

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-31 cont.

binational wildlife corridors such as the Las Californias and Parque to Park as discussed in the Phase II Testimony of Esther Rubin and Jerre Ann Stallcup submitted on behalf of the Center for Biological Diversity and the Sierra Club. The Jacumba Substation, the Baja Wind proposal, and all of the Southern route alternatives for the Sunrise Powerlink would cause significant impacts to those binational efforts and investments. See the attached March 2008 La Rumarosa Baja Wind protest letters, and attachments, from the Boulevard Planning Group and the Center for Biological Diversity on Sempra's Baja Wind application (Exh. 7). Those letters and attachments are hereby incorporated.

C. Alternatives:

B0002-32

Table C-1, Summary of Potential Impacts: Sunrise Powerlink, does not address groundwater contamination and/or collapse or dewatering of wells due to construction, blasting, drilling, fuel spills. We are groundwater dependent with no access to imported/alternate water supplies. Air Quality and Soils sections do not mention the potential for increased exposure to crystalline silica dust and the potential for silicosis a serious lung disease which can lead to lung cancer. Both construction and bystanders (residents) are at risk (The noise section does not mention the low level groaning or vibration noise emitted from industrial scale wind turbines. **The cumulative impacts of the groaning turbines and corona noise from the transmission lines needs to be addressed.**

B0002-33

C-73 Biomass/biogas. In November 2007 SDG&E announced power purchase agreements for an additional 10 MW of biomass. One project will be on the Los Coyotes Reservation and another will be located in Ramona. This appears to be new information.

B0002-34

C-73 Wind: The DEIR/EIS document references the potential use of tribal, public and private lands. San Diego County has zoning ordinance regulations (Exh. 8) which apply to small, medium and large turbines, restricting the height of turbines on private lands and requiring significant set-back requirements from property lines, residences, public buildings, and public roads. These projects must also go through the Major Use Permit process and must make findings showing compliance with issues of community character and bulk and scale. Under the County zoning ordinance, the tallest turbine allowed, including blades, is 80 feet with a set-back requirement from public roads and property lines of four times the height. Most industrial scale turbines are between 325' and 425' in height. Those proposed for tribal and/or public lands, where the County has no authority, conflict with what would be potentially allowed on private property. Although, we believe it will be incredibly difficult to show that industrial scale turbine projects on private lands meet community character and scale. These industrial projects will have negative and cumulative impacts on property values based on transforming open rural vistas to invasive, cluttered, and whirling, industrial skylines.

B0002-35

Biological Resources

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-36

East San Diego County Multiple Species Conservation Plan is now in the works. As the Chair of the Boulevard Planning Group, I sit on the Steering Committee for this project. The goal is to create large connected preserve areas addressing regional habitat needs for numerous species. Fragmentation and destruction of habitat is to be avoided. The separate and cumulative impacts from the various aspects of the proposed project, alternate routes, various wind proposals with separate transmission lines, quadrupling the size of the Jacumba Substation from 20 acres to 80 acres and moving it to a location on top of and next to Quino Checkerspot Butterfly Habitat and Big Horn Sheep Habitat, and miles and miles of access roads, is counterproductive to those goals of conservation and protection. **Please see comments below under E.1.12. In addition to the other sensitive habitat noted under comments on E.1.12, the 2001 Specific Plan for Big Country Ranch, located in Western McCain Valley, which will be impacted by the BCD Route , reports the 2,276 acre property contains 895.5 acres of Southern Mixed Chaparral, 501.6 acres of Red Shank Chapparral, 342.6 acres of Desert Transition Chaparral, 221.6 acres of Great Basin Scrub and 7.2 acres of Tamarisk Scrub. Species noted on-site included the San Diego Horned Lizard, Cooper's Hawk, and the Black-tailed Jack Rabbit, the tricolored black bird, the western spadefoot toad, and the two-striped garter snake, Jacumba milk vetch, desert beauty, Higgins' barber, Parish's Larkspur, and sticky geraea.**

Visual Resources

B0002-37

The overall negative impacts from the 500 kV transmission towers and lines, land scarring, skylining, and stark visual contrast will be devastating regardless of which route is chosen. However, in combination with La Rumarosa, the existing Kumeyaay Wind Facility and more industrial wind generation proposed at McCain Valley and Crestwood, there will be no way to turn to get away from the obnoxious industrial scale and skylining, blinking lights day and night , and the added transmission lines and towers, the impacts will be even greater and more geographically extensive. The loss of significant visual resources will be compounded with no viable mitigation. The Class I impacts recognized in the DEIR/EIS will be exacerbated. At page E.5-103 under the header Key Viewpoint 60-McCain Valley North (VRM) the DEIR/EIS states that "the existing Management Plan is currently being revised and VRM Class for McCain Valley West area is proposed to be changed to VRM Class IV. For the record, both the non-profit group Backcountry Against Dumps (BAD) and the Boulevard Planning Group filed protest letters opposing the unjustified downgrading of our VRM classifications simply to accommodate for-profit wind generation in our area.

