit and impulsive noise requirements apply to the boundary lines of neighboring occupied noise sensitive land uses such as existing residences. All temporary construction related operations compromised of (but not limited to) installation of civil improvements, site laydown areas, staging areas, construction of access and maintenance roads, installation of underground

runs for cabling, construction of foundations and the preparation of crane pads for turbine installation.

The noise generated from the wind turbines must comply with The Zoning Ordinance Section 6952.f related to C-weighted low frequency requirements also known as the Spectra Imbalance (which often leads to rumbling and other low frequency concerns). This requires the project C-weighted levels not to exceed the pre-existing Residual Background Sound Criterion by more than 20 decibels. Further within this section, Pure Tone requirements must also be discussed within the report.

Based on the above information, an acoustical (noise) study for this project is required. The analysis shall follow the County's Guidelines for Determining Significance for Noise available online at <http://www.sdcounty.ca.gov/PDS/docs/Noise-Guidelines.pdf> and the Report Format and Content Requirements for noise available online at <http://www.sdcounty.ca.gov/PDS/docs/Noise-Report-Format.pdf>.




Noise Element:

Noise exposure criteria are incorporated into land use planning to reduce future conflicts between noise and land use. This is achieved by specifying acceptable noise exposure ranges for various land uses throughout the County. The County uses the Noise Compatibility Guidelines listed in Table N-1 (Noise Compatibility Guidelines) to determine the compatibility of land use when evaluating proposed development projects.

The Noise Compatibility Guidelines indicate ranges of compatibility and are intended to be flexible enough to apply to a range of projects and environments. For example, a commercial project would be evaluated differently than a residential project in a rural area or a mixed-use project in a more densely developed area of the County.

A land use located in an area identified as "acceptable" indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can carry out outdoor activities with minimal noise interference. Land uses that fall into the "conditionally acceptable" noise environment should have an acoustical study that considers the type of noise source, the sensitivity of the noise receptor, and the degree to which the noise source may interfere with sleep, speech, or other activities characteristic of the land use. For land uses indicated as "conditionally acceptable," structures must be able to attenuate the exterior noise to the indoor noise level as indicated in the Noise Standards listed in Table N-2 (Noise Standards). For land uses where the exterior noise levels fall within the "unacceptable" range, new construction generally should not be undertaken. Please see the following tables below.

Table N-1 within the County Noise Element:

Table N-1 Noise Compatibility Guidelines		Exterior Noise Level (CNEL)						
Land Use Category			55	60	65	70	75	80
A	Residential—single family residences, mobile homes, senior housing, convalescent homes							
B	Residential—multi-family residences, mixed-use (commercial/residential)							
C	Transient lodging—motels, hotels, resorts							
D*	Schools, churches, hospitals, nursing homes, child care facilities							
E*	Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F*	Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G*	Office/professional, government, medical/dental, commercial, retail, laboratories							
H*	Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							
	ACCEPTABLE—Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.							
	CONDITIONALLY ACCEPTABLE—New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table N-2, Noise Standards. If a project cannot mitigate noise to a level deemed Acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.							
	UNACCEPTABLE—New construction or development shall not be undertaken.							

* Denotes facilities used for part of the day; therefore, an hourly standard would be used rather than CNEL (refer to Table N-2).

Note: For projects located within an Airport Influence Area of an adopted Airport Land Use Compatibility Plan (ALUCP), additional Noise Compatibility Criteria restrictions may apply as specified in the ALUCP.

Excerpts from Table N-2 within the County Noise Element

1. The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
2. The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
3. The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA Leq (one hour average).

4. For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area:
 - (i) For lots less than 4,000 square feet in area, the exterior area shall include 400 square feet,
 - (ii) For lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area;
 - (iii) For lots over 10 acres in area, the exterior area shall include 1 acre.
5. For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
6. For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
7. For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
8. The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
9. For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" in Table N-1 or an equivalent one-hour noise standard.

Note: Exterior Noise Level compatibility guidelines for Land Use Categories A-H are identified in Table N-1, Noise Compatibility Guidelines.

In addition, the County has adopted community noise control standards as part of the County's Noise Abatement and Control Ordinance (County Code of Regulatory

Ordinances, Title 3, Division 6, Chapter 4) and provides guidance for implementation of the County's noise policies and ordinance in the County's *California Environmental Quality Act (CEQA) Guidelines for Determining Significance for Noise*. The Noise Ordinance defines limits for activities that generate excessive noise and sets noise level limits for land uses. The County's CEQA significance guidelines provide guidance on the use of the General Plan Noise Element and the County Noise Abatement and Control Ordinance when considering the environmental impact of noise exposure to high or excessive noise levels.

Noise Ordinances:

A preliminary review of the project information provided indicates that there is insufficient information to determine whether permanent equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Section 36.404). The County Noise Ordinance does not permit noise levels that impact adjoining properties or exceed County Noise Standards. The project site as well as adjacent land uses are subject to the most restrictive a one-hour average sound level of 45 decibels (dBA) from 7 a.m. to 10 p.m. and 50 decibels (dBA) from 10 p.m. to 7 a.m. In order for the Department to make a determination on the project's conformance with County noise standards, the applicant must demonstrate that the hourly average sound levels do not exceed either threshold at the property line, as the most stringent Ordinance condition for the project.

The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two zones.

A preliminary review of the project information provided indicates that there is insufficient information to determine whether temporary construction equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Sections 36.408 and 36.409):

Section 36.408

Except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

- (a) Between 7 p.m. and 7 a.m.
- (b) On a Sunday or a holiday. For purposes of this section, a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th and any day appointed by the President as a special national holiday or the Governor of the State as a special State holiday. A person may, however, operate construction equipment on a Sunday or holiday between the hours of 10 a.m. and 5 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in sections 36.409 and 36.410.

Section 36.409

- Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. Amended by Ord. No. 9962 (N.S.), effective 1-9-09.

Section 36.410

A preliminary review of the project information provided indicates that there is insufficient information to determine whether impulsive construction equipment operations on-site will exceed sound level limits of the San Diego County Noise Ordinance):

- (a) 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 shown in [Table 36.410A](#), 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 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410A](#) are as described in the County Zoning Ordinance.

**TABLE 36.410A.
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN
DECIBELS (dBA)**

OCCUPIED PROPERTY USE	DECIBELS (dBA)
Residential, village zoning or civic use	82
Agricultural, commercial or industrial use	85

- (b) Except for emergency work, no person working on a public road project shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in [Table 36.410B](#), 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 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410B](#) are as described in the County Zoning Ordinance.

**TABLE 36.410B
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN
DECIBELS (dBA) FOR PUBLIC ROAD PROJECTS**

OCCUPIED PROPERTY USE	dB(A)
Residential, village zoning or civic use	85
Agricultural, commercial or industrial use	90

- (c) The minimum measurement period for any measurements conducted under this section shall be one hour. During the measurement period a measurement shall be conducted every minute from a fixed location on an occupied property. The measurements shall measure the maximum sound level during each minute of the measurement period. If the sound level caused by construction equipment or the producer of the impulsive noise exceeds the maximum sound level for any portion of any minute, it will be deemed that the maximum sound level was exceeded during that minute.

(Added by Ord. No. 9962 (N.S.), effective 1-9-09)

To determine conformance to the County Noise Ordinance, a noise study is required and it is essential that this component of this analysis include the following information:

Permanent Noise Sources:

- (1). Manufacturers Spec Sheet and/or field measurements for all noise producing equipment on-site that identifies the ARI standard and/or decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (2). Field measurements and/or noise source data for all noise producing operations and activities on-site that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (3). Additional plot plans that identifies the site location of all noise sources in relation to property lines. Discuss the worst-case noise source to property line distances (in feet). It is essential to address all potential noise sources on-site and to include a discussion related to openings within all surrounding walls or fences, such as driveways, fencing and gates.
- (4). Hours of operation and activity level at each hour.
- (5). Demonstrate that operational activities from the project including (but not limited to) wind turbines, O&M building, meteorological towers, and collector substation operations comply with the property line sound level limits per County noise standards.

- (6). Include any recommended design features and mitigation measures if required to demonstrate compliance with the County Noise Ordinance, Section 36.404.

Temporary Construction Equipment Operations:

- (7). Manufacturers Spec Sheet and/or field measurements for all construction equipment that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (8). Additional plot plans that identifies the site location of all construction equipment noise sources in relation to property lines. It is essential to address all potential construction equipment noise sources on-site.
- (9). Identify all existing occupied property/structures adjacent to the boundary of the project site.
- (10). Include the schedule of the grading activities, phasing and preparation of the project site.
- (11). Address the associated cut and fill of materials, and specify whether the operations of general construction equipment and/or impulsive construction equipment are proposed. (e.g. drill rigs, rock crushers, hoe rams, etc.)
- (12.) All temporary construction related operations compromised of (but not limited to) installation of civil improvements, site laydown areas, staging areas, construction of access and maintenance roads, installation of underground runs for cabling, construction of foundations and the preparation of crane pads for turbine installation include design features and/or temporary construction mitigation measures (if required) to demonstrate compliance with County Noise Ordinance, Section 36.408, 36.409 & 36.410.

The Zoning Ordinance, Section 6952.f

A preliminary review of the project information provided indicates that there is insufficient information to determine if the project complies with the C-weight low frequency requirement pursuant to this section. The C-weighted sound level from each large wind turbine while operating must not exceed the Residual Background Sound Criterion for Wind Energy Facilities by more than 20 decibels as both sound levels are measured at each property line of the lot on which the large turbine is located. Below is a simplified table version:

Condition	C-weighted
Noise Emissions Above Pre-Existing Conditions	$L_{eq(C)} [Winter\ Turbine] \text{ minus } (L_{A90}[\text{background}] + 5dB) \leq 20$

Please note the following:

1. Test sites are to be located along the property line(s) of the receiving nonparticipating or off-site parcels unless evidence is provided and accepted for alternate locations by the County of San Diego staff prior to measurements.
2. The background sound levels shall be established with the $L_{90(A)}$ sound descriptor measured during a preconstruction noise study during the quietest time of night (between 10 p.m. and 4 a.m.). All data sampling shall be one or more contiguous ten (10) minute measurements. The $L_{90(A)}$ results are acceptable whenever both the $L_{10(A)}$ results are no more than 10 decibels (dBA) above the $L_{90(A)}$ and the difference of $L_{10(C)}$ minus $L_{90(C)}$ is no more than 15 decibels (dBC) for the same time period. Noise sensitive sites are to be selected based on the wind facilities' predicted worst-case sound emissions (in $L_{eq(A)}$ and $L_{eq(C)}$) which are provided by the applicant.
3. Instrumentation and background measurement procedures shall be consistent with ANSI S12.9 and the following Attachment ANSI S12.9 part 3, Selected Options and Requirement Amendments.
4. A 5 decibel penalty is applied for tones as defined in The Zoning Ordinance, Section 6952.f and IEC 61400-11.

