

Lauren Coartney

From: Ken Daubach <dumptruck.01@wildblue.net>
Sent: Friday, March 04, 2011 10:00 AM
To: ECOSUB; catulewind@blm.gov
Subject: Daubach Comments
Attachments: comments.docx

We have sent a hard copy of our comments with signatures in the mail. The attached and below copy are the revised and completed copy. We mailed a copy out early because we cannot always rely on our internet. We wanted to make sure that our comments got in on time. You may disregard the mailed copy.

Below are comments from the Daubach family.

Boulevard's Needs

Our family has been involved in the community of Boulevard in many capacities, such as a volunteer firefighter, Fire Safe Council board members, Revitalization Committee members, CERT team, Red Cross, Mountain Empire Disaster, and the Boulevard Planning Group. It is fair to say that we have a pretty good idea of what this community's needs are. Boulevard has no community center/evacuation center for people or animals. When Red Cross came to look for a place to set up an emergency shelter, none of Boulevard's buildings were considered suitable. The fire station is inadequate and needs major renovation. The Sheriff's Department in Boulevard is only a substation and is not manned. The current Boulevard Fire and Rescue Department facility, which is not structurally sound enough to qualify as a certified emergency shelter, should either be retrofitted or built to allow for use as an authorized public emergency shelter. That shelter should be fully outfitted and stocked to serve the Boulevard community and others in need during natural or man-made disasters. The developers/owners should be required to fund these ongoing services along with their projects, which represent ongoing significant increased threat of fire.

Socio—economic

Contrary to the projects' claims, our community is being adversely affected in a socio-economic way. We're also being jeopardized by fire, our most serious threat.

An excerpt from Wikipedia's definition of socioeconomics: "Social economics may refer broadly to the "use of economics in the study of society." More narrowly, contemporary practice considers behavioral interactions of individuals and groups or social cut capital and social "markets" (not excluding for example, sorting by marriage) and the formation of social norms. In the latter, it studies the relation of economics and social values. A distinct supplemental usage describes social economics as "a disciplined studying the reciprocal relationship between economic science on hand and social philosophy, ethics, human dignity on the other" toward social reconstruction and improvement or as also emphasizing multidisciplinary methods from such fields as sociology, history, and political science. In criticizing mainstream economics for its alleged faulty philosophical premises (for example the pursuit of self interest) and neglect of dysfunctional economic relationships,... Although harder to measure, changes of less tangible factors are also considered, such as personal dignity, freedom of association, personal safety and freedom from fear of physical harm, and extended participation in civil society."

According to the 2010 census data, the combined population of Boulevard and Jacumba is 2,164 people. In the General Plan Update, it states "Recent studies conducted by the South County Economics Department Council has shown that the Mountain Empire has both lower per capita incomes and higher unemployment than other areas of the County of San Diego."

Table ES – 2 “Construction activity would temporarily cause groundborne vibration. Since it is not known whether impacted residents would agree to temporarily relocate, with mitigation listed at left, vibration impacts from blasting would remain adverse and unavoidable.” Impacted residents would have to be notified that they have an option to leave. All expenses for rental or hotel would have to be covered. Their livestock would also have to be provided for.

Table ES – 2 impact TR A – 1:” Construction would cause temporary road and lane closures that would temporarily disrupt traffic flow. TR A-1: Prepare and implement a traffic control plan. The measures listed at left would mitigate this impact. Residential impacts would not be adverse.” The majority of the people up here have to commute to work. They are already

driving a minimum of 40 min. to their destinations. Adding roadblocks and pilot cars will cause citizens to remain on the road longer which lengthens their workday. All the roads in the area are either dirt or two lane roads. A delay is unavoidable. When the freeway is closed, families can be split up. This happened during the last fires. Children and animals can be and were left on their own.

