

## **WIND ZERO BY THEIR OWN NUMBERS**

These numbers come from the information Wind Zero Group, Inc. provided for the Draft Environmental Impact Report (DEIR) dated January 2010 and Final EIR (FEIR) of July 2010 for the Coyote Wells Specific Plan project, the name given to the training facility and racetrack which they have proposed between Interstate 8 and Hwy 98 in SW Imperial County adjacent to Nomirage, a residential area SE of Ocotillo CA.

**FEIR Sec 3.0 is Comments & Responses to Comments on DEIR; FEIR Sec. 4.0 is Errata and changes to text of DEIR. Most information in responses to comments was NOT added as changes to the EIR.**

(Updated 8-26-2010 to include changes from FEIR of July 2010, additional updates to be made)

### **PROPOSED PROJECT VS EXISTING COMMUNITY**

**Current zoning is R-1, L-40, low density residential with 1 dwelling unit/40 acres** (DEIR 1.0-3; 2.0-1; 3.0-2) because of the groundwater constraints and concerns that were critical in the County's adoption of the April 26, 1994 Ocotillo/Nomirage Community Area Plan (ONCAP) which is a part of the Land Use Element of the Imperial County General Plan. Residents live adjacent to proposed WZ site.

- 4 - - number of possible entries with manned guard houses 120 sf x 12' (PR CWSP 20, 49 of 795)
- 6 - -Number of live fire shoot houses (FEIR 3.0-102 Response 9-6) in "Mock-up urban environment" w rectangular street layout and uninhabited houses and offices (FEIR 4.0-17, 18) with up to 15 shooters/house (FEIR 3.0-102 Response 9-6) (CWSP Addendum 4.0, 5.0)
- 7- number of semi-enclosed shooting ranges (FEIR 4.0-3 changed DEIR 3.0-18 from sixteen)
- 17 - - number of semi-enclosed shooting ranges Table 4 (CWSP Addendum 4.0 increases # in CWSP p19)
- 10 - -Number of live fire shoot houses (DEIR 3.0-17) in "Mock-up urban environment" w rectangular street layout and uninhabited houses and offices (FEIR 4.0-17, 18) (CWSP 2010 Table 4 Addendum)
- 12 - number of mini-storage buildings in rows (DEIR 4.0-17)
- 50 - ft height of admin building x 28,000 sq. ft. (2010 CWSP Exhibit 9R)
- 60 - - number of dwelling units in new "village" (FEIR 4.0-16)
- 80 - - ft height of 12,000 sq ft control tower/observation at center of site (DEIR 3.0-19, CWSP 2010 Exhibit 9R)
- 100 - -number of rooms in resort hotel (DEIR 3.0-24)
- 100 - - number of people who can be using indoor shooting ranges at same time (DEIR 3.0-17) (FEIR 3.0-102)
- 140 - - number of persons who can be using the 7 semi-enclosed ranges (Phase I) at a time (FEIR 4.0-3) or is it six semi-enclosed shooting ranges (FEIR 3.0-103 Response 9-8)
- 150 - -number of spaces in RV park for patrons/members of motorsports facility only (DEIR 3.0-24)
- 158 - number of 1 and 2 car storage garages (DEIR 3.0-24)
- 312 - -population of Ocotillo/Nomirage Community Area in 2000 census (DEIR 4.10-11)
- 320 - - number of people who can be using the 16 semi-open shooting ranges at the same time using night-vision goggles during evening hours to 8 PM fall to spring, to 10 PM spr-fall (DEIR 3.0-18)
- 22 - - acres of rooftops for Wind Zero project (DEIR 3.0-26)
- 167 - - acres covered by paving activities (DEIR 3.0-55), but only 16.8 ac roadways & airstrip (DEIR 4.8-10)
- 800 - - or more parking spaces in addition to 150 unit RV parking (CWSP various pgs)
- 944 - - acres of proposed project site (DEIR 1.0-1) (DEIR 4.8-10 for details below)
  - 380.6 acres recreational uses (motorsports facility);
  - 204.5 acres open space preservation area;

