INTRODUCTION

A Draft Environmental Impact Report (Draft EIR) for the proposed Project was prepared and circulated for public review from December 12, 2019 to February 3, 2020. During that time, the County received comment letters from Tribes, Agencies, Organizations, and Individuals. The County has prepared responses to each of the written comment letters. The comment letters and responses are included in Volume II of the Final EIR. In addition, the County has prepared Global Responses for recurring comment topics. In some cases, comments received prompted changes to the Draft EIR. These changes are shown in strikeout/underline in the Final EIR and are summarized in the Errata Summary Table below.

The County's responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the State CEQA Guidelines, the County is not required to respond to all comments on the Draft EIR, but only those comments that raise environmental issues regarding the adequacy of the Draft EIR. In accordance with CEQA Guidelines 15088 and 15204, the County has independently evaluated the comments and prepared the attached written responses describing the disposition of any significant environmental issues raised. CEQA does not require the County to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

Rather, CEQA requires the County to provide a good faith, reasoned analysis supported by factual information. To fulfill these requirements, the County's experts in planning and environmental sciences consulted with and independently reviewed analysis responding to the Draft EIR comments prepared by Dudek and other experts, which include experts in aesthetics, air quality, biology, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, noise, public services, transportation and traffic, utilities and service systems, energy, and environmental studies, each of whom has years of educational and field experience in these categories of environmental sciences; is familiar with the Project and the environmental conditions in the County; and is familiar with the federal, state, and local rules and regulations (including CEQA) applicable to the proposed Project. Accordingly, County staff's final analysis provided in the responses to comments are backed by substantial evidence. Likewise, the County Counsel's Office prepared and/or independently reviewed legal analysis supplementing the responses to the Draft EIR comments.

Global Responses

Several of the comment letters on the Draft EIR repeat comment topics. In the case of recurring comments, the County has prepared a series of "Global Responses" (Global Response GR-1 through Global Response GR-9). The Global Responses included in Volume II of this Final EIR consist of:

- Global Response GR-1 – Socioeconomic Impacts
- Global Response GR-2 – Public Health

- Global Response GR-3 – Piecemealing
- Global Response GR-4 – Noise
- Global Response GR-5 – Biological Resources
- Global Response GR-6 – Groundwater
- Global Response GR-7 – Fire Protection Services and Wildfire Impacts
- Global Response GR-8 – Visual Impacts
- Global Response GR-9 – Aviation

The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses. Several of the comment letters repeat issues the County addressed in Global Responses and other written responses as part of the Final EIR. Due to the repetition, the County relies on those other responses addressing the same or similar issues, even if an individual response does not reference other applicable response(s). This is justified by the voluminous comments provided, and by the same or similar issues raised in such comments. For this reason, each reviewer is encouraged to review the Global Responses and the other written responses for further information.

List of Tribes, Agencies, Organizations, and Individuals that Commented on the Draft EIR

During the Draft EIR public review period, the County received two Tribal comment letters (T-1 and T-2), two Agency comment letters (A-1 and A-2), twelve Organization comment letters (O-1 through O-12), and 48 Individual comment letters (I-1 through I-48). Volume II of the Final EIR includes all "Comment Letters" and "Comment Letter Responses." The comments have each been assigned an alphanumeric label, and the specific comments within each written comment letter are bracketed and numbered. For example, Individual Comment Letter I1 contains 9 comments that are numbered I1-1 through I1-9.

Please refer to the table below titled Comments Received on the Draft Environmental Impact Report for a comprehensive list of all written comments received during the public comment period. The Comment Letters and Response to Comment Letters within Volume II are organized in in the same order as outlined in the table below.

Comments Received on the Draft Environmental Impact Report

Designation	Commenter
Tribal	
T1	Members of Campo Band of Mission Indians
T2	Members of Campo Band of Mission Indians
Agencies	
A1	State Clearinghouse
A2	Caltrans Cover

Comments Received on the Draft Environmental Impact Report

Designation	Commenter
Organizations	
O1	Backcountry Against Dumps
O2	Backcountry Against Dumps
O3	Backcountry Against Dumps
O4	Backcountry Against Dumps
O5	Backcountry Against Dumps
O6	Backcountry Against Dumps
O7	Boulevard Planning Group
O8	Boulevard Planning Group
O9	Real East County Fire Safe Council
O10	San Diego Gas & Electric
O11	San Diego County Archaeological Society
O12	Citizens for Responsible Wind Energy
Individuals	
I1	Ed and Donna Tisdale
I2	Jodi Crow
I3	Leslie Mauris
I4	John Reddan
I5	Diane Ang
I6	Janin Ang
I7	Nancy Good
I8	Rowena Elliot
I9	Ryan Peterson
I10	Donna Tisdale
I11	Linda Gibson
I12	Janet Ryan
I13	Rupert Pedrin, Jr.
I14	Charles Good
I15	Robert and Marie Morgan
I16	Wen Chang
I17	Barbara Kennerly
I18	Donna Tisdale
I19	Lorrie Ostrander
I20	Mary Dauphine
I21	Mary Dauphine
I22	Mark Ostrander
I23	Don Lumb
I24	Craig and Carolyn Hobbs
I25	Andy and Teresa DeGroot
I26	Erin Tuatagaloa
I27	York Heimerdinger
I28	Brian Fallgren
I29	Laura Buehning
I30	Park Ewing
I31	Carol Frederick
I32	Murphy Smith
I33	Murphy Smith
I34	Jeff and Tamara Morrison
I35	Jeff and Tamara Morrison

Comments Received on the Draft Environmental Impact Report

Designation	Commenter
I36	Carol Frederick
I37	Clifford and Concepcion Caldwell
I38	Daubachs
I39	Diane Ang
I40	Donna Tisdale
I41	Jeffrey and Laura McKernan
I42	Kristine Alessio
I43	Mike Warburton and Sandra Darwash
I44	Michelle Strand
I45	Pam Guy
I46	Ri Parrish
I47	Cherilyn Maloney
I48	Scott McMillan

Summary of Changes to the Draft EIR and Appendices

In some cases, comments received on the Draft EIR prompted changes to the final version of the document – i.e., the Final EIR. These are shown in strikeout/underline format in the Final EIR. The Final EIR also includes informational updates and clarifications. These, too, are shown in strikeout/underline format. Consistent with CEQA Guidelines Section 15088.5(b), these revisions have been made to clarify text for consistency or revise punctuation as appropriate throughout the document, and these revisions do not result in what constitutes new significant information that would require recirculation of the document. A summary of these revisions are provided in the Errata Summary Table below. The Final EIR chapters that include revisions consist of:

- Executive Summary
- Chapter 1 – Project Description
- Chapter 2.1 – Aesthetics
- Chapter 2.3 – Biological Resources
- Chapter 2.5 – Hazards and Hazardous Materials
- Chapter 2.6 – Noise
- Chapter 2.8 – Traffic and Transportation
- Chapter 2.9 – Wildfire
- Chapter 3.1.1 – Agricultural Resources
- Chapter 3.1.4 – Greenhouse Gas Emissions
- Chapter 4 – Project Alternatives

- Chapter 5 – References
- Chapter 7 – List of Project Design Features, Mitigation Measures, and Environmental Design Considerations

In addition, several of the Draft EIR appendices were revised based on comments received during public review. The appendices in the Final EIR which include revisions consist of:

- Appendix B – Visual Resources Report
- Appendix C - Air Quality and Greenhouse GasTechnical Report
- Appendix D – Biological Resources Technical Report
- Appendix E – Cultural Resources Report
- Appendix I – Boulder Brush Facilities Fire Protection Plan
- Appendix N – Water Supply Assessment
- Appendix O –Shadow Flicker Analysis

Revisions to these appendices have been completed in strikeout/underline format and are also outlined in the Errata Summary Table below. Also, a supplemental analysis has been added to Appendix O.

Also, disclosure of additional materials have been included as additional appendices to the Final EIR. These appendices consist of:

- Appendix P-1 – USFWS Biological Opinion
- Appendix P-2 – Biological Assessment for the Campo Wind Project with Boulder Brush Facilities
- Appendix P-3 – Campo Wind Project with Boulder Brush Facilities Section 7 Supplemental Letter
- Appendix Q – Fire and Emergency Services Agreement

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	Executive Summary	
Executive Summary, Page ES-1	The following text shown in underline has been included to describe the public review period for the Draft EIR, and where comments and response to comments can be found within the Final EIR: The Draft Environmental Impact Report (Draft EIR) for the proposed Project was prepared and circulated for public review from December 12, 2019 to February 3, 2020. During that time, the County received comment letters from Tribes, Agencies, Organizations, and Individuals. The County has prepared responses to each of the written comment letters. The comment letters and responses are included in Volume II of the Final EIR. In some cases, comments received prompted changes to the Draft EIR. In addition, updated information is provided where appropriate. These changes are shown in strikeout/underline in the Final EIR and are summarized in the Errata Summary Table, Table ES-2, below.	Update
Executive Summary, Page ES-2	The following text shown in underline has been included to reflect the current status of the EIS prepared for the Project by the BIA: Since the majority of the Project is located on the Reservation, the Project is also subject to NEPA. The BIA is the Lead Agency for the Project under NEPA, and has prepared an EIS for the Project. The County is a cooperating agency for the EIS. The BIA released a Notice of Intent to prepare an EIS on November 21, 2018, and closed the comment period on December 21, 2018. The BIA held a public scoping meeting on December 6, 2018, at the Tribal Hall on the Reservation. The Draft EIS was released on May 24, 2019, for a 45-day public review period, which ended on July 8, 2019. The BIA signed the Record of Decision (ROD) on April 7, 2020, approving the project and completing the NEPA process.	Update
Section ES 1.1, Page ES-3	As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included: The Project as a whole would consist of the construction, operation, maintenance, and ultimately the decommissioning of a renewable wind energy generation project consisting of 60 wind turbines, three permanent meteorological (MET) towers, six temporary MET towers, a temporary concrete batch plant for use during construction, a temporary equipment staging and parking area for use during construction, an operations and maintenance (O&M) facility, water collection and septic systems, access roads, an electrical collection and communications system (ECCS), an approximately 8.5-mile-long gen-tie line, a collector substation, a high-voltage substation, and a switchyard to interconnect the Project to the existing SDG&E Sunrise Powerlink (see Figure 1-3, Project Site Plan, in Chapter 1 of this EIR). A total of 76 wind turbine sites within the Reservation are shown in Figure 1-3 and have been analyzed in this EIR; however, only 60 turbines would be constructed in accordance with the Campo Lease. Further, as a result of Federal Aviation Administration	Update

