

From: Luke Gordon [mailto:Skydanzer@Comcast.net]

Sent: Saturday, February 05, 2011 8:40 PM

To: ECOSUB; catulewind@blm.gov

Subject: Regarding - Prehearing on Feb 18, 201 @ 10 AM in San Diego State Office building, 6th floor, Courtroom 1- 6003, 1350 Front St., San Diego, CA

Dear CPUC Staff and Dudek,

Regarding - Prehearing on Feb 18, 201 @ 10 AM in San Diego State Office building, 6th floor, Courtroom 1- 6003, 1350 Front St., San Diego, CA

We strongly support the proposed alternative route designated ECO 3C/3E as opposed to the currently designated ECO 3B because of the following negative environmental impacts:

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.

1. 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. I bought this property for their and my use. I bought the property, and they rent it from me because of, a). Its natural beauty – 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 and a power line and towers would make property virtually worthless, sine the primary value of the property is in its natural beauty (Aesthetics). b). Seclusion and c). - 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.

e). Electromagnetic Radiation – Me and my friends are very sensitive to E.M. 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 weather it actually to causes harm or not.

f). 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 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 other deleterious effect mentioned above.
- 2nd possibility which would be objectionable, but better than the proposed plan, would be to bury the line rather than put it above ground on towers.

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

Yours truly,

Luke Gordon

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 hold the office of President and am a Director of Rasayana, a 501(c)(3) non-profit religious and educational organization. Rasayana's principal office is located in Berkeley, CA. Our non-profit, corporate purpose is to own land, buildings and supporting infrastructure for the religious and educational use of other non-profit organizations in furthering the teachings of schools of spiritual wisdom, including but not exclusive to: Yoga, Kaishmir Shavism, Taoism, Tantric Buddhism, Bon and

Sufism. In so doing, Rasayana's supports the communities that practice and live the teachings of the various spiritual traditions of our planet.

Rasayana owns or leases three parcels (#659 030 04, #659 030 11 00, and #612 120 53 00) comprising a total of 165 acres off Jewel Valley Road in Boulevard. Two residences and related structures occupy the parcels with street addresses of 1585 and 1521 Jewel Valley Road. The combined residences and the surrounding parcel lands also comprise a retreat center which offers daily free yoga, free food, and free spiritual instruction to the public, as well as an expansive schedule of spiritual intensives (typically 5-6 days) and weekend retreats. The residences house full-time residents/staff associated with long-time tenant, The New Being Project, also a 501(c)(3) non-profit, religious and educational organization. The New Being Project (NBP) has leased these properties with the assistance of friend and community member Luke Gordon since 1994. It has done so solely due to the land's seclusion and the absence of urban influences, the natural beauty of the terrain, the availability of potable groundwater and arable land for the development of sustainable agriculture, and its proximity to the coastal metropolitan areas of San Diego and Los Angeles and Orange Counties. Additional income for Rasayana and NBP is derived from subletting of the retreat facilities to other spiritual organizations for specific program events.

The proposed route for the 138kV transmission lines extending northward from the border to the ECO Substation would pass through and essentially dissect our property. Since the three parcels together are utilized for a single undissectable purpose (spiritual training, retreat programs and sustainable living), this massive physical and electromagnetic intrusion (i.e. electromagnetic field) would have a significant and adverse impact on both Rasayana's ability to maintain the properties for their intended function/purpose and the economic value of the property should it be necessary to sell it at diminished market value.

Environmental Impact Concerns Related to Transmission Line Construction/Operation

Based on the Significance Criteria cited in the NOP checklist, Rasayana has the following concerns regarding the project's environmental impacts on the subject property:

- 1) Aesthetics/Visual Impact- The 150 ft-high transmission towers and electrical lines would dominate the landscape of the parcels and have a significant and unavoidable impact on the existing and visual beauty of the terrain and on scenic vistas from the property's granitic mountain outcrops. Given the use of the properties as a spiritual retreat and training center, the impact would be doubly egregious.
- 2) Agricultural Resources- The construction of improved access road(s) to the tower sites and any impervious surfaces associated with the tower foundations would likely convert arable land to non-agricultural use in perpetuity. The current lessee, NBP, cultivates some of the property for onions, and additional land for

vegetables for consumption by the NBP community as part of NBP's sustainable living program. Their objective, supported fully by Rasayana, is to expand the current acreage in cultivation to include most of the parcels forded by the proposed towers. The areal extent of project-related conversion would depend on the extent and positioning of these impervious surfaces on the land.

