

To Whom It May Concern:

Thank you for the opportunity to comment on the East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects, along with the Campo, Manzanita, and Jordan wind energy projects and their cumulative effects in this regional area.

Briefly stated, we support the CEQA No Project/No Action Alternative for ALL of the proposed projects including the Campo, Manzanita, and Jordan wind projects that are anticipated to yield similar residual effects. We do not support the BLM Alternative 5 - Reduction in Turbines for the Tule wind turbine project. We think there should be NO wind turbine projects built anywhere in this regional area.

WILDERNESS AND RECREATION

On page D.5-30, wilderness and recreation, the report states, "Impacts to wilderness and recreation would be significant if: The proposed project, including the Campo, Manzanita, and Jordan wind energy projects, or alternatives would directly or indirectly disrupt activities in established federal, state, or local recreation and/or wilderness areas."

We disagree with the report's findings. We think there would be significant indirect and unmitigable adverse impacts to recreation and/or wilderness areas, and that they would be disruptive to its users from Tule wind turbines and other proposed wind turbine projects. These projects won't preclude recreational use of the area; however, as mentioned in the ESJ U.S. Transmission Line Project DEIS, Section S.11 Cumulative Impacts - page S-34: "To the extent that distant views of the surrounding landscape are a valuable component of recreational use of the region, then ANY diminishment of this character is considered an indirect and potentially major impact to recreational resources." We know the Tule wind turbines and other proposed wind turbine projects will intrude and encroach upon the distant and close-up views of the surrounding landscape diminishing its visual character and quality that would have major indirect adverse impacts to recreationists like us.

On page D.3-157, visual resources, Table D.3-8 lists four significant and unmitigable impacts to the visual resources from the Tule wind turbine project (TULE-VIS-1, 3, 4, 5). We agree, and think these adverse impacts would also apply to recreation/wilderness areas and its users.

TULE-VIS-1 - We think the substantial adverse effects on a scenic vista would apply to ALL areas within the McCain Valley National Cooperative Land and Wildlife Management Area, not just the Carrizo Overlook, Ribbonwood Trail and Ribbonwood Road Pathway and would affect ALL recreational activities there.

Additionally, on page D.5-16, wilderness and recreation, the report states, "Several turbine strings would, however, be located NEAR special designation areas, state park lands, and campgrounds. For example, several turbines in the proposed J-string would be located on the Ewiiapaayp Indian tribal lands that are BOUND to the north and east by the Sawtooth

Mountains Wilderness (the closest turbine would be located WITHIN 200 FEET of the wilderness boundary). Several other turbine strings (D- and E-strings on BLM land and R-strings on County lands) would be located on lands BORDERING the In-Ko-Pah Mountains ACEC and the Carrizo Gorge Wilderness Study Area. The closest turbine in the D-string would be located approximately 1.25 MILES west of the In-Ko-Pah ACEC BORDER, while the closest turbines in the E- and R-strings would be located within 100 FEET of the ACEC BORDER. The closest turbine in the R-string would be located approximately 4,000 FEET west of the Carrizo Gorge Wilderness Study Area BORDER. Turbines in the D- and E-strings would also be located WITHIN 1,300 FEET of the Carrizo Overlook, A SCENIC OVERLOOK. Lastly, several turbines in the G-turbine string would be located APPROXIMATELY 1,300 FEET west of the Lark Canyon Campground, and the closest turbine in the A-string would be located APPROXIMATELY 1,300 FEET northeast of the Cottonwood Campground.

Additionally, as shown in Figure D.5.I, the Sombrero Peak Wilderness Study Area in the Anza-Borrego Desert State Park would be in close proximity to the A-string turbines.

Many of these special designated areas mentioned above are key destination and key observation points (KOPs) that many recreationists like us use because they are remote and offer opportunities to view landscape and wildlife. The recreational experience of being in a remote location in the McCain Valley National Cooperative Land and Wildlife Management Area would no longer exist. Instead, we would experience being in the middle of several wind farms. Wind turbines would be highly visible and intrude or encroach upon, and thus obstruct and degrade, the scenic views we observe while using ALL of these areas within the McCain Valley Area for recreational purposes. It would have a major indirect adverse impact on recreational resources and its users.