General information: A noise analysis is needed to determine whether or not noise levels exceed San Diego County standards. Noise analysis shall occur when the project is adjacent to heavily traveled roads, railroad tracks, airports, or heavy industrial operations. Noise analysis may also be required for a project that generate high levels of noise either through activities directly associated with the proposal or major increases in traffic generated by the proposal (direct and cumulative impacts).

If the noise impacts are associated with traffic movements, airports, or other transportation activities, a noise analysis shall utilize field measurements and projected transportation noise levels to determine the potential for impacts to present and future residents of the project. The noise analysis must conform to the Noise Element of the San Diego County General Plan.

If the noise impacts are associated with activities on the site, such as rock crushing or some other proposed activity, the noise analysis shall include estimates of noise generation potential from the site utilizing measurements from similar activities that are already in existence. The noise analysis must conform to the San Diego County Noise Ordinance.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ANSI S12.9 part 3, Selected Options and Requirement Amendments
<http://www.windturbinesyndrome.com/wp-content/uploads/2008/11/kamperman-james-10-28-08.pdf>

4. ANSI S12.9 Part 3 Selected Options and Requirement Amendments

For measurements taken to assess the preceding criteria specific options provided for in ANSI S12.9-Part 3 (2008) shall be followed along with any additional requirements included below:

- 5.2 Background Sound: Use definition (1): 'long-term'
- 5.2 long-term background sound: The L_{90} excludes short term background sounds
- 5.3 basic measurement period: Ten (10) minutes $L_{90(10 \text{ min})}$
- 5.6 Sound Measuring Instrument: Type 1 Precision meeting ANSI S1.43 or IEC 61672-1. The sound level meter shall cover the frequency range from 6.3 Hz to 20k Hz and simultaneously measure dBA L_N and dBC L_N . The instrument must also be capable of accurately measuring low-level background sounds down to 20 dBA.
- 6.5 Windscreen: Required
- 6.6(a) An anemometer accurate to $\pm 10\%$ at 2m/s to full-scale accuracy. The anemometer shall be located 1.5 to 2 meters above the ground and orientated to record maximum wind velocity. The maximum wind velocity, wind direction, temperature and humidity shall be recorded for each ten (10) minute sound measurement period observed within 5 m. of the measuring microphone.
- 7.1 Long-term background sound
- 7.2 Data collection Methods: Second method with observed samples to avoid contamination by short term sounds (purpose: to avoid loss of statistical data)
- 8. Source(s) Data Collection: All requirements in ANSI S12.18 Method #2, Precision to the extent possible while still permitting testing of the conditions that lead to complaints. The meteorological requirements in ANSI S12.18 may not be applicable for some complaint tests. For sound measurements in response to a complaint, the compliance sound measurements should be made under conditions that replicate the conditions that caused the complaint without exceeding instrument and windscreen limits and tolerances.
- 8.1(b) Measuring microphone with windscreen shall be located 1.2m to 1.8m (1.5 preferred) above the ground and greater than 8 m. from large sound reflecting surface.
- 8.3(a) All meteorological observations required at both (not either) microphone and nearest 10 m. weather reporting station.
- 8.3(b) For a ten (10) minute background sound measurement to be valid the wind velocity shall be less than 2m/s (4.5 mph) measured less than 5 m. from the microphone. Compliance sound measurements shall be taken when winds are less than 4m/s at the microphone.
- 8.3(c) In addition to the required acoustic calibration checks, the sound measuring instrument internal noise floor, including microphone, must also be checked at the end of each series of ten minute measurements and no less frequently than once per day. Insert the microphone into the acoustic calibrator with the calibrator signal off. Record the observed dBA and dBC reading on the sound level meter to determine an approximation of the instrument self noise. Perform this test before leaving the background measurement location. The calibrator-covered microphone must demonstrate the results of this test are at least 5 dB below the immediately previous ten (10) minute acoustic test results, for the acoustic background data to be valid. This test is necessary to detect undesired increase in the microphone and sound level meter internal self-noise. As a precaution sound measuring instrumentation should be removed from any air conditioned space at least an hour before use. Nighttime measurements are often performed very near the meteorological dew point. Minor moisture condensation inside a microphone or sound level meter can increase the instrument self noise and void the measured background data.
- 8.4 The remaining sections, starting at 8.4 in ANSI S12.9 Part 3 Standard do not apply.

ATTACHMENT M
SCOPE FOR GREENHOUSE GAS ANALYSIS

Project Specific Information:

The proposed project has the potential to generate greenhouse gas (GHG) emissions, related to construction and operation of the proposed activities. Therefore, the project is required to discuss its potential impacts to GHG.

General Information:

Based on the potential impacts the project may have on global climate change, an analysis of GHG impacts is required.

The project is required to comply with the County *Guidelines for Determining Significance: Climate Change* dated January 2018 and the *Climate Action Plan Consistency Review Checklist* which can be found <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/PostBOSDocs/Guidelines%20for%20Determining%20Significance.pdf> and https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/PostBOSDocs/Final%20CAP%20Checklist_FormFillable.pdf. Projects consistent with the County's General Plan may use the Checklist to demonstrate consistency with the Climate Action Plan.

While a quantitative analysis is not required for General Plan-consistent projects, it may be useful to quantify project-generated GHG emissions and determine if the GHG emissions are below the annual 900 metric ton carbon dioxide equivalent (MT CO_{2e}) screening level as supplemental to the analysis. The screening level is referenced in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change white paper dated January 2008 which can be found at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>. According to the CAPCOA white paper, 900 metric tons of GHG emissions are generally produced by a 50-unit single family residential or 70-unit apartments/condominium. A review of the project indicates that the size-based screening criteria would not apply to the project and additional analysis would be necessary to determine if the project has the potential to exceed the screening criterion.

Emissions of pollutants of concern from the proposed project may occur from construction and operational activities. In general, GHG emissions from construction activities include the use of construction equipment, drilling equipment, trenching equipment, turbine and meteorological tower erection, foundation and building construction, landscaping, on-site batch plant operations, haul trucks (e.g., soil and rock import/export), vendor vehicles (e.g., building material delivery, water truck trips), worker commute vehicles, and stationary equipment (such as generators, if any). GHG emissions from Operation and Maintenance (O&M) activities include traffic throughout project site and beyond, other

mobile sources, area sources, energy use, water consumption, solid waste generation, and vegetation removal. The analysis must assess emissions from project components that may contribute to construction and operational emissions. GHG emissions from decommissioning activities are similar to those generated by construction activities, which include the use of construction equipment, haul truck, worker commute vehicles, and stationary equipment (such as generators, if any).

Additionally, the following issues should be addressed as part of the climate change analysis:

1. Would the proposed project generate GHG emissions that could contribute substantially to global climate change?
2. Would implementation of the proposed project interfere with the GHG reduction goals in California (e.g., Assembly Bill 32, Senate Bill 32)?

Any proposed project design elements that may be incorporated to minimize GHG emissions should be described in the project description.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT N
SCOPE FOR TRAFFIC IMPACT ANALYSIS

A Traffic Impact Analysis is required. This should form the basis of the traffic analysis following the County's Report Format and Content Requirements. The analysis will also form the foundation of the haul permits and any oversized load documentation. http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Traffic_Report_Format.pdf

- Table A-3 should also note that the County will also require an Oversized/Heavy Load Permit for any trips taken on County maintained roads.
- The traffic impact analysis should note that the projects cumulative impact and mitigation is based on the daily operations, which is described as 10-20 full time employees.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT O
TRAILS

General Information: On January 12, 2005, the San Diego County Board of Supervisors approved the adoption of the County Trails Program and the Community Trails Master Plan (CTMP). The County Trails Program will be used to develop a system of interconnected regional and community trails and pathways. These trails and pathways are intended to address an established public need for recreation and transportation, but will also provide health and quality of life benefits associated with hiking, mountain biking, and horseback riding throughout the County's biologically diverse environments. The County Trails Program involves both trail development and management on public, semi-public, and private lands. The Community Trails Master Plan is the implementing document for the trails program and contains adopted individual community trails and pathways plans.

**ATTACHMENT P
FEDERAL AVIATION ADMINISTRATION (FAA)
NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION**

The proposed project is located within the FAA Notification Surface due to the proposed height of the proposed wind turbines, which requires that notice be filed with the FAA. You are required to fill out and submit FAA Form 7460-1 Notice of Proposed Construction or Alteration to the FAA. Provide proof of completed Aeronautical Studies from the FAA for the parcels with Wind Turbines. FAA Notification Form - http://www.faa.gov/documentLibrary/media/Form/FAA_Form_7460-1_2017.pdf

The process is outlined here and be submitted electronically at:

<https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showWindTurbineFAQs>

When the FAA receives the Form, they will acknowledge receipt of the notice filed by the applicant. The FAA will then send the applicant the outcome of the initial screening either indicating that the proposed development project is not an obstruction and would not be a hazard to air navigation; or that the proposed development project is an obstruction unless reduced to a specified height.

General Information:

All applicants proposing any construction or alterations that may affect navigable airspace must file a Notice of Proposed Construction or Alteration (Form 7460-1) with the FAA. Part 77 requires that any applicant who intends to perform any of the following construction or alterations must notify the FAA:

1. Any construction or alteration exceeding 200 feet in height above ground level.
2. Any construction or alteration of structures, antennas, trees, mobile objects, and temporary objects such as construction cranes that:
 - A) Are within a horizontal distance of 20,000 feet from a public use or military airport and exceed a 100:1 surface from any point on the runway to each airport with at least one runway more than 3,200 feet.
 - B) Are within a horizontal distance of 10,000 feet from a public use or military airport and exceed a 50:1 surface from any point on the runway to each airport with at least one runway no more than 3,200 feet.
 - C) Are within a horizontal distance of 5,000 feet of a public use heliport and exceed a 25:1 surface.
3. Any highway, railroad or other traverse way where the prescribed adjusted height would exceed that above noted criteria.
4. When requested by the FAA.
5. Any construction or alteration located on a public use airport or heliport regardless of height or location.