On January 7, 2008, Stephan C. Volker, the attorney for BAD, filed a protest letter appealing the BLM's proposed Resource Management Plan/FEIR, and the downgrading of the VRM Classification, listing violations of the Endangered Species Act, the Federal Land Policy Management Act, and various NEPA violations including "...understating the management plans significant adverse impacts on the visual resource of McCain Valley contrary to their long-standing classification as high value resources, solely to accommodate unsightly windpower development that

B0002-38

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-38 cont.

would otherwise be impermissible in an area of such scenic importance". These cumulative negative visual resource impacts from multiple wind generation and multiple transmission infrastructure were not analyzed in the DEIR/EIS and is an error of omission.

Table B-19 at B-145 Applicant Proposed Measures (APM) for Hydrology and Water Quality: WQ-APM-6 # 4 states that *SDG&E will negotiate with affected landowner to provide alternative water supplies in the event a supply well or springs dry up directly caused by project activities.* As stated above, all of the southern route proposals pass through the Campo/Cottonwood Creek Sole Source Aquifer. There was a federal public process to get that designation which confirmed there is no economically viable alternate source. In reality all of the Eastern San Diego County area between the County Water Authority Boundary to the west and the areas served by the Imperial Irrigation District to the East are reliant on groundwater resources with no viable alternate sources of water available. SDG&E needs to held accountable with legitimate and enforceable measures to address this issue in a manner that is acceptable to the impacted property owners.

B0002-39

WQ-APM-9 states that **storage of fuels and hazardous materials will be prohibited within 200 feet of groundwater supply wells and 400 feet of community or municipal wells.** In our area of the backcountry our groundwater moves through highly fractured bedrock which can result in contamination traveling great distances in a relatively short period of time. Related to review of the proposed Campo Landfill, on the Campo Reservation, Dr. David Huntley of SDSU wrote several letters concerning the potential for contamination to leave the landfills site, reaching adjacent private wells, at a rapid rate of travel due to highly conductive fracture systems in the bedrock. There is also a May 2006 report available from Dr. Victor M. Ponce, another SDSU professor, regarding the hydrology /hydroecology of the Tierra Del Sol area. It is available at (Exh. 9)The report resulted from Dr. Ponce's study of the potential impacts of the proposed Campo Landfill on local water supplies

B0002-40

C-53 Transmission Line Route Alternatives: Southwest Powerlink (SWPL) Fire and Transmission Line Reliability fails to adequately address the potential for co-location of Route BCD with hundreds of proposed wind generation turbines on tribal and BLM lands near McCain Valley and Crestwood. According to company representatives for Invenergy, they have also offered an agreement to investigate industrial wind energy potential to the owner of several thousand acres of private property in the same area(Lansing Industries Big Country Ranch). By just Googling wind turbine fires hundreds of photos, articles and videos are available showing blazing turbines, collapsed turbines, and blade-shedding turbines ,and more. **No where in the DEIR/EIS did we see any mention of the potential for wind turbines to be an ignition point for a wildfire. The potential for towers collapsing onto adjacent transmission lines/towers, or for throwing blades, or pieces of blades that could inflict damage on adjacent transmission lines, is also not**

B0002-41

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-41 cont.

adequately analyzed (See Exh. 4).

In late January 2008 a massive blade shattered on the number two turbine north of I-8 at the Kumeyaay Wind Facility located on the Campo Reservation(see photo in Exh. 4) This is immediately adjacent to the proposed route for the Campo North Option for the I-8 Alternative (See Figure E.1.3-16A /16B where the number two turbine is visible behind the simulated tower in the foreground). With the Campo tribe now opposing an easement across their tribal lands there is more pressure to use the BCD alternative which would route the transmission lines into another area of high fire risk(See Figure E.2.15-2). During Santa Ana wind events (See Figure E.2.15-4 which appears to have the maps reversed for normal and extreme conditions) the BCD route would be downwind of the proposed McCain Valley wind energy site. In the event the BCD south option is used, then the route would *also* be downwind of Kumeyaay Wind facility and other potential tribal wind projects on the La Posta, and Manzanita Reservation. The Cuyapaipa are also pursuing wind projects. This compounds the potential for a major fire event to take out multiple generation facilities and transmission lines.

D.4-12 -13: The San Diego County General Plan update was mentioned, along with other plans like the North Mountain Subregional Community Plan. The Mountain Empire Subregional Plan (MESP)was only mentioned in passing and this is viewed as a deficiency in the DEIR/EIS. It covers the communities of Jacumba, Boulevard, Campo, and Potrero, which will be impacted by the various southern alternative routes identified in the DEIS/EIR. including those identified as environmentally superior to the proposed route, wind generation projects identified as part of environmentally superior project alternatives , connected action substations, and more. Many of the project related impacts conflict with our MESP.