Table ES – 2 “impact TRA-7: A noticeable increase in deterioration of roadway surface is used for the construction zone would occur as a result of heavy truck or construction equipment movements. TRA-2: Repair roadways damaged by construction activities. The measures invested at left would mitigate this impact. Residential impacts would not be adverse.” Todd Voorhees, a representative from SDG&E, "No cumulative projects were addressed for traffic study." One project estimated 500 vehicle trips a day during construction. This does not include the thousands of vehicles when the number of projects is combined. Exiting the Boulevard and Jacumba area is like exiting a foreign nation. To both the East and West are border checkpoints. Border patrol will not give waivers to anyone. This includes the construction traffic for these projects. The waiting times at the border patrol checkpoints are already very long. The construction traffic will make these waits at least three times as long. This will not only cause wear and tear on our vehicles but will cause a large waste of gas from idling vehicles, this will increase CO2 emissions. As a resident that lives off Ribbonwood Road, one of only two roads that will take you to the project sites, we have experienced first-hand the increased traffic we are already experiencing from construction. The trucks are extremely noisy and often exceed the speed limit. In one day 12 trucks went by in 20 min. When a line of trucks stops at the intersection our driveway is blocked. Our roads are fair at best. The projects say they will not affect our roads. But how can this be true? With so much increased traffic the projects must maintain these roads. The roads need to be in perfect condition when the construction is finished.

Table ES – 5 "the project would not displace people or housing, and would stimulate the local economy." No locals are being hired. The accommodations and food are being found elsewhere, as our resources are very limited up here. The local economy is not benefiting at all. Tule wind says the economy will benefit because of the larger tax base they will add. Our communities have no infrastructure to spend the tax base on. We have no park, no senior centers, no community centers, and no evacuation centers.

Table ES – 3 "construction and operation of the project would not result in disproportionately high or adverse effects on minority or low income populations." "Impacts EJ – 1: construction and operation would not result in disproportionately high or adverse effects on minority or low income populations." It states that this will cause no impact. One local business owner has put in for a USDA rural community grant. This grant is specifically for poor rural communities with populations under 5,000. By decreasing property values the projects are affecting low income

populations. The projects are destroying their investments. Because of the increased fire danger these projects represent, insurance policy prices will increase. Low income families will not be able to afford insurance for their homes. Most homes in the area are over 50 years old. They are not equipped with sprinklers or other fire safety measures. They do not have water storage tanks. Fires in the County have affected the insurance rates. Some insurance companies have dropped their clients in the backcountry. Residents should be guaranteed affordable fire insurance. Socio- Economic impacts are lost investments on property, ugly views, bad roads, air quality from fumes and dust, noise from dynamite, trucks, and helicopters, increased fire danger, increased insurance, and future turbine graveyards.

Visual Adverse Impacts

In table ES-2, it states that all projects except the ES J Gen-Tie project are Class I visual impacts. Impact VIS-1 states "The project would have a substantial adverse effect on a scenic vista." It continues "When mitigation listed at left, adverse impacts to scenic vistas would remain adverse and unavoidable." Stated in Impact VIS-3 "The project would substantially degrade the existing visual character or quality of the site and its surroundings." It continues "When mitigation listed at left, impacts to existing visual character would remain adverse and unavoidable." Impact VIS -2 states "The project would substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway." It then states that VIS -2 poses no impact so no mitigation is required. VIS-3 and VIS-1 contradict VIS-2. One cannot affect the community while the other does not. Our family moved to this area because it was a place in San Diego County where we could afford 10 acres to keep our horses. We have invested in this property and we save money to continue to invest in this property so that it will be a future investment for our children. This is our only investment. With these projects possibly going in and many others projects in the planning stages, our property value is dropping. New homes in the area that started at \$700,000 have reduced their price to \$350,000 and still cannot sell. Some have not had a prospective buyer in over a year. The sellers must disclose all the projects going in the area. Many homes have foreclosed. Without the scenic views, we cannot sell our house for the amount we bought it for. We cannot replace our property. If we would sell our property today, we could not buy a property of the same size with the same views for that price. These projects will not guarantee property values. However, all of us are in danger of eminent domain.

See this article:

<http://www.newsweek.com/2010/01/27/an-unquiet-nation.print.html>

Currently, this area is a dark spot. If these projects go through, this will no longer be a dark spot or a quiet spot. A quote from the article says "Light pollution is the evil cousin of noise pollution." There will have to be FAA lights on the top of all the turbines and transmission towers. The Astronomy Association also requires dark skies. <http://www.sdaa.org/> During the last eclipse, people came from the city to view the eclipse due to the dark skies. How will this be able to be mitigated? These projects are supposed to benefit our community. They will be taking away our tourism.

