

BACKCOUNTRY AGAINST DUMPS

PO Box 1275, BOULEVARD, CA 91905

California Energy Commission

DOCKETED

09-RENEW EO-1

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TO: docket@energy.ca.gov

FROM: DONNA TISDALE AS AN INDIVIDUAL AND FOR BACKCOUNTRY AGAINST DUMPS (BAD)
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RE: COMMENTS ON DRAFT DRECP NEPA/CEQA EIR/EIS; DOCKET NO.09-RENEW

EO-01; These comments are not complete , well organized ,or fully edited, due to lack of adequate review time, overlapping major project reviews and comment deadlines, including Imperial County's Renewable Energy and Transmission Element DEIR and numerous large scale Imperial County solar projects including Seville Solar, Wistaria Solar, Iris Cluster Solar & the 140MW Soitec Solar/160MW Energy Storage project in Boulevard, San Diego County—all of these controversial solar projects have now been approved over strong and well documented objections.

While I reside at Morning Star Ranch in Boulevard in Eastern San Diego County, I am an Imperial Valley Native, an Imperial Valley farm land owner, and a member of an extended multi-generational farming family that has been farming in California for over 120 years, with over 60 years in Imperial Valley--after being displaced by urbanization in Orange County. Imperial County is known for its unique heritage, bountiful resources, globally important production of food and fiber, and its generally wide open scenic vistas of productive fields, iconic desert landscapes, and for extensive recreation opportunities—all of which are placed at risk by the DRECP proposed Preferred and other Alternatives.

Backcountry Against Dumps is a public benefit non-profit group, based in Boulevard that I co-founded in the late 1980's to help protect and defend rural communities and resources from unsafe facilities and projects. These comments were authorized by our Board of Directors. They are in addition to those filed by Volker Law and various group members.

I am also the elected Chair the Boulevard Community Group, an unpaid elected community planning group that provides advisory land use recommendations to San Diego County Planning and Development Services and the Board of Supervisors. Like many Imperial County and other rural communities, Boulevard has been overwhelmed with industrial scale energy / transmission project applications put forward by monopoly utilities, local, national, international, and foreign companies. These destructive, life, and landscape altering projects are generally supported by policy driven and politically pressured public agencies and co-opted elected officials--over our justified and well researched, documented, and strenuous objections and *feasible alternatives*.

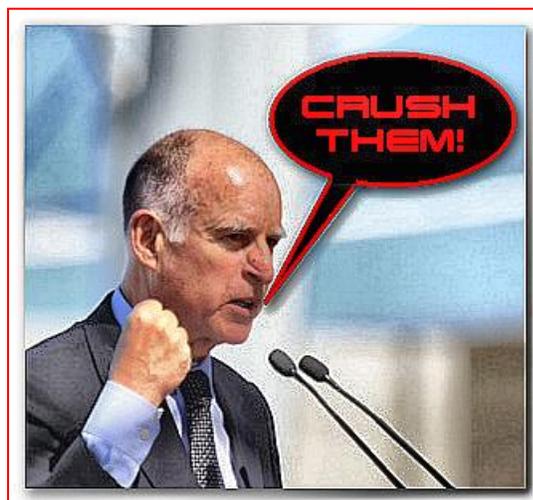
The comment extension from January 9th to February 23rd was appreciated but is still vastly inadequate for the scale and scope of the DRECP documents and data. The Draft EIR/EIS is difficult for the average citizen to navigate, comprehend, and comment on—especially with the limited amount of time allowed to do so. It should be revised and re-circulated for an extended public review.

The Draft DRECP plan supports outside interests and profits at the long-term expense of local interests, sustainability, public health and safety, quality of life, and life-time personal investments in residential / agriculture and other impacted properties.

- We strongly support the recommendation for a real distributed generation point-of-use alternative on new and existing structures, facilities and parking lots, that better protect valuable agriculture and open space resources and does not require hundreds of miles of new high voltage transmission infrastructure.
- Imperial County farmers and Supervisors have rightly expressed the need to pursue and ensure better protections for Imperial County communities, agriculture and other resources, water rights, taxpayers, and rate payers—beyond the already permitted industrial solar projects on approximately 20,000 acres of the Valley’s irrigated lands and two projects located on abandoned farm lands.
- It is biased and unfair to count the alleged benefits of the DRECP while dismissing and/or failing to recognize and analyze the real world adverse impacts generated by the conversion of non-renewable productive farm land and undisturbed desert lands and recreation areas into energy sprawl / rural sacrifice zones.

