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Boulevard Planning Group

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Documentation from the County of San Diego on Tentative Parcel Map No 20719/Grizzle show an Open Space Easement on file with the Department of Planning and Land Use as Environmental Review Number 03-21-001. The easement is required, as part of the subdivision approval, to protect biological resources, some of which rely on the shallow groundwater and wetlands that exist on the property. The Grizzle subdivision site (now owned by Lansing Industries, Inc) which straddles McCain Valley between Historic Route 80 and I-8, on the I-8 and BCD Alternate Routes, contains wetlands, and cultural and historical resources in the area transected by the I-8 route. The Lansing private parcel (APN # 61303035) is shown on Sheet 42 of 95 of the I-8 Alternative at I8-40 and BCD-0.

Another private parcel on Rocky Knoll Road in the I-8 Route, owned by William Erdman (APN# 61203025), also has an Open Space Easement to protect biological resources as part of TPM 20698RPL. It is on file with San Diego County under Environmental Review Number ER-02-21-006. The aerial photo on Sheet 43 of 95 of the I-8 Alternative shows what appears to be pond on the Erdman property. The environmental review for the project discussed wetlands and the need for protection under the County's Resource Protection Ordinance.

Modified Route D would negatively impact the Miller Valley drainage, watershed, and the old Stage Coach Springs watering pond on the Rancho Finistierra Subdivision which flows into Campo Creek. The BCD South would impact the La Posta Creek watershed which flows through the Cameron Valley and into Lake Morena. There are wetlands, springs, and seeps in all of those areas that would be impacted along with private wells and the well serving the new US Customs and Border Patrol at La Posta.

B0002-56

Figure E.2.15-4: Boulevard Fireshed BCD Alternative Fire Behavior Trend Model appears to have the maps reversed for normal and extreme weather conditions.

B0002-57

E.2.15-13 Impact F-3; Presence of overhead line would reduce the effectiveness of firefighting (Class III): The cumulative impact of the presence of overhead lines for the BCD Route, and the presence of the existing Kumeyaay Wind facility and the proposed wind facility on approximately 7,000 acres of BLM land at McCain Valley was not addressed. There is also the potential for more overhead transmission lines to accommodate the interconnection of the proposed BLM wind project and the potential for new and expanded wind projects on Campo, La Posta, Manzanita Reservations. There is also a concern that the wind turbines could generate electromagnetic interference with emergency services radio communications in and around the wind turbines. This radio interference could also impact the effectiveness of firefighting by disrupting their communications. Aerial firefighting will also be physically inhibited/restricted due to multiple towering turbine facilities. All of the above would greatly reduce the effectiveness of firefighting and should raise the significance level to Class I. The absence of this information is an error of omission.

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E.4.3 Visual Resources Modified Route D: The exclusion of the Cameron Valley, as a Key Viewing Point for Modified Route D is an error of omission. The Cameron Valley is highly scenic and highly visible from both Historic Route 80 and the adjacent I-8. Modified Route D would significantly degrade the viewshed. The existing view and the visual simulation of Modified Route D should be included.

B0002-61

E.4.12.1 Modified Route D Environmental Setting: This section contains material factual inaccuracies by erroneously stating that , “The Modified Route D Alternative crosses no designated groundwater basin” when in fact it crosses the federally designated Campo/Cottonwood Creek Sole Source Aquifer, one of only four in the State (Fed. Reg Cit 58.FR.31024). () (Exh. 10 Map). After a multi-year review process, the designation was finalized 5/28/93. I personally initiated the designation request with the USEPA and worked with professional geologists, various agencies, community groups, and elected representatives to guide the designation through public hearings and approval. The designation confirms that there is no economically viable alternate source of water to replace our groundwater resources.

B0002-62

Table E.4.12-2 Impacts Identified- Modified Route D Alternative - Water Resources: There are deficiencies in this section due to the fact that all the Impacts identified as Class II should instead be Class I due to the majority of the areas traversed by Modified Route D are totally reliant on the groundwater resources. Those impacts include accidental spills of potentially harmful materials and contaminants from the project and during construction of the project, along with drilling and dewatering operations, and applications of herbicide/surfactant, and chemical dust suppression/soil stabilizers.

