

Lauren Coartney

From: Marylubran@aol.com
Sent: Friday, March 04, 2011 8:24 AM
To: ECOSUB; catulewind@blm.gov
Cc: dianne.jacob@sdcountry.ca.gov; tisdale.donna@gmail.com
Subject: : Comments on DRAFT DEIR/DEIS FOR ECO SUBSTATION, TULE WIND & ENERGIA SIERRA JUA
Attachments: Comments Various on EIS Final.doc

To All Reading these Comments,

We have owned our property in Boulevard now for two years. It has been such a refuge from the craziness of the city and our work in the city. I have sat for hours listening to the silence and the murmur of the wind in the trees. We moved boulders onto the property as I love rocks and irregular shapes. I have watched for hours the sun cross the sky and play its shadow light game on the rocks making ever changing patterns.

As well as a musician, I am a trained artist and I can not tell you how I delight in the shapes of the rocks, the play of the sun with the land, the ever changing colors, the eternal wind song, seeing how it all comes together in a basic silence that awakens the remembrance in me of a deep silence also in the center of my being. This is a place of refuge, a place of spiritual feeling, a place called home.

Here at this little place in Boulevard "I loaf within the absolution of the wind,"--Philip Booth
and loafing, make music.

The property had not been cared for for many years. I have put many, many hours into restoring the land to its natural beauty, clearing away trash, and more trash, dead branches and dried weeds and reshaping it all so that our human presence is minimized and the essential harmony of the land can return. My sweat is in the land. "I love this land by the salt sweat it costs to own it whole."--Philip Booth

I hope you study these comments before you decide to impact things that technology does not completely understand. In this process we all have a grave responsibility because what we do will change the destiny of the land, its people, animals, birds and history.... Our power is great. We need to use it responsibly.

We need to consider more than the short term needs of our thirsty society and its overwhelming demands on the environment. We need to look at other alternatives including the sites of other abandoned California wind farms and the possibility of restoring that land to dignity by using it properly.

I was encouraged by the DEIS recognizing that the no action option is an option and hope that we can come to understand a way to preserve our land and satisfy all interests.

Mary Lu Brandwein
Homeowner/Musician
39745 Jewel Valley Way
Boulevard, CA 91905
858 945 8739
www.shakuhachi.org
marylubran@aol.com

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California Public Utilities Commission
Attn: Iain Fisher

March 4, 2011

BLM California Desert District Office
Attn: Greg Thomsen
c/o Dudek
605 Third Street
Encinitas, CA 92024

VIA E-MAIL: ecosub@dudek.com, catulewind@blm.gov
RE: DRAFT DEIR/DEIS FOR ECO SUBSTATION, TULE WIND & ENERGIA SIERRA
JUAREZ GEN-TIE PROJECTS

Dear Mr. Fisher, Mr. Thomsen,

I am a resident and musician living in the affected area; this is my second letter of comment on the proposed wind farm projects. This letter will discuss the collective impact of the proposed projects.

1. Communities and the Wind Farm Impact taken as a whole

The Draft Environmental Impact Statement for the various projects in the Jacumba-Boulevard region is extensive; I decided to focus my continuing efforts on the collective impact the various aspects of the projects would have on the environment and the communities of Boulevard and Jacumba as well as the whole surrounding desert region. The stated impacts summarized in the table presented in the Executive Summary may seem insignificant especially if kept within accepted legal mandates. Only the obvious impact of the visual effect may seem significant. But as I see it, taken as a whole, all the impacts added together, certainly seem to completely transform, not only the environment and our communities, but indeed, seem to threaten the very existence of our communities, as we know them today.

Taken together as a whole, the great changes as well as the slight changes, the total impact of these East County Wind Farms would be the total transformation of the areas involved. I am not sure that as residents this is understood. From what was said at the meetings, it would seem that things would remain pretty much as they are with a few wind turbines around, but reading through all the impacts from the table in the Executive Summary, it seems that taken as a WHOLE, just a little greenhouse gas here and herbicide there, dust here and land disturbance there, a little noise here and light there, etc. It seems **there would be a total transformation of the area** from a sleepy, quiet, beautiful residential and recreation area of peace and quiet sanity to one of intense industrial presence with substantial infrastructure. That is, roads in and out and businesses and storage areas, etc., current businesses going out of business and other businesses coming in, recreation areas being ruined and closed and all regional effort going to servicing the industrial presence. The whole character of the area would change from residential and recreational to industrial. This means it will become foreign to us for its complete change.

