

Comments Received from Individuals

Part 3



**CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC)/
BUREAU OF LAND MANAGEMENT (BLM)**



**Joint Environmental Impact Report/
Environmental Impact Statement (EIR/EIS)
for East County Substation, Tule Wind, and
Energia Sierra Juarez Gen-tie Projects**

Written Comment Form

(please print)

Wednesday, January 27, 2010

Name*: Brit Coupens
Affiliation (if any)* INVenergy
Address*: 3955 5th Avenue, Suite 205
City, State, Zip Code*: San Diego, CA 92103
Telephone Number*: (658) 531-9419
Email*: bcoupens@invenergyllc.com

As the state of California struggles to reach its mandated renewable energy goals, it is important to keep in mind that large projects which add considerable megawatts of electricity are required to achieve the stated levels. Certainly, roof top solar is a desirable and necessary addition to the renewable energy mix, however it is not as easily deployable and presents a much costlier alternative to wind, a cost competitive abundant resource.

Another important point to bear in mind is that wind farms require no water for ongoing operations. In water deficient Southern California, wind represents an attractive alternative all other energy forms, especially the significant water usage by natural gas drilling along the Colorado River Basin in Western Colorado and the uranium mining in Eastern Utah.

I urge the Commission and the BLM to support permitting of SDG&E's proposed ECO Substation, related upgrades and connected renewable energy projects

* Please print. Your name, address, and comments become public information and may be released to interested parties if requested.

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments can also be faxed or emailed.

(See reverse for additional information)

From: Sherie Hubble [mailto:shubble59@gmail.com]
Sent: Friday, February 12, 2010 1:50 AM
To: ECOSUB
Subject: Re:Decision to approve desert construction for renewable power plants.

Hi,

I just learned that I have until Feb. 15th to express my opinion to the CPUC in making this extremely sensitive decision.

First of all, I believe that when major developments on public lands are being considered there should be a period of at least 6 months where the public is notified in major newspapers and public hearings are held on this issue. As a member of the public, I think I have the right to be informed of such major developments on public lands and in a very public manner. We can't keep hiding these issues behind a veil until it's too late for the public to have a chance to express their opinions and observations.

Regarding these developments, I think it should be taken into consideration the fact that there are areas that have been disturbed and are not in sensitive, endangered environments and should be considered first and foremost before developing land that will never really be 'mitigatable'. Regardless of the 'convenience' of being attached to the Sunrise Powerlink whose construction and necessity is extremely in question, these projects need to be considered in a different light. Building more piecemeal and closer to the source of the needed energy would create a safer and more flexible power system that would not be as vulnerable to attack or destruction from natural causes due to not "having your eggs all in one basket".

San Diego County is blessed with one of the largest population of endangered and threatened species, even in the desert, believe it or not. San Diego's biodiversity must be protected. There are ways to take advantage of renewable energy resources without building major construction sites in unblemished lands that harbor a wide representation of endangered, threatened and sensitive species.

The development in our county has been handled irresponsibly, in part due to our being in a desert environment and having very limited water resources, which we are now learning about the result of such fallacy. Also, because we have not taken into consideration our unique environment that harbors such a large diversity of plants and animals, from coastal sage, to foothills, mountains and deserts, all of these areas are under constant threat of destruction by irresponsible construction. And we all know mitigation is a joke. We can mitigate the mitigated that was mitigated before and this can go on to infinity and until there are no wildlands left.

In closing, I request that you extend the public comment period so more of the "public" can be involved in the decision making regarding our "public lands". And also request that you email me back to let me know my comment has been added to the list.

Thank you for your consideration of my views,

Sincerely, Sherie L. Hubble
3675 Emmanuel Way
Alpine, CA 91901

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PineApp Mail-SeCure for the presence of malicious code, vandals & computer viruses.

To whom it might Concern.

My name is Mike Troy and I live south of the current Boulevard substation. I would like to express my concerns over the new plans which will effect my property if the substation comes South any and also with purposed routing of poles and high voltage. Of course I moved to Boulevard 27 years + ago to get away from city blight and now my only view left is going to hold high voltage wires and might cause health issues with my young daughter who is 11.

I would think you could rout the poles on old highway 80-which would allow for the up grade of the old wood poles to new metal poles and could in effect solve 2 problems at the same time-replace the old poles and go in a direction were power already is.

This is also a shorter route-overall less expensive cost to SDG&E.

Another suggestion is to place this in the city were there is already high voltage power lines and already effecting views which is NO were as beautiful as mine is.

This is an environmental injustice to put in my backyard (literally) when you have avoided Julian because Boulevard residents are poorer economically and not a tourist stop.

I'm sorry but SDG&E is 100% not trust worthy-they have lied to me from the beginning and still are. They started out saying let me on your property or we will take you to court-when I asked what it was about they said no there are no planes but we need to go on your property. Of course once I read about sunrise highway project they changed there tune and said we might be running power thru your property and you have no choice but to let us do the testing re "immanent domain law". I have let them on my property each time.