The FAA uses the 100:1 notification surface to help identify projects that may interfere with airport operations. A project exceeding the 100:1 notification surface is not necessarily incompatible, but rather requires that the FAA be notified, so they can conduct

an aeronautical study. Based upon the information provided by the applicant to the FAA, the FAA will determine if the project would be an airspace obstruction or hazard.

ATTACHMENT Q
BOULEVARD COMMUNITY PLANNING GROUP COMMENT LETTER
& RECOMMENDATION FROM JULY 12, 2018 MEETING

BOULEVARD PLANNING GROUP

PO Box 1272, BOULEVARD, CA 91905

DATE: July 22-18

TO: Bronwyn Brown, PDS Project Manager via Bronwyn.Brown@sdcounty.ca.gov

FROM: Donna Tisdale, Chair; tisdale.donna@gmail.com; 619-766-4170

RE: PDS2018-MUP-18-014: INITIAL COMMENTS ON TORREY WIND

These initial comments are submitted on behalf of the Boulevard Planning Group. We also incorporate by reference our Climate Action Plan comments submitted on 1-16-18, 2-12-18, and our Wind Energy Ordinance comments and Resolution submitted / presented in 2012 and 2013.

At our regular meeting held on July, 12th, after public discussion and review of an opposition letter from adjacent property owners of 102 acres, Clifford and Conception Caldwell, the Boulevard Planning Group voted to deny the project and to authorize the Chair to submit comments. Both motions passed with 4 yes, -0- no, with 3 members absent. PDS Form -534 was submitted on July 13th.

When asked if anyone supported the project, no one raised their hand. When asked who opposed the project, all those present raised their hands with the exception of Jim Whalen of J. Whalen & Associates and one unidentified couple. The concerns expressed now are the same as those expressed in opposition to the Wind Energy Ordinance and previously proposed wind projects in our area: Jewel Valley Wind, Manzanita Wind, Tule Wind, Shu'luuk Wind, Energia Sierra Juarez Wind and their related infrastructure. The projects represent significant environmental impacts, cumulatively considerable impacts, and are not in harmony bulk or scale with existing uses on private lands, in addition to adversely impacting public health and safety, property values and overall quality of life.

A full EIR is required for Torrey Wind project impacts and cumulatively considerable impacts from numerous other projects:

- An EIR must be prepared for this project that represents individual and cumulatively considerable impacts when added to existing, approved, and proposed renewable energy and related infrastructure and impacts in the general area.
- Legal definition of cumulative impacts: "A cumulative impact is defined as: The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 CFR 1508.7) Northwest Env'tl. Def. Ctr. v. Nat'l Marine Fisheries Serv., 647 F. Supp. 2d 1221, 1244 (D. Or. 2009)¹

¹ <https://definitions.uslegal.com/c/cumulative-impact/>

Existing wind turbines generate adverse impacts:

- Kumeyaay Wind, Tule Wind, and Energia Sierra Juarez Wind are already in operation on federal and cross-border land as is Ocotillo Wind just down the hill in Imperial County. All have generated complaints of noise, vibrations, reduced wildlife, injured birds and bats, and adverse health impacts and all are visually intrusive day and night with churning blades and lighting. Individually and cumulatively these projects have reduced and fragmented existing and connected habitats cannot be replaced or exchanged.
- All these wind projects and related infrastructure have had adverse and cumulative impacts on local residents, visitors, and resources including but not limited to: visual/aesthetic, dark skies, groundwater, biological and cultural resources, they have increased allegedly /potentially harmful levels of noise and vibrations, degraded the overall quality of life and community character.
- In addition, Rugged Solar is in the permitting process on Rough Acres Ranch between Ribbonwood Road and McCain Valley Road.

Torrey Wind turbines are much larger than existing turbines which are on federal land and further from most impacted homes:

- The Torrey Wind project, proposed for the same north of I-8 site as Enel Green Power's terminated Jewel Valley Wind that proposed using 2MW turbines, will generate increased adverse impacts due to the proposed 30 much larger 4.2MW wind turbines up to 586 feet tall (hub height of 361feet and 450 rotor diameter- 225 ft blades).
- Tule Wind I uses 52 GE 2.5 MW wind turbines with towers 252 feet tall and rotor diameter of 351 feet².
- Kumeyaay Wind uses 25 Gamesa G87 2 MW wind turbine towers are 228 feet tall with rotor diameter of 285 feet.³ It has been in operation since late 2005. On December 7, 2009, Kumeyaay Wind suffered catastrophic failure that required replacement of most electrical components and all 75-turbine blades.⁴ In December 2013 one of its turbines caught fire and sparked a brush fire.
- Larger wind turbines generate increased levels of low-frequency noise, infrasound and vibrations and related adverse health impacts.
- Infrasound and low frequency noise and vibrations travel greater distances unimpeded than smaller wind turbines.

Terminated wind turbine projects:

- Enel Green Power terminated their Jewel Valley Wind project proposed both north and south of I-8 after inclusion of low-frequency noise restrictions in the County's Wind Energy Ordinance.

² <http://www.sandiegouniontribune.com/business/energy-green/sd-fi-tule-wind-20170308-story.html>

³ <https://www.edprnorthamerica.com/wp-content/uploads/2014/04/G87.pdf>

⁴ <https://aws-dewi.ul.com/about-us/case-study/kumeyaay-wind-project-extreme-wind-analysis-san-diego-california/>

- Invenergy’s Shu’luuk Wind was terminated by a vote of the Campo tribe over concerns of health effects and risk of fire after one of their Kumeyaay Wind turbines caught fire in December 2013 and sparked a vegetation fire. The Bureau of Indian Affairs cancelled the Environmental Impact Assessment.⁵



- Manzanita Wind: SDG&E submitted a completed interconnection request to the CAISO. By 2014 it was the subject of an auction by SDG&E⁶. There is no information available on whether or not the auction was successful.
- Iberdrola withdrew MET towers and plans for wind turbines in the Table Mountain area of Jacumba and BLM land at the Southwest corner of the Campo Indian Reservation near the US/Mexico border.

The project description is inadequate and inconsistent:

- The current conditions and production rate of the existing water wells is not provided, nor is the estimated amount of groundwater proposed to be mined from the on-site well(s) the Jacumba Community Services District, or any other potential local source.
- Are any new water wells proposed? Are the existing wells permitted with well logs?
- Adjacent project neighbors Clifford and Conception Caldwell have alleged that the Notice to Property Owners that they received did not include the project’s parcel numbers.
- The acreage of the proposed project is inconsistently listed as 720.6 acres & 6 lots (PDS-524); 2,041 acres (Notice to Property Owners); 13 parcels listed on Torrey Wind Parcel List; 18 parcels listed in description provided in PDS-367; and 2,246 acres listed in Project Description Form 346S by Dudek, dated June 2018.

⁵<https://www.windpowermonthly.com/article/1282289/native-americans-scrap-250mw-project>

⁶<https://www.sdge.com/sdge-auction-manzanita-wind-project>

Change in project name:

- We want to note that the Torrey Wind project was previously proposed by Terra Gen as the San Diego Wind project.
- All of our previous comments, actions, and/or appeals submitted for San Diego Wind and Terra-Gen's related MET facilities application PDS2018-AD-007 are hereby incorporated in full by reference.

Terra-Gen's PDS-346 Form is inaccurate:

- The Project APPEARS TO BE WITHIN ½ MILE of a Regional Park: McCain Valley Recreation Area and Lark Canyon OHV Park. The YES box should be checked instead of the NO box.
- The listed 720.6 acres on 6 lots conflicts with acreage and lot numbers on other project documents, including the PROJECT DESCRIPTION and the Torrey Wind Parcel List with 13 parcels. See above.
- The project is located in the Boulevard Community Planning Area not Mountain Empire.

PDS -346S: Supplemental Application for exemption to Height Limits:

- We strongly oppose any exemptions to Height Limits for the proposed 310 foot tall MET towers that will include guy wires that are harmful to birds and bats and create a cumulatively significant visual intrusion and degradation for impacted residents and visitors to public lands in the McCain Valley and surrounding areas.

PDS-367: Application for Environmental Initial Study (AEIS)

Project Description

III. Features of the Project:

- A full EIR is required for this project that includes some of the largest onshore wind turbines available today.
- 4.2 MW turbines are some of the largest available on the market and are much larger and taller than existing wind turbines at Kumeyaay Wind, Tule Wind, Ocotillo Wind and Energia Sierra Juarez Wind.
- The brief project description on page 4 of 13 fails to include the full height of the turbines including blade height.
- Access is proposed over private roads connecting to Ribbonwood Road. If those private access roads include easements across non-participating private properties that were granted to the project site for residential or agricultural use, the proposed commercial industrial wind turbine project may not be authorized or supported by existing easements and impacted owners.
- No estimate of groundwater use is included in the description.

IV. Environmental Aspects of Project:

- **1. Land Use:** The proposed use is not an existing use on private lands in the area. The Tule Wind and Kumeyaay Wind projects are located on federal lands at a distance from existing homes and

uses that will be impacted by Torrey Wind. The Sunrise Powerlink is also located at the far north end of the proposed site that is at a distance from most private homes accessed by Ribbonwood Road.

- **2. Agricultural Resources:** It is our understanding that the most if not the entire project site has been used for cattle grazing for years. See answer to 1. Land Use above.
- **3. Population and housing:**
 - Based on adverse health impacts reportedly documented at other homes impacted by industrial wind turbine projects around the globe, Torrey Wind project's impacts may result in residents abandoning their homes if they are deemed uninhabitable due to proximity and related adverse health impacts from noise, vibration, and shadow flicker (flash and glare).
 - At this point, we cannot find any information based on 4.2 MW wind turbines due to their limited time on the market and real world information. Cumulatively significant impacts from other projects in the area must also be addressed.
 - Aerial maps should be produced and circulated for public showing how many existing homes are located within a 3 mile radius of the project and the distance from the closest turbines and other project facilities.
- **4. Geological Issues:**
 - The project site was impacted by the 7.8 Laguna Salada earthquake in 1892 that resulted in severe shaking, ground fissures, and rock slides in the McCain Valley and Jewel Valley areas of Boulevard. In McCain Valley, the ground was seen to move in waves.⁷
 - Severe shaking was also felt in the Boulevard area the 2010 quake on the Laguna Salada.
 - The project site includes the Tule Creek floodplain that includes alluvial soils that become saturated during El Nino years and other heavy rainfall events.
 - Saturated alluvial soils are much more prone to movement and potential damage during quakes.
- **5. Water Resources:**
 - This section fails to provide an estimated amount of groundwater mining/ consumption for this project.
 - What is the current production and recovery rate of the existing wells? How many other wells are proposed for the project site other than the existing wells and the one proposed for the O&M building's potable source?
 - How much water is proposed to be imported from the Jacumba Community Services District wells? Local groundwater and wells are the only source available to local residents and biological resources.
 - Groundwater resources are under stress from ongoing severe drought conditions⁸ and the construction of numerous large projects during the last 6-10 years: Sunrise Powerlink, ECO Substation and related transmission lines, Tule Wind, Jacumba Solar, Reconductoring of TL6931, US Border Patrol Station on Ribbonwood Road.