TULE-VIS-3 - We think the same reasoning would also apply to the visual character or quality that would also be substantially degraded by the Tule wind turbines in ALL areas within the McCain Valley National Cooperative Land and Wildlife Management Area. These wind turbines would cause PROFOUNDLY STRONG VISUAL CONTRASTS UP TO 5 MILES AWAY due to the more than 400-foot-tall scale and vertical form of the turbine towers, their light color, and especially the movement of blades. Where openly seen on ridgelines and/or against tan and green mountain slopes, the visibility of multiple wind turbines would create dominant, large-scale industrial elements in predominantly natural landscapes. They would be visually dominant from rural residential, highway, and PUBLIC LAND LOCATIONS within both foreground and middle-ground viewing locations. ALL areas in the McCain Valley National Cooperative Land and Wildlife Management Area would be within 5 MILES of a wind turbine, and thus there would be a major indirect adverse impact on recreational resources and its users anywhere within its boundaries and extend into the surrounding wilderness and ACEC areas.

TULE-VIS-4 & 5 - These impacts would also create a substantial new source of light or glare that would adversely affect day or nighttime views in the area and be a SOURCE OF ANNOYANCE not only for the residents, but for recreationists like us who enjoy star gazing at night from Lark and Cottonwood Campgrounds. This would have a major indirect adverse

impact on recreational resources and its users.

On page D.5-5, General Overview, the report states, "In general, the recreation and wilderness areas in the vicinity of the proposed project support a variety of activities including, camping, hunting, fishing and hiking while at the same time placing an EMPHASIS on habitat preservation and conservation efforts. According to the BLM, the Carrizo Gorge Wilderness is the ONLY ecological transition zone between the Colorado Desert and the Peninsular Mountain Ranges. (BLM 2009b)" We think the emphasis on this unique area is being diminished by the proposed projects.

On page D.5-15, we would like to add here that the report states the proposed transmission line would be located IN CLOSE PROXIMITY to the Table Mountain ACEC, Anza-Borrego Desert State Park, and County facilities. Several trail and pathway corridors (including the San Diego and Arizona Eastern Railway Trail, Jewel Valley Trail, Lansing Trail, and the Jewel Valley Road Pathway corridors) identified in the Boulevard Community Trails and Pathways Plan would also be CROSSED by the proposed alignment.

Federal Land Policy and Management Act

On page D.5-21, the report states, "FLPMA defines ACEC as "areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to PROTECT and PREVENT IRREPARABLE damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes, or to PROTECT life and safety from natural hazards." (BLM 2001)

On that same page, the report states, "FLPMA states that in the development and revision of land use plans, the Secretary of the Interior shall use and observe the principles of multiple use, GIVE PRIORITY to the DESIGNATION and PROTECTION of ACECs , AND WEIGH LONG-TERM BENEFITS TO THE PUBLIC AGAINST SHORT-TERM BENEFITS (BLM 2001).

We think it imperative that long-term adverse impacts from development in an intact, mostly pristine area should be weighed against short-term industrial uses such as wind turbines when they are located as little as 100 FEET AWAY from an ACEC. The important historic, cultural and scenic values and wildlife resources in these areas are not currently being given special management attention or protection and are being damaged by illegal motorcyclists (pictures attached) and adding any new roads nearer to an ACEC will only add to their destruction.

National Trails System Act

On page D.5-21, the report states, this Act was established "in order to provide for the ever-increasing outdoor recreation needs of an expanding population and in order to promote the PRESERVATION of, public access to, travel within, and ENJOYMENT and APPRECIATION of the OPEN-AIR, OUTDOOR AREAS, and historic resources of the Nation."

It refers to the Pacific Crest Trail which we use and will be impacted by the wind turbines on the Ewiiapaayp Indian tribal lands. How can recreationists like us enjoy and appreciate the open-air and outdoor areas and views when they are substantially obstructed and degraded by wind turbines? Is this preservation? The "great outdoors" won't be so great here anymore, just outdoors next to wind turbines and lines that intrude and encroach upon the views and the natural experience while hiking.

