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Sent: Friday, March 04, 2011 3:05 PM
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Cc: Rosenbaum, S. Wayne; Cason, Elizabeth A.
Subject: DEIR/DEIS Comment Letter from Invenergy
Attachments: Comment Letter from Invenergy 3-4-11.pdf

Please see attached comment letter from Invenergy Wind California LLC. Thank you.

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March 4, 2011

CLIENT/MATTER NUMBER
059681-1222

VIA E-MAIL AND U.S. MAIL

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Re: Comment Letter from Invenergy

To Whom It May Concern:

Thank you for the opportunity to provide comment on the December 2010 draft project level Environmental Impact Report/Environmental Impact Statement (“DEIR/DEIS”) for the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects and programmatic level DEIR/DEIS for the Campo, Manzanita and Jordan Projects (collectively, the “PROJECT”). On behalf of Invenergy Wind California LLC (“Invenergy”), a partner in the Campo wind energy project (“Campo project”), we would like to state our support for SDG&E’s efforts to build a new substation in Jacumba and to reconstruct and modernize the existing Boulevard substation that was initially built more than fifty years ago. Making these necessary improvements will help SDG&E meet its goal of providing 33 percent of its power from renewable sources by 2020. These improvements are also crucial in meeting the requirements of AB 32, the California Global Warming Solutions Acts passed and signed into law in 2006, which was developed to reduce greenhouse gas emissions to 1990 levels by 2020. The Campo project alone has the potential to reduce carbon dioxide emissions by nearly 505 million pounds per year.

The ECO Substation Project is important for a number of renewable energy projects in the area, including the Campo project. By making these necessary infrastructure improvements, the Campo project will be able to generate and transmit renewable energy from the wind farm proposed to be construction on the Campo Reservation. The renewable energy created from the Campo project will serve approximately 40,000 homes every year within the state of California. As the region has been identified as one of the country’s premier locations for renewable energy development, we have a responsibility to use those resources in an efficient and responsible manner in order to move toward a new clean energy future. Invenergy is excited to be a part of this transition, and is committed to developing and constructing a safe project that will protect the environment, will bring 10 to 12 permanent jobs to the community, and will provide an important economic development opportunity for the Campo Band.

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Iain Fisher
Greg Thomsen
March 4, 2011
Page 2

The electric public utility system upgrades contemplated in the DEIR/DEIS, do not just benefit SDG&E, the Campo project or the other proposed renewable energy project in the area, they benefit the entire region. By providing interconnection opportunities for renewable energy projects, the ECO Substation will create new jobs and ensure that we have a balanced and diversified energy portfolio to sustain economic competitiveness and a high quality of life in the San Diego region. These renewable energy projects will be an important contribution to the goals of the state of California to obtain an increasingly larger percentage of its energy from renewable sources. This goal is made all the more pressing and prudent as the unrest in the Middle East of the past few weeks, and the subsequent sharp rises in crude oil prices, have demonstrated.

In addition to providing its support for the Project, Invenergy wants to ensure that the information contained in the DEIR/DEIS accurately reflects information as it pertains to the Campo project, which we anticipate will be the subject of subsequent environmental review by the Bureau of Indian Affairs under the National Environmental Policy Act. We therefore propose the following clarifications to the information contained in the DEIR/DEIS. The information contained in this letter “merely clarifies or amplifies” existing information within the DEIR/DEIS and as such, does not constitute significant new information, but rather allows for accuracy in the record:

- At various points in the DEIR/DEIS, including but not limited to pages ES-11, and B-9, it is stated “SDG&E proposes to construct and operate approximately 106 turbines capable of generating 160 Megawatts (“MW”) of electricity...”, that turbines will be 1.5 MW, and that turbines will be approximately 450 feet tall from ground to tip of the fully extended turbine blade. This information should be clarified: instead, as is currently contemplated, Invenergy and the Campo Band are proposing to construct and operate the Campo project, and the current proposal for the Campo project consists of an initial phase of up to 80 turbines (e.g., 26 less than identified in the DEIR/EIS) each capable of producing between 2.0 and 3.0 MW for a total of 160 MW. Turbines will be up to approximately 500 feet tall.
- Page ES-11 of the Executive Summary, and page B-10 of the Project Description state “it is expected that the Campo and Manzanita wind energy projects would develop a switchyard for both facilities on non-tribal grounds, and a new 138 kV line would be constructed along the existing ROW of the 69 kV corridor that currently connects to the existing Boulevard substation...”¹ It is currently anticipated that San Diego Gas & Electric will develop and construct the aforementioned power line and switchyard facilities. As noted in the Draft EIR/EIS, the power line will likely run in the

¹ Under GO 131-D, Section I, a ‘power line’ is defined as a line designed to operate between 50 and 200kV.

