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Subject: Public Comment on DIER/DEIS
Attachments: Input Into Energy Plan-R.doc

To whom it may concern: attached are my comments on the proposed East county Substation/Tule Wind/Energia Sierra Juarez Gen-Tie projects. Please feel free to call me with any comments or questions. I appreciate the opportunity to be heard.

Regards, Danielle Cook

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One Citizen's Public Comments on the East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects-by Danielle Cook, PO Box 486, Jacumba Ca. 91934 •619-766-4640

On any given weekend in the San Diego County Gateway communities of **Boulevard , Jacumba and the McCain Valley Wilderness area**, people of all ages and walks of life can be seen enjoying these “jewels” in their backyard. San Diego Bicycle enthusiasts meandering down the historic Old Highway 80 and Highway 94; honeymooners enjoying a romantic getaway at the cozy Live Oak Springs Resort; family reunions and holiday barbeques at the Jacumba Hot Springs Spa; backpackers and campers experiencing the pristine McCain Valley; hikers climbing Jacumba Peak or exploring Carrizo Gorge, motor cyclists in formation cruising down the back roads (stopping at the Wisteria Candy Cottage for a sweet treat); San Diego Glider Club members swooping and soaring over the Jacumba Airport and the San Diego Stargazing clubs viewing skies so black and pure that the solitary stars and Milky Way look etched in 3D.

San Diegan's and other visitors travel and vacation here because the wilderness areas offer a peace and tranquility that feeds the soul. They come here because the whooshing of the wind through the pine trees, the fragrance of the aromatic desert plants, the sight of delicate desert wildflowers in bloom help recharge their batteries. One of the best parts is that these activities provide families a free or low cost option to more crowded and expensive recreational opportunities in the city.

But sadly, this is coming to an end

This document looks at the irrevocable damage and outright destruction that the East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects will perpetuate on San Diego's Gateway Communities (and the current wilderness playgrounds of all San Diegans). It will also put forth the argument that, in spite of being categorized as GREEN, Wind Turbine Energy is far from it. Finally, my document will put forth some solutions

THE IMPACTED AREAS

In the interest of disclosure, I am a property owner in Eastern San Diego County. My husband and I made many visits to this area to enjoy the wilderness and variety of recreational activities prior to selecting Jacumba as our retirement home. We have no economic interest in any business here, nor will the proposed utilities activities impact our immediate homestead (we did not buy the home for investment purposes but rather to live in during our retirement). My concerns are not knee-jerk NIMBY; instead, they are rooted in what I see as a broader catastrophic environmental change that will affect San Diegans and our communities now and for generations.

I am also a proponent of green energy, and have long supported wind energy. However, this was before I carefully researched all the periphery components that surround this energy source and the potential impact on the environment and San Diegans.

It is interesting that in the descriptions of our area as found in the project documents, we are described as rural, back country and filled with “desert scrub”. These sterile statements are meant to diminish our importance in the eyes of those making final decisions on the projects as well as to position the area as barren and thus suitable for exploitation. Here is the reality.

Boulevard and Jacumba combined have over 2,100 residents (2000 censuses). These include teachers, librarians, policeman, border patrol, entrepreneurs, artists, writers, plumbers' electricians, musicians, retired folk and families. In short a microcosm of what you would find in any city. We have small businesses that create economic opportunity and social benefit such as the *White Sage Farms*, the *Live Oaks Springs Resort*, the *Jacumba Hot Springs Hotel* and restaurant and the *Wisteria Candy Cottage*. We have other businesses such as the *Sacred Rock Resort* and the *Institute of*

Perception that embrace nature as part of their mission and provide contemplative retreat opportunities and family picnic areas. We also have ranchers, organic farmers and local "characters" that enrich our gateway communities in many ways.

While the vegetation might be correctly characterized as "desert scrub", these words hardly depict the specialness of the plant life. Stately Oaks, Chaparral, red-branched Manzanita, aromatic shrubs such as the endangered White Chia, Cottonwood trees, flowering Yucca and Prickly Pear cactus are used as food plants by butterflies and moths or cover and sustenance for a wide variety of reptiles, birds, insects and animals. And what a variety we have! Bobcats, Coyotes, Jackrabbits, Road Runners, ground squirrels, Quail (the California State bird), Golden eagles, hawks, insect eating bats, Scotts Orioles, ducks, woodpeckers, grackles, Horney lizards -the list goes on! In addition to this amazing flora and fauna, Jacumba, Boulevard and McCain Valley are an archeological treasure trove of many ancient Native American artifacts.