- 220.1 acres for education and training (to include a law enforcement and training facility).
- 39.2 acres light storage.
- 26.6 acres residential 150 RV spaces (DEIR 8-12)
- 20.2 Acres Townhomes minimum 3,000 sq ft /dwelling, temporary visitor serving (DEIR 4.10-11)
  - 32 townhome units, & 28 garage lofts (2010 Specific Plan Exhibit 9R)
- 16.8 acres roadways & airstrip (DEIR 4.8-10) thus 150 acres of parking lots based on 167 Ac paved
- 16.1 acres tourism uses,
  - 7.8 acres hotel/resort facility,
  - 6.3 acres single family residential, “primarily temporary visitor serving (DEIR 4.10-11)
  - 5.5 acres Infrastructure
- 9 -- number of permanent residents expected at build-out (DEIR 4.10-11) (FEIR Findings 1.2.3 p.5)

“Majority of jobs would be filled by persons outside Ocotillo/Nomirage Community area...” (DEIR 4.10-11) The **proposed project ... does not act as a desirable component of a future residential community.**” (DEIR 4.10-11) Project would likely slow growth of adjacent residential community because project is undesirable neighbor.

## **WATER**

There isn't enough potable water to support the project. Pumping water in the quantity required for the project will endanger the quantity and quality of water for current residents.

Location is in the overdrafted Ocotillo-Coyote Wells Groundwater Basin, which was designated by US EPA as a Sole Source Aquifer which means there is no other source of water for overlying domestic use

- 1 -- number of dwellings permitted on 40 acres under current “Desert Residential” zoning rules for the area because of limited water supply. (DEIR 2.0-1)
- 29.2 - acre-feet/year water, the amount that can be pumped from onsite if additional overdraft, remaining water up to 65 AF/Y will come from “alternative water supply” for Phase III (FEIR 4.0-32, 33) inconsistent: 33.3 AF/Y at FEIR 5.0-21
- 32 -- depth in feet to groundwater at nearby well (DEIR 4.14-2)
- 50 -- height in feet of Burn and Rappel Tower, { 3 story tall (CWSP 2008 at p.13) using 144,000gal. water/burn (CWSP 2008: 56) } OR One 4 story burn tower 22 x 35 ft using 60-86 gal propane/burn 15,000 gal water/burn 24 times/year (CWSP '09 : 18; DEIR 3.0-21)(Phase III CWSP 2009 81) 3 story 22x35x 50 ft high
- 50 -- gallons of water which can be pumped per minute from each of two wells (DEIR 3.0-36) This will be 144, 000 gallons per day. FEIR4.0-5 says 3,660 gallons/day of 4.1 AF/Y-Phase I , 29.2 AF/Y for Phase II (FEIR 4.0-5).
- 65 -- acre feet per year maximum water use limit at buildout Phase III (FEIR 4.0-4, correcting DEIR 3.0-36)) (CUP 08-0031 recommended, studies deferred)
- 1,500 - gallons of water /minute pumped from 200,000 gallon storage tank (DEIR 3.0-36); or is it... 1,500 - gallons/minute pumped from two new water wells (DEIR 3.0-46)
- 25,000 - 40,000 -- gallons of wastewater produced daily (DEIR 3.0-38)
- 200,000 - gallons of water to be stored in each of 2 water storage tanks near wells (DEIR 3.0-26) 34' diam x 32' H
  - Use of massive septic tanks during early phases can contaminate groundwater, no in FEIR
  - Wind Zero themselves admits that they don't know where they will find water for the later phases. They say they will find another source if needed. There are no other possibilities except using the aquifer. DEIR text below is a warning.
  - “If it is determined more groundwater is required subsequent to project development the property owner shall be required to modify the project scope to conform to the maximum water usage as projected and evaluated. In lieu of the project resizing, an alternate offsite supply of groundwater may be evaluated to supply the ultimate project needs.” (Emphasis added) ( DEIR 3.0-37)

