

8 OTHER CEQA CONSIDERATIONS

This chapter summarizes the information presented in Chapters 1, 2, and 3 of this Environmental Impact Report (EIR) to address the broader questions posed by the California Environmental Quality Act (CEQA) Guidelines, Section 15126.2. This chapter addresses significant effects from the Campo Wind Project with Boulder Brush Facilities (Project) that cannot be mitigated to less than significant, significant irreversible environmental changes, and growth-inducing impacts.

8.1 Significant Environmental Effects of the Project That Cannot Be Mitigated to Less Than Significant

Table ES-1, Summary of Significant Effects (within the Executive Summary of this EIR), summarizes the results of the environmental analysis completed for the Project. Mitigation measures have been identified to reduce environmental impacts associated with aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, noise, Tribal cultural resources, traffic and transportation, and wildfire, and are included in Table ES-1. Mitigation measures would reduce potentially significant impacts to less than significant for all impacts except for aesthetics, biological resources, and noise. Additional mitigation measures were considered in attempting to reduce impacts to below a level of significance for aesthetics, biological resources, and noise, but the impacts listed below would remain significant and unavoidable. A detailed analysis of significant environmental effects, mitigation measures, and infeasible mitigation measures is provided throughout Chapter 2 of this EIR. Numerical impacts and mitigation measures (i.e., Impact AE-1, M-AE-1) are specific to the Boulder Brush Facilities, and alphabetical impacts and mitigation measures (i.e., Impact AE-A, M-AE-A) are specific to the Campo Wind Facilities.

The following significant environmental impacts of the Project cannot be mitigated to less than significant:

- Aesthetics: Boulder Brush Facilities (Impacts AE-1 and AE-2); Campo Wind Facilities (AE-A, AE-B, AE-C, AE-D, and AE-CU-A)
- Biological Resources: Campo Wind Facilities (Impacts BI-B, BI-D, BI-M, BI-U, and BI-CU-1)
- Noise: Campo Wind Facilities (Impacts N-A, N-B, N-C, and N-CU-A)

Although the County of San Diego (County) cannot guarantee that the Bureau of Indian Affairs (BIA) will require the implementation of recommended mitigation measures on Tribal land as part of its lease approval decision under the regulations governing the leasing of Tribal land in Title 25 of the Code of Federal Regulations, Part 162, BIA has prepared an EIS for the Project with these

same recommended mitigation measures, and BIA can and should include these measures as a requirement of the BIA approval and record of decision.

Aesthetics

Boulder Brush Facilities

Impact AE-1: The scale of the Off-Reservation gen-tie line would be noticeably shorter than existing wind turbines in the area (i.e., wind turbines of the Kumeyaay Wind project and Tule Wind project (see Figures 2.1-17 through 2.1-19). In addition, and as viewed from identified KOPs, the Off-Reservation gen-tie line would be viewed as a series of faint lines in the landscape. However, the installation of the Off-Reservation gen-tie line in the Boulder Brush Corridor would result in the removal of boulders and limited oak vegetation. While limited boulder removal and oak woodland impacts would not substantially change existing visual character (and would not be prominent as viewed from public vantage points), installation of conductor wire between steel poles across the Tule Creek would interrupt the remaining openness of the landscape within the Boulder Brush Boundary as viewed from the northerly extension of Ribbonwood Road. As no feasible mitigation has been identified, impacts to visual character associated with the Boulder Brush Facilities would be **significant and unavoidable (Impact AE-1)**.