On Page D.5-21, 43 CFR 6300 and 8560, the report states, "To summarize, the use of mechanical transport within wilderness areas violates the intent of the wilderness area designation as an area of relatively undeveloped land still in its natural state (65 FR 78358-78376)." We have already mentioned the damage illegal motorcyclists have done in these areas and adding any new roads near wilderness areas will add to their destruction.

California Desert Protection Act

On page D5.22, the report states, The California Desert Protection Act of 1994 designated the Jacumba Mountains Wilderness and Carrizo Gorge Wilderness as federal wilderness areas.

BLM Eastern San Diego County Resource Management Plan

Even though the Tule wind turbine and other proposed wind turbine projects are not located in these areas, won't the substantial adverse impacts to visual resources from them that cause PROFOUNDLY STRONG visual contrasts up to 5 MILES AWAY intrude upon the the scenic vistas in these areas and indirectly adversely affect recreational resources and its users like us? The reason we use these areas is because they are WILDerness areas, not industrial areas.

After reading the report, two questions came to mind regarding the BLM.

1. HOW CAN THE BLM	WHEN THE BLM ALSO:
<p>state their INTENT is</p> <p>to DIRECT future development</p> <p>and MANAGE land within the</p> <p>Eastern San Diego County Area</p> <p>in a way that DOES NOT IMPACT the NATURAL RESOURCES</p> <p>and MAINTAIN THE ENVIRON-QUALITY</p>	<p>INTENDS</p> <p>to PERMIT Tule Wind</p> <p>to CONSTRUCT wind turbines/lines in the</p> <p>Eastern San Diego County Area</p> <p>with SIGNIFICANT UNMITIGABLE IMPACTS to the NATURAL RESOURCES</p> <p>that OBSTRUCT and DEGRADE ITS ENVIRONMENTAL QUALITY?</p>

2. If the RMA Zone-04 McCain Valley Recreation Management Zone:	
<p>is MANAGED as a DESTINATION</p> <p>and the Primary Market Strategy targets . . . EXPERIENCE OPPORTUNITIES</p> <p>for its NATURAL RESOURCE QUALITIES</p> <p>by participating in primary recreational activities such as: HIKING, LANDSCAPE and WILDLIFE VIEWING</p>	<p>Who would come here as a DESTINATION</p> <p>for OPPORTUNITIES TO EXPERIENCE</p> <p>HUNDREDS of UNNATURAL WIND TURBINES/LINES</p> <p>while HIKING and OBSERVING MOVING FAN BLADES that OBSTRUCT and DEGRADE the VIEW of the LANDSCAPE and KILL GOLDEN EAGLES and OTHER BIRDS?</p>

BLM Limited Use OHV Management Area

On Page D.5-25, the BLM OHV-05A: Reduce or halt the unauthorized proliferation of motorized and nonmotorized recreation trails, and OHV-06: Minimize impacts to identified sensitive cultural, natural, biological, and visual resources are not currently being properly managed, as already mentioned (see attached pictures).

California Wilderness Preservation System

On page D.5-27, State Regulations, California Wilderness Preservation System, defines wilderness areas, "In addition, both wilderness areas and state wilderness MUST have OUTSTANDING opportunities for SOLITUDE AND RECREATION, contain at least 5,000 acres of land, and contain ecological, geological, or other resources of scientific or SCENIC VALUE."

Some the wilderness areas adjacent to the McCain Valley National Cooperative Land and Wildlife Management Area would have wind turbines WITHIN 200 FEET. Opportunities for solitude and recreation would be intruded and encroached upon by OVER 400-FOOT-TALL wind turbines that have PROFOUNDLY STRONG visual contrasts up to 5 MILES AWAY. Turbines would be HIGHLY visible in the project area and would DOMINATE the visual landscape affecting the SCENIC VALUE when using this area for the wilderness experience.

We especially like hiking informal trails such as the Sombrero Peak and Pepperwood trails, that originate from Cottonwood Campground and have destinations to the north and northeast where the only thing that is man-made that still exists is of cultural or historical interest. There is an expansive view of the Sawtooth Wilderness Area, Canebrake Valley, and distant mountains.