The last time SDG&E mentioned the poles might go along the "east" existing road (old road to Jewell valley)-and than put some seismic sensors in the existing seasonal creek which is quite a ways away from the existing road -which if the poles are going to come close to my existing house I would be forced to move re health considerations of the "EMF" generated from hi voltage power poles.

Please take this into consideration

Mike Troy
Po box 1347
1991 flying cloud place
Boulevard Ca. 91905

From: Luke Gordon [mailto:Skydanzer@Comcast.net]
Sent: Monday, February 15, 2010 6:33 PM
To: ECOSUB
Subject: Follow-up to response to proposed SDGE East County Substation and Transmission Line Project

To whom it may concern:
I have already submitted this prior to the dead line.
On this draft I included my address and phone number in case there is need to contact me.
Thanks for your consideration,
Yours truly,
Luke Gordon

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Feb. 12, 2010

Iain Fisher
California Public Utilities Commission
c/o Dudek
605 Third Street
Encinitas, CA 92024

RE: Response to NOP for Proposed SDGE East County Substation and Transmission Line Project

Dear CPUC Staff and Dudek,

I am the owner of record of the parcel no. 659 030 04 00 and 612-120-53-00 or the property commonly known as 1585 Jewel Valley Rd. I purchased this property in 1994 in order to make it available to a religious community that I am a member of. Our organization is called the New Being Project. We are a 501(c)3 non-profit recognized as a church by the IRS.

I have served as proxy owner of the property while the community has organized itself to take ownership of the property. In 2005 I transferred an adjacent property to the community's newly formed non-profit, Rasayana. We currently have an active contract for sale by which Rasayana will take legal ownership of the above referenced parcel after completing the term of its mortgage which I hold in my name. The community uses 3 adjacent parcels which effectively give it 160 acres for its use. Our community uses the property as a retreat residence for church members and also for farming and animal husbandry activities as permitted by its S92 zoning designation. We purchased the property primarily for its secluded, rural atmosphere and to grow food for our community. We serve the local community by offering free classes and free food offerings.

Specifically, my concerns are as follows:

1. **Agricultural Resources:** We are farming on the land. Where the towers and lines run this will restrict the acreage available for farming. This will result in loss of future income and the loss of being able to grow our own food, which is one of the reasons we bought the property.
2. **Visual/Aesthetics:** I bought this property for their and my use. I bought the property, and they rent it from me, for its natural beauty and seclusion. I would have never have even considered buying the property if I knew that the power lines and tower would be put on my property. As a matter of fact, I would sell my property and I am sure Rasayana would sell their property, except for the fact that with the money I have invested in the property I would never recoup on a sale. The power lines and towers would make the property virtually worthless, since the primary value of the property is in its natural beauty and seclusion.
3. **Population and Housing:** I am also concerned that with this high voltage line that more development may occur in the area. With more future possible development then there

would be more people, traffic and noise in the area. One of the reasons that I bought the property was because it is on a dead-end, unpaved road in a secluded rural area.

4. Electromagnetic Radiation: My friends and I are very sensitive to EMF from high power lines. I know that some of my friends will not come out to the property with a high voltage power line running through it whether it actually causes harm or not.

5. Hazardous Substances, Hydrology and Water Quality: I am also concerned about how ground water contamination could affect the wells that supply us with potable water and contamination of the food we grow.

In conclusion, I am VERY concerned about entering on my property for testing, for later construction, and ultimately for the operation of a permanent high power transmission line and towers on my land. My preference would be to:

- 1st to move the transmission line around my property and out of sight so it does not destroy the natural beauty of the property and the other deleterious effects mentioned above.
- 2nd possibility which would be objectionable, but better than the proposed plan, would be to bury the line along the proposed alignment rather than put it above ground on towers.

Also, please refer to the letter written by William Vandivere, P.E. President/Director, Rasayana for a more detailed account of the issues I mentioned above.

Yours truly,

Luke Gordon
3773 Cherry Creek N, Dr, 801
Denver, CO 80209
303.331.4548

From: Chris Lawrick [mailto:blvdclark@yahoo.com]
Sent: Sunday, February 14, 2010 9:31 AM
To: ECOSUB
Cc: ecatmike@yahoo.com
Subject: tule wind

Please reject the tule wind project in its entirety. This massive monstrosity should be installed along the coast line where the population center needs the power. This will limit the power loss of long transmission lines and reduce its environmental footprint since there would be no need to clear paths for power lines into sensitive areas. The infrastructure for transmission are already in place along the coast the only problem that i see would be that the phony environmentalist would protest their views being obstructed.