Table ES – 2: "impacts 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."

Noise Adverse Impacts

"Construction noise would substantially disturb sensitive receptors and violate local rules, standards, and/or ordinances." "With mitigation listed at left, impacts related to nighttime noise would remain adverse and unavoidable. Noise impacts from helicopter and blasting noise would be adverse and unavoidable if impacted residents do not agree to temporarily relocate." How long would the residents be displaced? Where are they expected to go? Does this include their livestock? Who will pay the costs? Livestock, domestic animals, and children have been known to be afraid of gunshots. We've personally experienced trouble with our livestock in the presence of helicopters and loud sounds. How can this be mitigated?

Some more quotes from table ES–2. "Construction activity would temporarily cause groundborne vibration." "Since it is not known whether impacted residents would agree to temporarily relocate, with mitigation listed left, vibration impacts and blasting remain adverse and unavoidable." "Adverse unmitigable noise impacts (Class I) would occur temporarily due to construction related nighttime noise, helicopters and blasting. Other noise impacts would be adverse and mitigable (Class II) and/or not adverse (Class III)." From our own experience, Border Patrol helicopters, which are smaller and do not carry anything, have disturbed goats into stampeding. This caused injuries to both the animals and their caretakers. They could not be calmed until the helicopter had left the area.

Stated in GEO – 3 "Project would expose people or structures to potential substantial adverse effects as a result of seismically induced ground shaking, ground failure, or fault rupture." When any kind of aircraft flies low over our house all the windows shake.

Table ES – 2 “impact PS – 1 Operation could result in EMI, including interference with radar, radio, television, and electrical equipment. The measures listed at left would mitigate this impact. Residential impacts would not be adverse.” Radio reception up here is very limited. To interfere with the limited radio we have would render us without an outside news source. There is no cable for TVs and Internet. Some people up here have satellite for their television and Internet needs. There is no guarantee whether this will interfere with satellite reception or not. Antenna televisions are already fuzzy. With interference they would be obsolete. Cell phone reception is incredibly spotty up here. There needs to be a guarantee from the projects that are communication and news sources will not be cut off. There needs to be a way to contact residents during an emergency. Many locals do not have a land line and rely entirely on cell phones. <http://nawindpower.com/print.php?plugin:content.7302>

Fire threats

All of these projects have fire threats labeled as class I. This means they cannot be mitigated in any way. SDG&E has been trying to shut down our power over the last two years during high winds because of the extreme fire danger. SDG&E has repeatedly tried to form Red Cross Care Centers in this area for when they turn the power off. The CPUC told them not to turn the power off but SDG&E has stated that it was a suggestion and they will shut the power off when they believe it is necessary. We have repeatedly asked SDG&E to replace the wood poles with metal poles in order to decrease the fire danger. They have only switched out one line’s worth of poles from one substation to the other and these remain the only poles that are changed. When asked why these are the only poles that were changed, SDG&E said that the poles were changed for larger capacity. For a company that acknowledges the extreme fire danger in this area and often threatens to shut off the power for our own safety, they are in support of all of these many projects from the PowerLink to turbines, all projects that will only greatly increase the fire danger to our communities. We have requested the SDG&E underground as much transmission line as possible. SDG&E feels the undergrounding the transmission lines is too expensive. Yet, SDG&E still can afford to put helicopters in the air to install their transmission lines. This is both one of the most expensive and dangerous jobs out there. Helicopters and transmission lines also pose a huge fire threat. They choose to rely on the local fire departments which are composed of reserve firefighters who have little knowledge of the local area or landscape. The firefighters are not often repeat firefighters so they do not get familiar with the area. Our communities just got a grant for Street signs and it is up to volunteers to install them. It will be a slow process and even then not all the roads will be labeled. There are only two paid firefighters at the fire department at a time. They come from as far away as Irvine. If there was a disaster they might not be able to make it to the fire department, due to road closures. The firefighters will have the option to decide for their own safety purposes when they’ll fight a fire

near transmission line or turbine. The firefighters may wait for the fire to move a safe distance away from these dangerous obstacles before they fight it. This will give the fire a chance to grow. The fire could quickly get out of control especially if winds are present. Only one fire department in the area has a generator. The water here comes from wells, so only one fire department would have access to water, if the power should go out. The firefighters serving the local fire departments have served for at most one year. They have little or no firefighting experience and no experience with transmission lines or wind turbines. McCain Valley Conservation Camp is not a fire department.