The J- and A-string turbines would be intrusive here. We also use informal trails that originate from the Carrizo Overlook and Lost Valley Road areas that have destinations to the east in the wilderness and ACECs where there are palm oases. There would also be turbine strings here that would be visually intrusive especially when returning back from hiking in those areas and looking west. We think the KOPs looking west in these areas are exceptional because of the view of the Laguna escarpment, especially when covered in snow. There are also informal trails in the Sacatone Overlook area that would be affected in the same manner.

There are several Codes in the California Wilderness Preservation System that define a wilderness area, such as: "A wilderness area, in contrast to those areas where a man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. . . . which has retained its primeval character and influence or has been substantially restored to a near natural appearance without permanent improvements." The State Parks and Recreation Commission is responsible for "preserving the wilderness character of an area" . . . "commercial enterprises, temporary or permanent roads, structures or installations, motor vehicles, motorized equipment. . . ."

Considering that wind turbines, lines, roads, construction and maintenance equipment and personnel would be within 100 FEET of wilderness and ACECs without buffer zones, will the wilderness character of this area be preserved? We think the primeval character and near natural appearance without permanent improvements would no longer exist. Are we critically or casually concerned with our Areas of Critical Environmental Concern?

On page D.5-71, APM Tule-REC-1 does nothing to rectify the indirect major adverse visual impacts and their diminishment of recreational resources and its users, and we think these impacts would remain Class I impacts.

On page D.5-39, the report states, "In addition, as discussed in Section B, Project Description, all new permanent spur access roads would be gated off of the main access road. Please see our comments and pictures in regards to this issue under biological resources below.

VISUAL RESOURCES

The adverse impacts to the visual resources from the Tule wind turbines are due to the inherent characteristics of the wind turbines themselves and their associated auxiliary infrastructure that cannot be solved with reduction. Typical wind turbine characteristics such as the wind turbine's more than 400-foot-tall scale, their light color, the movement of blades, and lighting cannot be effectively screened or remedied by mitigation. These adverse impacts would be substantial.

BLM Eastern San Diego County Resource Management Plan

On page D.3-49, visual resources, the report states, "The majority of the Tule wind project site would be located within the McCain Valley National Cooperative Land and Wildlife Management

Area, which has been designated by the BLM as VRM Class IV." We know this area was recently downgraded, and we think it should be upgraded again to a Class I or Class II. We think either of these classifications is more appropriate than the Class IV because of the area's high visual resource values based on its scenic vistas, character and quality of the site and its surroundings as identified in the report (Class A - EXCEPTIONAL - in some instances). The VRM classifications determine to what extent an area is developed, and we would like to see very little, if any, development here because of its high visual resource values. The EXCEPTIONAL views would become APPALLING!

On page D.3-50, there is one VRM element we are concerned about. VRM-03 states, "Evaluate proposed surface-disturbing projects from KOPs for the following factors: distance (between project and KOPs), angle of observation, length of time the proposed project will be in view, relative size or scale, season of use, light conditions, recovery time, spatial relationships, atmospheric conditions, and motion. Are the Tule wind turbines and other proposed wind turbine projects in CONFLICT with VRM-03 considering their significant and unmitigable impacts to the high visual resources here?"

On page D.4-65, Land Use, BLM Final Programmatic EIS, the report states, "The BLM will not issue ROW authorizations for wind energy development on lands on which wind energy development is INCOMPATIBLE with specific resource values." We think the Tule wind turbines and other proposed wind turbine projects in the McCain Valley area have significant and unmitigable adverse impacts and/or are in CONFLICT with existing (recreation, for example) and planned multiple-use activities or land use plans that make them INCOMPATIBLE with the high visual resource values here.

Federal Land Policy and Management Act

On page D.3-50, visual resources, the report includes FLPMA (2001) and the sections that emphasize the PROTECTION of the quality of scenic resources on public lands: Section 102 (a), 103 ©, Section (a) and Section 505 (a). On the next page, the report states FLPMA objectives to protect the quality of scenic resources on public lands are met through the BLM's VRM system, previously described. The VRM system is implemented through the RMP and the management framework process. Are the high scenic resources on these public lands PROTECTED in view of the significant and unmitigable impacts in regards to the Tule wind turbine project and the other proposed wind turbine projects?