B0002-63

Table E.4.13-2 Impacts Identified - Modified Route D Alternative Options- Geology: The analysis in this section is deficient for the fact that our highly fractured bedrock was not addressed. Our groundwater moves through fractures in the highly fractured bedrock. Blasting, drilling, or extreme vibrations, may lead to collapse of various fractures, or entire wells, thereby altering or blocking the flow of water to existing wells. Contamination can also move rapidly through highly conductive fractures and makes any cleanup attempts incredibly difficult if not impossible. (See comments above at WQ-APM-9)

B0002-64

Impact S-3: Project construction and operation would increase the need for public services and facilities (Class III).This section is deficient because it does not show confirmation of water sources proposed to be available to provide for the construction needs of the project- an average of 27,000 gallons per day for dust control and 36gallons/yard of water for tower construction. That adds up to a lot of water. Show-me-the-water bills like SB610 and SB221

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require review and verification of availability of water supplies prior to construction of large subdivisions. That same concept should apply to the Sunrise Powerlink project and its direct and indirect connected actions.

Figure E./5.1-6a New In-Area renewable Generation Alternative, Wind

B0002-66

Component: This map shows the Campo wind component substation which may no longer viable due to the Campo tribe's opposition. And the Jacumba Substation will now be located much further to the east based on Sempra's December 2007 Baja Wind application with the DOE. This will increase the length of the wind component transmission line project and all the related impacts and cumulative impacts.

E.5.1.4 at E.5-25: Wind component area siting: This section is deficient based on conflict with the Mountain Empire Subregional Plan which includes the policy to "Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for any of the following reasons: a) Safety of the general public, b) Unmitigated visual impacts on the rural environment, c) Noise pollutiond) Such development may lead to the economic devaluation of contiguous properties

B0002-67

E.5-27 Wind Facility Design, required facilities: New information regarding opposition from the Campo tribe may negate the potential location of a substation on the Campo Reservation. And the Jacumba Substation location has moved further to the southeast to accommodate Sempra's Baja Wind project. In regards to access roads, PPM Energy has reported to me personally, that they are trying to obtain easements across various tribal and private lands to access their potential wind turbine site on BLM lands in McCain Valley. It had been pointed out to PPM that their construction equipment and turbine components will not fit under the I-8 overpass on McCain Valley Road. It is reported in the DEIR/EIS that roads would need to be 30-40 feet in width during construction and then restored to widths of 16-24 feet. This will create land scarring that will be difficult to reseed and restore to pre construction native vegetated conditions.

B0002-68

B0002-69

E.5-28 Construction and Grading: The grading of existing roads, beyond their current width, the new access roads, the reported 1,600 square feet of soil, grade, and vegetation disturbance required for each turbine pad, along with the 6,000 gallons of water, and 18 to 20 concrete hauling trips per pad, the required excavation of up to 40 feet below grade for the foundations, and the necessary lay-down areas for equipment and material staging, all add up to some significant cumulative impacts including groundwater impacts. Especially if the all the proposed wind components move forward on tribal lands, BLM lands and at the transborder region of Jacumba/Jacume. **The failure to analyze the cumulative impacts of all these wind projects together and in addition to the potential I-8 BCD South route selection, is viewed as a deficiency in DEIR/EIS**

B0002-70

E.5-31 & E.5-82: There is a material factual inaccuracy in the statement that a "switch yard

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B0002-71 cont.

would be located near the southern end of the Campo Reservation, north of Interstate 8."The southern end of the Campo Reservation is in fact several miles south of I-8 and just 1/4 mile north of the US/Mexico border—not north of I-8.