Chris Lawrick
2394 Tierra heights road
Boulevard Ca 91905 619 672 0567

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From: THEMIGHTYQ [mailto:themightyq@inbox.com]
Sent: Sunday, February 14, 2010 9:27 PM
To: ECOSUB
Subject: !5500 Acres of windmills! Miles if huge powerlines accross the forrest.

Please do something positive to add to the world. Don't destroy it.

FREE 3D MARINE AQUARIUM SCREENSAVER - Watch dolphins, sharks & orcas on your desktop!
Check it out at <http://www.inbox.com/marineaquarium>

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From: Billie Jo Jannen
P.O. Box 443
Campo, CA 91906
(619) 415-6298

Feb. 15, 2010

To: Iain Fisher
California Public Utilities Commission
605 Third Street
Encinitas, CA 92024

BLM California Desert District Office,
Attn: Greg Thomsen
22835 Calle San Juan de Los Lagos
Moreno Valley, California 92553-9046

Subject: Scoping comments for Joint EIR/EIS for East County Substation, Tule Wind, and Energia Sierra Juarez Gen-tie Projects

Dear Sirs:

In my role as former editor of two local newspapers, current member of Rural Economic Action League, and appointee of San Diego County Board of Supervisors to the county's Comprehensive Economic Development Strategy Committee, I have long taken a vigorous interest in regional economic and development issues. My comments below are a reflection of these interests and are not intended to be an official communication on behalf of any of the above.

I have real concerns about this series of projects, which not only keeps control and production of a vital resource in the hands of a mere few, but uses taxpayer and ratepayer dollars to do it. I feel that the social and economic review, to date, of less monopolistic options has been inadequate and this inadequacy benefits only the companies who profit from this use of taxpayer and ratepayer dollars. At the same time, the impacts to working families and the tax and rate paying public are largely ignored.

Therefore, I ask that a thorough and complete review of the short and long term impacts, costs and benefits be done **comparing this cluster of projects to smaller scale distributed generation alternatives, especially widespread rooftop solar**, over the region intended to be served by the projects. This **analysis should be projected to cover at least 20 years** and include, but not be limited to, the following:

1. The full long term monetary cost to taxpayers and ratepayers for each approach, weighed against the savings and/or profit that ratepayers and taxpayers realize by producing a share of the region's electric needs. This should include the cost of servicing the state and federal debt that accrues from these projects via taxpayer funded grants and loans, tax credits, and lost revenue from corporate tax deductions and credits, added to the anticipated rise in electric rates and surcharges to help pay off these companies' increased costs of doing business.

2. The full number and economic value of local jobs for design, retail sales, marketing, construction, maintenance and all other related jobs that would be generated by small-scale in-basin distributed generation, should be weighed against the local jobs that would be created by the proposed industrial project cluster. Jobs for people imported from out-of-area should be counted as a negative, as this reduces the net gain to the region's workers.

3. San Diego County and other counties that would be served by these projects have initiated a strong effort to get rooftop solar onto as many homes as possible. They should be consulted as part of these studies, as should solar industry experts and contractors, to help **determine the amount of electricity and the type and number of jobs that would be created if public support went into this effort instead of industrial wind turbines.**

4. The first of the backcountry's proposed wind projects was shut down for several months, due to the impacts of a single storm and, more recently, a Connecticut natural gas plant similar to the one proposed here, blew up dramatically. **Potential vulnerability to deliberate destruction, acts of nature, and general breakdown will clearly have a direct impact on the public's cost for power generation.** So will the cost of maintenance and replacement of worn/damaged parts. This needs to be realistically quantified, based on both cost and full risk assessment, in light of the public monies that are going to be expended.

5. The value loss to property and business owners who are forced, via eminent domain or easement, to host industrial scale electric lines, or are otherwise impacted by **industrial-scale electric projects, should be weighed against the total property value benefit of owning home generation infrastructure.** This analysis should also consider loss and gain of property tax revenue accruing to local governments.

Federal Sole Source Aquifer and property value impacts

I am also concerned about the impacts to local property values in the case of harm to local groundwater. A property that has no water source is worth little to anyone. For this reason, the entire backcountry region sits on a **Federally declared Sole Source Aquifer**. It is my understanding that federal dollars cannot be spent on projects that have even the potential to harm groundwater.

Loss of groundwater use is 100 percent immitigable, unless the energy giants want to build a pipeline to all impacted communities and negotiate for a share of Colorado River water on our behalf. It has been clearly stated on multiple occasions by state and local water authorities that **water will never be imported to this region**.

It is my understanding that the environmental review for Sunrise Powerlink was allowed to slip by without an appropriate assessment of its water usage and impacts. This negligence cannot be allowed to happen again.

Consequently, **I ask that this EIR/EIS determine with certainty whether these projects are legally entitled - in view of the Sole Source Aquifer protections - to the many Federal financial benefits that they are using to construct these massive projects.**

Cumulative impacts with Sunrise Powerlink

These costs and impacts should be viewed in light of cumulative impacts with Sunrise Powerlink. They are part and parcel of the complete economic and environmental package, the costs of which will be borne by taxpayers and ratepayers.