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	review, four of the 76 identified wind turbine sites would not be utilized. The Project would operate for more than 30 years, after which it would be decommissioned, except for the SDG&E-owned and operated switchyard and connection lines to Sunrise Powerlink, which would not be decommissioned. The details regarding the Project components and construction thereof are provided in Chapter 1, Project Description, Location, and Environmental Setting, of this EIR.	
Section ES.4, Page ES-9	The following text has been corrected and is shown in strikeout (deleted text)/underline (added text): ES.4 Issues to Be Resolved by the Decision-Making Body The San Diego County Planning Commission serves as the decision-making body for Major Use Permits; however, the Boulder Brush Facilities require a Fire Services Agreement, which must be approved by the County Board of Supervisors. Therefore, for the Boulder Brush Facilities, the Board of Supervisors is the decision-making body for the Major Use Permit. The Planning Commission will make a recommendation on the Boulder Brush Facilities to the Board of Supervisors. ~~The San Diego County Planning Commission serves as the decision-making body for the Project.~~ Issues to be resolved by the Board of Supervisors ~~Planning Commission~~ include: (1) how to mitigate the significant effects of the Project; (2) whether to reject or approve one of the alternatives to the Project and other environmental findings; and (3) whether to reject or approve the Project. The Board of Supervisors ~~Planning Commission~~ must adopt detailed findings on the feasibility of mitigation measures that substantially lessen or avoid the significant effects of the Project on the environment. In addition to mitigation measures, the Board of Supervisors ~~Planning Commission~~ will decide whether or not to adopt the Project or any of the Project alternatives that would feasibly attain most of the Project objectives while avoiding or substantially reducing any of the significant impacts of the Project. Because this EIR has identified adverse environmental effects that are unavoidable, the Board of Supervisors ~~Planning Commission~~ must also determine whether the adverse environmental effects are considered acceptable with consideration given to economic, social, technological, and other relevant benefits of the Proposed Project pursuant to CEQA Section 15093.	Correction
Table ES-1, Page ES-17	A correction has been made to Table ES-1, Summary of Significant Effects, in the Executive Summary chapter of the Final EIS to include the identified significant and unavoidable aesthetics impacts for the Boulder Brush Facilities (Impact AE-1 and Impact AE-2). These impacts were identified in both the Aesthetics Draft EIR Chapter and the Visual Resources Report (Appendix B), but mistakenly were not included in Table ES-1.	Correction

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
Table ES-1, Pages ES-19, ES-21, ES-22, and ES-23	The title of mitigation measure M-BI-7 has been revised as follows: **M-BI-7** (revegetation ~~of temporarily impacted areas~~).	Correction
Table ES-1, Pages ES-21, and ES-22	The title of mitigation measure M-BI-16 has been revised as follows: **M-BI-16** (federal, ~~and~~ state, and local agency permits).	Correction
Table ES-2, Pages ES-30 through ES-63	Table ES-2, Errata Summary Table, has been included in the Executive Summary for the Final EIR to reflect revisions made to the Final EIR as a result of public comments received during the public review period, as well as updated information.	Update
Chapter 1 Project Description		
Section 1.2.1, Pages 1-4, and 1-5; Section 1.2.2.1, Page 1-26; Section 1.2.2.2, Page 1-35	Related to comment O10-6, an editorial revision in Chapter 1 Project Description of the Draft EIR was implemented. As requested by SDG&E, references to "control house" have been revised to "control shelter" in the Final EIR.	Correction
Section 1.2.1, Page 1-6	In the first paragraph on Page 1-6 of the Project Description, the term retention pond has been changed to earthen bottom detention basin.	Correction
Section 1.2.2, Page 1-7	In response to comment O10-7, and as requested by SDG&E, the following text has been added: "SDG&E will have use of the access roads after construction is complete for the purpose of operations and maintenance of their facilities."	Response to Comment
Section 1.2.1, Page 1-9	As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included. Additionally Figure 1-3 has been updated to reflect the text included: The Project would include up to 60 wind turbines within the Campo Corridor on the Reservation. A total of 76 wind turbine sites within the Reservation are shown in Figure 1-3 and have been analyzed in this EIR; however, only 60 turbines would be constructed in accordance with the Campo Lease. Further, as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized. These four wind turbine sites are located in the northwestern corner of the Reservation (Refer to Figure 1-3). The 60 wind t~~T~~urbines would be arranged in accordance with applicable industry siting recommendations for optimum energy production and minimal land disturbance.	Update
Section 1.2.2, Page 1-18; Section 1.2.2.2, Page 1-31; and Section 1.2.7, Page 1-42; Section 1.2.2.3, Page 1-38 and 1-39	In response to comment O12-15, text has been revised to refer to "revegetation" rather than "restoration" for consistency with mitigation M-BI-C (e) which states revegetation.	Correction

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
Section 1.2.2.3, Pages 1-38 and 1-39	In response to comment O12-15, text stating "Local seed sources would be used where feasible" has been revised to state "Locally available seed will be used, and that seed from species that are unavailable for collection would not be incorporated into the final seed palette."	Response to Comment
Table 1-4, Page 1-57	Related to comment O6-76, in Table 1-4 a correction has been made to the status of cumulative project Rugged Solar, and the status has been changed from "Under Construction" (UC) to "Approved" (A) original application and "Under Review"(UR) revised application.	Correction
Chapter 2.1 Aesthetics		
Section 2.1.3, Page 2.1-17	For clarification, reference to the Supplemental Shadow Flicker Analysis has been added: "Additionally, for informational purposes, the County has conducted a Supplemental Shadow Flicker Analysis which is included as Attachment 1 to Appendix O."	Response to Comment
Section 2.1.3.1, Page 2.1-31	In response to comment I37-9, the following text has been added: "The proposed widening of Ribbonwood Road would occur within existing County right-of-way and/or non-exclusive easements (acquisition of private property for widening would not be required)."	Response to Comment
Section 2.1.3.2, Page 2.1-41	The following revision has been made in strikeout as a correction to the sentence: These components would ~~would~~ create strong form, line, and color contrast with the characteristic landscape (see Figure 2.1-9, KOP 2; Figures 2.1-10 and 2.1-11, KOP 3 and KOP 4; Figure 2.1-12, KOP 5; and Figure 2.1-14, KOP 7).	Correction
Section 2.1.3.3, Page 2.1-45	In response to comment I37-9, the following text has been added: "Improvements to Ribbonwood Road would consist of paving and where needed, widening of an existing road within existing County right-of-way and/or non-exclusive easements."	Response to Comment
Section 2.1.3.6, Page 2.1-66	As a result of information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included. A Shadow Flicker Analysis prepared for the Project ~~and~~ is included as Appendix O to this EIR (November 13, 2019). For informational purposes, and due to public comments received which noted the difference in the rotor diameter described in Chapter 1 (up to approximately 460 feet) and the rotor diameter assumed in the Shadow Flicker analysis (450 feet), a Supplemental Shadow Flicker Analysis, dated August 28, 2020 was prepared and included as Attachment 1 to Appendix O. The Supplemental Shadow Flicker Analysis assumed a rotor diameter of 460 feet, consistent with the Project description in Chapter 1 of the Draft EIR, whereas the 2019 analysis assumed the same maximum tip height with a rotor diameter of 450 feet. The supplemental analysis compared the modelled results based on a rotor diameter of 460 feet versus a rotor diameter of	Update

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	450 feet and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR. This analysis uses the Alameda County guideline as suggested by the County to evaluate potential shadow flicker effects from Project turbines on receptors both On- and Off-Reservations. For the purposes of this analysis, the term "On-Reservations" refers to anything within the reservation boundaries of the Campo, La Posta, and Manzanita tribes, while the term "Off-Reservations" refers to anything outside of the Campo, La Posta, and Manzanita tribal reservation boundaries.	
Section 2.1.3.6, Page 2.1-66 and 2.1-67	As a result of Federal Aviation Administration review of the Project, the following text shown in underline has been included. In accordance with the Campo Lease, no Project turbines would be sited within 0.25-mile (or 1,320 feet) of any receptor on the Reservation. In addition, and based on the modeled 76-turbine layout, no Project turbines are sited within 1,000 feet of any receptor outside of the Campo Reservation. As described in the Shadow Flicker Analysis (Appendix O), the modeling results are conservative as it analyzes 76 turbine sites, 16 more turbines than will be constructed under the terms of the Campo Lease. Further as a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized (Refer to Figure 1-3). However, based on the shadow flicker modeling conducted as part of the analysis, On- and Off-Reservations receptors may experience shadow flicker effects. Shadow flicker would result from turbines associated with the Campo Wind Facilities which are located within the Reservation Boundary, and thus, turbine siting and approval are outside the control of the County.	Update
Chapter 2.2 Air Quality		
Section 2.2.6, Page 2.2-47	Mitigation Measure M-AQ-2 (f.) has been corrected as shown in strikeout underline: f. Visible track-out into traveled public streets shall be removed with the use of sweepers, water trucks, or similar method ~~within 30 minutes of occurrence~~when active operations cease or every 24 hours for continuous operations.	Correction
Chapter 2.3 Biological Resources		
Sectoin 2.3.1.4, Page 2.3-11	Reference to the Quino checkerspot butterfly has been included at the end of this sentence for clarification. The included text is shown in underline: Of the total species observed, 27 of these are considered special status, one of which is a federally listed species (Quino checkerspot butterfly (*Euphydryas editha quino*)).	Clarification
Section 2.3.1.6, Page 2.3-23 and 2.3-24	The reference 'Faulkner, D.K., and M.W. Klein 2012' has been revised to year 2003 instead of 2012 as a correction	Correction
Section 2.3.3.2, Page 2.3-52 and 2.3-53	Multiple comments received on the Draft EIR expressed concern regarding the studies and analyses performed to identify potential impact on bats. In terms of the impact analysis for bats, the wind turbines were considered to present a potential risk to bats for both collision and	Correction

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	barotrauma impacts. The Final EIR has been revised to clarify this point. The added text is shown as underlined. "The Campo Wind Facilities would include approximately 60 turbines. Birds protected under the MBTA would be at risk for collisions with the turbines and gen-tie line support poles, and these impacts would be **potentially significant** (**Impact BI-E**). The infrequent sightings during the eagle point surveys and USGS biotelemetry data suggests that the Campo Corridor and surrounding area receives little use by eagles and is not the core territory of any eagles. Additionally, there were low occurrences of bats during surveys within the Campo Corridor, particularly when compared to other areas with higher-quality habitat types in the region. Risk to bats associated with the Project primarily stems from direct impacts to roost sites, electrocution, barotrauma, and collision. In this case, no maternity roost sites are known from the area or nearby. Additionally, because of the type of turbine infrastructure and turbine wiring protections, electrocution is also of limited risk. Moreover, because of the slower speeds associated with Project turbines, barotrauma is also of limited to no risk. The Shu'luuk data and Jewell Valley data sets showed most of the bat activity occurred around the lower microphone, or 15 feet off the ground and far under the rotor swept area. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. Therefore, bats and golden eagles are not anticipated to have a high number of collisions with turbines due to the low occurrence of these species using the site."	
Section 2.3.3.2, Page 2.3-53	Further clarification as to why direct impacts to bats from electrocution would be negligible. The added text is shown as underlined. "Direct impacts to bats could result in mortality or injury due to collisions at wind turbines. However, potential effects of the Project on the meta-community of bats in the region, including those species known to be susceptible to collision with turbine blades, would be negligible. Additionally, because of the type of turbine infrastructure and turbine wiring protections, electrocution is also of limited risk. Further, no maternity roost sites are known in the area".	Update
Section 2.3.3.2, Pages 2.3-53 and 2.3-54	In response to comment O12-41, text has been revised to clarify the significance determinations for impacts to County List D species. Deleted text is shown as strikeout and added text is shown as underlined. "There would be no direct impacts to County List C plant species resulting from implementation of the Boulder Brush Facilities. Potential impacts to County List D species include Colorado Desert larkspur within the Boulder Brush Corridor, ~~and Payson's jewelflower (Chorizanthe leptotheca), and pride of California (Lathyrus splendens) within the Campo Corridor,~~ which is considered less than significant per the County Guidelines because the Project would not impact the long-term survival of this plant. Impacts to County List D species Payson's jewelflower, Peninsular spineflower (Chorizanthe leptotheca), and pride-of-California (Lathyrus splendens) within the Campo Corridor are considered significant and unavoidable".	Response to Comment