Here are some things that must be mitigated in this area in relation to fire. The Boulevard/Jacumba/La Posta Fire Safe Council needs a 501(C)3. They also need storage areas, tools, and training in all three communities. There are no emergency centers in this area. There needs to be an evacuation plan and evacuation center for both people and animals. The fire departments need to be rebuilt or updated. The fire departments should be manned by four paid firefighters, on a 24hour/7 day-a-week basis. Any possible emergency center, such as the Highland community center, must have a generator. Water tanks should be made available to all residents for both fire suppression and for potable water. The Tule Wind fire plan has only the signature of Dave Nissan of Rural Fire. There are no CalFire signatures even though CalFire is mentioned many times in the plan. HAM radios and trained operators need to be available in all the communities.

Laws

Table ES – 2 states – "Construction of the project or the presence of the project components would result in an inconsistency with federal, state, or local regulations, plans, and standards applicable to the protection of visual resources." It goes on to say "With mitigation listed at left, impacts related to project facilities and inconsistency with policies and plans protecting visual resources would remain adverse and unavoidable." Another instance of this is stated in the same table "Construction noise would substantially disturb sensitive receptors and violate local rules, standards, and/or ordinances." With the result being a residual impact as stated "With mitigation listed at left, impacts related to nighttime noise would remain adverse and unavoidable." Another violation is listed under Impact BIO –8: "Construction activities would result in the potential loss of nesting birds (violation the Migratory Bird Treaty act)." Small businesses and normal citizens would not be allowed to have exceptions to rules, standards, acts, and ordinances. There should be no exceptions to this.

Wildlife & Environment

On table ES–2, the impacts for all three proposed projects are listed. The biological impacts are Class I. It states "with avoidance, minimization, and compensatory mitigation, impacts to Quino checkerspot butterfly critical habitat would occur and would remain adverse and unavoidable." Also, it states "Construction activities would result in a potential loss of nesting birds (violation of the Migratory Bird Treaty Act)." The table states "Presence of transmission lines and wind turbines may result in electrocution of, and/or collisions by, listed are sensitive bird or bat species" and "with avoidance, minimization, and mitigation, operation of turbines would pose a significant and unmitigable risk of collision for Golden Eagles due to the proximity of known active nests in the proposed project; therefore, this impact would yield residual effects." Another point states "Maintenance activities would result in disturbance to wildlife and could result in wildlife mortality." Table ES–3: this table shows the ECO-substation project's effects on biological resources, visual resources, and land use. Almost all of the listed impacts are considered Class I. In table ES–4, the table shows the impacts for the Tule Wind project and alternatives. The impacts are almost all Class I, the only reason some impacts are labeled as Class II is that the number of turbines has been reduced.

I have attended all the local hearings and meetings in relation to these projects. I specifically talked to a BLM representative at the last Dudek hearing in Boulevard. He said even though part of the BLM mission statement is "improve these lands", Presidential directives can override the mission statement and change its meaning. The downgrading of McCain Valley/Lark Canyon is an example of this. To me, this is similar to downgrading God. The animals affected by these projects have no voice and no choice. Land has been purchased for the bighorn sheep in another region. The local bighorn sheep cannot be given a map to access this land. A Manzanita tribal member told me that there are hundreds of bighorn sheep on the reservation and they were sorely miscounted. My husband commutes to work down Interstate 8 which travels through the locations of many of these projects. Many times he has seen herds of bighorn sheep visible from the highway. Some Border Patrol agents that I talked to have also had sightings of bighorn sheep. Just this year, two Jacumba residents saw two bighorn sheep on the corner of Interstate 8 and Kitchen Creek Rd. As an example of the disturbances to the natural environment, when the new border fence was put up in Jacumba the herd of burros that came across the border to get water could no longer cross the border so for about a month they stood on the other side of the fence and brayed. This does not even cover what happened to the bighorn sheep that migrate in this area or the other animals who might have been affected. Golden Eagles and other birds of prey as well as bats and other birds were not observed for a long enough period of time. At the last meeting in Boulevard, Ewiiapaayp tribal members attended. They gave tearful testimonies of the Golden Eagles which are spiritual and religious symbols to them. They felt that even one death was not acceptable. Even though their tribe would profit from this project, the tribal members that attended did not want any of the wind turbines on their reservation. They also felt that any turbines on the adjoining land were unacceptable. In fact, the tribal members present thought that the whole Tule Wind Project was