BLM Recreation Areas

On page D.5-40, wilderness and recreation, the report states, "wilderness area buffer zones are not provided in the Eastern San Diego County RMP." We would like to suggest that buffer zones be provided in the McCain Valley National Cooperative Land and Wildlife Management Area for the Tule wind turbine and other proposed wind turbine projects. Buffer zones could provide the necessary distances to protect various existing area designations from significant and unmitigable adverse impacts by an adjoining proposed project. Adjoining uses like

industrial wind turbines and/or a community, resource, wilderness or ACECs, recreation area, trails, campgrounds, viewpoints, etc. are examples of this. Buffer zones could already be established before projects are proposed, or afterwards when adverse impacts are identified. (The Tule wind turbine project, for instance, would PROFOUNDLY adversely affect views in areas up to 5 miles away and affect scenic vistas 15 miles away or more.) Buffer zones would provide a set of standards and uniformity that would be applied when different conflicting uses are adjacent to each other. Distances necessary could be measured by the foot or by miles depending on the degree of the adverse impact..

BIOLOGICAL RESOURCES

We agree with the significant and unmitigable impacts described under TULE BIO-10 for golden eagles, but disagree with the findings for the Peninsular bighorn sheep.

Birds

We have included two pictures of bald eagles we observed last year at Cuyamaca Rancho State Park and Cleveland National Forest. In August 2010, the bald eagle we spotted from Fletcher Island at Cuyamaca Lake was known to be in the area. The other one we observed with our son that Norm the Fire Watchman at the Los Pinos Fire Lookout spotted on Father's Day looking west towards the Hauser/Pine Creek wilderness areas last year was not known to be in that area. The Sunrise Powerlink Record of Decision amendments included the addition of the Bald and Golden Eagle Protection Act based on many sightings that became known from the public, along with ours, in many areas the Powerlink would traverse. Will this Act be added to the final Tule report as a mitigating measure because of TULE-BIO-10 in Table D.2-13 which pertains to golden eagles in the area? The report stated their populations are declining and that this area could become a continuing sink for golden eagles attempting to use nesting sites west of the project area if the proposed wind turbines are built here. We think the Tule wind turbine project and other proposed wind turbine projects would present a hazard for electrocution or collision with fan blades for golden eagles and should not be built.

We also think more intensive surveys for golden eagles should be conducted. We observe and have pictures of many large birds of prey in the McCain Valley area soaring above ridgetops.

There are other raptors and birds that use the area that could be significantly impacted when colliding with the wind turbine blades, such as red-tailed hawks and turkey vultures. Do we know if there would be a ripple effect on animal populations they hunt for food if their numbers decline?

On page S-18, in the ESJ Transmission Line Project DEIS, the presence of transmission towers were considered beneficial to raptors for nesting purposes. However, the Audubon Society wrote a letter stating the opposite is true. Can this be clarified and taken into consideration for these proposed projects? Also, would the proximity of the Sunrise Powerlink towers be in conflict with the proposed wind turbines? Birds that nest on the Sunrise Powerlink towers could collide with the rotating blades of the wind turbines when hunting for food.

Peninsular Bighorn Sheep

On page S-19, in the ESJ Transmission Line Project DEIS, it stated, "construction and operations of the wind facilities, coupled with elevated levels of human activity from workers and visitors to the wind farm, could alter wildlife behavior, including avoidance of the area."