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
Section 2.3.3.6, Page 2.3-103	Reference to Table 2.3-5 has been included at the end of this sentence for clarification, shown in underline: The Boulder Brush Boundary is located within the boundaries of the draft MSCP East County Plan area. The Boulder Brush Facilities conform to the goals and requirements as outlined in the East County MSCP Planning Agreement Conservation Objectives, see Table 2.3-5.	Clarification
Section 2.3.3.6, Page 2.3-108	The following revision shown in underline has been made as a correction to the sentence: Based on the low golden eagle use within the Campo Corridor for foraging, impacts are considered **less than significant**.	Correction
Section 2.3.4.1, Page 2.3-111	A revision has been to correct the acreage of disturbance associated with the biological cumulative analysis study area. The impacted acreage has been corrected to 2,367 from 2,893 acres.	Correction
Section 2.3.6, Pages 2.3-122 thru 2.3-127	The conservation measures (CM) included in, and required by, the Biological Opinion (BO) of the Final EIS have been added to mitigation measure M-BI-1 in Chapter 2.3 of the Final EIR and will be required to be implemented by the Project. The conservation measures required by the BO include CM-1: Offsite Land Conservation, CM-2: Limiting Impacts to Occupied Habitat, CM-3 Avoidance of Vehicle Strikes, CM-4: Revegetation of Temporary Impacts, CM-5: Weed Control, CM-6: Trash Control, CM-7: Dust Control, CM-8: Fire Prevention. The added text is shown as underlined in M-BI-1 in Chapter 2.3 of the Final EIR.	Updated
Section 2.3.6, Page 2.3-131	In response to comment O12-57, the Final EIR has been updated to clarify in Mitigation Measure M-BI-5 that the mitigation plan for the off-site open space shall include a combination of relocation and/plantings. Added text is shown as underlined. "…If any special-status species are found during the pre-construction surveys, the Applicant shall develop a plant ~~relocation~~ mitigation plan for the off-site open space. The mitigation plan shall be ~~(~~prepared by a biologist with at least 5 years of experience in rare plant relocation and/or mitigation~~)~~, and the plan shall include a combination of preservation relocation and/or plantings with plant specimens grown on site or from local seed or cutting sources to achieve the mitigation ratios required by the County. The individuals shall be planted within the open space to secure a 2:1 mitigation ratio for any County List A species, and a 1:1 mitigation ratio for County list B species identified. If relocation and/or plantings is conducted as part of the mitigation plan, t~~T~~he plant ~~relocation~~ mitigation plan shall require the Applicant to submit a revegetation plan, including annual monitoring reports for at least 5 years after the replanting to demonstrate that the plants have been successfully established at the required mitigation ratio."	Response to Comment
Section 2.3.6, Pages 2.3-134 and 2.3-135	The title of mitigation measure M-BI-7 has been revised, and additional text has been added to mitigation measures M-BI-7 to address the preparation and implementation of the decommissioning plan. The added text is shown as underlined.	Updated

Errata Summary Table
Campo Wind with Boulder Brush Facilities Final EIR Text Changes

Section Page	Change	Reason for Change
	"Revegetation ~~of Temporarily Impacted Areas.~~ Disturbed areas that are not required to be clear for operations and maintenance activities (i.e., temporarily disturbed areas) shall be revegetated or stabilized using soil binders within 90 days of construction completion. The Boulder Brush Facilities would result in temporary impacts to sensitive upland and jurisdictional aquatic resources (ephemeral channels). Temporary impacts shall be revegetated to provide erosion control, slope stabilization, or other necessary function. Revegetation areas may incorporate salvaged materials, such as seed collection and translocation of plant materials, as determined to be appropriate. The Project Biologist shall review the plant materials prior to grading and determine if salvage is warranted. Ephemeral channels will be restored to pre-construction conditions, as feasible. Prior to decommissioning of Boulder Brush Facilities, a decommissioning plan consistent with the terms of the Private Lease would be prepared and implemented. The decommissioning plan shall include revegetation of the previously disturbed areas. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed would be used, and seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of disturbed areas shall provide a minimum of 40 percent cover of plant species native to adjacent habitats within 2 years of construction completion. If 40 percent cover of native species is not achieved within 2 years, adaptive management measures will be pursued until 40 percent cover of native species is achieved." Section 2.3-6, Pages 2.3-135 and 2.3-136	As a correction, the last sentence of Mitigation Measure M-BI-11 has been removed. The deleted text is shown as strikeout: **"M-BI-11 Erosion and Runoff Control.** During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This shall protect sensitive vegetation from being inundated with sediment-laden runoff. Dewatering shall be conducted in accordance with standard regulations of the Regional Water Quality Control Board (RWQCB). A construction National Pollutant Discharge Elimination System permit, issued by RWQCB to discharge water from dewatering activities, shall be required prior to start of construction. This shall minimize erosion, siltation, and pollution within sensitive communities. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. ~~An Urban Runoff Plan and operational best management practices shall be approved by the San Diego County Department of Planning & Development Services prior to construction.~~"	Correction
Section 2.3.6, Pages 2.3-136 and 2.3-137	Additional text has been added to mitigation measure M-BI-13 to address the weed management plan. The added text is shown as underlined. **"Prevention of Invasive Plant Species.** A County of San Diego – approved plant list shall be used for the revegetation areas. A hydroseed	Correction

Errata Summary Table
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	mix that incorporates native species and is appropriate to the area, shall be used for slope stabilization in transitional areas. No invasive plant species as included on the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the Project region shall be included in the seed mix, and the plant palette shall be composed of native species that do not require high irrigation rates. The hydroseed mix and a map of the seeded areas shall be submitted and approved by the County of San Diego prior to re-seeding. Additionally, a weed management plan shall be developed prior to commencement of construction activities. The plan will cover a Weed Management Area (WMA) which includes all project disturbance areas, and a 50 foot buffer. The plan shall include the following: 1. Baseline weed inventory and risk assessment, identifying species targeted for control that currently occur within, or that may invade, the WMA 2. Identification of baseline infestation areas and necessary containment/preventive measures 3. Annual surveys within the WMA to document weed species during construction and for 2 years post construction 4. Success standards, such as no more than a 10% increase in target weed species within the WMA 5. Control techniques and adaptive management measures 6. Reporting All herbicide application shall be in compliance with applicable laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator."	
Section 2.3.6, Page 2.3-127	Reference to mitigation measure M-WF-1 has been included as the last sentence to M-BI-14, shown in underline: **Fire Protection**. To minimize impacts to biological resources from fire hazards, the Boulder Brush Facilities Fire Protection Plan shall be implemented in conjunction with development of the Boulder Brush Facilities. See also mitigation measure M-WF-1, Chapter 2.9 Wildfire.	Clarification
Section 2.3.6, Pages 2.3-137 and 2.3-138	In response to comment O12-60, additional text has been added to Mitigation Measure M-BI-16 to clarify the requirements for the Conceptual Wetlands Mitigation and Monitoring Plan. The title of the mitigation measure has also been revised. Added text is shown as underlined and deleted text is shown as strikeout. **"Federal, ~~and~~ State, and Local Agency Permits** "…Prior to issuance of land development permits, including clearing, grubbing, and grading permits for activities that would impact jurisdictional aquatic resources, the Boulder Brush Developer shall prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the Director of Planning & Development Services (or his/her designee) and the applicable Resource Agencies…."	Response to Comment

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Section 2.3.6, Page 2.3-138 and 2.3-139	In response to comment O12-56, Mitigation Measure M-BI-A has been updated to reflect the requirements outlined in the approved BO. Added text is shown as underlined and deleted text is shown as strikeout. "**Implementation of USFWS-Issued Terms and Conditions** All terms and conditions developed as part of the Section 7 consultation process with the U.S. Fish and Wildlife Service (USFWS) and provided in the Project's Biological Opinion shall be implemented. Terms and conditions shall apply to any ESA-listed species that may be impacted by the Project. Ratios for habitat-based mitigation (if any) shall be determined during the Section 7 consultation process. The mitigation shall focus on habitat preservation and creation for long-term conservation of metapopulation dynamics. Per coordination with USFWS, seasonal avoidance of mapped suitable Quino checkerspot butterfly habitat during Project construction would not be required. Terms and conditions outlined in the Project's Biological Opinion shall take precedence over the measure outlined herein. The measure described below would be subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and by the County of San Diego for the Boulder Brush Facilities. The Project's Biological Opinion will be issued to the BIA and the BIA will be responsible for implementing the terms and conditions of the Biological Opinion. **(a) Construction ~~Flagging~~ Fencing and Signage.** Construction ~~flagging~~ fencing and/or signage will be installed when construction of the Project occurs immediately adjacent to mapped occupied Quino checkerspot butterfly habitat (i.e., within a 200-meter radius around host plant concentrations or Quino checkerspot butterfly detections that are located within 1 kilometer of a mapped Quino checkerspot butterfly location) to prevent unnecessary intrusion into occupied Quino checkerspot butterfly habitat. Signage shall be installed where ~~construction activity~~ high-use areas of the lease area border suitable Quino checkerspot butterfly habitat to prevent intrusion into sensitive habitat and remind personnel of restrictions regarding activities within these areas." ~~**(b) Seasonal Avoidance. To the extent practicable, all construction clearing and grubbing in mapped suitable QCB habitat (i.e., within a 200-meter radius around host plant concentrations or QCB detections that are located within 1-kilometer of a mapped QCB location) associated with construction of the Project shall occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, as determined by the USFWS. Vegetation management during the operation and maintenance phase of the Project shall also occur when adult and larval activity is reduced and host plants are not generally flowering or germinating, to the extent practicable.~~	Response to Comment
Section 2.3.6, Pages 2.3-142 - Page 2.3-147	In response to comment O12-56, Mitigation Measure M-BI-C has been updated to reflect the requirements outlined in the approved BO. Added text is shown as underlined.	Response to Comment

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	General Avoidance and Minimization Measures. **(a) Project Biologist(s)**. A Project biologist(s) approved by the U.S. Fish and Wildlife Service (USFWS) and the Campo Band of Diegueño Mission Indians (Tribe) shall be designated by the ~~D~~developer. The Campo Environmental Protection Agency ~~is recommended to oversee~~ shall enforce the duties of the Project biologist for all work conducted on the Reservation. The ~~D~~developer shall submit the names, documented experience, any relevant permit numbers, and resumes for the Project biologist(s) to USFWS and the Tribe for approval prior to initiation of construction. The Project biologist(s) shall be responsible for the following: • Providing training to all construction workers (may take the form of any documentable training platform). • Reviewing and/or designating the construction area in the field with the construction contractor in accordance with the final grading plan prior to clearing, grubbing, or grading. • Conducting a field review of the staking to be set by the professional surveyor, designating the limits of all construction activity prior to clearing, grubbing, or grading. • Flushing wildlife species (i.e., ~~reptiles, mammals~~, avian, or other mobile species) from occupied habitat areas immediately prior to (i.e., within 2 hours) brush-clearing and earthmoving activities. ~~This does not include disturbance of nesting birds (see M-BI-B) or "flushing" of federally listed species (e.g., Quino checkerspot butterfly [see M-BI-A]).~~ • Regularly monitoring construction activities to verify that construction is proceeding in compliance with all permit requirements specific to biological resources. • Overseeing the construction site so that cover and/or escape routes for wildlife from excavated areas are provided on a daily basis. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them, and/or excavations shall provide an earthen ramp or boards to allow for a wildlife escape route at the ends and every 30 feet. • Maintaining communication with the appropriate personnel (construction Project manager, resident engineer) so that issues relating to biological resources are appropriately and lawfully managed. • Verifying that grading plans include a stormwater pollution prevention plan. • Reporting any noncompliance issues to the Bureau of Indian Affairs, resident engineer, and the Tribe. **(b) Environmental Training Program**. A worker environmental awareness program shall be developed and implemented prior to the start of construction. The Project biologist(s) shall use this program to conduct environmental training for construction personnel. All	