too much of a risk. They were not willing to endanger the Golden Eagles currently inhabiting this area. One tribal member said that they had 80 years of history in a journal to prove the Golden Eagles activity in the area. We live about 5 miles East of the current Kumeyaay wind farm and about 3 miles West of the proposed Tule Wind farm. In the recent years, we have noticed a sharp increase in the number of birds, from as small as hummingbirds to as large as birds of prey, with no feet, missing feet, no legs, one leg, and badly damaged wings. We have taken photos of some of these birds. No one in the area has any other explanation for this weird phenomenon other than turbines or power lines. The representatives for the Tule Wind Project stated that they count the number of fallen dead birds around turbines at their other projects. This does not account for predators carrying off the dead creatures, or birds who flew away then died, or for injured birds. Another strange occurrence has been multiple sightings of dead foxes on the two-lane roads in our community. The sightings started right after the beginning of the PowerLink project. The Quino Checkerspot butterflies do not stand a chance. If the projects are eventually decommissioned, they promise to return the land to its original form. I talked with BLM and they agree that there may always be scars and that in an arid desert community the chances of the land ever returning to its original form are rare. The turbines cannot be recycled after they are decommissioned. This project is an attempt to save the environment by doing so they are destroying the environment. Our own communities are not the only affected areas. In foreign countries where the magnets for the turbines are being made pollution is overtaking farmlands. <http://www.dailymail.co.uk/home/moslive/article-1350811/In-China-true-cost-Britains-clean-green-wind-power-experiment-Pollution-disastrous-scale.html>

Other environmental friendly options

Some quotes from an article by Douglas Fox, a reporter: "Low-tech actions such as weatherizing homes and installing more efficient water heaters could reduce household carbon emissions by 20% within 10 years." and "The greenest technology that we could devise in the foreseeable future might just be well-designed programs that take the guesswork out of home and appliance upgrades." CO2 emissions have not been reduced at all by using wind power. Cost increases with backup maintenance and transmission. Aboveground transmission and/or collector lines are high risk in the backcountry and should be avoided. Local rooftop and other solar are cheaper, quicker, and have little environmental impact.

ES J

This is a SEMPPRA Generation company. Their plan is to harvest energy from wind turbines but they will not guarantee that the power they bring over the border will be from wind turbines.

Currently, the border is a danger zone especially for Border Patrol and law enforcement officers. Visitors in Mexico must take special precautions. There are many reasons for the current unrest including the inability to control drug cartels. Drug cartels make more money coming across the border, than SDG&E will make on all of its projects. If there is a loophole to crossing the border, they will find it. There is also a threat of terrorism. The local Mexicans will not receive anything from this deal except a one-time lease. This project would take a Presidential permit which would override any safety or security issues. We should probably be asking why SEMBRA would build a project like this in Mexico at this time. The real reasons would probably include the easier access to permits and lack of codes as well as the lack of competition, the easy outsourcing, and the ability to create environmentally efficient energies and resources while destroying habitats outside of your own country. This really doesn't solve anything. America should be leading in stewardship.

