

STEVE WASHER

name

2948 RIBBONWOOD RD. BLDG. C.

address

MAR 10 20

3/7

_____, 2011
date

Mr. Iain Fisher, CPUC
Mr. Greg Thomsen, BLM,
c/o Dudek
605 Third Street,
Encinitas, CA 92024

Draft EIR-EIS Comments/ Opposition: Tule Wind, ECO Substation, Energia Sierra Juarez

Dear Mr. Fisher and Mr. Thomsen,

This letter is being provided to ensure that our concerns and strong opposition are documented in the record for these large wind turbine, substation, and power line projects that your agencies are reviewing as the Proposed Project, alternative projects, and cumulative projects. We may need to join in filing a future lawsuit for damages related to nuisance, loss of property value, quality of life, the use and enjoyment of our property, and other potential adverse effects.

We reside in the neighborhood off Ribbonwood Road north of I-8 , in Boulevard. When we moved here, this was a beautiful and quiet place to live and to invite family and friends to join us. Easy access to our adjacent public lands in the McCain Valley Resource Conservation and Recreation Area has been added benefit of living here. All that has changed and we are now very concerned for our own future and that of our neighbors, pets, livestock, and the local wildlife.

We are already impacted by the existing Kumeyaay Wind turbines on the Campo Reservation 2 miles or so to the west of us. We hear and feel the thumping of the giant blades that sometimes disrupts our sleep and creates a nuisance. We also deal with the visual blight of the whirling blades skyline on the ridgeline and the day and night strobe and aviation lights--none of which seem to work properly since the catastrophic failure of all 25 turbines in December 2009. Those almost 4 months of turbine downtime were some of the best days and nights we have had since the turbines started operation around 2005.

A moratorium on industrial wind turbine projects should be initiated by local state, and federal agencies, unless and until science-based peer reviewed health and safety tests are conducted to determine a safe setback distance. To date, those studies have not been done and industrial wind energy supporters cannot claim otherwise.

You are now reviewing three energy projects, along with the additional proposed wind turbine projects on the Manzanita and Campo Reservations and Greg Lansing's ranch lands on Ribbonwood Road and Jewel Valley Road. The Jordan / Enel Jewel Valley Wind Project on Ribbonwood Road would be within several thousand feet of our neighborhood homes. San Diego Gas & Electric's large 500 kV Sunrise Powerlink towers and lines will also be installed all along the eastern edge of McCain Valley Road east of us, and will also loop around to the north and west of our neighborhood, placing us down wind of many potential turbine, power line, and /or substation related fires / firestorms.

H1-1



The up to 134 Tule Wind turbines, that will stand almost 500 feet tall, are planned to be installed approximately 1 mile from our home along the top of the ridge just east of our property, and to north at across the top of McCain Valley.

The new Tule Wind 138 kV transmission line is also planned to run right next to the Sunrise Powerlink lines along McCain Valley Road, *or along the western edge of the BLM project site* and ridgeline to the north east of our home.

A new 5 acre substation and 5 acre operation and maintenance building, for the Tule Wind project, are also planned for private land on McCain Valley Road, or for the Rough Acres Ranch property just to the southeast of us.

Ribbonwood Road, our only access road, will be the adversely impacted by the related Project construction traffic, noise, and road damage from overweight vehicles and equipment. Our quiet neighborhood road will become an industrial highway of sorts, creating much more dangerous and invasive conditions for local residents.

There are several main concerns that we want your agencies to address and respond to:

1) Increased risk of fire; increased fire insurance rates or total loss of coverage due to new high risk development near our home; reduced fire fighting access due to increased potential for electrocution to fire fighters. Power lines, wind turbines, substation transformers can all start fires. This can translate into a life or death situation for us, with only one dead end access road and limited local fire fighting staff availability, equipment, and funding.

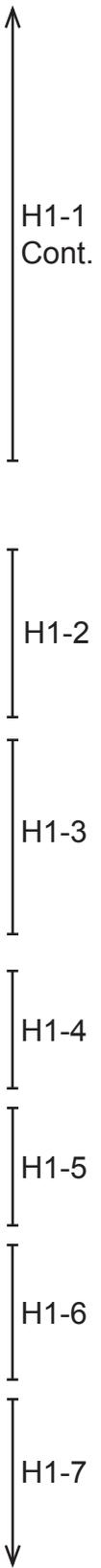
2) Noise and low frequency pollution from industrial wind turbines, some below the level of human hearing, can and does make people and animals ill when turbines are placed too close to homes, livestock, and sensitive wildlife areas. It has been reported that families have even abandoned their homes to escape the unbearable living conditions that are inflicted by these power generating turbine. Increased medical expenses and long-distance round trips for medical attention can really add up. Impacts to pets and livestock can also be severe and expensive.