"Impact AG-1: Construction and operation activities would interfere with active agricultural operations. NMN" (No mitigation necessary).

"Impact AG-2: Operation would permanently convert DOC Farmland to non-agricultural use. NMN"

"Impact AG-3: Operation would conflict with existing zoning for agricultural use or permanently convert Williamson Act lands to non-agricultural use. NMN"

"Impact AG-4: Operation would conflict with existing zoning for, or cause rezoning of forestland, timberland, or timberland zoned Timberland Production. NMN"

"Impact AG-5: Operation would result in the loss of forestland or conversion of forestland to non-forest use. NMN"

"Impact WR-3: Presence of a project component in a designated wilderness or wilderness study would result in loss of wilderness land. NMN"

"Impact WR-2: Presence of a project component would permanently preclude recreational activities. NMN"

"Impact SOC-2: Project construction and/or presence would cause a change in revenue for businesses, tribes, or governments and would cause a substantial change in local employment. NMN"

"Impact VIS-2: The project would substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. NMN"

"Impact WR-2: Presence of a project component would permanently preclude recreational activities. NMN"

"Impact WR-3: Presence of a project component in a designated wilderness or wilderness study would result in loss of wilderness land. NMN"

"Impact BIO-1: Construction activities would result in temporary and permanent losses of native vegetation."

It is really a question of deciding how to use our resources.

2. Visual Disturbance

The visual disturbance is the loss of large open spaces, long views that are unavailable in the city. These open spaces are particularly wonderful and I open and wrap myself around them and so find within myself an infinitude that hours of despair and churning out work at the computer day after day, and running around on freeways, kills again and again. I come to these open spaces to remember who I really am. Our modern society with technology dwarfs the human spirit to the size of a small cell phone, a Wii or an HD TV screen. These projects would then fill these broad vistas with wind turbines not only destroying the openness, but also militating against the human spirit, taking away what nurtures the soul. The industrialization of our communities and residential areas as well as our open natural spaces surrounding them, is what we are talking about here.

People from the City of San Diego come to these areas to re-create themselves so that they can go back to the city and continue to work. These re-creation areas are not a luxury, but an absolute necessity for people living in such a concentrated area as the city full of light, noise, and traffic day and night with no rest from disturbance.

If all the projects go in as so far planned, my property will have visible wind turbines in three directions: North, West and South. Wind turbines seem to be planned for as close as 1000 feet from the house.



3. Noise and Sound

Modern life in our society, in our cities has no silence and our lives in the city are filled day and night with noise and sound. Some people go to the desert areas for beauty, peace and quiet. As I previously mentioned in my first letter dedicated exclusively to noise and sound, not only audible sound but low frequency sound would be present too, disturbing people and wildlife and possibly contributing to the ill health of all. These noise components of the projects may well be within certain standards, but still do not allow for the quiet we are used to or the health we now enjoy.

"Impact NOI-4: Routine inspection and maintenance activities would increase ambient noise levels. NMN"

"Impact NOI-3: Permanent noise levels would increase due to corona noise from operations of the transmission lines and noise from other project components."

4. Air Quality/Water/Waste

Many things would affect air quality just a little.

"Impact GHG-2: Project operation would cause a net increase of greenhouse gas emissions." No mitigation required...there would be no adverse residual effects."

"GHG emissions from the O&M of the ECO Substation Project were estimated to be approximately 3,668 MTCO₂E/yr (SDG&E 2009)."

Herbicides, dust, exhaust emissions, toxic air contaminants would be part of the ongoing operation of the projects and I understand within certain legal limits but still above our current levels.

Water

"Impact HYD-2: Construction activity could degrade water quality through spills of potentially harmful materials."

"HYD-3: Identification of sufficient water supply."

"Impact HYD-4: The project could deplete local water supplies." Water supplies are already being depleted.

"Impact HYD-8: Where septic tanks are proposed, such facilities could impact local water quality. NMN"

Waste

"Impact PSU-4: The applicable wastewater treatment provider that serves or may serve the project determines that adequate capacity to serve the project's projected demand (in addition to the provider's existing commitments) is not available. NMN"

"Impact PSU-5: The project would not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. NMN"

Comment:

From what I understand of the above impacts on air quality, water and waste discussed in the project, they would seem to be minimal and well below the legal limits. "A net increase of green house gas emissions," and all the above substances released into the environment would be within or even below regulated limits. However, they would most certainly be more than what is currently experienced in our communities. For our relatively pristine area, these small amounts of this and that, all over an area enough to make room for the hundreds of wind turbines proposed, would add up to a qualitative difference that would change substantially the character of the area, albeit within legal limits.