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	construction site personnel shall be required to attend the environmental training in conjunction with hazard and safety training prior to working on site. **(c) SWPPP.** The stormwater pollution prevention plan (SWPPP) or equivalent shall include, at a minimum, the best management practices listed below. The combined implementation of these requirements shall protect adjacent habitats and special-status species during construction to the maximum extent practicable. At a minimum, the following measures and/or restrictions shall be incorporated into the SWPPP and noted on construction plans, where appropriate, to avoid impacts to special-status species, special-status vegetation communities, and/or jurisdictional waters during construction. The measures described in the SWPPP ~~would be~~ are subject to enforcement by the Campo Environmental Protection Agency on the Reservation, and the County of San Diego for the ~~Boulder Brush Facilities~~ Off-Reservation areas. The Project biologist(s) shall verify the implementation of the following design requirements: • No planting or seeding of invasive plant species (per the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the Project region) shall be permitted. • Construction activity shall not be permitted in jurisdictional waters of the United States except as authorized by applicable law and permit(s), including permits and authorizations approved by the U.S. Army Corps of Engineers. • Silt settling basins installed during the construction process shall be located away from areas of ponded or flowing water to prevent discolored, silt-bearing water from reaching areas of ponded or flowing water during normal flow regimes. • Temporary structures, staging, and storage areas for construction equipment and/or materials shall not be located in jurisdictional waters, including wetlands and riparian areas. • Any equipment or vehicles driven and/or operated within jurisdictional waters of the United States shall be checked and maintained by the operator daily to prevent leaks of oil or other petroleum products that could be deleterious to aquatic life if introduced to the watercourse. • No stationary equipment, such as motors, pumps, generators, and welders, or fuel storage tanks shall be located within 200 feet of jurisdictional waters of the United States. • No debris, bark, slash sawdust, rubbish, cement, concrete, oil, or petroleum products shall be stored where it may be washed by rainfall or runoff into jurisdictional waters of the United States. • When construction operations are completed, any excess materials or debris shall be removed from the work area.	

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	• No equipment maintenance shall be performed within 200 feet of jurisdictional waters of the United States where petroleum products or other pollutants from the equipment may enter these areas. • Fully covered trash receptacles that are animal-proof and weather-proof shall be installed and used by the construction contractor(s) to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Littering shall be prohibited and trash shall be removed from construction areas daily. All food-related trash and garbage shall be removed from the construction sites on a daily basis. **(d) Fugitive Dust Control**. The ~~D~~developer ~~or its designee~~ shall ~~implement the~~ develop a fugitive dust control plan in compliance with San Diego County Air Pollution Control Regulations to reduce particulate matter less than 10 microns (PM_{10}) and fine particulate matter less than 2.5 microns ($PM_{2.5}$) emissions during construction and decommissioning. The fugitive dust control plan shall include names, addresses, and phone numbers of persons responsible for the preparation, submission, and implementation of the plan; description and location of operation(s); and a list of all fugitive dust emissions sources included in the operation. The following dust control measures shall be implemented: • All on-site unpaved roads shall be effectively stabilized using soil stabilizers that can be determined to be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil stabilizers, and shall not increase any other environmental impacts including loss of vegetation. Application of the soil stabilizer shall be undertaken strictly to the manufacturer's directions for application and cognizant of the weather forecast to avoid application immediately before a rain event. • All material excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed areas. • All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). • Soil loads shall be kept below 18 inches of the freeboard of the truck. • Drop heights shall be minimized when loaders dump soil into trucks. • Traffic speeds on unpaved roads shall be limited to 15 miles per hour. • Disturbed areas shall be minimized. ~~measures outlined in project design features PDF-AQ-2 and PDF-AQ-3 (Fugitive Dust Control) of the Final EIR.~~**(e) Revegetation.** Disturbed areas that are not required to be clear for operations and maintenance activities ~~(i.e., temporarily disturbed areas)~~ shall be revegetated or stabilized using soil binders within 90 days of construction completion. If soil binders are used they shall be as efficient, or more efficient, for fugitive dust control than California Air Resources Board-approved soil	

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	stabilizers. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed will be used, and that seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation ~~of temporarily disturbed areas~~ shall provide a minimum of 40 percent% cover of plant species native to adjacent habitats within a ~~2~~ two-year time frame. If 40 percent% cover of native species is not achieved within ~~2~~ two years, adaptive management measures ~~(e.g., supplemental seeding, erosion control, pest control)~~ will be pursued until 40 percent% cover of native species is achieved. If the Campo Wind Facilities were to be decommissioned ~~Prior to decommissioning of Campo Wind Facilities~~, a decommissioning plan would be prepared and implemented. The decommissioning plan shall include revegetation of the previously-impacted ~~disturbed~~ areas. Soil would be revegetated with native plant species found within adjacent habitats. Locally available seed ~~would be~~ will be used, and seed from species that are unavailable for collection would not be incorporated into the final seed palette. Revegetation of disturbed areas shall provide a minimum of 40 percent% cover of plant species native to adjacent habitats within a ~~2~~ two-year time frame. If 40 percent% cover of native species is not achieved within ~~2~~ two years, adaptive management measures will be pursued until 40 percent% cover of native species is achieved. **(f) Erosion and Runoff Control.** During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This will protect jurisdictional resources from being inundated with sediment-laden runoff. Design of drainage facilities shall incorporate long-term control of pollutants and stormwater flow to minimize pollution and hydrologic changes. **(g) Weed Management.** A weed management plan shall be developed and approved by the Tribe prior to commencement of construction activities on the Reservation. The plan will cover a Weed Management Area (WMA) which includes all project disturbance areas, and a 50 foot buffer. The plan shall include the following: • Baseline ~~W~~weed inventory and risk assessment, identifying species targeted for control that currently occur within, or that may invade, the WMA; • Identification of baseline infestation~~problem~~ areas and necessary containment/preventive measures; • Annual surveys within the WMA~~restoration areas~~ to document weed species during construction and for ~~weed patches for~~ 2 years post construction; • Success standards of~~, such as~~ no more than a 10% increase in target weed species within the WMA~~in restoration areas~~; • Control techniques and ~~A~~adaptive management measures; and • Reporting.	

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	All herbicide application shall be in compliance with applicable all state and federal laws and regulations under the prescription of a Pest Control Adviser and implemented by a licensed applicator. **(h) Fire Protection.** To minimize the potential exposure of the Project to fire hazards, a Boulder Brush Fire Protection Plan (FPP) shall be prepared and a Fire Protection Plan for the Campo Wind Facilities shall be prepared to the satisfaction of the CRFPD. The FPPs shall be implemented in conjunction with development of the Project."	
Section 2.3.7, Page 2.3-148	Text has been included under the Candidate, Sensitive, or Special-Status Species (Project) The added text is shown as underlined. "There are no federally or state-listed plants within the Boulder Brush Corridor, Campo Corridor, or limits of grading. A portion of the Boulder Brush Facilities would result in the loss of sensitive plant species (County List A and County List B). The Project would result in permanent and temporary direct impacts to habitat for special-status (County Group 1 species or CDFW SSC) wildlife species. Project impacts to special-status plant and wildlife species would be reduced to **below a level of significance with mitigation** for all impacts in the Boulder Brush Facilities. Some impacts associated with the Campo Wind Project will remain significant; however, most are reduced to below a level of significance with mitigation."	Correction
Section 2.3.7, Pages 2.3-149, 2.3-151, 2.3-152, 2.3-154 and 2.3-155	Reference to mitigation measure M-BI-7 has been changed. Deleted text is shown as strikeout. **M-BI-7** (revegetation ~~of temporarily impacted areas~~)	Correction
Section 2.3.7, Pages 2.3-151 and 2.3-152	Reference to mitigation measure M-BI-16 has been changed. Deleted text is shown as strikeout and added text is shown as underlined. **BI-16** (federal, ~~and~~ state, and local agency permits)	Correction
Section 2.3.7, Page 2.3-151	A correction has been made under the significance conclusion for Impact BI-L. Deleted text is shown as strikeout. "These potential impacts would be reduced ~~to below a level of significance~~ with the implementation of EIS-recommended mitigation measures M-BI-B (Avian-Specific Avoidance, Minimization, and Mitigation Measures)."	Correction
Chapter 2.5 Hazards and Hazardous Materials		
Chapter 2.5, Page 2.5-1	The Supplemental Shadow Flicker Analysis has been included to the list of technical reports. Added text is shown as underlined. • *"Supplemental Shadow Flicker Analysis: Campo Wind Project with Boulder Brush Facilities* prepared by AWS Truepower LLC (a UL Company) for Terra-Gen Development Company LLC in August 2020 (Attachment 1 to Appendix O)"	Correction
Section 2.5.1, Page 2.5-8	In response to comment O-10-8, SDG&E has requested they be removed from a sentence stating their affiliation with either owning or operating treatment, storage, or disposal facilities within the County. Deleted text shown as underlined.	Response to Comment

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	"Within unincorporated San Diego County, multiple treatment, storage, and disposal facility sites exist, such as those owned and operated by the U.S. military ~~and SDG&E~~."	
Section 2.5.3.2, Page 2.5-37	For consistency with O5-51 and to avoid confusion over FAA requirements for the text has been revised. Added text shown as underlined. "Due to the height of the proposed turbines the Developer would be required to submit form FAA 7460-1 to the FAA 45 days prior to the start of construction."	Response to Comment
Section 2.5.3.5	The word "upon" has been corrected to include a missing letter.	Correction
Section 2.5.3.5, Page 2.5-53	A discussion of the Supplemental Shadow Flicker Analysis now included as Attachment 1 to Appendix O of the Final EIR has been included. Added text is shown as underlined. Additionally, for informational purposes, and due to public comments received which noted the difference in the rotor diameter described in Chapter 1 (up to approximately 460 feet) and the rotor diameter assumed in the Shadow Flicker analysis (450 feet), the County conducted a Supplemental Shadow Flicker Analysis (August 2020) which is included as Attachment 1 to Appendix O. The Supplemental Shadow Flicker Analysis assumed a rotor diameter of 460 feet, consistent with the Project description in Chapter 1 of the Draft EIR, whereas the 2019 analysis assumed the same maximum tip height but a rotor diameter of 450 feet. The supplemental analysis compared the modelled results based on a rotor diameter of 460 feet versus a rotor diameter of 450 feet and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR.	Update
Chapter 2.6 Noise		
Section 2.6.1.3, Page 2.6-7	As a result of Federal Aviation Administration review of the Project, and to reflect information provided in the Supplemental Shadow Flicker Analysis (Attachment 1 to Appendix O of the Final EIR), the following text shown in underline has been included: Sensitive noise receptors (i.e., noise-sensitive land uses [NSLUs]) are located at various locations in proximity to the 2,520-acre area of land, including the Campo Corridor plus the Boulder Brush Corridor (Project Site) both On-Reservation (i.e., within the Reservation Boundary) and Off-Reservation. Almost all of the NSLUs are residential homes. Other NSLUs On-Reservation include facilities such as the Campo Tribal Hall, the Kumeyaay Head Start preschool, and the Campo Health Center, which are generally located along Church Road. The nearest Off-Reservation NSLU to the Boulder Brush Facilities (in this instance an access road) is approximately 300 feet away from the proposed access road. The nearest Off-Reservation NSLU to the Campo Wind Facilities (in this instance also an access road) is an existing residence located approximately 800 feet away from an access road. Up to 76 turbine sites have been identified, of which only 60 would be constructed in accordance with the Campo Lease. As a result of Federal Aviation Administration review, four of the 76 identified wind turbine sites would not be utilized (Refer to Figure 1-3). No	Update