- Because of U. S .Gypsum groundwater pumping, water levels in the wells of Ocotillo/NoMirage residents have gone down. Painted Gorge has no potable water.
- FEMA designated floodway runs through property. Hwy 98 is under water with heavy rains. FEMA prohibits development in floodway without FEMA pre-approval.
- US ACE must make determination re jurisdictional waters of US because washes connect to Salton Sea

## NOISE & TRAFFIC

Retired people have chosen to live in the area for its clean air, tranquility and dark night skies. Many veterans, some with PTSD live here. The presence of this project would radically change the quality of life in the area. Noise from semi-enclosed shooting ranges, live fire shoot houses, high speed driving tracks as well as airplanes and helicopters would be intolerable and could sound like a “war zone”.

- 2 -- number of helicopter landing areas (DEIR 3.0-21 and 4.6-20) becomes one (FEIR 4.0-3 changing only 3.0-18), but shows as 2 heliports in Specific Plan Exhibit 9R Conceptual Site Dev Plan in PC Project Report and Tract Map
- 6.1 -- length of racetrack number in miles (DEIR 3.0-22) operate weekday 7 AM - 7PM, weekends 8 AM - 10 PM (CWSP ‘09:4, 23) (DEIR 3.0-22)
- 6 -- number of live fire training houses with up to 15 shooters/house (FEIR 3.0-102 Response 9-6)
- 7 -- number of semi-enclosed shooting ranges: three 50M x25M, three 100Mx25M and one 300Mx25M ranges. (FEIR 4.0-3 changes to DEIR 3.0-18 from 16 semi-enclosed ranges; CWSP Addendum at 4.0)
- 17 -- number of semi-enclosed shooting ranges Table 4 (CWSP Addendum 4.0 increases # in CWSP p19)
- 10 -- number of live fire training houses 6,000 sq. ft. x 30’ tall (DEIR 3.0-25) 2 story, each 5,000 sq. ft. (CWSP 20); *semi-enclosed 6,000 sq ft used until 8 PM fall-spring, to 10 PM spring-fall (CWSP ‘09:3, 20) (Phase III CWSP 81)* 6,000 s.f. x 30 ft tall (DEIR 3.0-17; 3.0-25) (DEIR 3.0-50) (FEIR 3.0-102 changes DEIR to 6 shoot houses)
- 12 -- number of helicopters landing per day during helicopter training (DEIR 3.0-21)
- 12 -- number of daily takeoffs and landings of small aircraft on 4,000ft airstrip (DEIR 3.0-23), up to 20 -- takeoffs & landings on weekends (DEIR 4.2-25); airstrip extension Phase III (DEIR 3.0-23)
- 100 -- number of people who can be using indoor shooting ranges at same time (DEIR 3.0-17)
- 320 -- number of people who can be using the 16 semi-open shooting ranges at the same time
- 4,391 -- Project weekday trip generation, traffic to/from site (DEIR Traffic Appendix 38app p.27) \*\*\***
- 5,266 -- Project weekend trip generation, traffic to/from site (DEIR Traffic Appendix 38app p.27) \*\*\***
- 57,360 -- rounds of ammunition to be fired daily at the training facility (DEIR 4.6-17) sunrise to 10 PM PC hrng
  - This noise ruins the quality of life for residents, especially gunfire, racing, and traffic to 10 PM
  - Lowers property values and makes future positive residential development impossible.
  - Unfair to residents who are veterans and others who have experienced armed conflict.
  - military bases do not have such activities adjacent to residential areas for active duty military and their families

## SAFETY AND HEALTH ISSUES

The floods of last September and the Easter Day and June 14, 2010 earthquakes with much local damage add to other concerns about placing this project across the street from a residential neighborhood.