⁷ https://en.wikipedia.org/wiki/1892_Laguna_Salada_earthquake

⁸ <https://www.drought.gov/drought/states/california>

- One 10,000 tank would not be adequate for fire protection.
- Any local springs need to be identified as well. Some tribal homes rely on springs for their homes and/or livestock.
- Pulling large amounts of water from the project site can impact wells and springs in the surrounding areas and must be fully and honestly addressed.
- Tule Creek flood plain has suffered flooding in previous years, as described in Clifford Caldwell's letters on this project.
- In response to the flooding and significant erosion along Tule Creek, the County required at least one homeowner to place funds into an account for a future bridge project across Tule Creek.
- Torrey Wind, a for-profit project, should be required to build a bridge across Tule Creek to ensure all weather access for employees, emergency services, and impacted residents.
- **6. Air Quality:**
 - Project grading and disturbance of soils will increase dust and particulates during construction and operation until the disturbance is mitigated, if that is even feasible.
 - Dust suppressants can become flammable once they dry out and can wash off during rain events and flow into surface waters and seep into groundwater resources.
 - Residents impacted by the Ocotillo Wind project in Imperial County have documented numerous events of increased dust, particulates and foaming dust suppressant run off.
 - An Ocotillo resident posted a video (5-6-17) showing dust blowing from 42 miles of access roads and 81 miles of underground collector cable that disturbed carbon sequestering desert crust on the Ocotillo Wind project⁹.
 - Electrical pollution and electrical magnetic interference, generated by industrial wind turbines, falls under the air quality category as well. We have submitted exhaustive details on all these impacts previously for the Climate Action Plan, the Wind Energy Ordinance, Tule Wind, Shu'luk Wind, Jewel Valley Wind, Energia Sierra Juarez Wind and cross-border line.
- **7. Transportation/Circulation:**
 - Ribbonwood is the primary access route for the project; it is also the sole legal access road for people who use Ribbonwood Road to reach their homes.
 - Traffic plans must address traffic impacts that include notification to impacted home owners alerting them to when their only road will be subject to long delays or closures.
 - The section of Ribbonwood Road north of the new road installed for Tule Wind access from Ribbonwood Road includes several sections with limited or zero line of sight and tight turns that will not accommodate large equipment or careless drivers.
 - The section of Ribbonwood Road that is dirt is private and it needs to be determined who owns the road and if Torrey Wind has the right to use that private road to access their commercial for-profit wind project.

9

<https://www.facebook.com/OcotilloWindTurbineDestruction/videos/vb.422340074490464/1410186462372482/?type=2&theater>

- The Boulevard Trails Map, approved by the Board of Supervisors in 2009, includes proposed community pathways and trails along Ribbonwood Road and the project site that connect up to BLM land at the north end of the project.
- Impacts to Board approved community pathways and trails for Boulevard must be addressed.
- **8. Biological Resources:**
 - Any biological studies must take into account current severe drought conditions and how that reduces plant and wildlife until the rains come again.
 - San Diego County's long-stalled East County Multiple Species Conservation Plan lists many endangered and listed species exist in the general area, including Golden Eagles, a wide variety of raptors, mountain lions, bats, reptiles, mammals, plants, and more.
 - The Tule Creek floodplain and seasonal wetlands exist on the project site with the potential for springs.
 - These resources and conditions and the biological resources that go with them are fairly rare in our high-desert transitional area.
 - The construction and operation of Tule Wind, Kumeyaay Wind and Sunrise Powerlink have already limited and fractured habitat and connectivity for a wide variety of wildlife. Cumulative and cumulatively considerable impacts must be recognized and addressed.
- **9. Hazards:**
 - Noise and electrical pollution are hazards and hazardous to public health and safety.
 - The project will generate waste oil/ lubricants from transformers, inverters, generators, and other equipment. It will need to be stored and transported to a licensed hazmat facility.
 - Due to the fact that the project is located within a sole source aquifer that is relied upon by residents, livestock, pets and wildlife, extreme caution must be used when storing, handling, and transporting used oil and any other hazardous materials.
 - Discarded turbine blades are also hazardous and non-recyclable. They also are highly flammable.
 - Discarded blades must be removed from the site and transported to a licensed facility.
 - The MUP should not allow storage or stockpiling of discarded blades or electrical components onsite or at any other non-licensed facility. A strict removal timeframe must be included in the MUP.
- **10. Noise:**
 - 4.2MW wind turbines will generate significantly more noise and vibrations than existing wind turbines and will be placed much closer to adjacent residents.
 - Any noise study will need to include real world operational noise measurements from any existing facilities using 4.2 MW wind turbines, including those taken at impacted homes.
 - Noise from turbines can move through the air and soil as pressure waves that can be perceived at varying distances, especially if there is underlying rock formations.
 - Ambient noise and electrical testing should be required at adjacent homes prior to permit and operation of any Torrey Wind turbines.

- **Wind Farm Nuisance Litigation¹⁰ June 8, 2018: Agricultural Law & Taxation Blog (excerpt)**
 - Nuisance litigation involving large-scale “wind farms” is in its early stages, but there have been a few important court decisions. A case decided by the West Virginia Supreme Court in 2007 illustrates the land-use conflict issues that wind-farms can present. In *Burch, et al. v. Nedpower Mount Storm, LLC and Shell Windenergy, Inc.*, 220 W. Va. 443, 647 S.E.2d 879 (2007), the Court ruled that a proposed wind farm consisting of approximately 200 wind turbines in close proximity to residential property could constitute a nuisance. Seven homeowners living within a two-mile radius from the location of where the turbines were to be erected sought a permanent injunction against the construction and operation of the wind farm on the grounds that they would be negatively impacted by turbine noise, the eyesore of the flicker effect of the light atop the turbines, potential danger from broken blades, blades throwing ice, collapsing towers and a reduction in their property values. The court held that even though the state had approved the wind farm, the common-law doctrine of nuisance still applied. While the court found that the wind-farm was not a nuisance per se, the court noted that the wind-farm could become a nuisance. As such the plaintiffs’ allegations were sufficient to state a claim permitting the court to enjoin the creation of the wind farm.
 - In another case involving nuisance-related aspects of large-scale wind farms, the Kansas Supreme Court upheld a county ordinance banning commercial wind farms in the county. *Zimmerman v. Board of County Commissioners*, 218 P.3d 400 (Kan. 2009). The court determined that the county had properly followed state statutory procedures in adopting the ordinance, and that the ordinance was reasonable based on the county’s consideration of aesthetics, ecology, flora and fauna of the Flint Hills. The Court cited the numerous adverse effects of commercial wind farms including damage to the local ecology and the prairie chicken habitat (including breeding grounds, nesting and feeding areas and flight patterns) and the unsightly nature of large wind turbines. The Court also noted that commercial wind farms have a negative impact on property values, and that agricultural and nature-based tourism would also suffer.
 - **Buy-Out Ordered**
 - A recent settlement order of the Minnesota Public Utilities Commission (Commission) requires a wind energy firm to buy-out two families whose health and lives were materially disaffected by a wind farm complex near Albert Lea, Minnesota. As a result, it is likely that the homes will be demolished so that the wind farm can proceed unimpeded by local landowners that might object to the operation. That’s because the order stated that if the homes remained and housed new residents, those residents could not waive the wind energy company’s duty to meet noise standards even if the homeowners were willing to live with violations of the Minnesota Pollution Control Agency’s ambient noise standard in exchange for payment or through some other agreement.

¹⁰ <http://lawprofessors.typepad.com/agriculturallaw/2018/06/wind-farm-nuisance-matter-resolved-buy-the-homeowners-out.html>

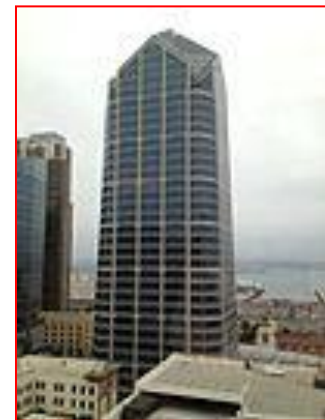
- **Development of the WHO Environmental Noise Received: 12 April 2018; Accepted: April 2018; Published: 20 April 2018¹¹ (includes wind turbine noise impacts)**
 - Abstract: “Following the Parma Declaration on Environment and Health adopted at the Fifth Ministerial Conference (2010), the Ministers and representatives of Member States in the WHO European Region requested the World Health Organization (WHO) to develop updated guidelines on environmental noise, and called upon all stakeholders to reduce children’s exposure to noise, including that from personal electronic devices. The WHO Environmental Noise Guidelines for the European Region will provide evidence-based policy guidance to Member States on protecting human health from noise originating from transportation (road traffic, railway and aircraft), wind turbine noise, and leisure noise in settings where people spend the majority of their time. Compared to previous WHO guidelines on noise, the most significant developments include: consideration of new evidence associating environmental noise exposure with health outcomes, such as annoyance, cardiovascular effects, obesity and metabolic effects (such as diabetes), cognitive impairment, sleep disturbance, hearing impairment and tinnitus, adverse birth outcomes, quality of life, mental health, and wellbeing; inclusion of new noise sources to reflect the current noise environment; and the use of a standardized framework (grading of recommendations, assessment, development, and evaluations: GRADE) to assess evidence and develop recommendations. The recommendations in the guidelines are underpinned by systematic reviews of evidence on several health outcomes related to environmental noise as well as evidence on interventions to reduce noise exposure and/or health outcomes. The overall body of evidence is published in this issue.”
 - **Effects of Different Spectral Shapes and Amplitude Modulation of Broadband Noise and Annoyance Reactions in Controlled Listening Experience; published in International Journal of Environmental Research and Public Health-** by [Beat Schäffer](#), [Reto Pieren](#), [Sabine J. Schlittmeier](#) and [Mark Brink](#) *Int. J. Environ. Res. Public Health* **2018**, *15*(5), 1029; <https://doi.org/10.3390/ijerph15051029> ¹²:
 - **Abstract:** “Environmental noise from transportation or industrial infrastructure typically has a broad frequency range. Different sources may have disparate acoustical characteristics, which may in turn affect noise annoyance. However, knowledge of the relative contribution of the different acoustical characteristics of broadband noise to annoyance is still scarce. In this study, the subjectively perceived short-term (acute) annoyance reactions to different broadband sounds (namely, realistic outdoor wind turbine and artificial, generic sounds) at 40 dBA were investigated in a controlled laboratory listening experiment. Combined with the factorial design of the experiment, the sounds allowed for separation of the effects of three acoustical characteristics on annoyance, namely, spectral shape, depth of periodic amplitude modulation