3) No safe distance has been scientifically determined for industrial wind turbine set-backs. We do know that we don't want them anywhere near our home or the homes of other families. They should be placed miles and miles away from any occupied buildings, livestock, public recreation areas, campgrounds, and protected wildlife areas.

4) Electrical pollution, stray voltage, has been documented in and around other wind turbine and substation projects and homes within 1,800 feet and much more. There are indications that wind turbines and the substations that serve them are more prone to generate electrical pollution due to the intermittent nature of the energy they produce.

4) Shadow flicker from turbines can extend several thousand feet during certain times of day and can create a harmful pulsing light effect that can result in vertigo, seizures, or other adverse effects. That strobe effect also has adverse effects on pets, livestock and wildlife. Our home and property will likely be impacted during the late afternoon and evening hours.

5) Property value losses are being recorded at other wind turbine projects. We join others in requesting that Tule Wind be required to enter into binding Property Value Protection Agreements to ensure that we do not suffer lost value or the inability to sell our property, if rendered necessary, due to the adverse impacts generated by the proximity of their massive wind turbines, power lines, and substations that will surround us. Their current



wind testing equipment, highly visible from our homes and neighborhood, must be disclosed to potential buyers.

H1-7
Cont.

6) We are requesting that any project approvals include binding contractual agreements for adequate and ongoing funding for third party unbiased pre-construction testing for ambient noise, low frequencies and infrasound, and dirty electricity levels to be taken both inside and outside our home and at all our property lines. We are also requesting ongoing monitoring and enforceable compliance guarantees that include shutdown of non-compliant turbines--in the event these projects are approved over our objections.

H1-8

7) The County noise ordinance and turbine setbacks are currently inadequate to protect public health and safety and cannot be relied upon for these projects. Compliance with those standards, as stated in the Draft EIR/EIS will NOT insure against the generation of a nuisance. Your agencies must address this issue. Our rural ambient noise levels are much lower than stated in the Draft EIR/EIS. Complaints have been generated at other wind energy projects with only minimal increases in noise levels. All ranges of noise levels, audible and inaudible need to be documented at pre-construction levels--and protected for public health and safety.

H1-9

8) We also have concerns over adverse impacts to both the quality and quantity of our well water. Tule Wind will be clearing, grading, and blasting for turbine footings and new access roads. They will also be drawing large amounts of well water from several wells on Rough Acres Ranch for cement batch plants and other operational uses. Their turbines, substation, transformers, and maintenance buildings will contain hazardous fluids that can spill or leak into the water table. Our water levels should be documented by a licensed unbiased third party prior to commercial uses at nearby wells. We have no economically viable alternative source of water available to replace what we currently have. Cumulative impacts include the Sunrise Powerlink and other projects proposed in this area.

H1-10

9) Day time strobe lights and red blinking night lighting on the turbines and some of the transmission towers will create another nuisance both day and night ,and take away from our beautiful dark night sky, one of the few left in Southern California.

H1-11

In short, we strongly object to and oppose the introduction of any additional commercial industrial scale wind turbines, the related infrastructure and power lines, and all the adverse impacts that go with them, into our quiet rural neighborhood.

Any approvals of such would constitute a nuisance based on bulk and scale, blinking lights, noise levels (including low frequency and infrasonic), disruption to the peaceful use and enjoyment of our home and property and the very real potential for adverse health effects. While ignored, denied, and dismissed by the wind energy industry, growing evidence documents that some home owners have been bought out by wind energy companies due to undeniable adverse effects. The problems are real and must be addressed by your agencies prior to any project decisions.

H1-12

We strongly support and encourage the efforts of Backcountry Against Dumps to protect and defend our rural community from the unnecessary, expensive and invasive commercial industrial energy projects, including potential future litigation.