Environmental Justice: Disproportionate, cumulatively significant, and adverse impacts to predominantly low-income communities:

- Due to limited time and resources, these comments are focused on Imperial County and rural Eastern San Diego County communities /areas which have already been disproportionately and adversely impacted by numerous unnecessary and poorly analyzed and mitigated commercial industrial scale renewable energy/transmission projects located on productive farmland and sensitive high desert lands –far too close to existing homes, ranches, recreation areas and sensitive wildlife.
- Our own Governor Brown apparently perceives impacted and predominantly low-income rural communities as “the opposition” and made biased and unjust statements at SDG&E’s Suncrest Substation ground breaking that we must be crushed! He has made similar rude, unnecessary, and aggressive comments at the Sunrise Powerlink groundbreaking in Boulevard, and elsewhere.



- In Eastern San Diego County these projects have been proposed and /or approved for lands that have no commercial or industrial zoning.
- Harmful community plan amendments and invalid overriding considerations have repeatedly been approved over strong community goals, visions, objections, and documentation.
- These biased approvals and overrides are unjust and strongly biased towards developers who tend to receive very lucrative tax relief credits, incentives, waivers, at the expense of resident tax payers in predominantly low-income communities.

DRECP Plan area—is confusing regarding San Diego County:

- Over 2.78 million acres of Imperial County public and private lands are listed in Table 1
- **Table 1** also lists 268,000 acres of private land in San Diego County and only 200 of public lands.
- However, San Diego County is not listed as a stakeholder.
- Full inclusion of REAT CREZs in San Diego County is unclear.

1.2 DRECP Planning Goals are unclear

- Renewable Energy Goals bullet # 6 @Executive Summary page 14 : *“Build on the Competitive Renewable Energy Zones identified by the Renewable Energy Transmission Initiative”*
- San Diego County includes several Competitive Renewable Energy Zones including CREZ 26 in the Boulevard Planning Area and CREZ 27 in north central San Diego County.
- It is not clear if these Zones are included in the DRECP in one form or other manner.

Biological Goals—collide with real world impacts:

- *“Locate renewable energy development covered by the DRECP on disturbed lands in areas with low biological conflict...”*
- The Preferred Alternative Development Focus Areas include virtually all of Imperial County farmland.
- The conversion of farmland and the loss of irrigated fields, and loss or related tail water in drains and flows to the Salton Sea have far reaching impacts to carbon sequestration, air quality, open space, and wildlife habitat and foraging areas.
- The numbers and wide variety of resident and migratory avian and other species that use irrigated farm land and related irrigation/ drain resources is staggering and must be fully recognized and addressed.
- Reports from biologists and others working on Imperial County energy /transmission projects indicate that the direct and indirect loss of wildlife during construction and operation is much more than expected.
- Impacted species include Flat-tailed horned lizards, and a wide variety of birds including a dead Yuma Clapper Rail, and water birds.
- Workers on the Sunrise Powerlink reported large numbers of Yellow Warblers found dead on the ground under new and energized lines in Imperial County.
- I personally found and reported a dead Turkey Vulture that had collided with the Sunrise Powerlink in McCain Valley in Boulevard.

- It is our opinion that the so-called climate change adaptation research and management objectives and /or policies are biased towards industrial scale energy projects that denude valuable habitat, release carbon stored in chaparral and desert soils, and suck up vast quantities of vanishing sole source groundwater resources.
- **Tri-colored blackbirds migrate through the Boulevard /Jacumba area and have been documented in Jacumba Hot Springs and at the Tisdale’s Morning Star Ranch, and in Jewel Valley area of Boulevard.**



- Golden Eagles have also been documented in the Boulevard/Jacumba area and in the Ocotillo /Mountain Springs/Table Mountain and cross-border Sierra Juarez areas.
- The Great Horned Owl (below) is silhouetted on a boulder at the Tisdale Morning Star Ranch with the MET tower (behind him) for the now withdrawn Shu’luuk Wind turbines proposed by Invenergy on Campo tribal lands. Even the guy wires can be hazardous to avian collisions.