We are concerned that the Peninsular bighorn sheep and other wildlife that are in close proximity to these proposed projects might also be affected by wind facilities here in the same way. On page D.2-59, biological resources, it states, "... portions of the In-Ko-Pah Mountains and are located WITHIN 800 FEET of the proposed project footprint. . . Unit 3 is currently occupied by Peninsular bighorn sheep. . . 0.79 MILE from the proposed project, near Tule Peak. The closest critical habitat for this species is just east of the Tule wind project area (see Figure D.2-9) where it is located less than half a mile from the easternmost portion." We have seen evidence of bighorn sheep when hiking in the McCain Valley area (footprints/scat/forage use). We know there are also springs and creeks with flowing water in these areas that they use. We know of one spring that used to have water, and as of two weeks ago, was dry. We know of two other springs that hold water at Mountain Springs, and were thought to be dry. Will these proposed projects affect the bighorn sheep and other wildlife when they use these water sources? Will the noise and activity level from construction and operation of the proposed wind turbines, coupled with elevated levels of human activity from workers, drive them into other areas, especially from the edges of the wilderness and ACECs because there are no buffer zones?

We have observed illegal motorcyclists and their tracks which cause damage when we hike in this area. The attached pictures show some of the damage we saw on recent hikes near the western rim of Carrizo Gorge. We encounter illegal motorcyclists frequently while hiking in remote areas that they are not supposed to be in where we have also observed either deer/ bighorn sheep prints, scat and bones. If motorcyclists are already damaging the area by riding illegally on roads/trails that already exist even when gated, posted off limits, or have riprap across them, what will happen when more roads are built? Will security be provided to ensure illegal use doesn't occur? Are the bighorn sheep and other wildlife already being effected by these motorcycles in the areas they used to frequent more extensively in the past?

WILDLIFE AND FUELS MANAGEMENT

We agree with the findings of significant and unmitigable in the report for this issue. Here again, the inherent characteristics of the wind turbines and their associated auxiliary infrastructures cannot be remedied by reduction in regards to this issue.

The report states the presence of over 100 wind turbines and related electrical transmission lines would result in potential ignition sources within an area ranked HIGH, VERY HIGH OR EXTREME for wildfire.

The Tule Wind project will have ongoing maintenance activities and the inclusion of five permanent and five part-time employees at the facility there that will also increase the possibility of ignition.

The primary areas of risk at the Tule Wind project site will be the overall premises, the towers, the rotor blades, the nacelles and potentially transformers and overhead collection lines. The nacelle is unmanned and too high for firefighter response.

The report concludes that due to the potential for ignitions related to the presence of the overhead transmission lines to occur throughout the calendar year, including during extreme fire weather, and in an area considered VERY HIGH FIRE HAZARD SEVERITY ZONE with adjacent wildland fuels, the presence of the project would adversely increase the likelihood of a wildfire.

Is it in the PUBLIC'S BEST INTEREST to introduce wind turbines and their auxiliary infrastructures into an area that is a very high fire hazard severity zone?

SUMMARY

We consider McCain Valley OUR FAVORITE DESTINATION to camp, hike, view landscape, wildlife and wildflowers, take pictures, star gaze and find solitude in all of San Diego County. One of our hiking resource books, Afoot and Afield San Diego County by Jerry Shad states, "The area between County Highway S-2 in the south end of Anza-Borrego State Park and the BLM's McCain Valley Resource Conservation Area constitutes some of the most wild, beautiful, and serene territory in San Diego County." That description is what has lured us to McCain Valley and the surrounding wilderness areas for decades, along with our children.

We would like to express our opinion that this regional area is SPECIAL, JUST AS IT IS! That's why we come. Industrialization would desecrate its present rural character and SOMETHING IRREPLACEABLE WILL BE LOST FOREVER! The experience of enjoying this area's natural resources would be GONE, and LOSING IT would QUENCH our desire to come out here anymore. Our family was fortunate to experience the wonders of this remote area with few modern man-made structures interfering. Will future generations be able to do the same?

We try to be good stewards when we visit this regional area for recreational purposes. Our hope is that the people in charge will also be good stewards and not forsake our valuable public resources. Our desire is that these people will grasp this opportunity for preservation so that not only ourselves, but future generations, will be able to experience and enjoy ALL the wonders of the natural world here.

There's a sign posted by the State of California on the Pepperwood Trail in McCain Valley that reads, "FEATURES PROTECTED. THIS IS YOUR HERITAGE - HELP GUARD IT." That is what we are trying to do.

Sincerely, *Charles E. Baker -
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