Sincerely,


signature here

*additional comments -
on Back.*

cc: Donna Tisdale
Backcountry Against Dumps
PO Box 1275, Boulevard, CA 91905

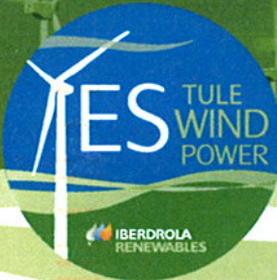
The noise from the komeys windmills
is apparently a bearing is out in one
of the units. It sounds terrible like
yapping animal

I brought this to service men ^{Attention} driving
your trucks they told me they'd
look into it, nothing has been
done. come over and listen.

These windmill are only maybe 5 yrs
old.
I feel they will not last 20 yrs
with the service they receive

I cannot see any more windmill coming
here, Boulevard is not a utility corridor
keep them in Oregon

H1-13



YES! We want the Tule Wind Power Project!

MAR 22 2011

Name: KG Golly
 Address: 32404 Evening Plumrose Trl
Campo, CA 91906
 Phone Number: 619-254-6606
 E-mail: bolesso@gmail.com

CASE NO: DOI-BLM-CA-D070-2008-0040-EIS

To the California Public Utilities Commission and the Bureau of Land Management:

We want wind power!

KG

H2-1

MAR 28 2011

Iain Fisher, California Public Utilities Commission
Greg Thomsen, Bureau of Land Management
c/o Dudek
605 Third Street
Encinitas, CA 92024

Re: Proposed Tule Wind Power Project

Dear Bureau of land Management and California Public Utilities Commission:

I live in San Diego County for 30 years and urge you to certify the EIR/EIS for the Tule Wind Project.

The wind resource in McCain Valley is rare and valuable, and I feel confident that the mitigation measures proposed in the EIR will address the issues of concern. I ask you to keep the Tule Wind Power Project at its currently proposed size.

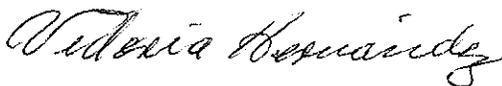
If we are going to commit to renewable energy, the time to do so is now. We cant afford to delay bringing jobs, revenue and responsible renewable energy resources to our communities.

I am in pro of keeping nature wonders and using wind will avoid large amount of contamination against nature

As a resident of San Diego County, these issues are important to me. I urge you to certify the EIR/EIS and allow the Tule Wind Project to proceed as proposed. The impacts to our community will be far greater if this does not move forward.

H3-1

Sincerely



Victoria Hernandez Raya
2640 Inyaha Ln
La Jolla Ca 92037
858-6886384



County of San Diego

ERIC GIBSON
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/dplu

March 30, 2011

Iain Fisher
California Public Utilities Commission
c/o Dudek
605 Third Street
Encinitas, California 92024

ADDITIONAL COMMENTS ON THE JOINT DRAFT ENVIRONMENTAL IMPACT REPORT AND STATEMENT FOR THE SDG&E EAST COUNTY SUBSTATION, TULE WIND, AND THE ENERGIA SIERRA JUAREZ (ESJ) GEN-TIE PROJECTS

Dear Mr. Fisher,

The County of San Diego (County) reviewed the Joint Draft Environmental Impact Report and Draft Environmental Statement (DEIR/DEIS) published December 24, 2010, for the above listed projects. The County provides these comments as a Responsible Agency under the California Environmental Quality Act (CEQA) and as a Cooperating Agency in accordance with the National Environmental Policy Act (NEPA). The County completed further review of section 15 of the Draft EIR (DEIR) prepared by DUDEK, dated December 2010. In conjunction, we have reviewed the revised fire protection plan, dated February 2011(received March 3, 2011), and prepared by RC Biological, Inc. for the Tule Wind Project (See Attachment A).

H4-1

SIGNIFICANCE CONCLUSIONS OF IMPACT FF-2 DISCUSSION

The Draft EIR denotes on page D.15-56 that despite the implementation of the proposed mitigation measures FF-1 through FF-5, Impact FF-2 "remains adverse due to the impact created by the presence of the wind turbine facility and the corresponding increase in the probability of a wildfire. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I)."