B0002-42

MESP Page 3, under the header of Findings for Land Use Element states: *“All residents of the Mountain Empire Subregion are aware of the importance that must be given to protecting the unique quality of the area’s natural resources. Existing trees, rock outcroppings, hillsides, and meadows are significant resources that contribute to the character and beauty of the region.”*

MESP Page 4, under the header of Findings for Residential Goals states that, *“ The Mountain Empire Subregion is generally characterized by large lot single family residential development outside the Country Towns, and generally undeveloped meadows, open spaces, and hillsides. The ability to experience large open spaces with views to distant hills is essential to preserving the Subregion’s present quality of life.”*At page 5,under Policies and Recommendations it states: *“# 12. Buffer residential areas from incompatible activities which create heavy traffic, noise, lighting, odors, dust and unsightly views.”*

MESP Page 8, under Findings for Industrial Goal: it states that: *“Additional industrial*

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-42 cont.

development is not compatible with the goal of maintaining the rural character of the Subregion...”At page 8, under Industrial Goal Policies and Recommendations it states: “ *New industrial development should consider all views into the property from public streets, adjacent properties and residences on nearby hills.*”At page 9 it states; “# 11. *Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for all of the following reasons: a) Safety of the general public; b)Unmitigated visual impacts on the rural environment; c) Noise pollution emanating from the site exceeding 65 (decibels) dbs at the property line, as it creates human discomfort and adversely affects the tranquility of the rural environment; d) Such development may lead to the economic devaluation of contiguous properties.*”

D.5-68 the DEIR/EIS reports that the Esmeralda-San Felipe Geothermal Project would develop 20 MW. .In a February 4, 2008 press release, SDG&E announced that their latest Power Purchase Agreement boosted their geothermal energy supply from the Esmeralda facilities in Imperial Valley to 60 MW. This is new information that did not appear in the DEIR/EIS. Again, we note the need to substantiate the water resources or the connected geothermal and solar projects.

B0002-43

D.5-70-75 Wilderness and Recreation: references to the Jacumba Substation and SCE La Rumarosa Wind Project all need to be changed based on new information contained in Semptra’s December 2007 filing with the DOE.(see section and references noted above). The La Rumarosa project is being built to export 100% of the energy generated in Mexico to the US. The Jacumba Substation is being built to accommodate the La Rumarosa site. The new location is adjacent to the Jacumba Wilderness Area and the Sierra Juarez recreation area. Recreationists may be deterred or prevented from using those remote and beautiful locations in the event massive wind turbine facilities are built there. Even though the impacts were noted as significant and unmitigable, this entire section needs to be re written to account for the 4-6 fold increase in the project size and the relocation of both the substation and the wind project. Recreational value, in both countries, will be significantly reduced. The same is true for the McCain Valley recreation area located on BLM lands.

B0002-44

Table D.7-1: the amount of potential land affected for substations need to be changed to address the increase in acreage for the Jacumba Substation from 20 acres to 80 acres.

B0002-45

D.10-168, Impact PS-5, under Connected Actions and Indirect Effects: **The Jacumba Substation and the La Rumarosa Wind Project are also subject to acts of terrorism and/or sabotage due to their close proximity to the US/Mexico and transborder locations,** in an area frequented by known criminal smuggling syndicates run by Mexican cartels. See comments on page 2-3 of this letter. Discussion of this issue was omitted from the DEIR/EIS and is a deficiency and error of omission.

B0002-46

D.10-28 Overall Impacts of the Proposed Project- EMF and Field Related

B0002-47

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-47 cont.

Concerns: The known radio and radar interference from industrial wind turbines was not addressed for the La Rumarosa wind project or those proposed in the Crestwood/ Boulevard area. This represents a deficiency in the analysis and an error of omission. According to the US Department of Energy Energy Efficiency and Renewable Energy website (<http://www.eere.energy.gov/wind/pubs/interference.html>), wind turbines can interfere with communication or radar signals by turbine structures or rotor plane. Turbines can also cause electromagnetic interference affecting TV and radio reception. Navigation and defense radar interference also needs to be addressed. The Federal Aviation Administration (FAA) has oversight of any object that could have an impact on the navigable airspace or communications/navigation technology of aviation (commercial or military) or Department of Defense operations. The FAA requires a Notice of Proposed Construction (Form 7460-1) be filed for any object that would extend more than 200 feet above ground level, or less in certain circumstances. For any project filed, the FAA undertakes an initial aeronautical study and issues either a Determination of No Hazard to Air Navigation (DNH) or a Notice of Presumed Hazard (NPH). The Department of Defense also studies the effects of wind projects on military readiness. Military flight paths do run east west through the Crestwood/Boulevard/Jacumba/Ocotillo area.