- Early data from a new Golden Eagle tracking projects in South San Diego County showed Golden Eagle territories were more than expected, from 45 to 340 square miles, traveled by one of the tracked females, and avoidance of urbanized areas like Ramona¹.
- On February 12, 2015, the American Bird Conservancy submitted a new updated Petition for Rulemaking on “Regulating the Impact of Wind Energy Development on Migratory Birds”² to Secretary of Interior Sally Jewel, including new science to advance the protection of migratory birds under the Migratory Bird Treaty Act.

¹ <http://www.sandiegoreader.com/news/2015/jan/15/stringers-eagle-tracking-study-unexpected-data/#>

² http://www.abcbirds.org/PDFs/Wind_petition_letter&petition.pdf

- The USFWS has recommended Eagle Take Permits for Iberdrola’s long-stalled 200 MW Tule Wind project approved in 2011 for the McCain Valley Resource Conservation Area and Recreation Area in Boulevard.

2.1 Energy—Planning for 20,000 Megawatts—must be updated to account for real world impacts:

- The DRECP documents are outdated and do not account for or detail the number and extent of existing, approved and /or under construction renewable energy /transmission projects.
- Enough industrial scale energy /transmission projects have now been constructed that real world figures can and should be collected and used to provide more accurate numbers for the amount of soil that will be moved, and the source and the amount of water used during construction, and operation, and more.
- Enough industrial scale projects are now operational to allow comparison the real world energy production with the predicted production in order to better inform the public and decision makers on any actual value these projects bring in comparison with what is being lost.

2.2 Covered Activities List—inside and outside Development Focus Areas in Eastern San Diego County:

- **Table 2. DRECP Covered Activities** includes transmission-related activities within and outside Development Focus Areas that would be eligible for streamlined review process
- **Appendix K-Transmission** shows that one or two new 500kV lines would be required between SDG&E’s Imperial Valley Substation and San Diego, somewhere along the Sunrise Powerlink route that was a one-time only and belated amendment to BLM’s Eastern San Diego County Resource Management Area and to the Cleveland National Forest land use plan.
- **Table 3. Proposed Covered Species List** appears to be limited to the desert areas while failing to cover many resident and migratory species that use irrigated farmland, ditch banks, drains, and the Salton Sea.
- **Table 3** also fails to adequately cover the DRECP impacted transitional areas between the mountains and the desert floor, including Boulevard, McCain Valley National Cooperative Land and Wildlife Management Area, McCain Valley Recreation Area and adjacent Wilderness Areas, WSAs and ACEC, and Jacumba Hot Springs.
- **The funding-stalled Draft Eastern San Diego County Multiple Species Conservation Plan³** includes maps, eco regions and communities maps⁴, vegetation maps⁵, biology—covered species list⁶ that should be included in the DRECP DEIR/EIS.
- **The Borrego Springs area is also included in the Draft MSCP Plan**
- DRECP related /steam lined impacts to Eastern San Diego County must be clarified, identified, and honestly analyzed.

³ <http://www.sandiegocounty.gov/pds/mscp/ec.html>

⁴ http://www.sandiegocounty.gov/dplu/mscp/docs/east_mscp_ecoregions_8x11.pdf

⁵ http://www.sandiegocounty.gov/dplu/mscp/docs/east_mscp_veg_8x11.pdf

⁶ http://www.sandiegocounty.gov/content/sdc/pds/mscp/ec_species.html

- **Energy Storage Systems (ESS) are not specifically identified in Table 2,** and yet it is a policy-driven direct connection to renewable energy projects with ESS mandates for IOUs and other developers.
- ESS is fairly new and has not even been fully analyzed for hazardous materials, potential for thermal runaway, explosions, toxic smoke, and potential for surface and groundwater contamination during cascading /catastrophic failures.
- **ESS batteries require approximately one full sized cargo container per 1 MW.** For the Soitec Solar projects approved in Boulevard’s Cal Fire designed Wildfire Corridor, 160 cargo containers of batteries are proposed!
- **Our rural communities should not be sacrifices as living laboratory experiments/lab rats!**

2.3 Development Focus Areas and Transmission—controversial new ROWs would be required in fire-prone Eastern San Diego County where existing ROW does will not accommodate new lines.