Sincerely



Billie Jo Jannen

CC list:

District 2 Supervisor Dianne Jacob
Larry Johnson, Rural Economic Action League
Congressman Duncan Hunter
Assemblyman Joel Anderson
Christy Scott, Editor, *The Alpine Sun*

From: Sunny Jones [mailto:blvrdjones@gmail.com]
Sent: Monday, February 15, 2010 11:10 PM
To: ECOSUB; catulewind@blm.gov
Subject: Tule Wind Project

To whom it may concern,

My name is Michael Jones. I reside at 2362 Tierra Height Road, Boulevard-Yes Boulevard California. My Phone # is 619-442-9706.

I am actually a resident of Boulevard not from some outside area where their opinions have no impact on themselves or families.

I moved up here in 1982 because of its rural appeal. I enjoy the stars, migratory waterfowl, including Canadian Geese & ducks, this peaceful area with nice views and McCains Valley.

Before 1982 I started riding motorcycles, hiking and hunting the McCains Valley area including camping there. The memories from this scenic-sacred area are priceless to me. Over the years our recreation area there has been cut. The justification back then was to preserve the natural state of this area for Big Horn Sheep, etc.

This seemed reasonable for conservation efforts so myself and a lot of other off-roaders, hunters, hikers went along with this decision. After all, it was to preserve the natural beauty and for the endangered animals. I have never complained about much but this attempted obnoxious over sized project has gotten me upset. There's nothing really I can say about the windmills put up on the Campo reservation although it has ruined my view out of the back side of my house.

At night, on any given night the white blinking strobes illuminate my house. I had to cover my skylight so that the flash would not wake me or keep me awake. I have concerns other than the blight they will create.

Everyone is in an incredible rush to push this ridiculous project through for financial gain from stimulus monies and personal gain. Everyone says that it needs to be put somewhere so let me propose, if they are so necessary, lets put these foreign built and owned, so safe, with no blight windmills on California's coast. We have transmission lines right there.

These monstrosities are not safe for the Boulevard area because of wind gusts, earthquakes, lightening, etc., they are not engineered or tested for these conditions. RPS standards mandate 20% by 2010 but I can tell you that the windmills on the Campo reservation are almost always off. I would estimate that they run less than 10% of the time. I know they were available to go online, so I'm told, 90% of the time. So, What this tells me is that SDG&E already meets its 20% quota or these windmills would be producing electricity instead of sitting idle.

There are 10 more years until Arnold's S-14-08 is supposed to be at target of 33% renewable. Arnold will never be Governor again and this might not be in effect after the next Governor's term.

Even so there are so many technologies available and becoming available, Nuclear, solar, wind in unoccupied areas(although this will be outdated soon), fusion and hydro-electric.

Slow down this rushed process, lets consider sacred burial grounds, endangered species, dust from new roads, water, migratory birds, more noise from the props, scenic corridors that can never be restored and fires, the take over of a national treasure, McCains Valley.

I don't believe hunters, hikers, off-roaders, and homeowners can co-exist with the Tule Wind Project and others planned for this area. They must be stopped!

Thank you for listening,
Michael & Sunny Jones

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February 15, 2010

To: Iain Fisher
California Public Utilities Commission
605 Third Street
Encinitas, CA 92024

BLM California Desert District Office,
Attn: Greg Thomsen
22835 Calle San Juan de Los Lagos
Moreno Valley, California 92553-9046

Thomas Zale
BLM Project Manager
Bureau of Land Management
El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243

Dear Sirs:

**Subject: Scoping comments for Joint EIR/EIS for East County Substation, Tule
Wind, and Energia Sierra Juarez Gen-tie Projects**

I have real concerns about this series of projects, which not only keeps control and production of a vital resource in the hands of a mere few, but uses taxpayer and ratepayer dollars to do it. I believe that the social and economic review, to date, of less monopolistic options has been inadequate and this inadequacy benefits only the companies who profit from this use of taxpayer and ratepayer dollars. At the same time, the impacts to working families and the tax and rate paying public are largely ignored.

Those concerns are:

1. The full long term monetary cost to taxpayers and ratepayers for each approach, weighed against the savings and/or profit that ratepayers and taxpayers realize by producing a share of the region's electric needs.
2. The full number and economic value of local jobs for design, retail sales, marketing, construction, maintenance and all other related jobs that would be generated by small-scale in-basin distributed generation, should be weighed against the local jobs that would be created by the proposed industrial project cluster.

3. Determine the amount of electricity and the type and number of jobs that would be created if public support went into the effort of rooftop solar onto as many homes as possible instead of industrial wind turbines.