¹¹ <https://docs.wind-watch.org/WHO-Noise-Europe-2018.pdf>

¹² <http://www.mdpi.com/1660-4601/15/5/1029>

(AM), and occurrence (or absence) of random AM. Fifty-two participants rated their annoyance with the sounds. Annoyance increased with increasing energy content in the low-frequency range as well as with depth of periodic AM, and was higher in situations with random AM than without. Similar annoyance changes would be evoked by sound pressure level changes of up to 8 dB. The results suggest that besides standard sound pressure level metrics, other acoustical characteristics of (broadband) noise should also be considered in environmental impact assessments, e.g., in the context of wind turbine installations.”

- **11. Public Services:**
 - Fire & Emergency Services should be included under this section.
- **13. Aesthetics (includes landforms):**
 - The proposed 4.2MW turbines at 586 feet are not only taller than the existing wind turbines in the area by about 100 feet; they are also taller than any of San Diego’s urban skyscrapers.
 - One America Plaza at 500 feet is reportedly San Diego’s tallest high-rise¹³—86 feet shorter than Torrey Wind turbines proposed for our rural and predominantly low-income community—far too close to existing homes and sensitive wildlife.



- The turbines will be highly visible to residents throughout Boulevard and surrounding neighborhoods, visitors to adjacent and regional public lands, the Pacific Crest Trail, I-8, Tierra Del Sol Road and other local areas at higher elevations, and some Boulevard’s proposed and approved paths and trails, especially those north of I-8.
- The project area has many unique boulder displays and the Tule Creek floodplain and riparian area, with seasonal ponds, springs, and running water.
- **14. Cultural and Historical Resources:**
 - The project site is located in Kumeyaay territory next to the Campo and Manzanita Reservations and along Tule Creek and known areas of habitation that represents the significant potential for cultural resources. Cumulatively significant impacts may result when added to Tule Wind, Sunrise Powerlink, ECO Substation and more.
 - The area was also home to the McCain family that settled the area now known as the upper northwest end of McCain Valley, in the late 1860’s.

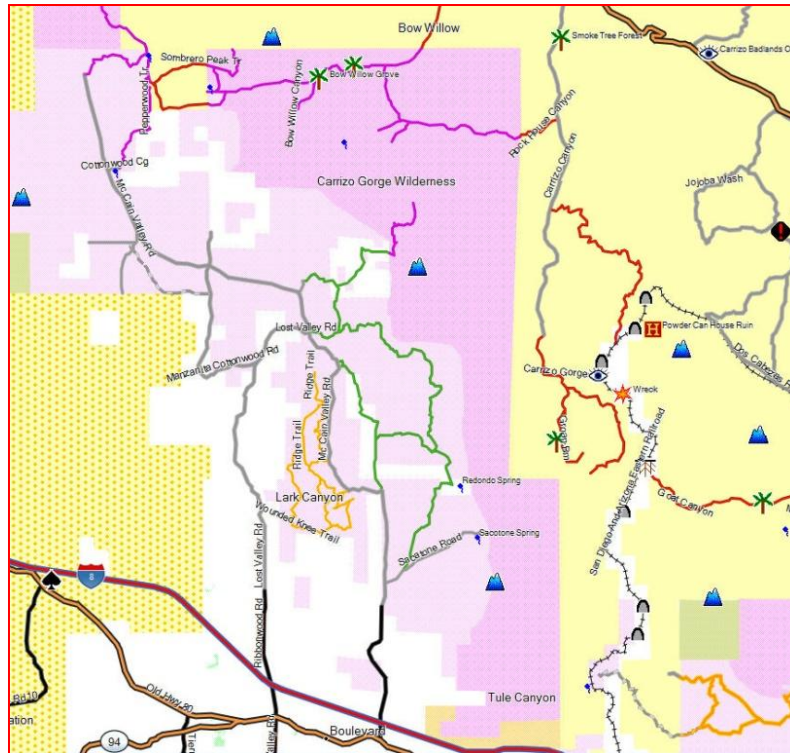
¹³ https://en.wikipedia.org/wiki/List_of_tallest_buildings_in_San_Diego

- According to a 2009 report on historical ranches, The McCain's built their cattle ranch near the Indian village of Sacatoon, relying on springs along Tule Creek.¹⁴
- The Walker Express Route also crossed the McCain Valley area and potentially the project site in the 1800's.
- McCain Valley is the historic heart of the Boulevard area.

V. Off-Site Improvements:

- **1. Streets:**
 - Ribbonwood Road may need to be widened at certain choke points with zero or limited sight lines and to accommodate large construction equipment and delivery of turbine and substation components.
 - The private dirt section of Ribbonwood Road should be engineered and paved, once legal access for a commercial project is confirmed and private property owners are compensated for potential easement adjustments or expansions if agreements can be reached.
 - A new bridge should be required to cross Tule Creek to ensure all-weather access for employees, emergency services, and impacted residents north of Tule Creek.
- **2. Extension of Utility Lines:**
 - How will the O&M building, wells, SCADA and other project components be connected to SDG&E distribution lines?
 - Is there an existing electrical service on the project site or will any easements be required to connect to the closest distribution line?
 - Will any underground water lines or holding tanks need to be connected to existing or proposed water wells?
- **3. Drainage/Stormwater/Flood Control:**
 - See comments for IV (7) above regarding need for bridge over Tule Creek.
- **4. Paths:**
 - See comments for IV (7) above regarding Boulevard Trails Map approved in 2009.
 - The map below shows some of the trails on adjacent BLM land in the McCain Valley Recreation and Conservation Area. The project site and other private land is shown in yellow dots, north of I-8.

¹⁴ Starting at page 102: <http://sohosandiego.org/warners/images/240yearsofranching.pdf>



VI. Grading:

- **Preliminary Grading Plans:** Please provide a copy of the preliminary grading plan. We would like to know the estimated about of cut and fill for this project.
- **Off-site grading:** Grading may be required for improvements needed for Ribbonwood Road to accommodate delivery of large construction equipment and project components. Grading will probably be required for new bridge structure needed to provide all-weather access to the project for employees, emergency services and adjacent residents.
- **Blasting:** Blasting was required for some of the Tule Wind turbines and may be required for some Torrey Wind turbines due to existing boulders including subterranean.

VII. Proposed Site Utilization:

- The project is a commercial industrial project but this section includes -0- footage/ acres for those uses.
- Will 10 parking spaces accommodate the number of employees proposed?

VIII. Commercial Industrial Site Utilization:

- **A. Project Operations:**
 - This section should include the number of proposed employees per shift, hours per shift, average daily vehicle trips generated.
 - This is a rural area and Ribbonwood Road was designed to as a residential road not to support huge for-profit industrial use.
- **B. Industrial Waste:**
 - See comments above at IV (9) regarding waste oil and discarded blades.

- Discarded electrical components also represent industrial/hazmat.
- Only non-toxic dust suppressants, oil, and lubricants should be authorized to protect our sole-source aquifer and better than average air quality.
- **Miscellaneous:**
 - **1.** This section should have been marked YES due to the low-frequency noise, infrasound, vibrations, shadow flicker, flash and glare, electrical pollution of the air and ground and electromagnetic interference with TV and other communication systems and more associated with the operation of industrial wind turbines.
 - **2.** It is good to see that Terra-Gen recognizes and admits the potential for substantial noise generation that could be heard outside the project. The project site may be too narrow to accommodate adequate / increased wind turbine setbacks based on larger and noisier wind 4.2 MW wind turbines, and compliance with noise restrictions for large wind turbines.
 - **3.** The project may involve the storage of dangerous, hazardous, flammable new and used materials used for fuel and lubrication of project vehicles and all related project components including turbines, inverters, transformers, generators, substation, electrical lines, and more.

PDS-399W: Project Facility Availability – Water:

- The Water Availability form, dated 6-5-18 and signed by Ken Wagner, has not been signed by the “Jacumba Water District” mentioned in PDS-367.
- The correct name is the “Jacumba Community Service District”.

PDS346S-Torrey Wind Project Description; Dudek June 2018:

1.1 Project Description:

1. The project description mentions decommissioning at the end of the project’s useful life but fails to mention what that estimated timeframe is or the potential for replacing the proposed turbines with even larger turbines prior to decommissioning.
2. Turbines with a range of 2.5 MW to 4.2 MW are proposed but only the 4.2MW turbines will produce the stated production goal of 126 MW. Only 75 MW could be produced using 2.5 MW turbines.
3. The developers should be required to state their intent to use 4.2MW turbines so the public can focus on the impacts from that size turbine instead of having to research and comment on impacts related to turbines between 2.5 MW and 4.2 MW.
4. 4.2 MW turbines are fairly new with little information available for review and comment.
5. The actual make and model of turbine and manufacturer’s specs and estimated noise emissions should be provided for public comment.
6. The project description fails to mention that the existing Kumeyaay and Tule Wind turbines are located on federal land or that Kumeyaay Wind was approved by the Bureau of Indian Affairs without a full Environmental Impact Statement (EIS) and that Tule Wind was lumped in with numerous other projects as part of the ECO Substation EIR/EIS project, making it very difficult and virtually overwhelming for public participation.

7. Instead of just mentioning adjacent “large rural lots”, the project description should be required to include an aerial survey that documents all the existing residences on private land and tribal land within at least a two mile radius of the proposed turbines.