Lessons from PowerLink

SDG&E refused to commit to renewables on PowerLink. Presiding CPUC Commissioner Diane Grueneich voted against approving PowerLink because SDG&E refused to commit to putting any renewable energy on the line. There needs to be a guarantee of green energy when projects come in. The costs SDG&E is spending on the PowerLink (\$10 billion) could have been spent for local rooftop solar projects. They are quicker, cheaper, and have little environmental impact and no footprint. SDG&E set up Community Council meetings to be held every month to keep the residents informed. They have not been held since last May. When SDG&E representatives are asked questions, they promise to come back with answers but they never did. When you write letters, the answers that come back are just generic and do not answer the question. Cameron Durckel, at the last Planning Group meeting, was given another list of questions, most of the questions had been asked before. These are questions important to our community. He didn't even bother taking notes. He didn't attend February's meeting. He didn't bother to email the answers to the questions either. He's supposed to be the community's contact with SDG&E. The power loss on that length of line is significant. None of the power will be being used in the local area. SDG&E has already put out notices of power outages in the Alpine area that last from 6 to 8 hours. Not all of the affected consumers have generators. There are no posting in Jacumba or Boulevard to inform the community about their construction. A quote from Don Haines, an SDG&E representative, in relation to the PowerLink "is a ridiculous serpentine thing, craziest thing you've ever saw." He also said that SDG&E didn't want the southern route and didn't think it was a good idea but they would be building it anyway. They promised local jobs for the Sunrise PowerLink but their definition of local jobs is anywhere in the Imperial and San Diego counties. When the project started and no locals were hired, SDG&E explained that they needed to hire union workers. When locals went to the Union, the Union stated that you cannot be site-specific. You would have to work where they send you. SDG&E has built a batching plant out here but have not hired any locals to man it. Many of the construction trucks

working on the PowerLink have Missouri, Arizona, and Texas license plates. The work is being outsourced from the state. The former governor came to one of the building yards for a ribbon-cutting ceremony before any permits had been obtained. The governor said this project would prevent power outages and brownouts and provide jobs for local communities. There haven't been any brownouts for years. The population of California has been moving out due to the poor economy. This is an example of how one project has not lived up to its expectations. Nine other projects are spouting the same lines but will they guarantee anything?

Sempre likes to believe that the Sun rises for them.

Solar and other options

"Wisdom is good with an inheritance: and by it there is profit to them that see the sun. For wisdom is a defense, and money is a defense; but the excellency of knowledge is, that wisdom giveth life to them that have it. – Ecclesiastes 7:11-12

"If there is a ray of hope here, it could be one that travels 186,000 miles per second – sunlight."
– Douglas Fox, reporter

Solar leaves no footprint when on:

- building
- walls
- parking lots
- etc.

"Of all the renewable energies, only solar can do the job single-handedly. Capture just 1/1000 of the sunlight that reaches our planet's surface and we can replace our entire use of fossil fuel."
– Vaclav Smil, an energy scientist at the University of Manitoba

Solar may be expensive but as it is more effective it would prove to be a savings in the end. The billions of dollars that are being spent on infrastructure and other projects which cause greater fire risks and leave larger footprints, could be used for creating a more reliable solar industry. Solar can make energy more reliable wherever it is.

Turbines

In a recent survey individuals voted on whether we should rely on more wind energy. 35% said yes. 65% said no. There is obviously a lack of trust in the effectiveness of wind energy.

"Turbines are too inefficient to help the environment. Ever wonder why sailing ships no longer apply the oceans with goods and passengers? It's a question wind energy advocates must ask themselves. They ignore the fact that the wind doesn't blow consistently and that its intermittent nature makes wind an unpredictable source of power and restricts wind generators from consistently reaching their potential."

<http://www.baltimoresun.com/news/opinion/oped/bs-ed-wind-skeptic-20110207,0,341520.story>

"There is nothing in which the birds differ more from man than the way in which they can build and yet leave a landscape as it was before." – Robert Lynd, *The Blue Lion and Other Essays*.

None of these projects will guarantee that there are no adverse health effects. As for our family we live, work, and volunteer in this community. This addresses only three projects. There are more than nine projects being planned or constructed in our area. As a family, we are not looking forward to any of them. We will not be benefiting from any of them. The benefits these projects will have are strictly for investors. The amount of environmental help they will provide is inconsequential and not guaranteed. When these projects are decommissioned, what they have taken away will never come back.

John Gibson of Hamann companies (Tule Wind Project) wrote "it is hard to conceive of a vocation in California that would have much less impact on the community. It would appear that if this area were not available for such use, then the only option would be to have no project

whatsoever, anywhere." He is correct. It would not impact our community; it would erase it. Our whole way of life will be adversely impacted.

All the above statements are our family's reasons for supporting a "No Project" stance.

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