Impact AE-2: As viewed from the northerly extension of Ribbonwood Road, the stringing of conductor wires between poles across the Tule Creek corridor would interrupt the remaining open views across the Project Site to the northwest (see KOP 9, Figure 2.1-16 that shows a partial view to the silhouetted gen-tie line within the Boulder Brush Boundary). Supported by steel poles up to 150 feet tall each, a short segment of Off-Reservation gen-tie line conductor wires would be viewed against the background sky and against the distant In-Ko-Pah Mountains. Where viewed against the sky, the resulting contrast in dark and light color and visibility of multiple lines would attract the attention of motorists and detract from the available view. While the volume of viewers on the particular segments of Ribbonwood Road and Opalocka Road is low and duration of view exposure is brief, introduction of the Off-Reservation gen-tie line would interrupt the remaining openness of views to the northwest across the Project Site from Ribbonwood Road and Opalocka Road. As no feasible mitigation has been identified, impacts to focal or panoramic views from the northerly extension of Ribbonwood Road resulting from implementation of the Off-Reservation gen-tie line would be **significant and unavoidable (Impact AE-2)**.

Campo Wind Facilities

Impact AE-A: Wind turbines of the Campo Wind Facilities that would be located south of I-8 (wind turbines are also proposed north of I-8) would be located atop visually prominent ridgelines. Due to their prominent locations, the scale of Project wind turbines would be emphasized and these features would dominate views from the central and southern portion of the Campo Band of

Diegueño Mission Indians Reservation (Reservation) and in westward views from the Tierra del Sol area of Boulevard. While wind turbine development is present in the Project Vicinity, distance and the presence of intervening terrain blocks or diminishes the contribution of existing wind turbines to the visual character of the central and southern portions of the Reservation and the Tierra del Sol area of Boulevard. Therefore, due to the anticipated size and scale disparity between Project wind turbines in the central and southern portions of the Reservation and existing scattered development in these areas (see KOPs 2, 3, 4, 5, and 7 [Figures 2.1-9 through 2.1-12 and 2.1-14] in Section 2.1, Aesthetics, of this EIR), Project wind turbines would substantially contrast with existing visual character. With implementation of **M-AE-A** through **M-AE-H**, impacts to visual quality and/or quality due to the Campo Wind Facilities would be reduced to the extent practicable but would remain **significant and unavoidable (Impact AE-A)**.

Impact AE-B: The installation of the Campo Wind Facilities would alter the existing (or remaining) openness of the landscape and quality of existing views. Installation of the Campo Wind Facilities would also result in the removal of rock outcrops and oak trees, as needed within the development footprint. Landscape openness, natural ridgelines, rock outcrops and oak trees are features and notable attributes that contribute to the existing visual character of Reservation. Once operational, Project wind turbines (approximately 586 feet tall) would line ridges on the Reservation to the north and south of I-8. As viewed from I-8 and segments of Old Highway 80 near the Golden Acorn Casino, Project wind turbines on the Reservation would be viewed alongside existing wind turbines on the Reservation. Twenty-five wind turbines of the Kumeyaay Wind project are installed atop the Tecate Divide and a single wind turbine is installed near the eastern parking lot of the Golden Acorn Casino. Therefore, when viewed in the context of existing wind turbines, the visual effects of Project wind turbines would be somewhat moderated; however, as viewed from Church Road, SR-94, and On- and Off-Reservation vantage points to the south of SR-94, existing wind turbines in the Project Vicinity are either screened from view by intervening terrain and vegetation or are distant and occupy a small portion of the available view. Further, installation of Project wind turbines as viewed from these locations would substantially alter the existing openness of the landscape and quality of existing views to rugged natural ridgeline. Even with implementation of **M-AE-A** through **M-AE-H**, implementation of the Campo Wind Facilities (particularly, Project wind turbines in the central and southern portion of the Reservation) would transform the largely undeveloped character of the Campo Corridor to wind energy development. Further, installation of wind turbines as experienced from On- and Off-Reservation vantage points, including Church Road, SR-94, and in general, the Tierra del Sol area of Boulevard, would substantially alter the existing openness of the landscape and quality of existing views. As such, even with implementation of applicable mitigation measures, impacts to community character associated with the Campo Wind Facilities would be **significant and unavoidable (Impact AE-B)**.