4. The Campo Tribe wind projects has been shut down for several months, due to the impacts of a single rainstorm this year. Lightening has been eliminated as the cause. A civilian witness to the spontaneous explosion with arching has been located and he has shared his information. Apparently, SDGE had turned off the electricity for a few hours that day also. Was this a surge when they turned the electricity back on? The engineers on this project continue to be unable to get the turbines back on line. As I look out of my window, they continue to stand motionless. Fortunately, it was raining when these turbines exploded. An explosion during a summer wind storm would spell disaster.

5. Loss of groundwater use is 100 percent unmitigable, unless the energy companys build a pipeline to all impacted communities and negotiate for a share of Colorado River water on our behalf. It has been clearly stated on multiple occasions by state and local water authorities that water will never be imported to this region.

I ask that this EIR/EIS determine with certainty whether these projects are legally entitled - in view of the Federal Sole Source Aquifer protections - to the many Federal financial benefits that they are using to construct these massive projects.

In basin solar is the solution for future needs for energy. Wind turbines are high-impact to everyone visually, health-wise, extensive land use needed, restrict fire-fighting abilities to communities and national security needs of the Border Patrol helicopters. Solar is not high impact. With an alternative so readily available that would serve the same goal but NOT negatively impact so many lives, why then would you approve these projects?

If these projects are approved, the northern section of the community of Boulevard will be sandwiched in with wind turbines just to the west of their houses and just to the east of their houses. The Scoping process for these projects did not include the proposed 5 commercial wind turbines on private land just to the west of the Tule Wind project that will be virtually in-line with that project.

Mitigation to the community of Boulevard must be considered if these wrong-way projects are approved. The electricity for an entire region will go THROUGH our community, but will be stopped TO our community by SDGE during "wind events". Mitigations items required for the community at a minimum are:

- Trash Transfer Station in Boulevard at the "old" County station. Enter into at least a 50-year contract with the County to offer this service at a discounted price to residents of Boulevard.

- **New Fire Station:** Purchase land and build new 6-bay station and equip it with equipment identified by the County Fire Authority. Solar powered.
- **Ambulance Service:** Purchase one new ambulance and pay for personnel.
- **Life Flight:** Build a helicopter landing site at the new fire station.
- **Community Center/Senior Nutrition/Disaster-Red Cross Care Response Center:** Purchase a minimum of 20 acres and build a state of the art community center with a commercial grade kitchen. There would be indoor and outdoor audio/video equipment and an appropriately sized silent-running generator to run the entire building. Additionally, a complete state of the art ham radio system would be funded.
- **Community County Park:** Purchase a minimum of 20 acres and install indoor/outdoor playground equipment/equine park/enclosed swimming pool/cabanas/four public bathrooms to San Diego County Park standards. In addition to recreation, the pool would be used for physical therapy. Provide funding for needed personnel.
- **Library:** After building the new Fire Station on another site, demolish the current building now being used by the Boulevard Fire Department and build a new state of the art library with a separate media wing housing the 20 computers and all equipment that you would donate. Provide funding for needed personnel.
- **Clover Flat Elementary School:** Build a new school, eliminating modulars, provide artificial turf for all playing fields.
- **New Sheriff's Administration Headquarters:** Purchase land and build a new administration headquarters to San Diego County standards that would service the east county. Provide funding for 24/7 coverage for Boulevard.
- **Post Office:** Pave parking lot to Old Highway 8 and build erosion control for heavy rains.
- **Transportation:** Purchase and donate a Van with wheelchair access and provide personnel and all satellite needs for this vehicle. Create transportation for Youth and Seniors in a loop (Jacumba to Campo to Buckman Springs to Pine Valley to Descanso). This would get kids to the library during the summer and seniors to the medical facilities in the area for appointments. Provide funding for needed personnel, fuel and maintenance, insurance.
- **DSL Service:** Install DSL for all of Boulevard. Jacumba currently has DSL for all homeowners.

Regards,

**Cheryl Lenz
2040 Ross Avenue
Boulevard, CA 91905**

From: Christopher Noland [mailto:sdrockguy@hotmail.com]
Sent: Monday, February 15, 2010 10:35 PM
To: catulewind@blm.gov; ECOSUB
Subject: Comments – Energia Sierra Juarez, ECOSUB, and Tule Wind

To whom it should concern:

We are residents, business owners, and parents of children who live in Boulevard and recently attended the open hearings regarding the environmental impact for several projects currently planned for the rural East County area. These are:

- SDG&E ECO Substation
- Energia Sierra Juarez (ESJ) Gen-Tie Project
- Iberdrola Renewables 200MW Tule Wind Project

In addition to these projects, there are other projects in the rural East County that are also planned and are of a similar nature. These are:

- Campo Reservation Wind Energy Project
- Cuyapaipe Indian Reservation Wind Energy Project
- Other proposed wind energy projects on the desert rim
- Wind and solar energy projects by individuals and businesses

We are very concerned that the quantity and type of projects being planned for the rural East County will have an overall negative effect if all aspects of each project are not analyzed properly and if all projects are not considered in their total effect on the region. The following are our comments regarding areas we feel should be investigated while the CPUC and BLM evaluations are under way including SEQA and NEPA reviews.