- This section and related streamlining is alarming to Eastern San Diego County residents who have endured the biased approval and legally challenged Sunrise Powerlink and ECO Substation projects.
- Residents and wildlife have been significantly impacted and displaced by these projects that used up all the existing and new ROW easements through our area.
- The special and controversial ROW Amendment for Sunrise Powerlink through BLM’s McCain Valley Resource Conservation Area and Recreation Area in Boulevard was advertised as a ONE TIME ONLY AMENDMENT /easement.
- A new easement and ROW would be required to accommodate the one or two new DRECP associated 500kV lines through Eastern San Diego County and would be strongly opposed due to disproportionate and significantly cumulative impacts in our VERY HIGH FIRE SEVERITY ZONE.
- A new Sunrise Powerlink ROW was also authorized through a road less area and sensitive fire prone lands within the Cleveland National Forest—that will not accommodate any new lines.
- Boulevard and Jacumba Hot Springs had to fight for real mitigation for increased fire risk, and then had to fight for the specialized electrical fire-equipment, staff, and training, approved as mitigation, to actually be stationed in the impacted communities that asked for it.
- Apparently, no exacting mandates had been included for where that specialized equipment, staffing, would be stationed. As a result, it was originally stationed outside the most impacted areas and residents had to fight to get it back.
- Improvements were needed at substandard and inadequate volunteer fire stations to accommodate the specialized equipment and staffing.
- Why would economic incentives be provided for projects on BLM lands when those are some of the most sensitive lands around?
- **Currently, San Diego Gas & Electric’s Master Special Use Permit⁷** is under review by the CPUC and the Cleveland National Forest. It is designed to allow for an expansion of existing uses and voltages. Cumulative impacts must be addressed.
- Tisdale photo below (left) documents the new and existing **industrial clutter of 230kV and 138kV lines going into SDG&E’s Imperial Valley Substation within the Flat-tailed Horned Lizard**

⁷ <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Management Area of the Yuha Desert (as viewed from Hwy 98 looking north), and new solar energy infrastructure installed where irrigated crops used to grow (right), also on Hwy 98.



- **The Imperial Valley Substation is also connected to both their 500kV Sunrise Powerlink and 500kV Southwest Powerlink** and Sempra's gas-fired power plants located west of Mexicali, BC— *THIS HAZARDOUS ENERGY SPRWAL IS NOT COMPATIBLE WITH RURAL COMMUNITIES AND AT RISK RESOURCES*
- **The photos below document the December 16, 2013 wind turbine fire** that sparked a brush fire at Infigen's Kumeyaay Wind facility located on the Campo Reservation in Boulevard, near homes, Interstate 8, and a Border Patrol Station. Luckily, the fire occurred one day after Santa Ana winds roared through. The burned out turbine was not repaired until 4 months later.



- **In 2009, all 25 - 2.5 MW Kumeyaay Wind turbines suffered a still unexplained catastrophic failure** that resulted in a multi-million dollar lawsuit and the replacement of all 75 blades and electronic components⁸.
- **The discarded non-renewable composite fiberglass wind turbine blades still litter the ground at the base of the Kumeyaay Wind turbines, while a few crushed blades litter the ground at the Jacumba Garage /junk yard in full view of Historic Route 80.**

2.4 Conservation Strategy:

- Again, the Conservation Strategy seems to ignore the impacts to Eastern San Diego County resources and related conservation/mitigation.
- Large sections of the I-8 travel corridor/viewshed /cross-border habitat have already been converted from ruggedly beautiful to urbanized ugly by industrial scale energy/transmission projects between Eastern San Diego County and Imperial County with more impacts proposed by the DRECP.
- The Bighorn Sheep, Golden Eagles and other wildlife have been impacted by Ocotillo Wind, Sunrise Powerlink, Southwest Powerlink, ECO Substation, Energia Sierra Juarez Wind and cross-border power line and more.

Identify Biological Goals and Objectives:

- We repeat the same comments as above regarding inadequate inclusion, analysis, conservation for DRECP and cumulative impact projects located in the Eastern San Diego County area.