B0002-48

E.1-1-7 Future Transmission System Expansion: The potential for future expansion in our fragile area is highly objectionable.

B0002-49

E.1.2-7 Impacts Common to All Alternatives: We again raise the lack of discussion and analysis for the potential cumulative impacts, in the southeast corner of the County, from multiple wind generation projects at Crestwood, McCain Valley, and La Rumarosa, multiple transmission line routes (both 500 kV and 230 KV), including numerous wind connections to SWPL, and multiple substations, for all those impacts noted in this section. We also have the cumulative fire threat and radio communications interference from multiple transmission lines and wind turbine projects. This represents a deficiency and error of omission.

B0002-50

Figure E.1.3-1, on the Visual Resources SWPL Alternatives map, Even though the impacts for Key View Point # 58 are considered Class I for increased structure contrast, industrial character, structure prominence, and view blockage, the View Point should have been just a little further to the East on I-8 where there are expansive views to the north into the McCain Valley area and to the North east towards the Corrizo Wilderness Area. At the Key View Point 48 section the DEIR/EIS states that the VRM Class is proposed to change from Class II to Class III in the BLM's Eastern San Diego County Management Plan. As noted before, the Boulevard Planning Group and the attorney for Backcountry Against Dumps have filed protest letters opposing the VRM downgrading. Also, with the now increased size and changed location for the Jacumba Substation, and La Rumarosa Wind project, there will be a significant increase in visual contrast and negative impacts on visual resources, including light pollution on dark sky resources.

B0002-51

The March 28, 2008 motion from the California Botanical Habitat to become a

B0002-52

Comment Set B0002, cont.
Boulevard Planning Group

Boulevard Planning Group comments on Sunrise Powerlink 4-10-08

B0002-52 cont.

party in the Sunrise Powerlink CPCN process : The CBI expressed concern for southeastern San Diego County stating, *“As an Anthropological Nature Reserve with viewshed and boundaries which are visible by over 6 million people each year, over 3.25 miles along Interstate 8 and 4.25 miles along Old Highway 80, which is adjacent to the Southern boundary of the Anza Borrego Desert State Park, we are concerned with the impacts proposed by San Diego Gas and Electric (SDGE) which would place 160 tall pylons on top of our mountains and an array of hot sagging 500,000 volt power lines across our valley, as well as bulldoze several access roads through an extraordinary and vulnerable landscape, severely and permanently devastating our wilderness, research, construction and recreational areas, all in violation of the California Environmental Quality Act (CEQA) particularly when there are several easier to implement, lower cost alternatives that cause no damage, which have not been reviewed or considered by the CPUC or SDGE. We are also concerned that if new environmental data and alternatives are not considered and that existing choices, particularly along the southern route, which have not been well researched or considered, are then implemented, that the results will be devastating to the region...”*

E.1.3-Key Viewpoint 50 West I-8 Near La Posta Reservation (VS-VC): Even though this is already rated as a Class I impact due to increased structure contrast, industrial character, and view blockage, this view will now most likely change due to the potential for the more westerly BCD South Option to replace the I-8 Campo North Option. The BCD South route appears to be visible from a geographically extensive area.

B0002-53

E.1.12 Water Resources I 8 Alternatives: The DEIR/EIS jumps from the Jacumba Valley over the Boulevard area to the Campo Valley. There are numerous locations in the Bankhead Springs, Boulevard, Manzanita, McCain Valley, Live Oak Springs, La Posta area where mountain meadows, seeps, springs, wetlands, and shallow groundwater levels exist. The Campo/Cottonwood Creek Sole Source Aquifer starts at the Tecate Divide and is impacted by various I-8, Modified Route D and BCD Routes. In reality, everything between the Campo/Cottonwood Creek and the Ocotillo/Coyote Wells Sole Source Aquifers qualify for the designation as well, we have just not had the money to pursue it.

B0002-54

The Lansing Industries, Inc., developers for approximately 2,200 acre Big Country Ranch in the McCain Valley area, at the northern end of Ribbonwood Road, will be impacted by the BCD route. Their consultants have reportedly determined they have abundant groundwater resources. Their property contains a major drainage area and a 100 year flood plain. During the El Nino years, there was major flooding and ponding in the area. The subdivision of Big Country Ranch, under previous owner, Bluegreen West Corporation, was being processed under Case # SP98-02 TM5133 RPL. **The 2001 Specific Plan for Big country at page 9 noted biological resources which included 120.5 acres of Fresh water Seep (wet meadow), 4.5 acres of Open Water, 3.2 acres of Freshwater Marsh, and 3.5 acres of waters of the US. It also includes 86.6 acres of Coast Live Oak Woodland and 6.0 acres of Southern Riparian Forest. All of which were considered sensitive habitats at the time.**

B0002-55