1.2 Project Design:

1. As stated previously, it will take 30 – 4.2 MW wind turbines to produce the stated goal of 126 MW.
2. The Plot Plan shows bare minimum setbacks of 1.1 times the turbine height (644.16 ft) but that setback does not take into account the need to increase turbine setbacks from public recreation lands and private properties and tribal homes and businesses for noise emissions including low frequency noise and infrasound that should be required under zoning ordinance 6952 LARGE WIND TURBINES and NOISE ORDINANCE section 36.401, and to address potential blade throw.
3. ***NO NOISE WAIVERS SHOULD BE ALLOWED IN ORDER TO PROTECT PUBLIC HEALTH AND SAFETY AND TO REDUCE BIOLOGICAL IMPACTS FOR WILDLIFE, LIVESTOCK, AND PETS.***
4. The NREL’s posted Wind Farm Area Calculator specifically states that “...The "footprint," which is typically around 0.25 acres per turbine, does not include the 5-10 turbine diameters of spacing required between wind turbines...¹⁵
5. The project design does not take into account the recommended spacing between turbines of 10-15 rotor diameter widths, based on 300 ft rotor widths, to reduce wake effect.
6. **2011 Wind turbine spacing study at John Hopkins = 15 turbine rotor widths apart:** The newest wind farms, which can be located on land or offshore, typically use turbines with rotor diameters of about 300 feet. Currently, turbines on these large wind farms are spaced about seven rotor diameters apart. The new spacing model developed by Meneveau and Johan placing the wind turbines 15 rotor diameters apart -- more than twice as far apart as in the current layouts -- results in more cost-efficient power generation.^{16, 17}
7. **Wind Turbine Separation Distances Matter ; prepared by Peter R Mitchell, AM, BChE June 2014**¹⁸: Summary (excerpt): Siting wind turbines too close together has a number of predictable consequences resulting from the turbulent nature of the air exiting turbines and entering adjacent turbines. The consequences include: • increased wear on the turbine components, ultimately increasing early failure rates; • increased audible noise; • increased infrasound and low frequency noise. These predictable and long known consequences of placing turbines too close are frequently ignored by both wind turbine manufacturers and developers; particularly if they are operating in a country with systemic regulatory failure of the wind industry, such as Australia. Evidence is that the manufacturer-recommended separation distances of 7 to 8 rotor diameters for turbines in line with the prevailing wind and 5 rotor diameters for turbines abreast, still allows turbulent air exiting one turbine to retain significant turbulence when entering the next; so the manufacturers’ recommended spacings can be considered as an unfortunate compromise and inadequate to contain noise. The most efficient turbine spacing,

¹⁵ http://www.energybc.ca/cache/wind2/www.nrel.gov/analysis/power_databook/calc_wind.html

¹⁶ Johns Hopkins University. "Better turbine spacing for large wind farms." ScienceDaily. ScienceDaily, 7 February 2011. www.sciencedaily.com/releases/2011/01/110120111332.htm

¹⁷ <http://gazette.jhu.edu/2011/01/18/new-study-yields-better-turbine-spacing-for-large-wind-farms/>

¹⁸ <http://www.na-paw.org/Mitchell/Mitchell-Wind-Turbine-Separation-Distances.pdf>

i.e., that which allows the turbines to economically extract the most energy from the wind, has been shown to be some 15 rotor diameters. Most efficient extraction of useful energy will approximately coincide with the least production of waste energy, namely sound and vibration”.

8. Spacing turbines 10-15 rotor diameters apart would also help reduce wake effects, turbulence, and complex emissions of noise, vibrations, and infrasound.

1.2.1 Wind Turbines:

1. The brief project description on page 4 of 13 of PDS-367 proposes up to 4.2 MW GE Wind Turbine Renewable Energy Facility
2. Identifying GE Wind Turbines in one document and then declining to identify the turbine technology that will be used in another form is contradictory, misleading, and confusing.
3. By failing to identify the intended turbine technology that will be used, the developer and the County deny the public the information necessary to help defend public health and safety.
4. Rotor diameter is stated as approximately 450 feet (225-foot blades)
5. 10 times the rotor diameter = 4,500 feet between turbines.
6. 15 times the rotor diameter = 6,750 feet between turbines.
7. It appears that most of the project site is too narrow (approximately 5,500-6,500 ft at widest point)to accommodate the recommended turbine spacing needed to reduce wake effects that increase noise and vibrations and increase productivity, and to protect impacted residents in the area on private and tribal lands.
8. In addition the wake effects from the Kumeyaay Wind and Tule Wind turbines must be taken into consideration as they will at times generate additional wake effect, turbulence, and noise, and reduce production.
9. The project developer should be required to identify their preferred turbine make and models in order to allow public comment based on facts and actual specifications available on those specific turbines.
10. Vestas Confidential Health and Safety Instruction Manual for a Falmouth MA Wind Farm warns of blade throw up to 1640 Feet (500 Meters), and they advise employees to stay at least 1,300 ft from turbine unless necessary and to evacuate by running upwind 1,640 ft in the event of a runaway turbine.^{19, 20}
11. **INFRA SOUND AND LOW FREQUENCY NOISE – informative video presentation on related health impacts by Dr. Mariana Alves Pereira - Ljubljana 2018²¹**
12. Research shows that the larger wind turbines generate higher levels of low frequency noise that is annoying and disruptive with alleged and potential adverse health impacts for impacted neighbors.
 - *Low-frequency noise from large wind turbines; The Journal of the Acoustical Society of America 129, 3727 (2011); <https://doi.org/10.1121/1.3543957>²²*

¹⁹ <https://northeastwindmills.com/wp-content/uploads/2013/07/vestas-nordex.pdf>

²⁰ <https://patch.com/massachusetts/falmouth/falmouth-vestas-wind-turbine-blade-throw-warning-1640-feet>

²¹ https://www.youtube.com/watch?time_continue=194&v=ZXCZ3OyklrE

²² <https://asa.scitation.org/doi/abs/10.1121/1.3543957>

ABSTRACT

“As wind turbines get larger, worries have emerged that the turbine noise would move down in frequency and that the low-frequency noise would cause annoyance for the neighbors. The noise emission from 48 wind turbines with nominal electric power up to 3.6 MW is analyzed and discussed. The relative amount of low-frequency noise is higher for large turbines (2.3–3.6 MW) than for small turbines (≤ 2 MW), and the difference is statistically significant. The difference can also be expressed as a downward shift of the spectrum of approximately one-third of an octave. A further shift of similar size is suggested for future turbines in the 10-MW range. Due to the air absorption, the higher low-frequency content becomes even more pronounced, when sound pressure levels in relevant neighbor distances are considered. Even when A-weighted levels are considered, a substantial part of the noise is at low frequencies, and for several of the investigated large turbines, the one-third-octave band with the highest level is at or below 250 Hz. It is thus beyond any doubt that the low-frequency part of the spectrum plays an important role in the noise at the neighbors.”

1.2.2 Electrical Collection System:

1. What is the status of the CAISO interconnection agreement to connect the new proposed 500kV substation to SDG&E's 500 kV Sunrise Powerlink?
2. What is the remaining capacity on the Sunrise Powerlink with all the existing wind and solar projects already connected to it in the Imperial County?

1.2.3 Project Substation:

- See comments for 1.2.2 above.
- What are the setback requirements between the substation and Sunrise Powerlink?
- Substation lighting should be shielded.
- Electrical pollution from all project sources also radiates through the air and soil and can be inducted into homes through their communication lines, plumbing, and more.

1.2.4 O& M Building:

- The O&M Building should be placed further away from non-participating properties to reduce the impacts on neighbors.
- Lighting on O&M building should be shielded.

1.2.5 SDG&E Switchyard and 500 kV Om & Out Legs to the Sunrise Powerlink:

- See comments for 1.2.2 above.

1.2.6 Meteorological Towers:

- This section fails to mention the temporary MET tower facilities that have been appealed but no hearing has been held.
- We strongly oppose a height waiver for 361 foot tall MET Towers that are taller than many of downtown San Diego's high rise buildings.

1.2.7 Roads:

- The estimated acreage required for new and expanded existing roads and improvements to Ribbonwood Road should be provided for public review and comment.
- See previous comments regarding need to improve the dirt private road section of Ribbonwood Road and need to confirm easements across private land allow for the proposed use that was never considered at the time the easements were granted in a rural residential / agricultural area.
- An all weather access bridge should be required across Tule Creek, as stated previously in these comments.

1.2.8 Temporary Staging, parking, Batch Plant, and Construction Trailer areas:

- With up to 350 employees per day during construction, all of these very noise and dusty project uses should be moved from the current sites that are too close to adjacent residents/ non-participating properties.
- Construction is estimated to take at least 12 months which is a long time for rural residents to live next door to and deal with a massive construction site.
- Are there any on-site sand minding or rock blasting / crushing for aggregate planned for use in the batch plant? Both would be very noisy operations.
- Noise carries further in our higher elevation with limited natural barriers, and tends to bounce off hard surfaces like boulders.

1.2.9 Lighting and Security:

- It is good to know that the entire project will not be fenced in with prison like fencing topped with barbed or razor wire. The less disruption to wildlife passage the better.
- Please ensure that all project lighting is shielded and directed down at on-the-ground facilities.
- Invasive and disruptive wind turbine lighting should also be shielded from ground view if possible. The neighbors will know the turbines are there and don't need to be forced to deal with more obnoxious and sleep disrupting blinking red lights all night long. The FAA required lighting just needs to be visible from the air.
- Turbine lighting should be made to sync with the blinking of the existing Tule Wind and Kumeyaay Wind turbines.

1.3 Construction:

- Clearing grading should be kept to a minimum and should not be allowed to take place on windy days in order to reduce potentially significant dust storms and off-site impacts.

Table 2:

- The estimated number of each type of construction equipment should be provided.

1.3.1 Work Force:

- With up to 350 employees per day 6 days a week, with potential for extended hours, during construction, some form of car-pooling should be required.
- The Golden Acorn Casino at I-8 and Crestwood Road has lots of unused parking spaces and may be willing to negotiate an arrangement to allow workers to park and ride to the job site together, for a fee.
- Some form of working hour limits should be placed on the project to allow some relief for the impacted neighbors during the estimated 12 months of construction.
- Some form of employment office should be set up locally to encourage the hiring of at least some local workers—if the project is approved.