2.5: Implementation—requires valid enforcement for justified complaints:

- Implementation and enforcement has been a major issue of controversy and concern related to existing projects located on BLM, tribal, and private lands in Imperial and San Diego Counties.
- Legitimate complaints from impacted residents and recreational users have regularly been dismissed, ignored, and downplayed by industry, agencies, enforcement authorities and elected officials.
- Based on real world experiences there is absolutely no reason to expect any changes or real efforts to protect and defend residents and resources with the DRECP.
- Public outreach has been vastly inadequate. We are not aware of any meetings held in impacted rural communities in San Diego County.
- Valid complaints have been consistently and irresponsibly ignored, as documented by the Ocotillo Wind Destruction Facebook page postings⁹, and Save Ocotillo You Tube videos posted by impacted residents¹⁰--including wind turbine blade throws, turbine fires, desert destruction, dust storms, noise and light pollution. These impacts are no different than those suffered impacted by other industrial wind turbines around the world.
- **The photograph below is just one example of the light pollution generated by Pattern Energy's Ocotillo Wind turbines that have destroyed night skies, circadian rhythms, health and safety**

⁸ <http://www.eastcountymagazine.org/what-happened-wind-farm>

⁹ <https://www.facebook.com/OcotilloWindTurbineDestruction>

¹⁰ <https://www.youtube.com/user/SaveOcotillo/videos>

and the value and enjoyment of private properties. This photo is a poor representative of actual real world visual impacts that can be seen from 20 miles or more around.



3.1 Overview of Preferred Alternative: A real Distributed Point-of-Use Alternative is feasible and should be fully analyzed

- Figure 5: Preferred Alternative is far from preferable
- **We strongly oppose the DFA that includes virtually all of Imperial County’s non-renewable irrigated farmland with senior water rights—one of America’s vanishing bread baskets.**
- Cumulative and cumulatively significant impacts to farming have already taken place with urbanization, fallowing to meet farm to city water transfers, and other mandates that take water away from farms
- We agree with numerous comment letters on the need for a new alternative focused on energy efficiency, conservation and real point of use distributed generation on new and existing structures, facilities and solar shade covers over parking lots.
- “Potential transmission lines from existing substations in Imperial and Riverside County” is an understatement.
- Virtually all DRECP alternatives include one or two new 500kV lines through sensitive lands, critical habitat and predominantly low-income communities
- Other new high-voltage gen-ties will be required.
- **The Tisdale photo below documents the destruction related to SDG&E’s 500kV line and new ECO Substation 138kV line through the rural community of Jacumba Hot Springs on the route through Boulevard to San Diego. Note the tiny vehicles.**
- Please note that the 500kV line was required to be installed via helicopter to avoid highly erodible soils and steep slopes, while the 138kV line was allowed to grade footings and a new road into the side of the undisturbed desert soils on a steep slope. An incredible amount of water was consumed for construction of these projects—far more than estimated.



3.5 Cost and funding is questionable & can be avoided with new DG alternative.

- The unnecessary and costly conversion of agriculture and desert lands and the DRECP cost estimates of \$1.2 billion to \$2.9 billion for Biological Objectives Mitigation of the Preferred Alternative strongly support public calls for a new alternative for increased energy efficiency and conservation and point of use alternatives.
- Conversion of rooftops and parking lots to solar with clean inverters and battery storage do not require costly biological mitigation or billions of dollars for major new transmission infrastructure.
- The primary funding source is listed as DRECP implementation fees and other unidentified sources of public and private funds
- There is no real guarantee that the number or location of projects that actually move forward within the DRECP boundaries and /or alternatives footprints will be able to support the related conservation, mitigation or monitoring
- There is also the risk of the State of California reversing or denying their promises to help fund certain DRECP aspects/programs when the damages and related costs are much more than anticipated
- We point to the Salton Sea Restoration plans where the State has failed to follow through with obligations /promises and where the flawed EIR has reportedly proven wrong with over 60,000 acres of playa exposed instead of the EIR estimated 16,000 acres.
- On November 19th, the Imperial Irrigation District filed a PETITION FOR MODIFICATION OF REVISED WATER RIGHTS ORDER 2002-0013¹¹, seeking enforcement of the States unfulfilled obligations to restore the Salton Sea related to the historic and controversial QSA for the largest farm to city water transfer that reduced inflows to the Salton Sea resulting increased threats to public health and safety, environmental, and socio-economic well being.
- The SWRCB is soliciting public comments through March 11th regarding the STATUS OF THE SALTON SEA AND REVISED ORDER WRO2002-0013¹² and whether