Iain Fisher
Greg Thomsen
March 4, 2011
Page 3

existing ROW of the 69 kV power line corridor from the existing Boulevard substation, cross the Campo project toward the west and terminate at a switchyard for the Campo and Manzanita projects, which will likely be located directly west of Campo on non-tribal lands. A second line would connect switchyard to the Manzanita wind energy project.

- Table A-1 (located on page A-15) states that the “Campo Band of Mission Indians **and CPUC**” have jurisdiction over the “Wind Turbines” component of the Campo project. The CPUC has jurisdiction over state, county and private lands. The CPUC has jurisdiction over federal lands when there is a nexus for connection to a transmission facility in the State of California. We ask that Table A-1 be clarified to indicate that CPUC will have jurisdiction only over those portions of the project located on state, county, private or federal lands.
- Figure D-2.9 depicts the area of Quino Checkersport Butterfly critical habitat that includes areas within the Campo Reservation boundary. Our understanding, as confirmed by the U.S. Fish and Wildlife Service, is that this figure reflects all areas that were *proposed* to be designated as critical habitat for the Quino Checkersport Butterfly in 2009, but fails to account for the fact that the final rule designation of critical habitat included *no lands* that are part of the Campo Reservation. Please revise the figure to accurately reflect the critical habitat area for the Quino Checkersport Butterfly, as identified in the final rule by the U.S. Fish and Wildlife Service. [Federal Register: June 17, 2009 (Volume 74, Number 115)][Rules and Regulations][Page 28775-28862]
- At various points in the DEIR/DEIS, including but not limited to pages D3-13 D3-15, D8-34, the document analyzes visual and noise simulations for the Campo project. As noted above, the Campo project will use turbines with capacity between 2.0 and 3.0 MW rather than 1.5 MW wind turbines, and this information should be clarified throughout the DEIR/DEIS. As stated above these turbines will be slightly larger than the 1.5 MW turbines, but there is an overall reduction in turbines by moving to a larger machine. We feel this counterbalance does not significantly change the visual and noise impacts as currently described in the DEIR/DEIS, and in fact reduces these impacts due to the fewer number of turbines. The DEIR/DEIS has already disclosed that visual impacts from the PROJECT are Class 1. Additionally, with respect to noise impacts, we note that the DEIR/DEIS assumes impacts are similar to the Tule Wind Project, which identifies turbines in the 1.5 to 3.0 MW range. Therefore this information does not constitute new information that would require recirculation because the impacts have already been evaluated and

Iain Fisher
Greg Thomsen
March 4, 2011
Page 4

disclosed. *See, e.g.*, DEIR/DEIS at B-90 (description of Tule wind turbines, which are also approximately 500 feet in height); D.8-28, 29, 34, 35 (PROJECT noise analysis); D.3-62 (PROJECT with Class I visual impacts).

- Page D9-12 states that it is unknown whether the Campo wind energy project “would use helicopters during construction.” The Campo project does not anticipate using helicopters for construction of the wind energy facility.
- In several places in the DEIS/DEIR, including but not limited to Pages D11-30 and D18-20, it is stated that the Campo project “is expected to be online in August 2012, which would probably require construction in 2011 to 2012 based on the installation of 106 wind turbines; however, no specific construction schedule has been identified by the applicant.” As noted above, the initial phase of the Campo project will consist of up to 80 turbines rather than 106, and Invenenergy anticipates that the Campo project will be online in 2014, rather than 2012, with construction commencing some time in 2013.
- Pages D12-38 and 39 state that the Campo project “would also be required to prepare and implement Stormwater Pollution Plans and Stormwater Management Plans...” This implies that the Campo project would be subject to the San Diego County General Municipal Permit; however, because the wind energy project is located entirely on the Campo Indian Reservation, the project will not in fact be subject to the Municipal Permit requirements.
- Page D15-58 states that the Campo wind project will install fire suppression systems on its wind turbines. The Campo project is currently consulting with technical experts to determine the most effective mitigation measures to address fire impacts. These mitigation measures will be fully analyzed in the project level DEIS for the Campo project. Therefore, at this time we believe this statement to be premature.

We appreciate the opportunity to provide our comments and proposed clarifications to the DEIR/DEIS.

Very truly yours,



S. Wayne Rosenbaum