Impact AE-C: Components of the Campo Wind Facilities, including On-Reservation gen-tie line poles and conductor wires, access roads, the collector substation and O&M facility, and temporary laydown areas and batch plant, would be visible from potential future trails and pathways identified in the Boulevard and Campo/Lake Morena Community Trails and Pathways Plans. However, the trails and pathways are potential future facilities and as such, the general alignments currently receive no official or authorized recreational use. Because future users of the potential future pathways and trails are not a viewer group represented in the baseline condition and the facilities are not existing, a significance determination in regards to potential impacts to focal or panoramic vistas from potential future trails and pathways was not provided and is not required. The installation of 60 wind turbines with FAA obstruction lighting, as well as the On-Reservation gen-tie line, would substantially interrupt and/or degrade focal or panoramic vistas from I-8, Old Highway 80, Ribbonwood Road, and McCain Valley Road. Even with implementation of **M-AE-A** through **M-AE-G**, impacts would be **significant and unavoidable (Impact AE-C)**.

Impact AE-D: Non-wind-turbine lighting installed on Project components On-Reservation would be kept to the minimum required for security and safety, and all lighting would be hooded and directed downward to reduce potential for skyglow and light trespass onto adjacent properties. Through implementation of lighting controls (i.e., hooded and downward-directed lighting at the substation and downcast, motion-sensitive lighting at the O&M facility) and turning off lighting when not in use, night lighting at the collector substation and O&M facility would not substantially affect nighttime views. However, the operation of FAA obstruction lighting on Project wind turbines would adversely affect existing night views in the surrounding area. While obstruction lighting atop the wind turbines of the Kumeyaay Wind project and Tule Wind project is visible in the Project Vicinity, the wide distribution of Project wind turbines on the Reservation and particularly, in the central and southern portions of the Reservation, would entail the operation of obstruction lighting in closer proximity to occupied On- and Off-Reservation residential properties. Even with implementation of **M-AE-H**, impacts are would be **significant and unavoidable (Impact AE-D)**.

Impact AE-CU-A: implementation of the Project would result in significant adverse direct cumulative impacts on the visual environment. Implementation of design features and recommended mitigation measures proposed for the Project (as recommended in the EIS [BIA 2019]) would reduce anticipated visual contrast and view impacts to the extent feasible; however, due to the tall prominent form of wind turbines and large footprint and scale, prominent contrasting components (i.e., wind turbines) cannot be more successfully integrated into the landscape. Therefore the Project would result in **significant direct and unavoidable cumulative impacts** on the visual environment (**Impact AE-CU-A**).

Biological Resources

Campo Wind Facilities

Impact BI-B: The Campo Wind Facilities would likely result in the loss of special-status plant species during construction within the Campo Corridor. No impacts to federally listed plants would occur, however, impacts to County List A and B species would likely occur. These impacts cannot be quantified because location information for special-status plants identified during surveys in 2010 and 2011 for the previously proposed Shu'luuk Wind project was not recorded. Special-status plants potentially impacted within the Campo Corridor include Tecate cypress (List A), Jacumba milk-vetch (List A), sticky geraea (List B), southern jewelflower (List A), Tecate tarplant (List A), and desert beauty (List B). Because County Guidelines regarding County List A and B species are not applicable on the Reservation no mitigation is proposed, and permanent direct impacts to County List A and B plant species would be **significant and unavoidable**, and no mitigation is proposed.

Impact BI-D: Implementation of the Campo Wind Facilities would result in the direct loss of habitat for special-status wildlife species, including foraging habitat, for the following County of San Diego Group 1 and Group 2 species and SSCs): barn owl, Blainville's horned lizard, California horned lark, Cooper's hawk, cougar, golden eagle, loggerhead shrike, long-eared owl, merlin, mule deer, northern harrier, peninsular metalmark, prairie falcon, red-shouldered hawk, San Diegan tiger whiptail, San Diego black-tailed jackrabbit, San Diego desert woodrat, turkey vulture, western bluebird, western spadefoot, yellow warbler, Bell's sage sparrow, coast patch-nosed snake, Coronado skink, rosy boa, San Diego banded gecko, San Diego ringneck snake, and western small-footed myotis. As the County does not have legal authority to require mitigation on Reservation land, no mitigation is proposed, and potential impacts to County Group 1 and SSC within the Campo Corridor would be **significant and unavoidable**.