5. Light

"Impact VIS-4: The project would create a substantial new source of light or glare that would adversely affect day or nighttime views in the area."

Comment: As for light pollution at night very much can be said and the projects offer some mitigation, but what about the Mexican side of this project? Even now on the horizon there are disturbing red lights blinking which is irritating, to say the least and certainly disturb the area's astronomers. My husband is one of them. Glare in the daytime is annoying. All the installations would impinge on stargazing and the county's best area for dark nights. I realize that the impact

of the Mexican side of the border is not within the scope of the proposed projects here discussed, but is certainly related to and cause for much concern for me.

6. Property Values

"Impact SOC-3: Project construction and operation would cause a decrease in property values. NMN"

Comment: Here no mitigation is said to be necessary.... All the property owners in the area are to just lose out. As a property owner in the affected area whose property has already lost value, I think the companies involved need to give all a "good faith" guarantee of property values with the money to be made from the project. This is a money making project and so no one should loose here. I have found nothing to address possible decreased property values in the document other than saying they need not be addressed.

What will happen if the wind farms go in and people find they are unable to live with the noise or other conditions? Will there be a guarantee of the property value? Will there be a buyout option respecting the full non-wind farm value?

Pre-construction "good faith" contracts need to be signed with every property owner involved.

7. Fire Probability and Fire Fighting

"Impact FF-1: Construction and/or operation and maintenance and decommissioning activities would significantly increase the probability of a wildfire."

"Impact FF-2: Presence of project facilities including overhead transmission line would increase the probability of a wildfire."

"Impact FF-3: Presence of the overhead transmission line/facilities would reduce the effectiveness of firefighting."

"Impact FF-4: Project activities would introduce non-native plants, which would contribute to an increased ignition potential and rate of fire spread."

"Impact PS-4: Project structures could be affected by wind or lightning hazards. NMN"

"Impact PS-5: Facilities could suffer an outage from intentional destruction or terrorism. NMN"

Comment: The proposed wind farm areas are already very delicate and in high fire zones. This area hasn't burned in 25 years and so we are due for a good burn. It is known that when fire has not passed through a region in many years, it is long overdue. The construction of these wind turbines will greatly increase the fire hazard of the areas as is recognized in the above impact statements.

Putting an industrial complex in a residential high fire area has severe responsibilities. Wind Farms increase the risk of fire many times over in an area already at risk. SDG&E does not have a good record in San Diego County with regard to fire prevention and care of electric distribution lines. This is a matter of public record. Will they suddenly do better now in East County?

SDG&E wanted to turn off service a few years ago because it could not guarantee safety from fire during Santa Ana conditions in East County, so I understand this project area will be entirely impossible to defend and will greatly increase fire risk.

From the East County Magazine:

"October 13, 2008 (San Diego's East County) - Backcountry residents are reacting with shock, praise and outrage to a notice sent by San Diego Gas & Electric (SDG&E) to 45,000 customers warning that power lines may be shut off when fire danger is high. With red flag warnings issued by the National Weather Service through Tuesday night, thousands of East County and North County residents may find themselves without power Monday or Tuesday."

It seems that currently, SDG&E does not feel it can promise customers safety with the existing power structures and now with the 5 wind farms projected...and no new fire stations, it seems that the reality of fire control has been underplayed. I don't know. I am afraid. The fire impacts are clearly stated: these projects would not only make fire more probably but also make fighting any fires more difficult. I, for one, am very afraid the small measures proposed as mitigation of this problem of dealing with fire, may not be enough.

This fire issue alone indicates that the projects should not be carried out.

Inability to get fire insurance and home insurance must be dealt with also. Will the owners of these projects insure residents' homes if insurance companies refuse to?

8. Decommissioning/Partial Decommissioning and Clearing Away

As such, I think it is important to carefully weigh all the impacts including those that may result if these projects are constructed but for whatever reasons, fail. Looking around the state and the world, this is certainly an outcome that is possible. This would be very sad. Destroying communities, scenic visits, wildlife habitat and wonderful recreation areas in the interest of providing energy is a difficult decision and one that is made with the expectation of success. But success is by no means guaranteed and provisions must be made in the event that these projects fail. Provisions must be in place so that failure of these projects does not result in a mere bankruptcy with the public left "holding the bag."