This vibrant, precious resource is soon to be lost to San Diego

SNAPSHOT OF THE INDIVIDUAL PROJECT IMPACT-Energy development needs to be considered in terms of cumulative effects. Sometimes, projects are approved on an individual basis with little collective evaluation of social and environmental impacts. Collective evaluation is necessary to judge the true destructive nature of what is being done to San Diego's gateway communities and wilderness playgrounds. (This is not an in-depth review. Others have done that before me. My intentions are to highlight some of the more troublesome aspects. I have done so in the following chart) Additional detail will follow. Information was taken from the draft DEIR/DEIS document

| Project Name | Years for Completion | Truck Deliveries | Water Usage | Permanent Acres Impacted | Plant Removal/Other impact |
|---------------------------------|---|---|--|--------------------------|--|
| Eco substation | 2 years (12 hrs/day Mon -Sat. Sometimes by night!) | 60/day for 8 months. 200 trips to deliver equipment | 30 million gal | 110.5 | 3 mature oaks, removal of 88 acres of vegetation/habitat. Earth movers, cranes, rollers concrete mixers etc |
| Tule (134 turbines) | 2 years construction 7AM-7PM M-Sat | 325/day peak | 17,512,000 gallons for dust suppression and concrete mixing. 2,500 gal/day during operations for employee use | 562.8 | All vegetation cleared 50 to 150 feet around each pole. 232 wood or steel poles. 5,000 sq ft area set aside for switching station/control house. Dig a well A 138 kv overhead transmission line with 108 poles running over to the Boulevard substation |
| SWPL Loop-in/ESJ Gen Tie | 6 months? | 10-20 vehicles/day and up to 200 delivery trucks | 780,000 gal for watering dust and soil compaction. May drill well | 40 acres | Continuous helicopter activity, 75 ft X 35 ft working zones around all structures cleared of shrubs, blasting equipment |

THE TROUBLE WITH WIND FARMS

They are not green . It is a dirty little secret that wind farms, far from being green, are very damaging to the environment. This is because they never exist in a vacuum. Wind energy and their associated construction, roads, power lines, power grids and other structures, destroy or fragment wildlife habitat and are directly responsible for killing thousands of birds and bats annually. Birds can collide with turbines and other structures, bats apparently do not collide as frequently but can be devastated by a syndrome called barotrauma. This occurs because when the bat chases the turbine blade, it is sucked into a low pressure area behind the blade. The low pressure area causes blood vessels in the bats lungs to expand and explode. (Baerwald EF et al 2008 Curr Biology 18 (16):R695-96). Bats keep undesirable insects (such as West Nile -carrying mosquitoes and gnats) under control.

In Northern California, a Government Accountability Office (GAO) study found more than 1,000 raptors were killed annually by wind-power facilities there (Altamont Pass region). In West Virginia, more than 2,000 bats were killed in a seven-month period in an area with 44 wind turbines, according to the GAO report. The Tule project is scheduled for 3X that amount!

Wind turbines built in areas dependent upon water wells face special problems. As stated earlier, wind turbines don't exist in a vacuum. The years of water usage for construction (roads, structures, accompanying power lines etc) and the demands of operation could adversely affect water levels and availability for current residents, ranchers and farmers

They Negatively impact property values. It is ludicrous to believe (as the slick *Tule Wind news* brochure suggests) that property values do not suffer. Ask any local realtor and you will discover that the news of the massive wind turbines (and their corresponding electrical lines and grids) has made it virtually impossible for local residents to sell their properties except to the project developers at far less than replacement costs. I do not know of anyone who deliberately chooses to live around wind turbines or under high voltage 120 ft towers and electrical lines, do you?

They Will Have a Negative NET Impact on Employment. Although the Tule Wind news states that 325 "green" jobs will be created at peak of construction, experience tells us that most will be union jobs and the permanent operations and maintenance employees will transfer in from other regions. While it is true that for a couple of years a small amount of jobs may be created, and local sandwich shops and hotels might see a spike in business, what isn't discussed is the permanent economic fallout for the many businesses that depend upon tourists coming to enjoy our formerly pristine environment. Gross job creation could look positive for a narrow window of time while long term NET JOB LOSSES could be devastating.

They are not economical and do little to help Global Warming. A report on the German experience of renewable energy by Professor Wolfgang Pfaffenberger, Director of the Bremer Energy Institute at the University of Bremen, warns of wind energy's economic downside.