E.5-102 Visual Resources Setting for Wind: Please see Visual Resources comments above. There is a material factual inaccuracy in this section based on the failure to recognize that these towering industrial wind turbines will be highly visible from Historic Route 80, Tierra Del Sol Road, Ribbonwood Road, and from homes on elevated locations throughout the community of Boulevard and Bankhead Springs, as well as from tribal homes on the Campo, Manzanita, and La Posta Reservations

B0002-72

E.5-103: The proposed change to Visual Resource Management Classification for BLM land. The VRM change proposed for McCain Valley West has been protested by the Boulevard Planning Group and Backcountry Against Dumps. PPM Energy has protested the reduced number of acres down from the over 17,000 acres they have a Right of Way on for wind testing.

B0002-73

E.5-117 Land Use Setting for Wind: The exclusion of the adjacent Carrizo Gorge Wilderness Area from the surrounding land uses is a material factual inaccuracy.

B0002-74

E5.134 Impact WR 1 Construction activities: New information from verbal conversations with PPM Energy confirms that McCain Valley Road cannot be used for access for construction due to the height limitations of the I-8 overpass over McCain Valley Road. They are looking for access agreements from various tribal and private property owners from I-8 at Crestwood to the north and east.

B0002-75

E.5-180 Overall Impacts of Renewable Generation Alternative for Noise: This section is deficient due to the lack of analysis of noise related to the wind turbines themselves. Information found on the web indicates that communities with existing turbines have complaints of a low groaning, humming, or vibrations which can reportedly cause negative health impacts.

B0002-76

E.5-190 Transportation and Traffic Setting for Wind: Once again, new opposition from the Campo tribe may negate the location of wind substation on the Campo Reservation and the location of the Jacumba Substation has moved several miles to the southeast to accommodate Sempra's Baja Wind project.

B0002-77

Table E.5.9-1 Public Roadways Along the Alternate Route Wind Component: Crestwood Road, Corrizo gorge Road, and Historic Route 80 need to be added to this list due to the elimination of McCain Valley Road due to overpass height limitations and the moving of the Jacumba Substation to the southwest.

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E.5-204 Public Health and Safety for Wind: This section is deficient based on the lack of analysis of groundwater interference from drilling for the turbine footings which may entail the use of chemical drilling muds, and/or a change in groundwater flow dynamics which may result in negative impacts to springs, seeps, and wells in the area. The change in surface water runoff due to grading and access roads may also negatively impact groundwater recharge to springs, seeps, and wells. Due to the highly fractured nature of our bedrock any contamination could move off-site at a rapid rate and be difficult if not impossible to remediate. An explosion at the Maple Ridge Wind Farm in July 2006, led to 491 gallons of oil leaking from the damaged transformer. In December 2007 it was determined that the leak had contaminated a residential well (Exh. 3:Watertown Daily News 12-29-07). Due to the fact that the area is completely dependent on groundwater resources, any contamination should be viewed as a Class I impact. (See comments above at WQ-APM-9).

This section is also deficient based on the lack of recognition and analysis regarding wind turbines as an ignition point for wild fires. Turbines are known to malfunction, explode, collapse, shed blades and create shadow flicker. All can result in significant threats to public health and safety. Two violent wind turbine collapses occurred in Copenhagen in February 2008. One windmill began spinning out of control during high winds. A video on YouTube shows the explosion-like collapse after one blade flew off, casting debris into the three other blades and shearing the 60-meter tower nearly in half (Exh. 11: The Copenhagen Post 2-25-08). Other YouTube videos show flaming turbines in various locations. Numerous melted turbines were viewed by me personally on a recent trip along the I-10 corridor near Palm Springs. There were also turbines with missing blades, and blades scattered on the ground.

B0002-80

E.5-231-23 Impact H-3, H-4 contains material factual inaccuracies. The Jacumba Substation is located in the Jacumba Valley Groundwater Basin Number 7-47 not in the Coyote Wells Valley basin as stated in the DEIR/EIS. However, both are located in the Colorado River hydrologic region. Due to lack of information the Jacumba Valley East, Basin Number 7-60 was deleted from the California's Ground water Bulletin. The Jacumba Valley groundwater levels are much higher than the Coyote Wells Valley. The claim that the depth to groundwater exceeds 50 feet and poses no possibility of encountering groundwater appears inaccurate. Developers for the 2,000 plus acre Ketchum Ranch subdivision in Jacumba claim that their consultants have determined they have abundant groundwater resources. In deed, the Ketchum Ranch (previously known as the Jacumba Valley Ranch) is currently being farmed with groundwater resources only. The I-8 route crosses the Ketcham Ranch, as does the existing SWPL.

