PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 30, 2011

Mr. Jeffrey Durocher Wind Permitting Manager Iberdrola Renewables 1125 NW Couch Street, Suite 700 Portland, OR 97209

(Sent via e-mail: Jeffrey.Durocher@iberdrolaren.com)

Subject: Tule Wind Project – Data Request No. 17

Dear Mr. Durocher:

The California Public Utilities Commission, in association with the Bureau of Land Management (BLM), requests additional information in support of the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects environmental review process. Based on concerns expressed by the Anza-Borrego Desert State Park (State Park) during the Draft Environmental Impact Report/Environmental Impact Statement comment period, as well as BLM and State Park consultation meetings, additional information is requested from key observation points from the State Park to the Proposed Tule Wind Project. Please refer to Attachment A for detailed information regarding this data request. Please provide the requested information no later than July 11, 2011.

If you have any questions or need additional information, please contact me by phone at (415) 355-5580 or by e-mail at iain.fisher@cpuc.ca.gov, or Greg Thomsen at (951) 697-5237 or Gregory_Thomsen@ca.blm.gov.

Sincerely,

Iain Fisher
Energy Division
California Public Utilities Commission

cc: Greg Thomsen, BLM (GThomsen@blm.gov)
Thomas Zale, BLM (Thomas_Zale@blm.gov)
Jeffery Childers, BLM (Jeffery_Childers@blm.gov)
Patrick O'Neill, HDR (Patrick.O'Neill@hdrinc.com)

Attachments A. B. and C

Visual Simulations

1. Attachment B indicates photo points requested by the Anza-Borrego Desert State Park to be considered for visual simulations from the park toward the Tule Wind Project. Please provide visual simulations depicting the modified Tule Wind Project from photo points/key observation points (KOPs) **PP2**, **PP4**, **and PP6** (see Attachment C for a description of these points as provided by California State Parks). Assuming implementation of the modified Tule Wind Project layout, please indicate on the visual simulations which turbines would be visible from each KOP, as well as the approximate distance to visible turbines from each KOP. In addition, please provide the same information for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) Tule Wind Reduced Turbine Alternative.

The shape files for the photo points are attached.

2. Please provide a viewshed map depicting the visibility of the Tule Wind Project across the entirety of the Anza-Borrego Desert State Park. On the viewshed map, please include the Anza-Borrego Desert State Park boundary, as well as the renewable energy project areas in Imperial County represented in Figure F-1 of the Draft EIR/EIS.