1.3.2 Construction Access Right-of-Way:

- See comments on 1.3.1, 1.2.7, V.1, and IV.7, above.
- An alternate route should be considered using McCain Valley Road and Lost Valley Road that would relieve the burden on Ribbonwood Road and the people who rely on it as their sole access road.

1.3.3 Clearing and Grading:

- The stated 250 by 350 ft (2.9 acres) clearance required for 30 turbines = 87 acres, just for the turbines.
- The plot plans show existing and planned roads.
- The estimated amount of acres to be cleared and tons of earth to be graded should be provided for public review and comment.
- Grading and leveling should be minimized in seasonal wetland and floodplain areas where previous El Nino and other heavy rain events have resulted in flooding, erosion, standing water, and seasonal springs and creek flow, washing out Ribbonwood Road.
- The estimated amount of water needed for clearing and grading should also be produced for public review and comment.
- Due to severe drought conditions additional water resources will likely be required, similar to the situation when SDG&E used significantly more water to construct the ECO Substation than planned or disclosed during public review—despite having geotechnical investigations.
- Construction of the ECO Substation also unearthed numerous cultural resources and the same will likely be true for the Torrey Wind site due to previous Indian occupation of the McCain Valley and Tule Creek area, prior to their displacement when settlers moved in.

1.3.4 Foundation Construction and Tower Erection:

- See comments at 1.3.3 above.

1.3.5 Construction of Underground Electrical Collection System:

- How many additional acres of clearance and trenching (road width expansion?) would be needed for underground electrical and communication systems?
- During the Ocotillo Wind project in Imperial County the width of the proposed roads increased significantly for their underground components, which took local residents by surprise.

1.3.6 Project Substation:

- Industry is well aware that along with the potential for electrical pollution to move off-site through the air and ground from wind turbines and substations, there is also the potential for substation noise to leave the site through air and ground pressure waves that can be perceived at distance.
- In addition to homes in the area, there is also wildlife habitat, trails, and habitat connectivity that must be recognized and addressed.
- ***Cautions and recommendations from the Electrical Engineering Portal²³ include the following:***
 - Substation Noise Sources to take into consideration:
 - Continuous audible sources
 - Continuous radio frequency (RF) sources
 - Impulse sources
 - Equipment noise levels
 - Attenuation of noise with distance
 - Noise Abatement Methods to take into consideration:
 - Reduced transformer sound levels
 - Low-impulse noise equipment
 - RF noise and corona-induced audible noise control
 - Site location
 - Larger yard area
 - Equipment placement
 - Barriers or walls
 - Active noise cancellation techniques

1.3.7. Water Quantities:

- An estimated amount of water use overall should be provided for public review and comment.
- Groundwater is our only source of water in the Boulevard area with no water district or other source serving homes that access their properties via Ribbonwood Road.
- Project interference with groundwater quality and quantity is a major concern locally.
- Some Canadian communities are complaining about adverse impacts to their wells during and after construction of wind turbine projects, with pile driving and vibrations from turbine operations which results in seismic coupling - stirring up turbidity and silt that plugs up the filters provided by the wind project developer after complaints were raised. There are reportedly 20 impacted well owners at one project and more at other projects, according to the head of the Ontario Groundwater Association.²⁴
- At least 14 well owners filed water well interference complaints against Samsung wind turbine project for polluting wells in the Chatham-Kent area of Ontario Canada.
 - “Dave Lusk filed the fourteenth well interference complaint after his water stopped running while he was showering on Wednesday. “Four generations of my family have had pure, beautiful drinking water from that well for 52 years” said Lusk. “A week after

²³ <https://electrical-engineering-portal.com/audible-substation-noise>

²⁴ <https://www.chathamdailynews.ca/2016/07/15/we-want-the-water-sampled-ontario-ground-water-association/wcm/29e201cc-05ef-89d1-2b40-15297d19ce1a>

the pile drivers started next door, we are choked out with black silt. How the hell are they allowed to keep doing this to people? This has to stop.”²⁵

1.4 Operation and Maintenance:

- Please provide a copy of the Environmental Health and Safety Plan and the Fire Protection plan, mentioned in this section, for public review and comment.
- VII.5 states that there will be 10 parking spaces at the O&M facility but this section states there will be 12 employees.
- Our area can have some quickly shifting and turbulent winds and wind shears that may require turbines being services more than twice a year.
- Poor maintenance generally results in noisier wind turbines, based on observations of impacted residents.
- Is one 10,000 gallon tank enough for adequate fire protection?

1.5 Decommissioning:

- The County should require a decommissioning bond to ensure proper site rehabilitation.
- Our concerns include the potential for new and even bigger wind turbines to be installed when the currently proposed turbines are pulled out of service.
- Some limits should certainly be placed on turbine height and MW which have been increasing significantly in the last 10 years. Larger turbines generate larger impacts over greater distances.

Plot Plans (dated 6-21-18):

- The proposed wind turbines are approximately 587 ft tall including 225 ft long rotors (450 rotor diameter)
- As noted in comments in section 1.2.1 above, physics-based recommendations for reduced wake effect, more efficient production, and reduced noise impacts, requires that wind turbines be spaced 5-15 rotor diameters apart, and that is based on smaller wind turbines –not the new 4.2 MW monster turbines that should require even greater spacing and setbacks.
- $450 \text{ ft} \times 5 = 2,250 \text{ ft}$ spacing between turbines; $450 \times 10 \text{ ft} = 4,500 \text{ ft}$ spacing; $450 \times 15 \text{ ft} = 6,750 \text{ ft}$.
- The bare minimum setback of 1.1 times the turbine height (644.16 ft), used on the plot plans, is vastly inadequate and does not take into account the need to increase turbine setbacks to meet noise restrictions as identified in the wind energy zoning ordinance , or the 4.2 MW monster turbines that are taller than the tallest high-rise in downtown San Diego!
- Reminder that Vesta’s confidential health and safety manual warns employees to stay at least 1,300 ft from turbines and blade throw can be 1,640 ft, as noted in comment on 1.2.1-10 above.
- **Sheet # 1 of 11:** The parcel is 3,978 feet wide with two turbines and well #1: T-12 does not appear to meet bare minimum setback of 1.1 times the turbine height (644.16 ft) and T13 barely

²⁵ <https://canadians.org/media/fourteenth-complaint-filed-against-samsung-wind-turbine-project-polluting-water-wells-chatham>

exceeds that bare minimum. Why are two MET towers proposed only 250 feet or so apart? T-6, T-7, and T-8 are spaced about 650 feet or so apart. T-15, T-16 and T-17 appear to be spaced less than 800 ft or so apart.

- **Sheet #2 of 11:** T-15, T-16, T-17, T-6, T-7, and T-8 also barely make the bare minimum setback of 1.1 times the turbine height.
- **Sheet #3 of 11:** T-14 barely meets the minimum turbine setback and sits almost on top of existing well 2. Installation of and vibrations generated during operations from T-14 could adversely impact the integrity and production and water quality of well 2.
- **Sheet #4 of 11:** T-18 barely meets minimum turbine setbacks and appears to be less than 700 feet or so from the adjacent BLM public recreation area boundary. See map at comment V. 4 above.
- **Sheet #5 of 11:** T-19 appears to be less than 500 ft from tribal land on the west side; T-20 appears to be less than the bare minimum setback of 644.16 ft. T-19 and T-20 appear to be spaced only 700 ft or so apart.
- **Sheet #6 of 11:** T-1 appears to be 300 ft or so from tribal land on the west side; T-2 is less than the bare minimum 1.1 turbine height setback; and T-3 appears to be less than 800 ft or so from tribal land. Tribal members have limited land and options for future home building. Placing turbines too close to their land can reduce the number of future home sites and the same is true for private land owners. T-1, T-2 and T-3 appear to be spaced only 825-850 ft apart.
- **Sheet #7 of 11:** T-9 and T-10 appear to be spaced less than 700 ft apart; T-11, T-28, T-29 and T-30 all appear to be spaced about 800 feet or so apart.
- **Sheet #8 of 11:** T-21, T-22, T-23, T-24, T-25 and T-26 do not meet or barely meet the bare minimum turbine setback of 644 ft. T-22, T-23 and T-25 are approximately 900-1,000 ft from non-participating eastern property boundary.
- **Sheet #9 of 11:** T-5 is too close to the non-participating Caldwell (est. 1,300 ft) and Barnes (est. 1,500 ft) boundaries. It the understanding of this writer that several extended members of the Barnes family have expressed health complaints related to the Kumeyaay Wind turbines operating too close to their homes on the Manzanita Reservation. One member reportedly moved to another house to get further away from the turbines that bothered them. Housing options on the local reservations are limited as are most incomes.
- **Sheet #10 of 11:** APN 611-010-02. Well #4 is about 200-300 ft from adjacent non-participating property boundaries for Caldwell and Barnes. Pumping from well #4 could result in off-site well interference; non-participating property owner to the east is not identified and the laydown yard is proposed less than 100 ft from that property boundary. The dusty and noisy batch plant and O&M building should be moved further away from non-participating Caldwell and Barnes properties to help reduce noise and dust impacts.
- **Sheet #11 of 11:** T-27 does not meet the bare minimum 644 ft setback from public BLM lands on the east and south. How close is the nearest non-participating house to this turbine at the north end of Ribbonwood Road?
- **Zoning Ordinance Section 6952 5 (i):** Even Tule Wind turbines were required to be setback four (4) times the wind turbine height , when measured from the center of the turbine to residence

or building occupied by civic use type. For Torrey Wind turbines that would equal 2,344 feet which is still not enough to protect public health and safety.