4 - -number of 12,000 gallon above-ground fuel storage tanks (DEIR 4.6-12)  
15.7 - tons of waste generated per day without recycling (DEIR 4.11-16) or 4170 tons/every 300 days.  
21 - - number of “chemicals of potential concern associated with ammunition firing” (DEIR 4.6-17)  
1,000 - - gallon propane storage tank near burn tower (DEIR 3.0-21)  
12,085 - - pounds of waste generated/day (DEIR 4.11-16)  
57,360 - - rounds of ammunition to be fired daily at the training facility (DEIR 4.6-17)

- County is always struggling with air quality compliance and toxics. Why add to pollution?
- Go kart and diesel fuel which will be used is particularly damaging to air. There can be no justifiable “need” for such activities adjacent to a residential community.
- How is ammunition accounted for and prevented from leaving site?
- Additional seismic studies are needed because earthquakes are continuing in area.

## **CULTURAL RESOURCES**

There are significant unexplored cultural resources and cremations known on site.

### **Number of employees by Phases**

40 - - number of employees Phase I (DEIR Table 3.0-6 at DEIR 3.0-31)  
65 - - number of employees Phase II (DEIR Table 3.0-6 at DEIR 3.0-31)  
165 - - number of employees at build-out, Phase III with hotel (DEIR Table 3.0-6 at DEIR 3.0-31)  
200 - - number of estimated jobs both during and after construction (DEIR 4.10-11)  
“Majority of jobs would be filled by persons outside Ocotillo/Nomirage Community area...” (DEIR 4.10-11)

### **Some important questions for you to consider**

Do you know the kinds of jobs that would be created by this project?

How many of the jobs require specific training and will be filled by contacts of the owners who will come from other geographical areas?

Are you aware that the county has forbidden people to build in Ocotillo in one of the floodways?

If you give Wind Zero an exception from the floodway zoning, are you risking FEMA flood disaster insurance for the whole county? (issue came up in 1984)

Is it wise to add pollution from diesel generators, additional traffic, firing, go Kart engines and off road driving when county is struggling to meet EPA standards?

**Why should the Imperial Valley be a dumping ground for projects that more affluent areas have rejected?** In an open meeting CEO of Wind Zero, Brandon Webb, stated that they wanted to build in San Diego but that they had to look elsewhere because people in San Diego were concerned about the environment. He told Planning Commission he wanted a site to train snipers.

**Would you want this project across the street from your parents, children or grandchildren ? Is this the neighbor you want where you live?**

## **MORE INFORMATION ABOUT COYOTE WELLS SPECIFIC PLAN PROJECT PROPOSED BY WIND ZERO GROUP**

- Coyote Wells Specific Plan Draft EIR SCH No. 2009011063 January 2010, released 1-27-2010 available online at <http://www.icpds.com/?pid=2308> . Appendices also available at same site,. Final EIR was posted to same site after 12 July 2010 with comment deadline at the August 11 Planning Commission Public Hearing. Final EIR only includes responses to comments and any changes to document in response to comments.
- Additional information on Wind Zero's project can be found online at following sites:
- [www.wind-zero.com](http://www.wind-zero.com) (from Wind Zero Group, the project applicant),
- [www.copswiki.org/w/bin/view/common/WindZero](http://www.copswiki.org/w/bin/view/common/WindZero), which include videos of 4 meetings discussing project
- [www.wind-zero-ocotillo.org](http://www.wind-zero-ocotillo.org) by ICDOG,
- <http://www.youtube.com/watch?v=UZRx9uMMfi> PAWZ Video of local residents' concerns
- [peopleagainstownzero@yahoo.com](mailto:peopleagainstownzero@yahoo.com)
- 

## **Public Hearings have been set for County to consider Wind Zero-Coyote Wells Specific Plan project**

At County Administration Building 940 Main St. El Centro 2<sup>nd</sup> floor

- Planning Commission Aug 11, 2010 (Recommended approval by Board of Supervisors)
- **Board of Supervisors September 28, 2010 at 1:30 PM**

### **SPEAK AT PUBLIC HEARING or SEND WRITTEN COMMENTS**

on or **BEFORE Sept 14, 2010** (Hand written letters are just as important as anything typed or said.)