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	Project turbines will be sited within 0.25 miles of any residential structure or tribal building on the Reservation. The closest Off-Reservation NSLU (i.e., on private lands) to a Project turbine site is approximately 1,030 feet away.	
	Chapter 2.8 Traffic and Transportation	
Section 2.8.3, Page 2.8-10	The following text shown in underline has been included to the County of San Diego Transportation Fee Ordinance description: Subsequent to adoption of the County's Transportation Guidelines in June 2020, the County is currently not implementing the local Transportation Impact Fee program and is currently not collecting fees for mitigation of projects analyzed using VMT. The existing program was based on Level of Service impacts, which are no longer analyzed under CEQA in accordance with Senate Bill 743.	Update
Section 2.8.4, Page 2.8-21	The following text shown in strikeout/underline has been included to the second sentence of the analysis under Threshold b): CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) for determining the significance of transportation impacts. The VMT provisions of Section 15064.3 are not applicable to this Project ~~until~~ because this EIR was circulated for public review prior to July 1, 2020 (CEQA Guidelines §§15007(c), 15064.3(c)).	Clarification
Section 2.8.4, Page 2.8-23	The following text shown in underline has been added under Threshold c) for clarification: Please refer to the analysis in response to threshold (d) below.	Clarification
Section 2.8.4, Page 2.8-23	The following text shown in underline has been added under Threshold c) for clarification: The analysis herein addresses both threshold c) and d).	Clarification
	Chapter 2.9 Wildfire	
Section 2.9.2.3, Page 2.9-21	The reference for San Diego County Code of Regulatory Ordinances Chapter 4 has been revised from '1985' to year '2004.'	Correction
Section 2.9.3.2, Page 2.9-30	The concluding paragraph for the Project related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/underline has been revised: ~~While the Project would comply with all applicable fire codes and provide design features for fire suppression, the Project would be located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire. Therefore, impacts related to wildfire risk are determined to be~~FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation of the Project would result in a **potentially significant impact (Impact WF-1/Impact WF-A)**.	Correction

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Section 2.9.3.2, Page 2.9-33	The concluding paragraph for the Boulder Brush Facilities related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/underline has been revised: ~~While t~~The Boulder Brush Developer would participate in a Fire Service Developer Agreement with the County, which would outline a fair-share funding agreement for fire services, and the Boulder Brush Facilities would comply with all applicable fire codes and provide design features for fire suppression as recommended and required by the FPP~~, the Boulder Brush Facilities are located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire~~. FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation of ~~As such,~~ the Boulder Brush Facilities would result in a **potentially significant impact** (**Impact WF-1**) regarding wildfire hazards.	Correction
Section 2.9.3.2, Page 2.9-34	The concluding paragraph for the Campo Wind Facilities related to Wildfire Risk has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout/underline has been revised: ~~While the Campo Wind Facilities would comply with all applicable fire codes and provide project design features for fire suppression, the Campo Wind Facilities are located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE, and additional measures are warranted to mitigate the potential for wildfire.~~FMZs and Project-specific fire risk management measures would ensure the Project would not exacerbate wildfire risk. However, because of the high wildfire risk location, installation ~~As such, implementation~~ of the Campo Wind Facilities would result in a **potentially significant impact** (**Impact WF-A**) regarding wildfire hazards.	Correction
Section 2.9.4, Page 2.9-40	The cumulative impact analysis has been revised for consistency throughout the Chapter. The determination of significance remains the same, but the following text shown in strikeout has been removed: While the Project would comply with all applicable fire codes and provide design features for fire suppression, the Project, and cumulative projects, would be located in a Very High Fire Hazard Severity Zone, as statutorily designated by CAL FIRE~~, and additional measures are warranted to mitigate the potential for wildfire~~. As such, the Project would result in a **potentially significant cumulative impact** (**Impact C-WF-3/C-WF-C**) regarding wildfire risk.	Correction

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	Chapter 3.1.1 Agricultural Resources	
Section 3.1.1.1, Pages 3.1.1-6 and 3.1.1-7	The reference 'Dudek 2018' has been revised to reference 'Appendix F-2.'	Correction
	Chapter 3.1.2 Energy	
Section 3.1.2.2, Page 3.1.2-10	The following state regulation has been included in the regulatory setting Section: California EO N-79-20 Executive Order N-79-20 establishes a new statewide goal that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It establishes a further statewide goal that 100% of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It also establishes a statewide goal to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible.	Update
Section 3.1.2.2, Page 3.1.2-14	The following text shown in underline has been included in the description of the County's Climate Action Plan as an update and for clarification: The County developed a Climate Action Plan that is a comprehensive strategy to reduce GHG emissions in the unincorporated communities of the County. The Climate Action Plan includes two strategies and five measures to reduce energy consumption and increase renewable energy generation (County of San Diego 2018). As outlined in Chapter 3.1.4 of this Final EIR, while the County Board of Supervisors rescinded the CAP, the Board provided direction to continue to implement GHG reduction measures and to work on fixing the CAP EIR and bring back a corrected CAP for adoption:	Update
	Chapter 3.1.4 Greenhouse Gas Emissions	
Section 3.1.4.2, Page 3.1.4-12	California Executive Order N-79-20 has been included to the list of applicable state regulations, as shown in underline: ***California EO N-79-20***. EO N-79-20 establishes a new statewide goal that 100% of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It establishes a further statewide goal that 100% of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It also establishes a statewide goal to transition to 100% zero-emission off-road vehicles and equipment by 2035 where feasible.	Update
Section 3.1.4.2, Page 3.4-19 and Page 3.1.4-20	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout and added text is shown as underlined. The court opinion did not address the majority of CAP measures, and the County finds those measures would reduce GHG emissions. For example,	Update

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	Measure E-2.1, Increase Renewable Energy, specifies a goal to achieve 90% renewable electricity for the unincorporated County by 2030. This measure is consistent with General Plan Strategy A-3, listed below. On appeal, the 4th District Court of Appeal for the most part held the lower court ruling and set aside the County's CAP. As with the lower court opinion the appellate court provided strong statement that the measures identified in the CAP, including Measure E-2.1, are valid measures to pursue to reduce GHG emissions. As the courts have set aside the County's CAP, and that the Checklist items in the CAP are not applicable to renewable energy projects, disclosure of consistency with the CAP has been removed from this EIR without consequence to the conclusions herein. The County Board of Supervisors rescinded the CAP and provided direction to continue to implement GHG reduction measures and to work on fixing the CAP EIR and bring back a corrected CAP for adoption. ~~A project's consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Consistency Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's GHG projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the CAP Consistency Checklist. Step 2 of the CAP Consistency Checklist identifies CAP GHG reduction measures that would apply to discretionary projects, and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Consistency Checklist are required as a condition of project approval. A project must provide substantial evidence that demonstrates how the project would implement each applicable CAP Consistency Checklist requirement described in Appendix C of the County's CAP, to the satisfaction of the Director of Planning and Development Services.~~	
Section 3.1.4.3, Page 3.1.4-25	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout and added text is shown as underlined. To address the CEQA Guidelines checklist question number 2, whether the Project is consistent with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, the Project was evaluated against the County's ~~CAP~~General Plan and Strategic Energy Plan, AB 32, SANDAG's RTP/SCS, and EO B-55-18. ~~In addition to the Project's potential impacts on GHGs using the GHG thresholds set forth in CEQA Appendix G, the analysis evaluates the Project using~~ considering the County's CAP Consistency Checklist	Update

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	~~General Plan and Strategic Energy Plan.[1] In December 2018, a court set aside the CAP and its supporting EIR. The court order allows the County to continue processing projects that do not require carbon offsets to mitigate impacts from GHG emissions. However, the County's CAP is still considered the applicable planning document for CEQA purposes. A project's consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the CAP Checklist. Step 2 of the CAP Checklist identifies CAP GHG reduction measures that would apply to discretionary projects and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Checklist is required as a condition of project approval. Projects must provide substantial evidence that demonstrates how that project would implement each applicable CAP Checklist requirement (see Appendix C of the Air Quality and Greenhouse Gas Technical Report [Appendix C to this EIR]) to the satisfaction of the Director of Planning and Development Services.~~	
Section 3.1.4.3, Page 3.1.4-30 and Page 3.1.4-31	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout. ~~County of San Diego CAP Consistency Checklist~~ ~~Step 1 – Land Use Consistency~~ ~~In the County's General Plan, the land use designation for the Boulder Brush Boundary is designated as Rural Lands 80 (RL-80). The Boulder Brush Boundary is zoned General Rural (S92) by the County of San Diego Zoning Map (County of San Diego 2017c). The County does not have jurisdiction over Reservation land. Minor and major impact utilities may be allowed with approval of a Major Use Permit. Major impact services and utilities (e.g., wind energy facilities) and minor impact utilities (e.g., electrical distribution substations) are defined under Sections 1350 and 1355 of the County Zoning Ordinance. The Boulder Brush Facilities require approval of a Major Use Permit from the County, but would not require a change in land use designation or zoning. The County's General Plan and zoning do not apply to land within the Reservation Boundary. The Project does not include a residential component that would increase local population growth, or a commercial component that would substantially increase employment; rather, the Project would involve construction and operation of a renewable energy generation project. Implementation of the Project would not result in development in excess of~~	Update