There needs to be a third bonding party who will assure the removal of machinery and all physical materials related to the projects. The need to return the land to its original state when the project is finished must be assured. The companies involved can't be allowed to just walk away and leave all the worn out equipment and turbines, etc. on the land. So far there is no plan....it just states on Page B-136 that a plan would have to be drawn up. That plan and the funds for it should be set aside from the beginning because at the end there may no be funds. There are too many abandoned wind farms that one sees (12,000 in California alone it seems). These measures and funding should be in place before the beginning of construction.

Also partial decommissioning may need to be addressed if one wind turbine or two need to be shut down as a result of new standards for proximity to habitations. These wind turbines would need to be carried off and cleared away and not just turned off. Funds need to be set aside from the beginning for these eventualities.

9. Mexican Component

No mention has been made of the Mexican component of the Wind Farms. Right now there are bright, red, blinking lights. How many more turbines will be put up in Mexico? What standards for light, noise, air quality, etc.? This is a huge unknown and very disturbing. Even though it is not part of the proposed projects, at the same time it is part of the overall project for alternative energy sources in the eastern area of the county.

Conclusion

Considering all the stated impacts with and without mitigation, East County and our communities will still be essentially and permanently changed and not be recognizable, if these projects proceed.

The scenic beauty will be destroyed with industrial machines,
with blinking lights,
a net decrease in air quality,
a net increase in noise from many different sources
a net increase in low frequency noise
that possibly will cause what is called "Wind Turbine Syndrome" in some people,
some diminishment of dark nights with turbine lights
and more lighting of adjunct infrastructure like parking lots, etc.,
increased fire risk,
and decreased ability to move and fight fires,
the decrease of agriculture, open and recreational space
the possible contamination of ground water,
some lessening of water supplies,
increase in erosion
as well as a crisscrossing of dirt roads,
the possible introduction of non-native plant species that could very likely overrun some native plant life.

Our communities will not be recognizable. They will certainly not grow as communities nor will they be places where people will want come to live or even come for recreation as they do now.

Jobs in the area will be INS and technology related. These projects don't just mean our communities as they are now with a few wind turbines here and there, but the complete reshaping of the whole area.

The whole character of the area will completely change.

I didn't see in the Draft Environmental Impact Statement anything speaking to the total overall effect of these projects on our communities. If there is a gradual moving away of people who can't take it and a possible sickening of the retired members and younger members of the community that have less vigor to withstand health threats, these communities as they are now could shrink considerably and be replaced with the adjuncts of the industry to be served. This means diminishment of the quality of life for all.

I have seen reports stating there may be as many as 12,000 abandoned wind turbines in California alone, perhaps some of these place could be reworked and made to function again. SDG&E already has energy investments in Montana, so why not other parts of California?

European Companies are coming here to further development wind farms (Iberdrola Renovables is a Spanish Company). Why is this? This seems to me to be very strange. Perhaps wind farms are being dismantled in Europe or not working well, so that European companies are coming to the US. We here don't know yet all the negatives of this form of energy. There are many, many more studies with real data than I have been able to study in this short time. The fact that a growing number of European countries are putting the brakes on allowing more wind turbines to go up, should raise a very BIG red flag (See a list here: <http://www.wolfeislandresidents.ca/windturbines.html>)

From the study itself, I understand that the overwhelming environmental impact is so great that **it is best not to construct the wind farms.** The DEIS concludes with this statement. Given the level of impact to the environment, this seems like the only answer and the one that should be the decision of those who will decide the future based on the study itself.

If it is decided to move ahead inspite of these major impacts, then in the interest of the long term health and sanity of the near-by occupants, I think it is necessary to **at least move the wind turbines away from the residential areas and schools to at least 2 to 2.5 miles.** As I discussed in my first letter of comments, this is necessary because of health indicators and an incomplete understanding of the effects of wind turbine farms on the near by inhabitants. This step would at least make it possible for our communities and the wind farms to co-exist.

Mary Lu Brandwein
Homeowner/Musician
39745 Jewel Valley Way
Boulevard, CA 91905
858 945 8739
www.shakuhachi.org
marylubran@aol.com