B0002-81

E.5-233 Impact H-7 Accidental releases of contaminants from project facilities could degrade water quality is erroneously listed as a Class III impact: Again we challenge the erroneous conclusion that the depth to groundwater in the wind component area makes contamination/degradation of groundwater unlikely. The depth to groundwater varies throughout the

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region and varies with the rainfall and recharge rates. As noted in the comment above, there are many areas with very shallow groundwater. Due to the highly fractured nature of our crystalline bedrock, the risk of contamination is elevated due to the potential for rapid transport of contamination through highly conductive water bearing fractures. These fractures can carry contamination off-site long distances and can prevent easy cleanup and mitigation. **See comments on ES-64 above regarding well contamination from a wind facility and at WQ-APM-9.**

E-5-233-234 Overall Impacts of Wind For Water Resources: The DEIR/EIS is deficient in its recognition and analysis of groundwater impacts from the wind component. The wind projects on tribal and BLM lands in the Crestwood /McCain Valley area of Boulevard will include disturbed soils from expanding existing roads to accommodate construction equipment and turbine components, miles of newly graded turbine pads (1600 Sq Ft per pad), connecting easement roads, trenching for on-site burial of lines, the installation of miles of new 230 KV lines, with their own access roads, to connect to the new 80 acre Jacumba Substation. During El Nino years and heavy storm events, such as Hurricane Kathleen in the mid-70's which washed out sections of I-8 and the rail line, severe erosion from the wind components has the potential to alter the surface flow, redirect groundwater recharge, inundate ponds, streams, and wetlands with sediment. There is also the increased potential for contamination from runoff and infiltration of herbicides, soil stabilizers used for dust suppression, and oils and fuels used by the turbines themselves and related equipment including transformers.

B0002-83

E.5-263 Impact S-1 Project construction would disrupt the existing utility systems or cause a co-location accident (Class II). During the reconductoring of the existing 69kV line to accommodate the new energy generated by the Kumeyaay Wind facility, the towns of Boulevard and Jacumba, and several tribal neighborhoods, were taken off the grid and had to rely on SDG&E's emergency generators for weeks. This issue was reportedly not fully disclosed to the CPUC prior to approval. We experienced numerous power outages and brownouts. Locals complained of damaged equipment and economic losses. Due to the location of the proposed wind projects, and our end of the line situation, we would expect the same situation to occur with an even greater impact based on the increased size of the proposals.

B0002-84

E.5-265 Impact S-3 Project would increase the need for public services: This section is deficient because it does not recognize or analyze the potential for wind turbines to be an ignition source for wildfires. **See comments above at E-S-64 and E.2.15-13.** Boulevard currently relies on an understaffed and underfunded volunteer fire department (Exh. 12: Backcountry Messenger 4-08). Cal-Fire currently has a contract with the County to provide some local coverage. However, due to a lack of dedicated funding, there is no guarantee of annual contract renewal. We do not know where ladder trucks would come from to fight turbine fires when the motor catch fire at the top of the 200-300 foot towers. In many places the fires are allowed to burn themselves out. That would not be advisable in this area of high fire hazard and old growth fuel loads which is subject to extended high wind events often

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exceeding 70 MPH.

B0002-85 cont.

E.5-273: Fire and Fuels Management for Wind: It appears that a portion of the PPM Energy wind energy proposal for BLM lands in McCain Valley, and the Table Mountain area in their ROW to study wind, may be located in the Boulevard Fireshed not just the La Posta Fireshed.

B0002-86

E.8-47: Impact N-3 Wind generation in Crestwood area: This section is deficient based on the lack of recognition and analysis of noise generated by the wind turbines themselves. Some have described it as a groaning, or low vibration which is irritating and potentially damaging to the health of those impacted. This could also impact wildlife.