Impact BI-M: Construction of the Campo Wind Facilities would result in impacts to approximately 789.25 acres of vegetation communities and cover types within the Campo Corridor. Approximately 740.45 acres of the 789.25-acre impact would occur to sensitive vegetation communities. These impacts are described in detail in the EIS. As the County does not have legal authority to require mitigation on Reservation land, no mitigation is proposed, and the direct loss of sensitive vegetation communities due to construction of the Campo Wind Facilities would be **significant and unavoidable**.

Impact BI-U: The Campo Corridor is not subject to the County RPO. It is not known whether there are biological resources subject to that County's RPO within the Campo Corridor. Therefore, no mitigation measures are proposed. Impacts to RPO wetland and wetland buffers, if they exist, are considered to be **significant and unavoidable**.

Impact BI-CU-1: The Project's cumulative impacts to sensitive plants and vegetation communities (**Impact BI-CU-1**) would be reduced via **M-BI-2** through **M-BI-5**, **M-BI-7**, and **M-BI-10** through **M-BI-16**. While the Campo Wind Facilities impacts would also be reduced via indirect impact avoidance measures, no mitigation is recommended for direct impacts to sensitive plants and vegetation communities on the Reservation. Thus, this cumulative impact would remain **significant and unavoidable**.

Noise

Campo Wind Facilities

Impact N-A: predicted turbine noise levels spilling off the Reservation into private lands would exceed the County ordinance requirements on private lands within the County near representative Project property line location LT-1, and due north of LT-12. As such, operational wind turbine noise impacts would be significant, as wind turbines would generate noise levels that violate County Ordinance 36.404. Because the Campo Wind Facilities would be located outside of the jurisdiction of the County, the County would not have authority to require a site layout that reduces these operational impacts to below a level of significance or to impose other feasible mitigation. Therefore, operational noise impacts associated with the Campo Wind Facilities would remain **significant and unavoidable**.

Impact N-B: With respect to the County's Renewable Energy Regulations Section 6952 Large Wind Turbine, C-weighted aggregate nighttime hourly L_{eq} is expected to be greater than the Residual Background Sound Criterion (RBSC) value at the Reservation Boundary near representative location LT-1, and due northeast of LT-10. As such, operational wind turbine noise impacts would be significant, as wind turbines would generate noise levels that violate the County's regulations. Because the Campo Wind Facilities would be located outside of the jurisdiction of the County, the County would not have authority to require a site layout that reduces these operational impacts to below a level of significance or to impose other feasible mitigation. Therefore, operational noise impacts associated with the Campo Wind Facilities would remain **significant and unavoidable**.

Impact N-C: Operational turbine and Project-attributed traffic noise levels were predicted at On-Reservation noise-sensitive land use (NSLU) areas and Reservation Boundary positions to assess where an EPA-based guideline exterior noise standard of 55 dBA L_{dn} would be exceeded. Predicted Project-related operating turbine noise levels vary from 44 dBA to 65 dBA L_{dn} at these identified NSLU areas. At one modeled location (LT-9), predicted operational noise levels exceed the 55 dBA L_{dn} guideline but includes the proximity of five turbines proposed to be located within a quarter-mile of the represented NSLU. When including consideration that turbines cannot be within 0.25 miles of a residence On-Reservation, per the Campo Lease, modeled noise levels would be no greater than 55 dBA at sensitive receptors, which would not exceed the dBA L_{dn}

guidance-based threshold even under 10 m/s (or greater) average wind speeds over a 24-hour period. However, even if the potential impact at LT-9 was reduced to a less than significant level due to compliance with the Campo Lease, there is the potential under this 76-turbine studied wind turbine operation scenario for average hub-height wind speed of 10 m/s to cause operational noise impacts at up to five other represented locations including LT-1, LT-2, LT-5, LT-8, and LT-10. Based on the 76 possible wind turbine locations, **Impact N-C** would be **significant and unavoidable**. However, the Campo Lease allows for only 60 turbines and requires a 0.25-mile distance from residences, which would address this impact as described in the BIA's EIS.