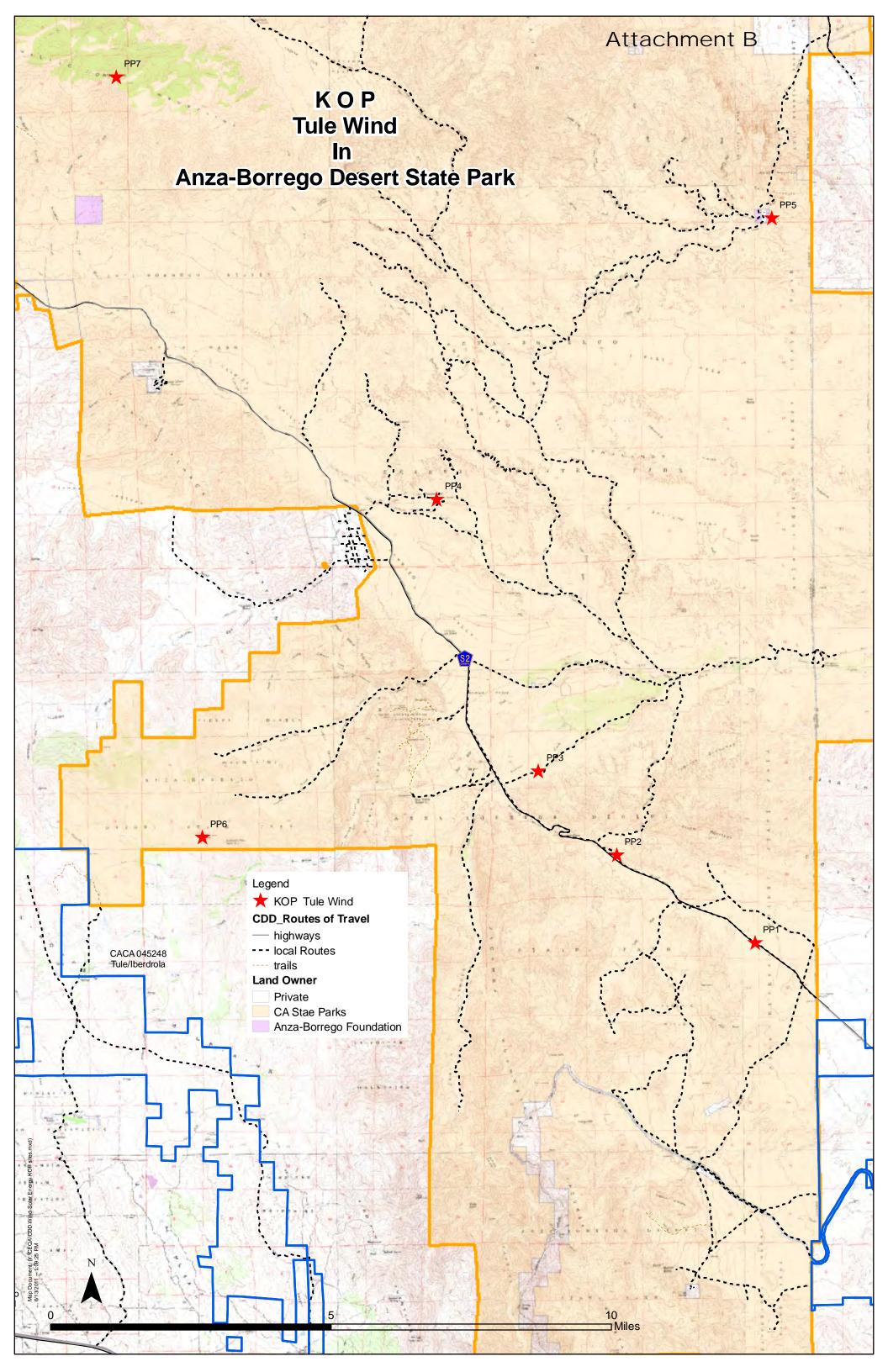


Photo Point Descriptions as provided by California State Parks <u>TULE WIND KOP's</u>

Five photo points were documented to assist in the analysis of visual impacts on Anza-Borrego Desert State Park by the proposed Tule Wind Project in the McCain Valley area of eastern San Diego County. Points were set to represent a broad land area impacted by the proposed 492 foot tall wind turbines, and were also meant to represent varied visitor uses and experiences within the park.

Two additional points are recommended, which can be set by L. Louise Jee on GIS---those two KOP's are:

SOMBRERO PEAK, State Wilderness, hiker and backpacker destination, visited by several hundred park visitors per year. Located just $1\,\%$ to 2 miles east of the proposed Tule Wind Project.

WHALE PEAK, State Wilderness, hiker and backpacker destination, visited by hundreds of visitors per year. Popular with hiking clubs, Sierra Club.

PHOTO POINTS:

PP1 (Photo Point #1) County Road S-2, approximately 1 mile north of the south Park Entrance.

Point was set on the west side of S-2 looking NW at an approx. elevation of 1,050'

GPS: 32 degrees, 48 minutes, 14 seconds N, 116, 07, 19 W

Two photos, one of PP1 and one depicting the photo point site and the panorama of Sombrero Peak, Thing Mtn. and Lagunas in the background.

Southern entrance to California's largest State Park, on County Road, travelled by many thousands of visitors each year.

PP2 Carrizo Badlands Overlook, east of County Road S-2 at the Carrizo Badlands Interpretive Panel. View looks WNW to Sombrero, Thing Mtn. and Thumb Rock. Approx. elevation is 1,260'.

GPS: 32, 49, 37 N, 116, 09, 51 W

Three photos taken, #1 of PP with interpretive panel, #2 is view from PP@ to Sombrero Peak, and Photo #3 is a telephoto showing Sombrero Peak and the ridges to the west of Sombrero where wind turbines are proposed.

Site is a scenic destination for thousands of visitors from throughout the country. Geological attractions and tremendous scenic vistas from this overlook.

PP3 South Carrizo Creek Tamarisk Row, approx. ½ mile east of County Road S-2, north side of row of tamarisk trees at approx. elevation of 640'.

GPS: 32, 50, 56 N, 116, 11, 17 W

Photos depict PP3 at east end of row of trees, and #2 shows Sombrero Peak and thing Mtn. in the background.

This site is a very popular camping destination for hundreds of park visitors each year. Free, open camping with open vistas of the Peninsular Ranges make this an attractive camp area.

PP4 Palm Spring, 1.6 miles east of County Road S-2 at Mile Post 43. PP4 is at the Interpretive Panel near the pond at Palm Spring at an approx. elevation of 870'.

This site was selected because of its importance to car campers, its historic relevance to the region, and the fact that Palm Spring is on the Southern Emigrant Trail, recently designated as a Cultural Preserve by the California Parks and Recreation Commission in 2010. The Southern Emigrant Trail is also a candidate for inclusion in the National Historic Trails program, sponsored by the National Park Service. Thousands of park visitors come to Palm Spring each year and hundreds camp nearby during the cool season between October and May.

GPS: 32, 55, 10, N, 116, 13, 07, W

Photos: #1 PP4, adjacent to interpretive panel, looking W. and Photo #2 shows Thing Mtn. above the community of Canbrake.

PP5 Windcaves Trail, Split Mountain area. PP5 is along the trail on a rocky mesa above Fish Creek Wash, with a commanding view of the Peninsular Ranges and the Carrizo Badlands. Elevation of PP5 is approx. 610'

The Windcaves are a very popular day hike destination for thousands of park visitors. Folks are attracted by the geological wonders of the windcaves, as well as the tremendous view of the badlands from this elevated hillside location.

GPS: 32, 59, 30 N, 116, 06, 54 W

First photo shows the PP5 along the foot trail, with Sombrero Peak and Thing Mtn. on the skyline and #2 shows the panorama from Sombrero Peak, Thing Mtn. and the Laguna Mts..