Professor Pfaffenberger emphasises that the cost of reducing emissions by the use of stochastic (randomly intermittent) generation such as wind is very high, and referring to a growing body of research in Germany (see below), Professor Pfaffenberger states that the difficulties of managing wind energy make it so costly that its net economic impact is negative.

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"Basically, of course, investing in renewable energy plants creates employment in industries producing these investment goods. On the other hand the extra cost of renewables adds to the cost of energy and in this way destroys purchasing power that otherwise could have created demand and indirectly employment in other areas. Whereas the gross effect of spending money on renewables is always positive, the net effect may be negative".

Germany is one of the world's leading adopters of wind energy, with nearly 17,000 MW of wind turbines installed, but contributes only 5% of total German electricity consumption.

This energy source is not sustainable on its own .The rush to push this project through is to get government stimulus dollars. Wind energy is much more expensive per unit of power generated than fossil fuel or nuclear power. Its intermittent nature (dependent upon wind blowing) requires a backup which cancels out any reduction in carbon dioxide emissions. Our energy costs will surely go up and it is ironic that our own tax dollars are being used to destroy an area with such a unique and beautiful "sense of place".

They can be a health hazard. Nina Pierpoint, MD who has made a study of the health hazards of wind farms has this to say in her groundbreaking book *Wind Turbine Syndrome*. . ."people living within two miles from 'wind farms' all had similar complaints and health problems. . .these include: sleep disturbance, headache, tinnitus, ear pressure, dizziness, vertigo, nausea, visual blurring, tachardia, irritability, problems with sensations of internal pulsation or quivering while awake or asleep".

Dr. Pierpont goes on to say: "Two kilometers or 1.24 miles, remains the shortest setback from residences that communities should consider. In mountainous terrains, 2 miles is probably a better guideline. . . .The shorter setbacks in use in the USA and elsewhere, 1,000 -1,500 ft are a financial convenience for wind developers and leasing landowners. They have no basis on safety and health, and they make no clinical sense."

The Tule Project in particular will forever scar a priceless wilderness resource-McCain Valley Wilderness. The Tule Wind project is centered around McCain Valley Road. The left hand, Western side of the road serves light ranching, OHV recreational, and a camp for troubled teens. The right hand, Eastern side of the road contains magnificent designated environmental areas and recreational assets. The Tule Wind report mentions McCain Road areas as a designated RMZ (Resource Management Zone) while largely ignoring the designated wilderness areas and recreational assets immediately adjacent on the right hand Eastern side and also at the north end of the road. McCain Valley Road provides the sole primary vehicular access to the immediately adjacent Carrizo Gorge dedicated Wilderness and the Sawtooth dedicated Wilderness areas. The road serves this same purpose for the higher elevation Western side of Anza Borrego State Park (the largest state park in the USA). In the case of the Sawtooth Wilderness Area, McCain Valley Road offers the only access of any kind. These wilderness and recreational access and entry points and related recreational sites are well documented by a large quantity of recreational guides and books and the BLM's own literature and maps. This industrialization of McCain Road is also absolutely not compatible with the wildlife found in the valley and the adjacent wilderness areas. These are described in BLM's own documents shown later. Wildlife found include bats, protected Golden Eagles and endangered Bighorn sheep

During the years of construction, this area will endure 325 truck deliveries a day 7 AM to 7PM Monday through Saturday. 232 over 120 foot high wood or steel poles will be placed. All vegetation will be cleared 50 to 150 feet around each pole, devastating wildlife habitat. There will be a 5,000 sq ft area set aside for a switching station/control house.

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Campers and backpackers will not be able to enjoy their former idyllic sanctuary. All for an energy source proven not economic. What a shame.

What is troubling is that other wind turbines have been planned for: Mazanita (25); Campo (106) and the Jordon project (40)

The Boulevard Substation Rebuild

What a misnomer! This is not a "rebuild" but rather a gross expansion 10X its original size. Again, this language was no doubt chosen to minimize the scope of the project. The new behemoth that will be created will service a lattice work of over 150 continuously humming massive high voltage steel towers hovering ominously over the Boulevard community and scenic Old Highway 80 like something out of a science fiction movie. We might as well rename the highway "Electric Avenue".