B0002-87

E.8-49: Impact T-4 Construction would cause temporary road and lane closures: Boulevard has only two I-8 on and off-ramps(Crestwood and Boulevard), and only two east-west two lane roads (Historic Route 80 and S 94). Any lane or road closures can cause extended delays as we experienced when Route 80 was impacted by the trenching and burial of fibre optic lines through town several years ago. It was a nightmare. Now we have two tribal casinos located at the I-8/Crestwood location. The casino patrons use the same route that will be needed for construction of the wind projects on tribal lands and at the McCain Valley location.

B0002-88

B0002-89

Figure G-8 Cumulative Projects SWPL Alternatives Eastern Portion: This section is deficient because it does not show all of the wind proposals at Crestwood, McCain Valley, Table Mountain, La Rumarosa, the Jacumba Substation, or the Campo Landfill proposal on the Campo Reservation

B0002-90

G-117 Cumulative Impact Analysis -temporary and permanent losses of native vegetation (Class I): The cumulative impacts will be even greater with the increased size and scale of the La Rumarosa Wind project and the potential for increased vegetation/fuels management around transmission towers and turbine towers in response to the 2007 fire storms.

B0002-91

G-120 Cumulative Impact B-9-wildlife movement corridors: See comments above under the header Jacumba Substation and SCE La Rumarosa Project. The Jacumba Substation and Sempra's new and much expanded La Rumarosa Baja Wind project, as well as the BCD South I-8 Alternative, will impact Los Californias wildlife corridors which have been the subject of extended bi-national scientific and conservation efforts, as documented in Phase II testimony by Center for Biological and others.

B0002-92

G-121 Geographic extent visual resources: We challenge this section which says there will be nothing visible beyond the two mile limit. High elevation and other viewing points along Tierra Del Sol Road, Ribbonwood Road, McCain Valley Road, Canebrake Road, Historic Route 80, I-8, Jewel

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Valley Court, Tierra Heights, Lillie Lane, and more, would have extended views into the wind components at McCain Valley, Crestwood, and La Rumarosa. Depending on the exact location of the La Rumarosa wind facility it may also be highly visible from the Ocotillo, I-8 and recreational areas in the Ocotillo, and the Table Mountain ACEC, Jacumba Wilderness and Corrizo Gorge Wilderness areas

G-123 Impact V-2 Long term visibility of land scars in arid and semi-arid landscapes (Class I): See comment G-117 above.

B0002-94

G-137 Cumulative- Related Concerns: See comments above at D.10-28 regarding interference with aviation communications and military readiness.

B0002-95

G-144 Impact H-4, Groundwater dewatering for project construction could deplete local water supplies. See comments above at Table B19 WQ-AMP-6 regarding the deficiency of these sections regarding the availability of alternate sources of groundwater, and only vague and inadequate and unenforceable mitigation measures.

B0002-96

G-153 Cumulative Impact F-2 Presence of overhead transmission lines would significantly increase the probability of a wildfire (Class I): See comment above at E.2.15-13 regarding the failure to include the cumulative impacts of turbines, their related transmission lines and equipment being ignition points for wildfires fires, compounded by multiple projects.

B0002-97

G-159 Table G-11 BCD and BCD South incremental effects on Class 1 Cumulative Impacts identified for I-8 alternatives: The BCD route passes through or adjacent to 2,276 acre the Big Country Ranch at the north end of Ribbonwood Road. The current owner, Lansing Industries, Inc, has informed the Boulevard Planning Group and others that they plan to pursue a general plan amendment for a planned community development with commercial, industrial, and residential densities at 2 dwelling units per acre. The wind projects at Crestwood and McCain Valley will also increase the cumulative impacts. The BCD South route will share the same cumulative impacts due to location in the same viewshed from various vantage points, with the Crestwood wind proposals.

B0002-98

G-162 Table G-13 Significant Unavoidable(Class I) Impacts of New in Area Renewable Generation Alternative: Once again the increased threat of fire related to wind turbine malfunction/explosion was left out of this table.