Impact N-CU-A: For representative location LT-9, the predicted Project operations noise is the larger of the two acoustical contributors to the "future" logarithmic sum and is cumulatively considerable because its adverse effect is to cause the combined future noise level to exceed the EPA guidance limit.

As discussed in the Acoustical Analysis Report (Appendix G), this noise analysis conservatively predicted noise as if all 76 potential sites featured an operating turbine. Due to the parameters of the aforementioned Campo Lease, which only authorizes 60 turbines to be constructed for the Project, there is an opportunity for reduced cumulative noise exposure at one or more of these studied representative locations. Final Project turbine layout may offer potential reduction of predicted cumulative noise levels at Off-Reservation NSLU due to their increased distance from one or multiple operating turbines. The quantifiable effect of such a layout would depend on the turbine locations based on final engineering, the existing NSLU location, its current proximity to existing turbines, and the pre-existing outdoor ambient sound level. Nonetheless, because the Campo Wind Facilities would be located outside of the jurisdiction of the County, the County would not have authority to require a site layout that reduces these cumulative impacts to below a level of significance. As such, cumulative noise impacts associated with the Campo Wind Facilities would remain **significant and unavoidable (Impact N-CU-A)**.

8.2 Significant Irreversible Environmental Changes

Irreversible long-term environmental changes associated with the Project would include those potential significant impacts described in Sections 2.1 through 2.9, and environmental effects analyzed in Sections 3.1.1 through 3.1.9 of this EIR. Construction of the Project would require fossil fuels, a nonrenewable resource, to power construction vehicles. In exchange for using nonrenewable and non-retrievable resources, the Project would provide a source of clean, renewable energy. Over the operational life of the Project, it would contribute incrementally to the reduction in demand for fossil-fuel-based electricity generation through the production of wind energy. Therefore, the incremental reduction in fossil fuels would result in a beneficial effect through the commitment of renewable resources.

8.3 Growth-Inducing Effects

The CEQA Guidelines (Section 15126.2(d)) identify a project as growth-inducing if it fosters economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 1.8, Growth-Inducing Impacts, and Section 3.1.6, Land Use and Planning, of this EIR specifically address whether the Project would induce growth and/or impact populations and housing in the area. This section summarizes this discussion.

The Project does not propose any residential use such as a residential subdivision, mobile home park, or single-family residences that would cause an increase in population. The Project also does not propose a recreational component, such as a hotel, resort, campground, or other facility that would attract or accommodate an increase in visitors to the area that would indirectly cause temporary increases in population.

During construction, the Project would temporarily employ a total of approximately 684 workers, with a daily maximum of up to approximately 561 workers at the peak of construction and an average daily peak of 202 workers. Few of these workers, if any, would relocate to the area with their families, and they are not expected to induce substantial population growth in the Mountain Empire or Boulevard area. Once construction is complete, the Project would contain an operation and maintenance facility that would employ approximately 10 to 12 permanent workers, which is not a significant increase in population.

As discussed in Section 1.1, Project Objectives, the Project would assist meeting California air quality goals and greenhouse gas emissions reduction goals in conformance with Assembly Bill 32 and Senate Bill 32. As such, the Project would not directly induce growth related to provision of additional electric power. Rather, energy demand, as determined by the California Public Utilities Commission with input from the California Energy Commission, drives generation procurement; procurement does not drive an increase in either utility customers or energy consumption. Furthermore, implementation of the Project would not permit San Diego Gas & Electric or any other investor-owned utility to expand its service territory. For these reasons, and as further described in Section 3.1.6 of this document, the Project would not directly or indirectly induce substantial population growth.