New information on adverse health impacts related to industrial wind turbine operations:

- Among lots of new information since San Diego County adopted the Wind Energy Ordinance with the misconception that there are no adverse health impacts related to industrial wind turbines.
- The San Diego County Planning Commission has failed to conduct the promised updates on turbine related health impacts as promised and repeatedly requested by the Boulevard Planning Group.
- Below is a summary of the key factual findings and conclusions on noise and health in the legal decision made on December 4, 2017, by an Australian Administrative Appeals Tribunal.
- The full decision – *Waubra Foundation v Commissioner of Australian Charities and Not-for-profits Commission* [2017] AAT is posted at the link in the footnote.²⁶
- Starting at paragraph 467 of the judgment, here are the key factual findings and conclusions on noise and health:
- **SUMMARY OF THE EFFECT OF THE MEDICAL AND SCIENTIFIC EVIDENCE**
On our analysis, a number of propositions emerge from the medical and scientific evidence. Some of those propositions had unanimous support by the relevant experts, and others had the support of most. The propositions which we understand have unanimous support from the relevant experts or are not contested include the following:
 - “Wind turbines emit sound, some of which is audible, and some of which is inaudible (infrasound);
 - There are numerous recorded instances of WTN exceeding 40 dB(A) (which is a recognised threshold for annoyance/sleep disturbance);
 - There are also recorded instances of substantial increases in sound at particular frequencies when particular wind farms are operating compared with those at times when they are shut down. [Measurements undertaken at the Waterloo wind farm showed that “noise in the 50 Hz third-octave band was found to increase by as much as 30 dB when the wind farm was operational compared to when it was shut down” – Exhibit A51, p 2.]
 - If it is present at high enough levels, low frequency sound and even infrasound may be audible;
 - WTN is complex, highly variable and has unique characteristics;
 - The amount and type of sound emitted by a wind farm at a given time and in a given location is influenced by many variables including topography, temperature, wind speed, the type of wind turbines, the extent to which they are maintained, the number of turbines, and their mode of operation;
 - Wind farms potentially operate 24 hours a day, seven days a week;
 - There are numerous examples of WTN giving rise to complaints of annoyance from nearby residents, both in Australia and overseas.

²⁶ <https://waubrafoundation.org.au/resources/aat-decision-reasons-waubra-foundation-vs-acnc-dec-4-2017/>

- The propositions which are supported by the preponderance of relevant expert opinion, and which we accept on that basis, include the following:
 - A significant proportion of the sound emitted by wind turbines is in the lower frequency range, i.e. below 20 Hz;
 - The dB(A) weighting system is not designed to measure that sound, and is not an appropriate way of measuring it. It is even acknowledged in the International Standard, ISO 1996-1 that the A-weighting system alone is “not sufficient to assess sounds characterized by tonality, impulsiveness or strong low-frequency content” – Exhibit A29, T43/8; Section 6.1; “Acoustics – Description, measurement and assessment of environmental noise – Part 1: Basic quantities and assessment procedures”, International Standard ISO (1996-1).
 - The most accurate way of determining the level and type of sound present at a particular location is to measure the sound at that location;
 - The best way of accurately measuring WTN at a particular location is through ‘raw’ unweighted measurements which are not averaged across time and are then subjected to detailed “narrow-band” analysis;
 - When it is present, due to its particular characteristics, low frequency noise and infrasound can be greater indoors than outdoors at the same location, and can cause a building to vibrate, resulting in resonance;
 - Humans are more sensitive to low frequency sound, and it can therefore cause greater annoyance than higher frequency sound;
 - Even if it is not audible, low frequency noise and infrasound may have other effects on the human body, which are not mediated by hearing but also not fully understood. Those effects may include motion-sickness-like symptoms, vertigo, and tinnitus-like symptoms. However, the material before us does not include any study which has explored a possible connection between such symptoms and wind turbine emissions in a particular population.
- We consider that the evidence justifies the following conclusions:
 - The proposition that sound emissions from wind farms directly cause any adverse health effects which could be regarded as a “disease” for the purposes of the ACNC Act is not established;
 - Nor, on the current evidence, is there any plausible basis for concluding that wind farm emissions may directly cause any disease;
 - However, noise annoyance is a plausible pathway to disease. We note the World Health Organization has stated: “There is sufficient evidence from large-scale epidemiological studies linking the population’s exposure to environmental noise with adverse health effects. Therefore, environmental noise should be considered not only as a cause of nuisance but also a concern for public health and environmental health”– Exhibit A4, T287/5709, citing “WHO. Burden of disease from environmental noise.” World Health Organization; 2011 [viewed April 2013]; Available from: <http://www.euro.who.int/en/what-we-publish/abstracts/burden-of-disease-from-environmental-noise.-quantification-of-healthy-life-years-lost-in-europe> as referenced by Professor G Wittert in Exhibit 56 NHMRC Draft Information Paper: Evidence on Wind Farms and Human Health, “Expert Review: Comments in full”, National Health and Medical Research Council, February 2015, Appendix 8; and Exhibit 4, T299/6308, Reference No. 40, WHO “Burden of disease from environmental noise”. Bonn: World Health Organization

European Centre for Environment and Health, 2011. Available from: http://www.euro.who.int/_data/assets/pdf_file/0008/136466/394888.pdf

- There is an established association between WTN annoyance and adverse health effects (eg. this was established by the Health Canada study);
- There is an established association between noise annoyance and some diseases, including hypertension and cardiovascular disease, possibly mediated in part by disturbed sleep and/or psychological stress/distress. This is also supported by much of the documentary material before us, including a Victorian Department of Health publication entitled “Wind farms, sound and health”, Technical Information, at 7. How can noise affect our health? – Exhibit A4, T297/6232362.
- There are as yet no comprehensive studies which have combined objective health measurements with actual sound measurements in order to determine for a given population the relationships between the sound emissions of wind turbines, annoyance, and adverse health outcomes. Indeed there is as yet no study which has given rise to a soundly based understanding of the degree to which particular types or levels of wind turbine emissions give rise to annoyance, or what levels or types of emissions are associated with what level of annoyance in the population. Because it relied on calculated rather than actual sound measurements, and was limited to the A and C-weighted systems, the Health Canada study did not do this.
- ...The applicant submitted that the evidence in the hearing provided plausible and credible evidence of the kind required. Counsel referred in particular to the effect of noise on sleep and, in particular, in disturbing sleep. It was not contentious that impaired sleep, if sufficiently serious, may result in a number of ailments and diseases. Professor Wittert said that “depression and sleep disturbance are, respectively, the first and third most common psychological reasons for patient encounters in general practice”. The professor went on to say that insomnia doubles the risk of future development of depression and that insomnia symptoms together with shortened sleep are associated with hypertension. Professor Wittert also said that a person suffering from restricted sleep is exposed to an increased risk of elevated blood sugar levels and endocrine disorders such as diabetes, symptomatic ischaemic heart disease, hypertension, obesity, insomnia and anxiety related illnesses.
- The applicant emphasised that Environmental Sleep Disorder has been recognised in the International Classification of Diseases, although there does appear to be some controversy about its existence as a separate and discrete condition.
- We also note that the evidence indicated that the annoyance resulting from noise during sleeping times may be greater for those with a noise sensitivity or who have become sensitised to noise.
- As our earlier findings have indicated, some wind farms generate sound which is capable of causing, and does cause, annoyance. We are further satisfied that annoyance of the kind which is generated (often associated with psychological distress and sleep disturbance), is a recognised pathway to a range of adverse health outcomes, including hypertension and cardiovascular disease”

Miscellaneous:

- **Gone with the wind: Valuing the visual impacts of wind turbines through house prices²⁷**

Stephen Gibbons

- **Abstract**” This study provides quantitative evidence on the local benefits and costs of wind farm developments in England and Wales, focussing on their visual environmental impacts. In the tradition of studies in environmental, public and urban economics, housing sales prices are used to reveal local preferences for views of wind farm developments. Estimation is based on quasi-experimental research designs that compare price changes occurring in places where wind farms become visible, with price changes in appropriate comparison groups. These groups include places close to wind farms that became visible in the past, or where they will become operational in the future and places close to wind farms sites but where the turbines are hidden by the terrain. All these comparisons suggest that wind farm visibility reduces local house prices, and the implied visual environmental costs are substantial.
- The article below is important due to the fact that the Torrey Wind project is proposed for an already very dry area in a Very High Fire Hazard Zone²⁸ that will become even drier if climate change progresses as predicted, thereby further increasing an already highly flammable wildland area.
 - [The Observed Impacts of Wind Farms on Local Vegetation Growth in Northern China²⁹](#)
March 2017; DOI: [10.3390/rs9040332](https://doi.org/10.3390/rs9040332)
 - Wind farms (WFs) can affect the local climate, and local climate change may influence underlying vegetation. Some studies have shown that WF’s affect certain aspects of the regional climate, such as temperature and rainfall. However, there is still no evidence to demonstrate whether WF’s can affect local vegetation growth, a significant part of the overall assessment of WF effects. In this research, based on the moderate-resolution imaging spectroradiometer (MODIS) vegetation index, productivity and other remote-sensing data from 2003 to 2014, the effects of WF’s in the Bashang area of Northern China on vegetation growth and productivity in the summer (June–August) were analyzed. The results showed that: (1) WF’s had a significant inhibiting effect on vegetation growth, as demonstrated by decreases in the leaf area index (LAI), the enhanced vegetation index (EVI), and the normalized difference vegetation index (NDVI) of approximately 14.5%, 14.8%, and 8.9%, respectively, in the 2003–2014 summers.

²⁷ <https://www.sciencedirect.com/science/article/pii/S0095069615000418?via%3Dihub>

²⁸ http://frap.fire.ca.gov/webdata/maps/san_diego/fhszs_map.37.pdf

²⁹ (PDF) *The Observed Impacts of Wind Farms on....* Available from:

https://www.researchgate.net/publication/315741377_The_Observed_Impacts_of_Wind_Farms_on_Local_Vegetation_Growth_in_Northern_China [accessed Jul 22 2018].

There was also an inhibiting effect of 8.9% on summer gross primary production (GPP) and 4.0% on annual net primary production (NPP) coupled with WFs; and (2) the major impact factors might be the changes in temperature and soil moisture: WFs suppressed soil moisture and enhanced water stress in the study area. This research provides significant observational evidence that WFs can inhibit the growth and productivity of the underlying vegetation.

Thank you for consideration of our comments.

Any errors or omissions are unintentional

###



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
 GROUP PROJECT RECOMMENDATION**
 ZONING DIVISION

Record ID(s): PDS2018-MUP-18-014

Project Name: Torrey Wind

Planning/Sponsor Group: Boulevard CPG

Results of Planning/Sponsor Group Review

Meeting Date: 7-12-18

A. Comments made by the group on the proposed project.

Comment letter will follow

B. Advisory Vote: The Group **Did** **Did Not** make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

- MOTION:**
- Approve without conditions
 - Approve with recommended conditions
 - Deny
 - Continue

VOTE: 4 Yes 0 No 0 Abstain 3 Vacant/Absent

C. Recommended conditions of approval:

Reported by: Alanna Tisdale Position: Chair Date: 7-13-18

Please email recommendations to BOTH EMAILS;
Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov **and to**
CommunityGroups.LUEG@sdcounty.ca.gov

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770

<http://www.sdcounty.ca.gov/pds>