Summary

1. The past record of the CPUC regarding approval of the Sunrise Powerlink even though the administrative staff stated that the project was not needed causes concerns that the technical review and the residents' comments will have no bearing on the CPUC decisions.
2. Renewable energy technology is moving very rapidly and the construction today may be quickly outdated and the investments lost.
3. The United States energy distribution grid currently has no convenient or cost effective method of energy storage; therefore, most all energy must be produced only when needed by the consumer.
4. The recent past history of existing wind mills installed on the Campo Indian Reservation shows that these large, imposing machines are vulnerable to damage by natural forces of weather.
5. So many projects at one time within a rural population area will likely have a huge cumulative impact. All projects must be examined at the same time to evaluate these impacts.
6. The rural population of 10,000 is only a small portion of the 3.2 million residents of San Diego County, but all of these impacts will only affect these rural residents. The pristine natural environment of the rural East County must be protected although there are far fewer voters living here.
7. Recent revelations of falsification of climate data

Detailed Discussion

1. The past record of the CPUC decisions.
 - a. Just last year the CPUC voted to approve the Sunrise Powerlink even though two administrative law judges stated in their reports that the Powerlink was not needed now or in the future.
 - b. The CPUC approved SEMPRA energy to use a snake-like powerline path that has not been properly investigated since SEMPRA really wanted to put the power line in the desert. The alternatives were never properly investigated but this made no difference to four of the five CPUC commissioners.
 - c. The CPUC chose this alternative although this alternative was the fourth best alternative according to CPUC staff research. Therefore, the CPUC ignored better alternatives without regard to the science or the concerns and recommendations of the residents.
 - d. We are concerned that, while you are conducting what may be a thorough examination of all these projects, in the end the CPUC will disregard all your research and vote in a way that benefits the energy companies involved in these projects.
 - e. CPUC commissioners appointed by a Governor are in no way considered the voice of the people.
2. Renewable energy technology is moving rapidly.
 - a. In the past, renewable energy technology had moved slowly because there was no apparent large market for renewable energy usage. Today, the situation has changed since, both for cost effectiveness and foreign policy reasons, renewable energy has become very important to our nation.
 - b. We are just at the beginning of emerging technologies such as improved solar panels and new areas such as algae production for fuel sources. You can see new emerging technologies almost every day now that there is an apparent market and development money is available to pursue these new technologies.
 - c. Wind power has been used in the past to develop electrical energy, but the advancements in wind power are not occurring at the rate of new technologies which appear to promise even greater efficiencies in the future.
 - d. The installation of wind generators, while they appear to be a good investment at this time, may be a very poor investment as new technologies replace the use of wind with our most readily energy source, the sun.
 - e. As part of the evaluation of the installation of wind generators in the rural East County, consideration must be given to the future availability of other sources that will be better for our environment over time.
 - f. Examples of such technologies are:
 - Development of CIGS solar panels which promise greater efficiency.
 - MIT development of hydrogen-oxygen storage systems that promise a cost-effective locally installed energy storage system.
 - Vertical axis wind turbines that are quiet, efficient, and do not harm birds.

- o Algae farming that would produce promising biofuels while being able to be farmed in a similar manner to crops.
- o High temperature super conductors that promise more efficient electrical transmission capability, can be easily installed underground, eliminating the need for obsolete transmission towers.

3. No convenient method of energy storage

- a. While the U.S. has been rushing to install wind generation as the solution for our electrical power problems, the fact that we have no convenient or efficient energy storage system has been neglected.
- b. While energy can be generated by wind when it is blowing, and solar during sunlight hours, there are no good ways to store excess energy. Therefore, the energy must be generated only when it's needed to be consumed.
- c. There have been some large scale energy storage solutions which have involved pumping water uphill when the energy is available and allowing it to flow downhill through generators when power is needed, in the same manner as an electricity generating dam, but these storage solutions are not generally available on the U.S. electrical distribution grid.
- d. While there is research in new ways of electrical storage, there are currently no viable storage methods, meaning that wind generators will only run when power is required. You have probably seen fields of wind generators where most generators are not functioning. This is largely due to the fact that the excess electrical power is not required at that time and, therefore, the wind generators must sit idle.