Why more electrical Lines are counter indicated for this area

They have a negative impact on wildlife-Kathy Barton, a professor at UC riverside had this to say in a news article: "California natives, with few exceptions, are disease free and restore much needed natural habitat to dwindling populations of animals whose breeding grounds, sources of food and water, and protective cover have been polluted and destroyed by decades of unchecked, rampant development and urban sprawl. Construction of overhead power transmission lines nearly destroys plant cover and soil conditions in the immediate area. The towers also provide nesting sites for ravens, a native bird whose population is growing. Ravens prey on the threatened desert tortoise. Trenching associated with underground pipelines for gas, oil and water destabilizes soil crusts and rock surfaces, concentrating water runoff and erosion. Research has shown it takes more than 30 years for these areas to recover."

They pose unnecessary fire danger in an area proven to be extremely fire prone—Is there anyone that doesn't shudder at the devastation wrought during the October 2007 series of deadly wild-fires? The fires destroyed 1500 homes, caused 9 deaths and impacted 500,000 acres. At least one of the fires (I believe the Rice Canyon fire) was cause by downed power lines!

I think it astonishing that SDGE, the very same organization pushing for a power shut-off to back country areas during high fire periods, is now pushing a massive transmission line grid on us. Fires do not just devastate the backcountry but they pose real danger to the entire San Diego county area as they can easily spread westward. It is a fact that downed electrical lines from high winds cause fires. SDGE has paid thousands of dollar for what the PUC (I believe it was this organization) characterized as poor maintenance of lines but they seem to be more interested in paying off insurance claims than in fixing the problem.

With all the additional lines to police and maintain, how can we be assured that we are not creating a situation that could result in an even more destructive fire season than that of 2007?

To Summarize:

- Six hundred eighty three (rounded) acres will be directly and permanently impacted –there will be thousands of other acres including homes, ranches and farms that will be indirectly impacted
- Over Fifty million gallons of precious water will be squandered and our local water wells may be diminished during the two years of construction
- The Boulevard/Jacumba/McCain Valley areas will be subjected to TWO YEARS of Monday thru Saturday constant rumble of construction and dust pollution. Incessant humming and potential toxic electromagnetic emissions will also have to be endured (The area will hardly attract the tourists that the residents desperately need for economic survival)
- Acres of fragile wildlife habitat will be destroyed or displaced
- Historic old Highway 80 will be rendered unusable by residents and tourists trying to dodge massive earth movers, back-hoes, cranes, water and cement trucks. Highway 80 was not designed to take this type of traffic and the narrowness of the road will invite accidents.
- San Dieagans will lose precious recreation resources and the peace and tranquility they seek will be shattered.

Recommendations

My initial recommendation would be to locate all these projects to a less sensitive area but I am a pragmatist and know that this is unlikely given the money and subsequent political muscle of the various project developers. These are my alternative recommendations:

- 1) Move wind turbines away from McCain Valley Road and all of its associated sensitive areas (including Cottonwood Campground)
- 2) If that isn't feasible, scale back the Tule wind project from 134 turbines to 72 and reroute some of the related transmission lines as a previous environmental report recommended.
- 3) Ensure the Iberdrola wind turbine company uses the curtailment process (shutting down the wind turbines during low wind periods at night) that has proven successful in reducing bat deaths (I believe Iberdrola pioneered a study on this with the Bat Conservation Group)
- 4) Relocate the Boulevard Substation to an alternative and less sensitive area closer to San Diego and the border
- 5) Bury all the power lines scheduled to snake down Historic Highway 80 and from the Tule wind farm. This would greatly reduce fire exposure and prove less stressful on the environment and wilderness area long-term. It would also allow San Diegan's to continue to enjoy the area
- 6) Restrict project work days to Monday through Friday. Local residents and weekenders from San Diego deserve this.

- 7) Mandate that SDGE replace all wooden poles with more wind resistant steel AND produce and implement a plan for stepped up inspections and maintenance of their lines
- 8) Require that SDGE place coils and other devices on the power lines that have been proven to decrease bird deaths
- 9) Have all the project developers contribute to a fund for third-party, unbiased oversight on the many commitments they have made to mitigate environmental damage (habit control and replanting, relocation of raptors' nests, careful handling of cultural resources, keeping night lighting to a minimum and turned down etc)
- 10) Assist the impacted communities of Boulevard and Jacumba by funding emergency evacuation plans and equipment for evacuation centers

Our rush to produce green energy in the beautiful Eastern San Diego County will do irrevocable damage to our vibrant communities and fragile wilderness. The costs of "electrifying" this archeologically and biologically rich area will be measured in terms of economic devastation, habitat degradation , possible species extinction, and the perpetuation of the myth that all non-fossil fuel energy is GREEN and thus desirable.

We have the opportunity to make a wrong perpetuated on this area a right. Let's not squander this opportunity.