

Steve Taffolla

From: aqsurf@aol.com
Sent: Friday, March 04, 2011 4:36 PM
To: ECOSUB
Subject: ECO SUB

AARON QUINTANAR

1946 Sixth Avenue, San Diego, CA 92101
Telephone: 619.231.5923 Email: Aqsurf@aol.com

March 4, 2011

Iain Fisher
CPUC c/o DUDEK
605 Third Street
Encinitas, CA 92024

I am writing you to express: 1) my support for the No Project determination for the East County (ECO) Substation, Tule Wind, and Energia Sierra Juarez U.S. Generator-Tie projects; and 2) concern regarding the failure to address cumulative impacts from connected actions in Baja California, Mexico.

The Draft EIR/EIS executive summary correctly identifies its obligations but fails to account for the entirety of the project's environmental impacts. Sempra Energy's Energia Sierra Juarez (ESJ) wind energy project should be considered as a connected action in the EIR/EIS analysis. The executive summary states:

In considering the proposed ECO Substation Project, the CPUC and BLM have evaluated a range of projects, including active generator applications that have been submitted to the California Independent System Operator (CAISO) for connections to the Southwest Powerlink (SWPL) through the proposed SDG&E ECO Substation Project. The CPUC and BLM have evaluated these projects to determine whether they are so closely related to the proposed ECO Substation Project as to be considered "connected actions" under the National Environmental Policy Act (NEPA) and "whole of the action" under the California Environmental Quality Act (CEQA). The CPUC (as the state lead agency under CEQA) and the BLM (as the federal lead agency under NEPA) have identified two projects in these categories:

- Tule Wind Project, as proposed by Pacific Wind Development (a subsidiary of Iberdrola Renewables, Inc.), which would tie into the proposed Boulevard Substation rebuild component of the ECO Substation Project
- Energia Sierra Juarez U.S. Generator-Tie Project, as proposed by Energia Sierra Juarez U.S. Transmission, LLC, which would connect to the proposed ECO Substation.

The ESJ wind project's impacts should be considered a connected action to ECO Sub projects identified above due to the plan to transport up to 1,250MW of power on the ESJ Gen-Tie.

The ESJ industrial wind energy project includes a 700,000-acre general project area and proposes the construction and installation of up to 1,000 wind turbines, 900kms of roads, substation(s), transmission lines, and maintenance facilities. Mexico's environmental ministry, Secretaria de Medio Ambiente y Recursos Naturales (SEMARNAT) granted the wind project a conditional approval. The approval is in fact a request for additional information disguised as a conditional approval. SEMARNAT attached sixteen (16) conditions to the approval, ten (10) are evidence of fundamental deficiencies in the environmental assessment submitted by Sempra's ESJ-Mex. This document and therefore the project itself fails to meet CEQA or NEPA standard. This is a critically important fact because all of the energy generated by ESJ wind project is destined for California via the ESJ Gen-Tie component of ECO Sub. The wind project's deficiencies will result in the

inability of the ESJ wind project to secure Power Purchase Agreements (PPA) under California's Renewable Portfolio Standard (RPS) in California. This seriously calls into question the "Purpose and Need" of the ECO Substation project.

The ECO Sub projects in question here and connected actions in Mexico will result in harmful impacts on the U.S. Federally listed species including Golden Eagles and Quino Checkerspot butterflies.

The region along with the Sierra Juarez mountain range is known habitat for federally protected bird species and serves as a critical migratory bird pathway. The region is the historic habitat of the California condor. Current condor conservation efforts are succeeding and therefore the inevitable extension of habitat and feeding range will include the region. The region is also known habitat for federally protected Golden and Bald Eagles. Wind turbines and electrical transmission lines are known hazards to eagles, condors, and other raptors. This is especially true for juveniles who are attracted to new structures within their ranges and habitats.

The ECO Sub projects and connected actions including the ESJ wind project will severely impact a globally recognized biodiversity region. Habitat fragmentation due to these projects will result in the breaking up of natural habitats into small isolated patches. The creation of small patches produces edge effects whereby ecosystem processes begin to breakdown. Therefore it is critically important to extend the geographic scope of impacts into northern Baja California in order to account for ESJ wind project impacts.

Sincerely,
Aaron Quintanar

This footnote confirms that this email message has been scanned by
PineApp Mail-SeCure for the presence of malicious code, vandals & computer viruses.