4. The recent history of Campo Reservation wind generators

- a. Several years ago, 25 2MW wind generators were installed on the Campo Indian Reservation and situated along the Tecate Divide. We have no factual data indicating the yearly power output, but we have noticed that there are many times when only a few of those generators are turning.
- b. We have been told by wind generator manufacturers that the overall efficiency of any typical wind generator is about 30 percent. This means that a 2MW wind generator is actually a .6MW electrical producer over time. If we are going to sacrifice the pristine rural mountains, we believe we should receive a greater output than 30 percent efficiency. Other, more benign, energy generators will yield greater efficiency.
- c. Recently, high winds and weather have caused damage to all 25 of the Campo wind generators. We were initially told that the problem was caused by lightning, although no residents saw lightning. We were later told that the damage was caused by high winds. This is unusual because the winds experienced during that time were not as high as has been experienced in previous years. Investigation may reveal that this region may not be the best for installing this type of wind generator due to the nature of erratic winds.

- d. We understand that the Campo Reservation is planning for the installation of 25 or more new wind turbines. This information should be included in your evaluation of all current projects.
- e. We are concerned that the wind generator market is being driven by the huge tax incentives available to wind generator installations rather than the profit that could be realized through the sale of the electricity. This means to us that the investors are more interested in completing the installation of any wind turbines, rather than being interested in the long term profitability of electricity generation. If the investors are primarily interested in the tax incentives, there will be limited future incentives to keep these huge wind turbines operational as new and better electrical generation technologies become available

5. Cumulative impact of so many energy projects at one time in the rural area

- a. Your documentation lists several projects on both sides of the Mexico-California border that are being evaluated at the same time. Your documentation, however, does not mention the many other proposed projects in the same area of the same or similar type. As an example, there are projects such as:

- Campo Reservation Wind Energy Project
- Sunrise Powerlink
- Cuyapaipe Indian Reservation Wind Energy Project
- San Diego Gas & Electric proposed electrical shut-off plan
- Other proposed wind energy projects on the desert rim
- Wind and solar energy projects by individuals and businesses

- a. It is our belief that all area projects must be evaluated for their cumulative effect on the rural area and the adjacent communities.

6. Disproportional burden on small rural population

- a. There are 3.2 million people living in San Diego County, but only approximately 10,000 people live in the rural East County area.
- b. It is easy for city residents to say that electrical generators should be placed in rural areas because it will have no effect on their properties. At the same time, the effect on the rural landowner can be severe.
- c. Basic engineering principles have always dictated that energy is best generated near its destination. There are technologies currently available that will allow the energy for the larger San Diego population to be developed nearer the population also eliminating the need for transmission lines.
- d. These technologies involve solar panels for electricity and solar water heaters that could be installed on rooftops and other area directly adjacent to the large consuming population. This approach is more fully described in the San Diego Smart Energy 2020 Plan developed by Bill Powers. For information go to: www.sdsmartenergy.org.
- e. While we understand that 3.2 million people do have energy needs, the rural population of approximately 10,000 has much reduced energy needs and, in most cases, have the land to install sufficient

- renewable power generation equipment which could make them self-sufficient.
- f. The County of San Diego has recently signed on to the California First financing program which will enable local residents to finance their own renewable power system for the first time. This will open a whole new vista for individuals to install their own power system and thereby eliminate the future need for remote power sources such as the wind turbines.

7. Recent concerns over falsifying of climate data:

Recent events have uncovered the manipulation of climate data that may or may not be true. It is imperative to not only California, but the world to know if the re-evaluation of climate data may make the "Green" movement obsolete. So much legislation is passed based on this climate data which has been compromised. This should also be taken into account when writing the EIS and basing opinions or sections on world climate data.

I thank you for taking all of these items into consideration during preparation of the EIS.

Sincerely,

Chris and Christina Noland
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Boulevard, CA 91905

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Comments for East County Substation, Tule Wind, and Energia Sierra Juarez Gen-tie Projects



M. Ostrander

Jacumba Resident

I am writing a formal response to the SDG&E East County Substation, Pacific Wind Development, Tule Wind, and Energia Sierra Juarez LLC, and Energia Sierra Juarez Gen-Tie Projects. I am opposed to the projects based on the attached reasons.

Comments for East County Substation, Tule Wind, and Energia
Sierra Juarez Gen-tie Projects by M. Ostrander, Jacumba resident

<u>Environmental Issue Area</u>	<u>Potential Issues or Impacts</u>	<u>Comments</u>
Aesthetics	<p>Visual Contrast, Industrial character, view blockage, and skyling resulting from the placement of the project structures.</p> <p>Nighttime construction lighting would be used during project construction and the proposed substations would include operational nighttime security lighting that could affect the nighttime view.</p>	<p>There is no mention of potential impacts of wind turbines which would create visual contrasts to the existing view scapes and skyline.</p> <p>Will wind turbines have FAA lighting white and red? The night time lighting may affect the area's dark skies application and could potentially effect the community's potential economy.</p>
Air Quality		<p>The document does not address Green House Gasses (GHG) as mandate in AB32 and SB97. The project should address GHG from cradle to grave eg. Manufacture, transportation, construction, maintenance, and removal of all structures, appliances, wires, and components associated with the project.</p>
Biological Resources	<p>Project construction activities would result in temporary and permanent loss of native wildlife habitat.</p> <p>Loss of Habitat for sensitive species designated by State and Federal resource agencies.</p> <p>Construction and operation of the proposed project could disturb wildlife and cause changes in wildlife behavior.</p>	<p>This could potentially have a devastating effect on already stressed endangered species such as, Big Horn Sheep, Arroyo Toad, Golden Eagles, and the Quino Checker Butterfly. If there is no guarantee that impacts could be prevented this could mean possible eradication of some species in the area.</p>