### **ALL LETTERS MUST GO TO COUNTY SUPERVISORS**

To:

Imperial County Board of Supervisors  
940 Main Street Suite 209  
El Centro CA 92243

or email to:

Clerk: [sylviabermudez@co.imperial.ca.us](mailto:sylviabermudez@co.imperial.ca.us)  
Luis Fuentes [lfuentes@co.imperial.ca.us](mailto:lfuentes@co.imperial.ca.us)  
Gary Wyatt [Garywyatt@co.imperial.ca.us](mailto:Garywyatt@co.imperial.ca.us)  
Mike Kelley [mkelley@co.imperial.ca.us](mailto:mkelley@co.imperial.ca.us)  
Wally Leimgruber [supvleimgruber@co.imperial.ca.us](mailto:supvleimgruber@co.imperial.ca.us)  
Jack Terrazas [jackterrazas@co.imperial.ca.us](mailto:jackterrazas@co.imperial.ca.us)

### **Planning Commission and Board of Supervisors must make the following decisions about the Wind Zero/Coyote Specific Plan projects:**

1. Whether or not to certify the Final EIR (see below)
2. Whether or not to approve a Zone Change (or change the Land Use Ordinance) to allow activities proposed for the 944 acres of land called Coyote Wells Specific Plan adjacent to Nomirage
3. Whether or not to approve an Amendment to the County General Plan to change the Ocotillo-Nomirage Community Area Plan (ONCAP) to allow this kind of intensive development adjacent to Nomirage and remove most of the protections in the existing ONCAP

4. Whether or not to approve the Tract Map which would allow all of the subdivisions and changed uses requested by the applicant
5. Whether or not to approve the project with the mitigation measures proposed
6. Whether to make a decision that some “economic benefits” override or outweigh all the adverse impacts to the environment and the community and thereby justify approving the project

**Issues related to “certification” of the Final EIR (FEIR)/ Wind Zero -Coyote Wells Specific Plan project consideration - EIR Should not be certified/approved**

1. FEIR is not adequate or complete, text is still inconsistent, some analysis deferred to future contrary to CEQA requirements that studies be done for full disclosure of impacts prior to approvals
2. FEIR does not show a good faith effort at full disclosure of environmental information especially as it related to the adjacent residential community and is not consistent with text of the Specific Plan
3. FEIR does not provide sufficient analysis to allow decisions to be made regarding the project and its environmental consequences
4. FEIR Mitigation measures are inadequate and inconsistent

**Wind Zero training Facility, Coyote Wells Specific Plan General Plan Amendment, Zone Change and Tract Map should all be denied** because:

- Project is inconsistent with the Ocotillo-Nomirage Community Area Plan, a part of the Land Use Element of the County General Plan. Any approval would essentially invalidate the protections and goals of the ONCAP
- Project is large scale version of spot zoning which favors one property owner to the detriment of other adjacent and nearby properties and uses
- Project is detrimental to the health and well being of the existing residential community with children and retirees
- It has the potential to degrade and deplete the part of the Sole Source Aquifer where residential wells are drilled and ignores issues of “safe yield” for this part of groundwater basin
- permitting development in FEMA floodway could impact ability of property owners throughout Imperial County to get flood insurance
- It is inappropriate to site such shooting and military style activities within sight and hearing of the adjacent established residential community when a military base would not have such activities near on-base housing.
- The proposed project would make all existing and future residential uses in Nomirage area undesirable and reduce the potential for future residential development on now vacant lots. Who would want such activities as a neighbor? No one supporting the project seems to want it across from where he/she lives.
- There is no credibility to arguments about reduction in gasoline use by reducing travel time to the Wind Zero facility, when one component calls for competitive racing and encourages fuel consumptive activities. That contribute to Greenhouse gases.

[PAWZ 8-26-2010](#)