- 3) Hazardous Materials and Water Quality- The NOP indicated that some hazardous materials would be used in conjunction with tower construction, operation and maintenance. The alluvial aquifer that underlies the 1585 Jewel Valley Road property supplies 95-99 percent of the potable water used by the retreat center. Introduction of hazardous materials into surface soils, abetted by infiltration and percolation of rainfall, will over time reach the water supply aquifer- as no impermeable strata overlie it. If such unintended contamination of surface soils were to occur as the result of tower and related facilities construction, operation or maintenance, the impact on groundwater quality could be significant.
- 4) Hydrology- The construction of impervious surfaces associated with tower foundations and access roadways would potentially decrease the area of groundwater recharge for the drinking water aquifer. The areal extent of this impact would depend on the actual area occupied by such impervious surfaces. During the recent drought, groundwater levels in the two on-site wells that supply potable water to the property's storage tanks have receded seasonally to levels that have begun to affect well pumping capacities. Thus, small decreases in recharge become more significant.

Another potential hydrologic impact related to construction-related excavations (e.g. for foundation piers) and road reconstruction is the presence of a relatively shallow potable water line that crosses the existing unimproved access road and links the on-site water wells with the storage tanks just east of the roadway. Damage to this water line during construction could cut-off water supplies to both residences and force cancellation of planned income-producing retreats until repairs were completed.

- 5) Geology and Soils- The construction of the transmission towers and support infrastructure will denude portions of the property. Subsequent winter rains could increase site erosion and downslope sedimentation. Regeneration of desert vegetation takes more time than does vegetation in wetter climates. Thus, the period of susceptibility will be longer without appropriate measures to revegetate the site and control soil erosion.
- 6) Electromagnetic Field- The EMF impact of above-ground transmission towers and lines would be as significant and unavoidable as the visual impact to those involved in spiritual residency/training, studies and retreats. One of the benefits of meditation and related spiritual practices is the resulting refinement of one's ability to sense/feel and perceive the natural world. The EMF created by high-voltage transmission would negate the benefits gained through these spiritual

practices for prospective participants- and make it impossible for Rasayana to fulfill its non-profit purpose.

Potential Mitigations for Identified Environmental Impacts

To reduce the significance of the impacts identified above, Rasayana recommends the following:

Visual/Aesthetics: As indicated in the letter from J. Freeburn, representing lessee NBP, I concur that two possible mitigations are available for reducing this impact to a less than significant level:

Mitigation 1a- Preferred Mitigation: Reroute the transmission towers and lines to points far enough removed from the Rasayana/L. Gordon properties to eliminate them from any sight lines available on the property.

Mitigation 1b- Lesser Preferred Mitigation: Bury the segment of the lines that would pass through our properties. While it would likely be more costly to implement than the proposed above-ground alignment, it would allow Rasayana and lessee, NBP, to continue to utilize the land for their shared purpose. (Also, see relation to EMF impact mitigation.)

Agricultural Resources:

Mitigation 2: The impact on agricultural resources would be mitigated in full or in part by implementation of Mitigation 1a or Mitigation 1b, respectively.

Hazardous Materials and Water Quality:

Mitigation 3- Apply Best Management Practices (CA. Stormwater Quality Manual- Construction Activity) during construction for on-site transport, handling and source controls of hazardous materials. Provide for inspection of construction activities by a County inspector, water quality inspector/specialist from the Regional Water Quality Control Board, or other oversight agency to ensure compliance. Provide evidence of post-project sequestration of potential hazardous materials leakage from transmission tower facilities from surrounding soils. This will also facilitate possible cleanup operations/maintenance should unanticipated leakage/spills occur.

Hydrology: Groundwater Recharge and Water Line Disturbance

Mitigation 4a- Use porous pavement in place of regular asphalt pavement for any segments of access road reinforcement. This would allow for infiltration of rainfall and reduce the local impact on groundwater recharge to the potable water aquifer underlying the property to a level of insignificance.

Mitigation 4b- Contact Rasayana and NBP representatives prior to the start of any construction so that the existing water line alignment can be flagged and avoided/protected during construction.

Geology and Soils:

Mitigation 5- Prepare an erosion control and long term revegetation plan for all areas disturbed by grading, tower construction and line installation. This plan should include plant species, specifications for installation, short-term irrigation for establishment and any physical measures to protect soils prior to the establishment of the near-ground canopy of desert vegetation.

Electromagnetic Field:

Mitigation 6- Impacts from EMF can be fully mitigated by implementing Mitigation 1a above, or can be mitigated to an acceptable degree by implementing Mitigation 1b.

Rasayana joins respondents Jim Freeburn (NBP) and Luke Gordon in asking that we collectively be contacted and enjoined in the process of mitigating the impacts of the ECO Substation and Transmission Line project on our properties.

Yours truly,

William Vandivere, P.E.
President/Director, Rasayana
& Principal, Clearwater Hydrology

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