[1] ~~The CAP is the subject of current litigation.~~

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	~~that anticipated in local plans, or an increase in population/housing growth beyond those contemplated by SANDAG when preparing its SCS to reduce GHG emissions from mobile sources. As such, vehicle trip generation and planned development for the Project have been anticipated in the State Implementation Plan and San Diego Regional Air Quality Strategy.The Project would be consistent with Checklist Step 1.~~ ~~Step 2 – CAP Consistency Checklist~~ ~~The County CAP includes Strategy E-2, Increase Renewable Electricity Use, transitioning from fossil fuels to renewable energy for electricity generation (County of San Diego 2018), which would reduce emissions and provide a more sustainable source of electricity. The Project would aid the County in achieving Measure E-2.1, Increase Renewable Electricity, with the goal to achieve 90% renewable electricity for the unincorporated County by 2030 to lower GHG emissions by relying on cleaner energy (County of San Diego 2018). As a renewable energy project, the Project is a unique development that is not addressed in the County's CAP Consistency Checklist. The Project would not include a residential component, typical commuting workers (such as commuters traveling to and from an office land use), or agricultural operations, which are addressed in the CAP Consistency Checklist. Implementation of the Project would not interfere with the County's implementation of the CAP Consistency Checklist action items on projects where they are applicable. Additionally, the Project would further CAP Measure E-2.1, Increase Renewable Energy. Further, the CAP was developed to reduce GHG emissions throughout the County over time; therefore, any project that is contemplated in the CAP and/or would be consistent with the CAP would directly aid in the County's reduction of GHG emissions throughout the County's jurisdictional area.~~ ~~Each CAP Consistency Checklist item, along with an explanation of why each specific measure does not apply to the Project, is outlined in Table 3.1.4-7, Climate Action Plan Consistency Checklist. Also see Appendix C for the Project's completed CAP Consistency Checklist. The Project is consistent with the land use build-out assumptions in the County's CAP, and would implement all applicable action items from the CAP Consistency Checklist.~~ ~~The Project would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist's individual GHG measures would not apply to the Project because the CAP Checklist is designed for commercial, institutional, and residential projects, and not renewable energy projects, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP.~~	
Section 3.1.4.3, Page 3.1.4-33	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout. County Greenhouse Gas Reduction Plans As discussed above, the Project would be ~~consistent with the County's CAP through application of the CAP Consistency Checklist. The Project~~	Update

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	~~also is~~ consistent with County plans and policies adopted to reduce GHG emissions. The County's General Plan includes many goals and policies adopted to reduce GHG emissions, which the General Plan organizes into "strategies."…	
Section 3.1.4.3, Page 3.1.4-34; Page 3.1.4-45; Section 3.1.4.6, Page 3.1.4-52;	Table 3.1.4-7 Climate Action Plan Consistency Checklist has been removed from this Chapter. All following tables have been renumbered accordingly, including Table 3.1.4-8 which has been revised to Table 3.1.4-7.	Update
Section 3.1.4.3, Page 3.1.4-36; Page 3.1.4-49; Section 3.1.4.6, Page 3.1.4-52;	Table 3.1.4-7 Climate Action Plan Consistency Checklist has been removed from this Chapter. All following tables have been renumbered accordingly, including Table 3.1.4-9 which has been revised to Table 3.1.4-8.	Update
Section 3.1.4.6, Page 3.1.4-38	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout. <u>Project</u> The Project would reduce GHG emissions more than it would cause them, thereby having a net beneficial effect on GHG emissions. The Project is consistent with state and local goals to increase renewable energy, including the state's RPS targets and the County's General Plan goals to add renewable energy sources in the County. The Project is also consistent with applicable plans, policies, and regulations adopted to reduce GHG emissions, including SB X1 2, SB 350, and SB 100, and County General Plan Strategy A-3. The Project would not require a General Plan Amendment or zone change. The Project also supports the County's Strategic Energy Plan. ~~Although the CAP Consistency Checklist's individual GHG measures would not apply to the Project, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP.~~ Additionally, the generation of renewable energy from the Project is integral in the County ~~meeting CAP Goal E-2.1, "Increase Renewable Energy," and~~ General Plan Strategy A-3, "Increase generation and use of renewable energy sources." Therefore, the Project would result in a **less than cumulatively considerable contribution to significant cumulative impacts** related to climate change.	Update
Section 3.1.4.6, Page 3.1.4-39	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout. **Boulder Brush Facilities** The Boulder Brush Facilities are necessary to transmit the energy produced by the Campo Wind Facilities wind turbines to end users. The Boulder Brush Facilities are a necessary component to a wind energy project and are consistent with state and local goals to increase renewable energy, including the state's RPS targets and the County's General Plan goals to add renewable energy sources in the County. The Boulder Brush Facilities would not require a General Plan Amendment or	Update

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	zone change~~. Although the CAP Consistency Checklist individual GHG measures would not apply to the Boulder Brush Facilities, the Boulder Brush Facilities would be consistent with the underlying assumptions of the CAP and would support goals within the CAP.~~ The Boulder Brush Facilities' net GHG emissions and impact will be further assessed to include the benefit of producing zero GHG emission energy and the avoided GHG emissions associated with its use within the regional power grid. Therefore, the Boulder Brush Facilities would result in a **less than cumulatively considerable contribution to significant cumulative impacts** related to climate change.	
Section 3.1.4.6, Page 3.1.4-39	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown as strikeout. **Campo Wind Facilities** Although there are no specific requirements for evaluating GHG emissions under NEPA, estimated Project-generated construction and operational GHG emissions are included for disclosure. The Campo Wind Facilities would not require a General Plan Amendment or zone change. ~~Although the CAP Consistency Checklist individual GHG measures would not apply to the Campo Wind Facilities, the Campo Wind Facilities would be consistent with the underlying assumptions of the CAP and would support goals within the CAP.~~ The Campo Wind Facilities' net GHG emissions and impact will be further assessed to include the benefit of producing zero GHG emission energy and the avoided GHG emissions associated with its use within the regional power grid. Therefore, Campo Wind Facilities would result in a **less than cumulatively considerable contribution to significant cumulative impacts** related to climate change.	Update
Section 3.1.4.6, Page 3.1.4-43; Page 3.1.4-44; Page 3.1.4-45	For consistency with updates to the County's Climate Action Plan (CAP), Table 3.1.4-7 Climate Action Plan Consistency Checklist, has been removed from this Chapter. All following tables have been renumbered accordingly	Update
	Chapter 3.1.6 Land Use and Planning	
Section 3.1.6, Page 3.1.6-1	For consistency with updates to the County's Climate Action Plan (CAP), the following associated document has been updated. Deleted text is shown as strikeout and included text is shown in underline: • <u>San Diego County General Plan Update Final Environmental Impact Report (County of San Diego 2011g)</u>~~Supplemental EIR to the 2011 General Plan Update Program EIR for the Climate Action Plan, General Plan Amendment, GHG Threshold, and Guidelines for Determining Significance for Climate Change (County of San Diego 2018a)~~	Update

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	Chapter 4 Project Alternatives	
Section 4.3.2, Page 4-11 and Page 4-12	The following text shown in underline has been added to the Alternative 2 analysis for clarification: The No Boulder Brush Facilities on Private Lands Alternative assumes that the Boulder Brush Facilities would not be developed and the existing conditions on lands within the County's land use jurisdiction would remain. No reasonably expected actions or changes to the Boulder Brush Corridor would be anticipated if the County does not approve the Major Use Permit for the Boulder Brush Facilities. Because the Reservation is outside the jurisdiction of the County, the No Boulder Brush Facilities on Private Lands Alternative may not result in no development of the Campo Wind Facilities. This alternative considers the connection of power generated on the Reservation by the 60 wind turbines to the grid via the Sunrise Powerlink, via a gen-tie route that extends across the Manzanita Band of Diegueño Mission Indians' (Manzanita) Reservation and Bureau of Land Management (BLM) managed lands, connecting to a substation on a portion of the Sunrise Powerlink on BLM managed lands. The Alternative 2 On-Reservation gen-tie route alignment would generally be the same as that of the Project On-Reservation gen-tie route, but the Off-Reservation gen-tie line would traverse north and then east, eliminating the need for the Boulder Brush Facilities on private lands. <u>The gen-tie under Alternative 2 would be estimated to be approximately up to 11 miles, depending on terrain. While it would be further from County residences than the Boulder Brush Facilities it would likely be closer to Tribal residences. It would extend across terrain similar to that of the proposed Boulder Brush Facilities.</u> The County does not have any authority or ability to (a) mandate that a gen-tie line alignment be approved on BLM-managed or Tribal lands or (b) exercise discretion for activities on the Reservation, Manzanita Reservation, or BLM-managed lands (including an alternative gen-tie line route, substation location on BLM or Tribal lands, or any components on the non-private lands).	Clarification
Section 4.3.3, Page 4-18	The following correction shown in strikeout/underline has been made under the Alternative 3 analysis: <u>Feasibility</u> Alternative ~~2~~<u>3</u> would be feasible to implement.	Correction
	Chapter 5 References	
Section 5.4, Page 5-9; Section 5.10, Page 5-19; Section 5.11, Page 5-22; Section 5.16, Page 5-34 and Page 5-35	The following references have been corrected. Deleted text is shown as strikeout and added text is shown as underlined. Faulkner, D.K., and M.W. Klein. 200~~3~~<u>12</u>. Sensitive Butterflies of San Diego County, California. San Diego's Sensitive Butterflies: A Workshop Focusing on Nine Local Species. County of San Diego. 200<u>4</u>~~1985~~. San Diego County Code of Regulatory Ordinances Chapter 4: Removal of Combustible Vegetation and Other Flammable Materials. March~~July~~ 24.	Correction

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	The following document is included in Appendix F-2 and thus is deleted as a reference. ~~Dudek. 2018. *Phase 1 Environmental Site Assessment*. Torrey Wind Project. September 2018.~~ County of San Diego. 2011g. *San Diego County General Plan Update Final Environmental Impact Report*. August 2011. Accessed October 14, 2020. ~~County of San Diego. 2018a. *Final Supplement to the 2011 General Plan Update Program CEQA Considerations Document for the Climate Action Plan, General Plan Amendment, GHG Threshold, and Guidelines for Determining Significance for Climate Change*. January 2018.~~	
Chapter 7 List of Project Design Features, Mitigation Measures, and Environmental Design Considerations		
Section 7.3.1, Pages 7-10 thru 7-15, 7-19, 7-23 thru 7-25, 7-27, and 7-31 thru 7-35; Section 7.2.1, Page 7-6	Mitigation measures M-BI-1, M-BI-5, M-BI-7, M-BI-11, M-BI-13, M-BI-14, M-BI-16, M-BI-A, and M-BI-C have been updated to reflect the revised Biological Resources mitigation measures in Chapter 2.3 of the Final EIR. These revisions are outlined in this table above under Chapter 2.3 Biological Resources Mitigation measure M-AQ-2 has been revised as outlined in this table above under Chapter 2.2 Air Quality.	Response to Comments/Corrections
Errata Summary of Campo Wind with Boulder Brush Facilities Draft EIR Appendices Text Changes		
Appendix A – Notice of Preparation, Initial Study, and Comment Letters		
Page 59 of the PDF	In response to comment O6-6, the Boulevard Planning Group letter dated 2-12-2019 has been included in Appendix A of the Final EIR. This letter is part of the County record and considered by the County as part of the application for the MUP including development of the Draft EIR.	Response to Comment
Appendix B – Visual Resources Report		
Cover Page	In response to comment, the Preparer of the Visual Resources Report has been included under 'Preparer': Dudek	Response to Comment
Section 5.1.4, Page 33	In response to comment O-6-79, the following text has been added to disclose the height of proposed wind turbine assumptions used in the development of Project visual simulations. Added text is shown as underlined. Lastly, in the visual simulations, wind turbines are modeled at their proposed maximum height (approximately 586 feet tall from tower base to fully extended blade tip).	Response to Comment
Section 5.3.2, Page 53	In response to comment I-37-9, the following text regarding Ribbonwood Road improvements has been added: "The proposed widening of Ribbonwood Road would occur within existing County right-of-way and/or non-exclusive easements (acquisition of private property for widening would not be required)."	Response to Comment