H4-2

Many meetings and discussions have been held between Iberdrola Renewables, SDCFA, CAL FIRE and SDRFPD with the goal of reducing the risk of a wildfire being caused by the projects, and mitigating the impacts if a wildfire were to occur. These meetings and discussions resulted in the development of an extensive array of Project Design Features (PDFs) and mitigation measures which we believe reduce the impact of the projects to a level below significance (Class II).

Some of the proposed PDFs that would reduce the risk of a wildfire include the following:

- The nacelle housing and turbine blades would be constructed of non-combustible or difficult to ignite materials.
- The turbines would be monitored at all times with the ability to power down the turbines at the first sign of trouble.
- The lubricant oils for the turbines would be non-combustible or have a high flash point.
- The turbine in the nacelle and the associated electrical equipment would be equipped with an automatic fire extinguishing system.
- Electrical equipment associated with the turbines would be protected with arc flash mitigation relays, which greatly reduce severity of a flash should an electrical malfunction occur.
- Ongoing hazard/fire safety training for all staff.
- Provision of two Type-6 inserts in pick-up trucks to be used as an industrial fire brigade for the project site. Staff would be trained in basic wildland fire techniques.
- Combustible vegetation would be modified per County Fire Code standards in an area of 100 feet around all turbines and structures and 30 feet along all roadways.
- The majority of 34.kV collector lines would be installed underground.
- On-site personnel and personnel at IBR's command center would have contact names and phone numbers of emergency personnel in the event of an emergency.
- Five water storage tanks for fire suppression would be provided at locations throughout the project.

In addition to addressing onsite project design features, there was much discussion on how to mitigate offsite impacts if a wildfire were to occur as a result of the project. If a wildfire were to start as a result of a fire in the nacelle of a turbine or from downed high voltage power lines, the fire could run for 40+ miles to the west through vegetation—some of which has no burn history, and much of which has not burned in 40 years since the Laguna Fire of 1970—threatening the communities and cities in the East and Southeast County. The vast majority of land between the proposed project and developed communities is classified as a Very High Fire Severity Zone—as determined by CAL FIRE FRAP mapping—and is steep in topography with very limited fire department access. The Laguna Fire of 1970 originated 5 miles west of the northwestern edge of the proposed Tule Wind Farm project and burned to the eastern



H4-2
Cont.

H4-3

edges of El Cajon and Spring Valley, consuming 190,000 acres, destroying 382 structures and causing the deaths of 5 people.

Today, there are approximately 16,860 homes located within the adjacent continuous fuel bed, and if a wildfire were to occur, the results could be catastrophic. However, this baseline risk exists today without the proposed project. The project is proposing additional mitigation to address this current baseline risk. One of the many lessons learned from the 2003 and 2007 wildfires in San Diego is that structures with adequate defensible space have a much greater chance of surviving a wildfire. Furthermore, in SDCFA's experience, when fire code inspections result in the issuance of a notice of violation for failure to maintain proper defensible space, property owners correct the violation approximately 80% of the time. After a second notice, but before abatement proceedings are begun, 98% to 99% of property owners correct the violation. Consequently, code inspections are an effective tool for reducing the risk of loss from wildfires.

H4-3
Cont.

One of the mitigation measures being proposed would significantly increase the SDCFA's ability to conduct defensible space inspections, and if necessary, abatement of the hazard. The project would provide proportional funding for a permanent, full-time Fire Code Specialist II position at the SDCFA. The person filling this position would do inspections of the homes for compliance with defensible space requirements. Additionally, the project would provide proportional funding for four part-time reserve and/or volunteers to perform defensible space inspections for up to 90 days a year. The funding for the additional staffing would allow the SDCFA to perform approximately 6,000 additional defensible space inspections every year. These mitigation measures would significantly reduce the baseline fire risk and would offset any additional risk of wildfire posed by the proposed project. These mitigation measures would also provide a mechanism for addressing cumulative risk of future wind projects in the vicinity, such as the Padoma, Manzanita and Campo wind projects studied at the programmatic level in the Draft EIR.

H4-4

The cost for the Fire Code Specialist II position is about \$120,000 per year in 2011. The cost for the four part-time positions for 90 days is about \$18,000 per year in 2011. The funding should be provided by each applicant to the SDCFA through their respective Development Agreements which must be executed prior to construction of any part of the project.