Comments for East County Substation, Tule Wind, and Energia
Sierra Juarez Gen-tie Projects by M. Ostrander, Jacumba resident

<u>Environmental Issue Area</u>	<u>Potential Issues or Impacts</u>	<u>Comments</u>
Biological Continued	<p>Conflict with State or local policies or ordinances protecting biological resources.</p> <p>Overhead transmission lines could cause bird electrocution and collision.</p>	<p>The document does not address wind turbines and the effects on species.</p> <p>The document does not address plant species.</p> <p>This could cause violations to the Migratory Bird Treaty Act.</p>
Cultural and Paleontological Resources	<p>Construction of new towers and access roads could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources.</p>	<p>There are numerous sites located along McCain Valley Road. Looked at individually are less significant, but looked at as a whole could be a major site or village site. I personally know of four sites: CA-SDI-4788, CA-SDI-10595, CA-SDI-10596, and CA-SDI-10597. The area needs to be thoroughly surveyed. I also know the Bureau of Land Management (BLM) missed a significant site on one of their projects on Shockey Truck Trail in Gloria Canyon located in Campo; it was discovered by another archaeologist not employed by BLM.</p>

Comments for East County Substation, Tule Wind, and Energia
Sierra Juarez Gen-tie Projects by M. Ostrander, Jacumba resident

<u>Environmental Issue Area</u>	<u>Potential Issues or Impacts</u>	<u>Comments</u>
Hazards and Hazardous Materials	<p>Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater.</p> <p>Fire Hazard during construction.</p> <p>Wildfires could be caused by the proposed project facilities or could damage project facilities.</p> <p>Improper storage or handling of hazardous materials and/or hazardous wastes during project construction, operations, or maintenance could present hazards to construction workers or the public.</p>	<p>If this cannot be mitigated to no possibility and groundwater is affected, it would impact the community's drinking water. This could potentially create a Health Hazard to residents of the project area that are dependent on groundwater for drinking water.</p> <p>There is no full time fire department in the community. The current fire department is volunteer which currently is uncovered due to lack of volunteers. The closest staffed station 24/7 is 12 miles from the community.</p> <p>There is also the issue of training for firefighters to deal with electrical hazard, substation hazards, electrical fires, and wind turbine hazard and fire.</p>

Comments for East County Substation, Tule Wind, and Energia
Sierra Juarez Gen-tie Projects by M. Ostrander, Jacumba resident

<u>Environmental Issue Area</u>	<u>Potential Issues or Impacts</u>	<u>Comments</u>
Socioeconomics	<p>Employment of construction personnel could be beneficial to regional economy.</p> <p>Potential environmental justice issues associated with locating project in rural area.</p>	<p>Past projects in the area did not bring economic development in the area. The employment opportunities for locals were limited to non-existent and of a short duration. The Back Country has the highest unemployment rate and the lowest annual income per capita in the county. The Back Country Communities depend on tourism for income. The communities are currently working on revitalization which includes developing ecological tourism. The environmental justice issues would have a detrimental impact on the revitalization of these communities.</p>

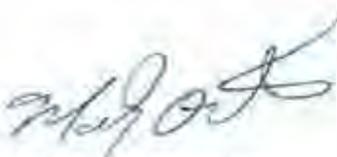
Comments for East County Substation, Tule Wind, and Energia
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In conclusion, I hope you take the comments stated into serious consideration and also look at the cumulative impacts of past projects and proposed projects when determining the total impacts. I also ask that you weigh the potential impacts on groundwater as this could be irreversible on availability of safe, clean drinking water for the communities in the project area as they are dependent solely on groundwater. Lastly, it is my hope that you would look at the socioeconomic impacts on the communities in the project area that are struggling to come back from previous project impacts. We truly are a David fighting a Goliath.

There are better alternatives such as, roof top solar on existing structures situated on already disturbed ground and small wind generation at the same. We are told to move away from creating companies too big to fail and here we are subsidizing with government incentives creating one. Lastly, it is my hope that you analyze the economic stability of the Industrial Wind Turbines minus any government subsidies and programs. Past Industrial Wind Turbine Projects were not economically viable after government programs ran out and the areas were left with non-functioning turbines that were not removed.

Thank you for your consideration of these comments and allowing me to participate in this process.

Sincerely,



Mark Ostrander
Jacumba Resident