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Section 5.3.2, Page 57	In response to comment I-37-9, clarification has been provided regarding Ribbonwood Road improvements. Added text is shown as underlined. Proposed improvements to Ribbonwood Road would consist of paving and where needed, widening of an existing road <u>within existing County right-of-way and/or non-exclusive easements</u>.	Response to Comment
Appendix C – Air Quality and Greenhouse Gas Emissions Analysis Technical Report		
Cover Page	The date of the Errata Appendix C has been updated from December 2019 to September 2020.	Update
Page iii and Page iv	As a result of text revisions throughout the Errata Appendix C, the list of Appendices and Tables in the Table of Contents has been updated	Update
Section 3.2.3, Page 105	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Added text is shown in underline. Although the CAP must be set aside, the court opinion did not address the majority of CAP measures, and the County finds those measures would reduce GHG emissions. For example, Measure E-2.1, Increase Renewable Energy, specifies a goal to achieve 90% renewable electricity for the unincorporated County by 2030. This measure is consistent with General Plan Strategy A-3, listed below. <u>On appeal, the 4th District Court of Appeal for the most part held the lower court ruling and set aside the County's CAP. As with the lower court opinion the appellate court provided strong statement that the measures identified in the CAP, including Measure E-2.1, are valid measures to pursue to reduce GHG emissions. As the courts have set aside the County's CAP, and that the Checklist items in the CAP are not applicable to renewable energy projects, disclosure of consistency with the CAP has been removed from this document without consequence to the conclusions herein.</u>	Update
Section 3.4.1, Page 116	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Added text is shown in underline and deleted text is shown in strikeout. In regards to evaluating the project's significance with respect to CEQA Guidelines number 1, the project GHG emissions will be compared to its production of carbon-free electricity. ~~In addition to the Project's potential impacts on GHGs using the GHG thresholds set forth in Appendix G, the analysis will evaluate the project using the County's CAP Consistency Checklist.[2] A project's consistency with the CAP is evaluated in a two-step process. Step 1 in the CAP Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP~~	Update

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	~~projections and can move forward to Step 2 of the Checklist. Step 2 of the CAP Checklist identifies CAP GHG reduction measures that would apply to discretionary projects and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the CAP Checklist shall be required as a condition of project approval. The project must provide substantial evidence that demonstrates how the Project would implement each applicable CAP Checklist requirement described in Appendix C of the County's CAP to the satisfaction of the Director of Planning and Development Services (see Appendix C of this report).~~ To address the CEQA Guidelines question number 2, whether the project is consistent with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, the project will be evaluated against the County's ~~CAP~~General Plan and Strategic Energy Plan, AB 32, SANDAG's RTP/SCS, and EO B-55-18.	
Section 3.5.1, Page 118	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout. ~~**1.County of San Diego Climate Action Plan Consistency Checklist**~~ ~~Step 1 – Land Use Consistency~~ ~~Although the County as Lead Agency is analyzing the Project as a whole, the County's land use jurisdiction is limited to the Boulder Brush Facilities. The Bureau of Indian Affairs has jurisdiction over the Campo Wind Facilities, and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019).~~ ~~In the County's General Plan, the land use designation for the Boulder Brush Boundary is Rural Lands 80 (RL-80). The Boulder Brush Boundary is zoned General Rural (S92) by the County of San Diego Zoning Map (County of San Diego 2017c). Minor and major impact utilities may be allowed with approval of a Major Use Permit. Major impact services and utilities (e.g., wind energy facilities) and minor impact utilities (e.g., electrical distribution substations) are defined under Sections 1350 and 1355 of the County Zoning Ordinance. The Boulder Brush Facilities require approval of a Major Use Permit from the County, but would not require a change in land use designation or zoning. The County's General Plan and zoning do not cover land within the Reservation Boundary.~~ ~~The Project would not result in residential, commercial, or growth-inducing development; rather, the Project would construct and operate a renewable energy generation Project. Implementation of the Project would not result in development in excess of that anticipated in local plans or increases in population/housing growth beyond those contemplated by SANDAG when preparing its Sustainable Community Strategy to reduce GHG emissions from mobile sources. As such, vehicle trip generation and planned development for the Project is considered to be anticipated in the SIP and RAQS. Therefore, the project would be consistent with the CAP Consistency Checklist Step 1.~~ ~~Step 2 – Climate Action Plan Consistency Checklist~~	

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<table>
<tr><th>Section Page</th><th>Change</th><th>Reason for Change</th></tr>
<tr><td></td><td>~~The County CAP includes Strategy E-2, Increase Renewable Electricity Use, transitioning from fossil fuels to renewable energy for electricity generation, which would reduce emissions and provide a more sustainable source of electricity. The Project would aid the County in achieving Measure E-2.1, Increase Renewable Electricity, with the goal to achieve 90% renewable electricity for the unincorporated County by 2030 to lower GHG emissions by relying on cleaner energy (County of San Diego 2018). As a renewable energy project, the Project is a unique development that is not addressed in the County's CAP Consistency Checklist. The Project does not include a residential component, typical commuting workers (such as commuters traveling to an office land use), or agricultural operations, which are addressed in the CAP Consistency Checklist. Implementation of the Project would not interfere with the County's implementation of the Consistency Checklist action items on Projects where they are applicable. Additionally, the Project would further the CAP Measure E-2.1 "Increase Renewable Energy." Further, the CAP was developed to reduce GHG emissions throughout the County over time; therefore, any Project that is contemplated in the CAP and/or would be consistent with the CAP would directly aid in the County's reduction of GHG emissions throughout the County's jurisdictional area.~~
~~Each CAP Checklist item and why each specific measure does not apply to the Project is outlined in Table 23.~~
~~**Table 23**~~
~~**Climate Action Plan Consistency Checklist**~~
<table><tr><th>~~CAP Checklist Item~~</th><th>~~Project Compliance~~</th></tr><tr><td>~~1a. Reducing Vehicle Miles Traveled: Non-Residential: For non-residential Projects with anticipated tenant occupants of 25 or more, will the Project achieve a 15% reduction in emissions from commute vehicle miles traveled (VMT), and commit to monitoring and reporting results to demonstrate on-going compliance? VMT reduction may be achieved through a combination of Transportation Demand Management (TDM) and parking strategies, as long as the 15% reduction can be substantiated.~~</td><td>~~Not Applicable.
The Project would employ 10 to 12 persons, and thus would not accommodate 25 or more tenant occupants.~~</td></tr><tr><td>~~2a. Shared and Reduced Parking: Non-Residential: For non-residential Projects with anticipated tenant occupants of 24 or less, will the Project implement shared and reduced parking strategies that achieves a 10% reduction in emissions from commute VMT? Check "N/A" if the Project is a residential Project or if the Project would accommodate 25 or more tenant occupants.~~</td><td>~~Not Applicable.
As a renewable energy development Project, the Project is not a typical commercial or retail development that would have tenants. Employee trips would be related only to as-needed operation and~~</td></tr></table></td><td></td></tr>
</table>

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		~~maintenance activities associated with operation of the wind facility. Carpooling will be encouraged to the extent practical to reduce VMT during operation and the Project's parking spaces would not exceed County's code requirements.~~	
	~~3a. Electric or Alternatively-Fueled Water Heating Systems Residential: For Projects that include residential construction, will the Project, as a condition of approval, install the following types of electric or alternatively-fueled water heating system(s)?~~ ~~☐ Solar thermal water heater~~ ~~☐ Tankless electric water heater~~ ~~☐ Storage electric water heaters~~ ~~☐ Electric heat pump water heater~~ ~~☐ Tankless gas water heater~~ ~~☐ Other~~	~~Not Applicable. The Project does not include a residential component.~~	
	~~4a. Water Efficient Appliances and Plumbing Fixtures Residential: For new residential Projects, will the Project comply with all of the following water efficiency and conservation best management practices?~~ ~~1. Kitchen Faucets: The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 pounds per square inch (psi). Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi.~~ ~~2. Energy Efficient Appliances: Install at least one qualified ENERGY STAR dishwasher or clothes washer per unit.~~	~~Not Applicable. The Project does not include a residential component.~~	
	~~5a. Rain Barrel Installations: Residential: For new residential Projects, will the Project make use of incentives to install one rain barrel per every 500 square feet of available roof area? Check "N/A" if the Project is a non-residential Project; if State, regional or local incentives/rebates to purchase rain~~	~~Not Applicable. The Project does not include a residential component.~~	

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	~~barrels are not available; or if funding for programs/rebates has been exhausted.~~		
	~~6a. Reduce Outdoor Water: Residential: Will the Project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current Maximum Applied Water Allowance (MAWA) for outdoor use?~~ ~~Non-Residential: Will the Project submit a Landscape Document Package that is compliant with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40% reduction in current MAWA for outdoor use?~~	~~Not Applicable.~~ ~~The Project would not include any landscaping that would necessitate preparation of a landscape plan or Landscape Document Package.~~	
	~~7a. Agricultural and Farming Equipment: Will the Project use the San Diego Air Pollution Control District's (SDAPCD's) farm equipment incentive program to convert gas- and diesel-powered farm equipment to electric equipment? Check "N/A" if the Project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.~~	~~Not Applicable.~~ ~~The Project would not include gas or diesel-powered farm equipment and would not contain any agricultural or farming operations.~~	
	~~8a. Electric Irrigation Pumps: Will the Project use SDAPCD's farm equipment incentive program to convert diesel or gas-powered irrigation pumps to electric irrigation pumps?~~ ~~Check "N/A" if the Project does not contain any agricultural or farming operations; if the SDAPCD incentive program is no longer available; or if funding for the incentive program has been exhausted.~~	~~Not Applicable.~~ ~~The Project would not include irrigation pumps and would not contain any agricultural or farming operations.~~	
	~~9a. Tree Planting: Residential: For residential Projects, will the Project plant, at a minimum, two trees per every new residential dwelling unit proposed?~~ ~~Check "N/A" if the Project is a non-residential Project~~	~~Not Applicable.~~ ~~The Project does not include a residential component.~~	
	~~**Source**: County of San Diego 2018 (see Appendix C).~~ ~~**Notes:** CAP = Climate Action Plan; SDAPCD = San Diego Air Pollution Control District.~~ ~~As discussed above, the Project would not require a General Plan Amendment or zone change. Although the CAP Consistency Checklist~~		