MM FF-4 TULE WIND PROJECT FIRE PROTECTION PLAN

We reviewed the revised fire protection plan, dated February, 2011, prepared by RC Biological Consulting, Inc. for the Tule Wind Project. The FPP has offered additional onsite and offsite mitigation in addition to the considerable number of project design features previously proposed. We agree with the FPP conclusion that the project's impacts have been reduced to a level below significance and, therefore, we accepted the fire protection plan for the Tule Wind Project.

H4-5

Additional clarification on the following items is requested:

There are many inconsistencies between the Applicant Proposed Measures (APMs) in the DEIR and the Mitigation Measures (MMs) in the Fire Protection Plan accepted by the SDCFA. These discrepancies should be resolved.

MM FF-1 is a deferred submittal, but is offered as mitigation. By deferring preparation of the plan, we cannot evaluate the effectiveness of the proposed mitigation. This plan should be submitted concurrently with the DEIR either as an attachment or separate submittal.

MM FF-3 is to provide development agreements for the projects with the SDRFPD and the SDCFA. To date, only the Tule Wind Farm project has entered into a development agreement with the SDRFPD, and Tule Wind Farm is in the process of creating an agreement with the SDCFA. The ECO Substation Project and the ESJ Gen-Tie Project have not made progress in creating development agreements.

MM FF-4 is to create a customized fire protection plan for the project. To this date, no fire protection plan has been submitted for the ECO Substation Project.

Pages D.14-22 & 23 stipulates that all three projects comply with the travel time requirements of the County General Plan. Unmanned electrical generation facilities and transmission lines usually are not evaluated for compliance with this General Plan requirement. Both the ECO Substation and the Boulevard Substation are on County lands, and their locations comply with the travel time requirements of the General Plan. The project is located in a Rural Land Use Category and the General Plan allows a maximum travel time of 20 minutes from the nearest responding fire station to the development. The portion of the Tule project that is in the County's land use jurisdiction is consistent with the General Plan travel time standard. Other portions of the Tule project are not consistent with the travel time standard, but the two fire agencies that will serve the project approved a Fire Protection Plan for the entire project and agreed to provide fire service for the project, the project includes significant design features and mitigation measures to reduce the fire risk and these portions of the project are located on land that is outside of the County's land use jurisdiction, such as BLM land.

Page D.15-48, second paragraph states "Wind turbines in California annually result in 35 turbine generator related fires (IAEI 2010)". Research conducted by Iberdrola Renewables has found the source of the information cited in the article to be unsubstantiated. We agree with Iberdrola Renewables and this sentence should be removed.

Page D.15-54 notes the Tule Wind Project "would result in potential ignition sources adjacent to wildland fuels in an area with a history of wildfires and over 2,000 inhabited structures in the vicinity". This sentence dramatically understates the baseline risk. The project would be located within a very large continuous bed of old combustible vegetation where there are now approximately 16,860 homes and steep topography with very limited fire department access.

H4-6

H4-7

H4-8

H4-9

March 30, 2011

The County appreciates this opportunity to provide comments on the DEIR/EIS and looks forward to working with the CPUC to resolve any questions that may arise from the provided comments. If you have any questions please contact the County Project Manger Patrick Brown at (858) 694-3011, or by email at: Patrick.Brown@sdcountry.ca.gov

H4-10

Sincerely,



RICHARD HAAS, Assistant Director
Department of Planning and Land Use

Electronic Attachment:

- A. Tule Wind Fire Protection Plan, dated February 2011(received March 3, 2011), and prepared by RC Biological Consulting

cc: Alberto Abreu, Director Project Development, Sempra Generation, 101 Ash Street, HQ14A San Diego, CA 92101
Tule Wind Development LLC, Jeffrey Durocher, Iberdrola Renewables, 1125 NW Couch Street Suite 700, Portland, Oregon 97209
Donna Beddow, Planning Manager, Department of Planning and Land Use (email)
Rich Grunow, Chief, Department of Planning and Land Use (email)
Patrick Brown, Project Manager, Department of Planning and Land Use (email)
Mark Mead, Senior Deputy County Counsel, Office of County Counsel (email)
LeAnn Carmichael, Department of Planning and Land Use (email)

The attachment provided electronically by the County of San Diego (Tule Wind Fire Protection Plan) can be found on the project's website under the Volume 4, Comment Letters Received heading, E.1, Applicant Attachments Provided by Iberdrola Renewables