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H-138 Table H-26 Class I Impacts created or eliminated by Non-wires Alternative: Again, the increased threat of fire related to malfunction/explosion of wind turbines and or their related switchyards and transmission lines, and cumulative impacts, was omitted.

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H-142 Table H-27 Summary of Impacts of New In Area Renewables Generation

Alternative: Under Public Health and Safety, the impact should be changed to Class I due to the fact that “Construction could cause soil and groundwater contamination from hazardous materials”, and the total reliance on groundwater resources in the backcountry areas. See comment above for ES-64 and WQ-AMP-6.

Ap.1-323 Wind Feasibility and Disadvantages: See comments above at E.5-204 regarding wind turbines, and their related equipment, as ignition sources for wildfires

B0002-101

Ap.11C-45 I-8 Alternative Overhead Portion Detail: The location of the staging area-fly yard is located on a sensitive wetland area which was noted in comments above at E.1.12: **The Grizzle subdivision site (now owned by Lansing Industries, Inc) which straddles McCain Valley between Historic Route 80 and I-8, on the I-8 and BCD Alternate Routes, contains wetlands, and cultural and historical resources in the area transected by the I-8 route. The Lansing private parcel (APN # 61303035) is shown on Sheet 42 of 95 of the I-8 Alternative at I8-40 and BCD-0. This photo detail shows the BCD route extremely close to the old McCain family ranch house, located adjacent to McCain Valley Road, on State land near the McCain Valley Conservation Camp. The house does not have historic designation that I am aware of but it should. These impacted meadow/marshy areas are frequented by wildlife, including raptors and bats, due to the more abundant grasses, small prey and insects.**

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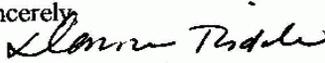
Figure Ap. 11C-47, 75,76: These overhead details of the I-8 & Modified Route D alternatives also show staging area-fly yards in meadow areas—most of which are highly visible . See comments directly above.

B0002-103

Ap 12-109 ground based Herbicidal treatments: This section states that a colorant or dye shall be added to the herbicide mixture and that a surfactant shall be added to the herbicide mixture to facilitate targeted absorption. Surfactants can cause contaminants to move more rapidly through the vadose zone and reach the water table more quickly than if no surfactant was present. This raises further concerns with negative impacts to groundwater quality. As noted numerous times above, negative impacts to our sole source groundwater should be considered as Class I Impacts.

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This concludes our comments.

Sincerely,

Donna Tisdale, Chair
cc: interested parties
Attachments: Exhibits 1-12

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**Sunrise Powerlink DEIS/EIR
Exhibit List Index for
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1. Illegals From Terror-Sponsoring Nations at Large in US (cnsnews.com 8-8-06)
US-Mexican Border As A Terror Risk (Christian Science Monitor 3-22-05)
2. Edison initiative adds twist to power-line debate (North County Times 4-8-08)
SCE Launches 250-MW Solar Project (RenewableEnergyWorld.com 3-28-08)
3. Wind Farm Oil Taints West Martinsburg Well (Watertown Daily News 12-29-07)
4. Various photos downloaded from web re: turbine fires, collapse, blade shredding/shedding, transport difficulties. Three photos marked "Campo" show shattered turbine blade taken at Campo's Kumeyaay Wind facility.
5. Two photos of industrial drilling rig along I-15 showing comparative destruction needed for installation of transmission tower footings.
6. Sempra's December 2007 DOE Application Filing for Baja Wind at La Rumarosa
7. Baja Wind protest letters from Boulevard Planning Group (3-21-08) and Center for Biological Diversity (3-24-08). Attachments to letters were not included as they are already part of the Sunrise Powerlink record through Phase II Testimony for CBD.
8. Turbine regulations for San Diego County
9. Tierra Del Sol watershed study by Dr. Victor Miguel Ponce (May 2006)
10. Campo/Cottonwood Creek Sole Source Aquifer map showing Designated Area (USEPA 2001)
11. Minister demands explanation for windmill collapse (The Copenhagen Post(2-25-08)
12. Boulevard Fire Department News (Backcountry Messenger April 2008)

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