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	~~individual GHG measures would not apply to the Project, the Project would be consistent with the underlying assumptions of the CAP and would support goals within the CAP. Therefore, the Project would have a **less-than-significant impact** on GHG emissions.~~	
Section 3.5.1, Page 121	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 24 which has been revised to Table 23	Update
Section 3.5.1, Page 121 and Page 122	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 25 which has been revised to Table 24	Update
Section 3.5.1, Page 122 and Page 123	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 26 which has been revised to Table 25	Update
Section 3.5.1, Page 123	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 27 which has been revised to Table 26	Update
Section 3.5.1, Page 124	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 28 which has been revised to Table 27	Update
Section 3.5.2, Page 125	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout. **County Greenhouse Gas Reduction Plans** As discussed in Section 3.5.1.1, the Project would be ~~consistent with the County's CAP through application of the CAP Consistency Checklist. The Project also is~~ consistent with County Plans and policies adopted to reduce GHG emissions.	Update
Section 3.5.2, Page 126 and Page 130	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 29 which has been revised to Table 28	Update
Section 3.5.2, Page 132, Page 133 and Page 134	As a result of Table 23 being deleted from the Errata Appendix C, the following tables have been renumbered accordingly, including Table 30 which has been revised to Table 29	Update
Section 3.5.4, Page 134	For consistency with updates to the County's Climate Action Plan (CAP), the following text has been updated. Deleted text is shown in strikeout and added text is shown in underline. The Project would be consistent with the County's ~~CAP~~General Plan, the Scoping Plan, and SANDAG's Regional Plan; therefore, impacts related to GHG emissions would be **less than significant**. No mitigation is required.	Update
Appendix D – Biological Resources Technical Report		
Section 3.4, Page 50	The following edits have been made regarding special status plants. Added text is shown as underlined and deleted text is shown as strikeout. Six flowering rare plants were found before starting surveys which included desert beauty (*Linanthus bellus*), Jacumba milk-~~w~~vetch	Correction

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	(*Astragalus douglasii* var. *perstrictus*), southern jewelflower (*Streptanthus campestris*), pygmy lotus (*Acmispon haydonii*), sticky geraea, ~~and~~ alpine gold (*Hulsea californica*), Tecate tarplant (*Deinandra floribunda*), and Colorado Desert larkspur (*Delphinium parishii* ssp. *subglobosum*).	
Section 4.5.1, Page 253	The reference to the ~~southern~~ Colorado has been correct to delete 'southern.'	Correction
Section 4.5.1, Page 268	The reference 'County of Riverside 2008' has been revised to 'County of Riverside 2003' as a correction.	Correction
Section 5.3.2, Pages 583 thru 585	The discussion regarding impacts to bats under Impact W-D has been expanded. The added text is shown as underlined. **"Impact W-D** Impacts to Wildlife Species from Collisions and Electrocution *Avian.* There are potential impacts from avian collisions with turbines or towers and electrocution by transmission lines (gen-tie) (**Impact W-D**). Birds can collide with structures during migration or hunting/foraging activities. *Bats.* The abundance of bats adjacent to the Campo Corridor is low when compared to other habitat types and regions. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. Risk to bats associated with the Project primarily stems from direct impacts to roost sites, electrocution, barotrauma, and collision. In this case, no maternity roost sites are known from the area or nearby. The Shu'luuk Wind Project found limited non-maternal roost locations potentially supporting one or few animals only. The Tule Wind Project found only one horizontal mine shaft that had potential to support roosting bats; located 1 mile from Project turbines. Because of the type of infrastructure and wiring protections, electrocution is also of limited risk. Additionally, because of the slower speeds associated with Project turbines, barotrauma is also of limited to no risk. The National Renewable Energy Laboratory (NREL 2018) conducted one of the few studies to attempt to analyze actual risk related to the barotrauma hypothesis. They used computational simulations and analytics to determine actual risk. Using realistic assumptions regarding activity (e.g., 15 m/s as the highest wind speed that bats would be expected to fly) and survival pressures (i.e., existing data regarding rats as a surrogate), and comparing three different distances from the blade, they concluded that (1) the pressure drop on the suction side of the blade was a factor of four less than the lethality threshold for rats, (2) the low-pressure region over the blade is highly localized, and (3) the minimum pressure in the tip vortex is a factor of three less than the lethality threshold for rats. While the actual relationship between rat thresholds and bat thresholds are not known, they seem to be an equivalent surrogate and the conclusion was that it seemed unlikely that barotrauma is a significant contributor to turbine-related bat deaths. Regarding the potential relative risk of collision for bats, a number of factors are important to consider. The abundance of bats within and adjacent to the biological study area is low when compared to other	Updated

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	habitat types and regions. The Searchlight Nevada project (O'Farrell 2010) used paired high and low acoustic monitoring units similar to the acoustical bat surveys for performed for the Jewell Valley project; the majority of species, excluding the migratory tree bats and high-flying molossids, were found to fly less than 30 meters in height and those that did occur within the higher spaces represented only a small fraction of total activity. The Shu'luuk data and Jewell Valley data sets showed most of the bat activity occurred around the lower microphone, or 15 feet off the ground and far under the rotor swept area. Thus, most species of bats are at minimal risk of adverse encounters with wind turbines. The overall magnitude of bat usage within the Campo Corridor is significantly less than any locations studied that contain attractant features (see Section 4.4, Wildlife Diversity). This suggests that the risk for bat collisions with Project wind turbines is low when taking into account the overall low abundance of bats in the area and lower abundance of high-flying bats (see Table 19 in Appendix H to the Campo EIS). The acoustical bat results indicate that the activity at the higher microphone (which captures bats that tend to fly higher) was lower when compared to the lower microphone. CEC (2013) notes that bats can be more attracted to areas with strong lights because of the increased insect prey availability and hypothesized that some observed mortalities may have been generated by the presence of strong lights in the vicinity of roost sites and turbines. CEC also notes that there is no evidence that aviation lighting associated with nacelles contribute to bat mortality (Kunz et al. 2007, as cited in CEC 2013). No turbines will be located closer than 0.25 miles from an On-Reservation receptor, so the possibility of resident-induced lighting attractants are reduced. Direct impacts to bats could result in mortality or injury due to collisions at wind turbines. However, potential effects of the Project on the meta-community of bats in the region, including those species known to be susceptible to collision with turbine blades, would be negligible.	
Section 6.4.1, Pages 624 thru 629, 633, 637 thru 640	All revisions made to Boulder Brush Facilities mitigation measures M-BI-1, M-BI-5, M-BI-11, M-BI-13, M-BI-16 in Chapter 2.3, Biological Resources, of the Final EIR have been incorporated into the Biological Resources Technical Report	Update
Section 6.4.1, Page 638	The reference to mitigation measure M-BIO-8 has been revised as M-BI-8.	Correction
Section 6.4.2, Pages 642, 646 thru 651	All revisions made to Campo Wind Facilities mitigation Measures M-BI-A and M-BI-C in Chapter 2.3, Biological Resources, of the Final EIR have been incorporated in the Biological Resources Technical Report.	Update
Section 6.5.2, Pages 653 and 654; Section 7.2.1, Page 660; Section 7.2.2, Page 662; Section 7.2.4, Page 666; Section	Reference to mitigation measure M-BI-7 has been revised to read '**M-BI-7** (revegetation)'	

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7.5, Pages 673 and 674; Section 8.2, Page 677; Section 9.24.1, Page 687; Section 9.5, Page 688; Section 10.5, Page 699; Table 11-1, Pages 701 thru 713		
Section 12, Pages 716 and 722	The following references have been included as References. Added text is shown as underlined. CEC (California Energy Commission). 2013. *Bird and Bat Movement Patterns and Mortality at the Montezuma Hills Wind Resource Area*. Publication Number CEC-500-2013-015. Prepared by D.S. Johnston, J.A. Howell, S.B. Terrill, N. Thorngate, J. Castle, J.P. Smith (H.T. Harvey & Associates), T.J. Mabee, J.H. Plissner, N.A. Schwab, P.M. Sanzenbacher, and C.M. Grinnell (ABR Inc.). NREL (National Renewable Energy Laboratory). 2018. *Estimating the Likelihood of Bat Barotrauma Using Computational Simulations and Analytical Calculations*. Prepared by M. Lawson, S. Jenne, and R. Thresher. March 20, 2018.	Correction
Appendix B-2	Figures associated with Appendix B-2 of the Biological ResourcesTechnical Report were mistakenly not included. These figures are now included in Appendix B-2 as part of the Final EIR.	Correction
Appendix E – Cultural Resources Report		
Section 1.2.1, Page 4	The reference 'Dudek 2018' has been revised to reference the 'Appendix D to the Project's EIR'	Correction
Section 5.1.1, Pages 121; Section 7, 162	The reference 'Schmitt et al. 2013' has been revised to 'Schmitt et al. 2012'	Correction
Section 7, Page 123	The reference 'Comeau et al. (2015)' has been changed to (2016)	Correction
Section 7, Page 162	The reference 'USFWS 1998' has been removed as it is not cited in-text.	Correction
Appendix I – Boulder Brush Facilities Fire Protection Plan		
Section 7, Page 42	The Fire Protection Measures have been revised from a numbered list to a bulleted list for consistency with the Wildlife EIR Chapter of the EIR.	Correction
Section 7, Page 49	The reference 'American Petroleum Institute (API) 2008' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 49	The reference 'Bushey, C.L. 1985' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'Linn, R. 2003' has been removed from the references cited list as it is not cited in-text.	Correction

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Section Page	Change	Reason for Change
Section 7, Page 51	The reference 'OSHA 2002' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'OSHA 2007' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'OSHA 2008' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'SANGIS 2014' has been removed from the references cited list as it is not cited in-text.	Correction
Section 7, Page 51	The reference 'Sneeuwjagt and Frandsen 1977' has been removed from the references cited list as it is not cited in-text.	Correction
Appendix N – Water Supply Assessment		
Section 3.1.2, Page 17	The reference 'Dudek 2019c' on Page 17 has been revised to 'Dudek 2019e' as a correction.	Correction
Section 5, Page 29	The reference 'Dudek. 2019c. Groundwater Resources Investigation for the Campo Wind Project with Boulder Brush Facilities. November 2019' has been revised to 'Dudek. 2019e', as a correction	Correction
Section 5, Page 29	The second instance of reference cited 'Dudek 2019a' has been removed as it is a duplicate.	Correction
Section 5, Page 29	The second instance of reference cited 'Dudek 2019b' has been removed as it is a duplicate.	Correction
Appendix O – Shadow Flicker Analysis		
Attachment 1 to Appendix O	For informational purposes, a supplemental shadow flicker analysis was conducted to model turbines with a rotor diameter of 460 feet. This memo was prepared on June 22, 2020 and presents an overview of the changes from the November 2019 Shadow Flicker Analysis (Appendix O to the Draft EIR) as well as a summary of the results. This supplemental analysis assumes a theoretical "maximum dimension" turbine and determined that it would not materially change the Shadow Flicker Analysis (Appendix O) in the Draft EIR.	Response to Comment
Appendix P-1 - USFWS Biological Opinion		
Appendix P-1	For informational purposes, the USFWS's Biological Opinion (January 2020) prepared for the BIA's proposed approval of the Wind and Solar Resource lease (Campo Lease) has been included for reference as part of the Final EIR.	Update
Appendix P-2 - Biological Assessment		
Appendix P-2	For informational purposes, the Biological Assessment prepared by Dudek (August 2019) pursuant to the Endangered Species Act to evaluate the potential effects of BIA's approval of a WSR lease (Campo Lease) has been included for reference as part of the Final EIR.	Update
Appendix P-3 - Supplemental Information Regarding the Biological Assessment		
Appendix P-3	For informational purposes, the Section 7 Supplemental Letter regarding the Biological Assessment for the Campo Wind Project with Boulder Brush Facilities, prepared by Dudek (December 2019), has been included for reference as part of the Final EIR.	Update

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Appendix Q – Fire and Emergency Services Agreement		
Appendix Q	The Fire and Emergency Services Agreement between the Developer and the San Diego County Fire Authority has been included as Appendix Q.	Update