¹¹ http://www.swrcb.ca.gov/waterrights/water_issues/programs/salton_sea/docs/iid_petition.pdf

¹² http://www.swrcb.ca.gov/waterrights/water_issues/programs/salton_sea/

- The September 2014 **Pacific ‘s Hazard’s Toll: The Cost of Inaction at the Salton Sea**¹³ estimates that continued inaction by the state in meeting its restoration obligation at the Salton Sea could cost up to \$70 billion over the life of the QSA.
- Any DRECP plans to focus solar energy development around the Salton Sea would seem to exacerbate existing and predicted environmental problems by disturbing exposed playa and undisturbed desert soils and creating glint and glare and lake effect issues for resident and migrating wildlife that heavily rely on the Salton Sea. Soil binders have proven inadequate and problematic at most existing industrial scale solar/wind projects—as documented by impacted residents. In some cases, chemical soil binders can be toxic and have on and off-site impacts.
- **Imperial County is already designated as a “serious” PM10 non-attainment area.**

3.6 Action Alternatives

- Converting productive Imperial Valley farmland cannot be considered low biological resource conflict due to the wide variety and number of resident and migratory species that use the irrigated farmland and related canals, drains, and Salton Sea as critical foraging habitat.
- Use of sole source desert groundwater should be prohibited, especially in light of the extensive drought conditions and lack of aquifer recharge that is expected to worsen with climate change.
- The jury is still out on the heat island effect and microclimate impacts of massive energy projects on desert /high desert weather and rain patterns that may further reduce critical recharge events.

4.1 CEQA & NEPA compliance:

- We rely on Volker Law’s comments for most of much of this section.
- Our non-profit group currently has unresolved litigation over BLM approvals for Ocotillo Wind (operational) and the stalled Tule Wind projects that are within and adjacent to the DRECP boundaries; and against San Diego County for their flawed Wind Energy Ordinance & Community Plan Amendment.
- Tule Wind has no Eagle Take Permits, No Power Purchase Agreements, no lease from State Lands Commission
- **Environmental Effects Outside of the Plan Area**
 - Cumulative and significant adverse impacts to resources, views, water , people, wildlife, views, public health and safety, emergency services, socio-economics and recreation will be an issue for any new transmission projects proposed in the Jacumba Hot Springs, Boulevard, McCain Valley Resource Conservation & Recreation Area Campo, Pine Valley, Cleveland National Forest, and more, have not been fully addressed or analyzed.
 - New Right of Ways, easements, and eminent domain will be required in areas that have not yet recovered from construction of SDG&E’s Sunrise Powerlink, Suncrest Substation, ECO Substation, Boulevard Substation and new 138kV lines in between.

4.2 Summary of Environmental Impacts—omits noise and electrical pollution emissions

¹³ http://pacinst.org/wp-content/uploads/sites/21/2014/09/PacInst_HazardsToll.pdf

- **Table 8 Environmental Disciplines Analyzed:** Noise, low frequency noise, infrasound and Electrical pollution/stray voltage, and air quality were inexplicably omitted.
- It has been our experience that real world impacts far outweigh what is estimated in project related EIR/EIS reports and we expect the same to be true for the DRECP EIR/EIS.
- **The Tisdale photo below documents the extreme amount of windblown soil erosion** generated by the removal of irrigated crop cover and clear grading over 900 acres (almost 500 acres of Prime Farmland) of Imperial Valley Solar Energy South project near Mount Signal south of Hwy98 in Imperial County. The transported soil had created small dunes and filled up the abandoned irrigation ditch



Less than Significant Impacts! NOT!

- It never ceases to amaze us that such an unnecessary large scale, landscape, and life-altering proposal, that displaces so many existing uses and users can be magically deemed as less than significant. We strongly disagree!

Significant and unavoidable: Table 9:

- Meteorology & Climate Change Impact MC-2 fails to adequately address the release of stored carbon in desert soils, desert and chaparral vegetation and /or growing crops and grass cover. It also fails to address increased particulate matter generated by related conversion of desert soils, chaparral, and farmland, reduced water flows and increased related exposure of Salton Sea playa.
- Tisdale photo below shows mature oaks being bulldozed for SDG&E's new Boulevard Substation-- Oaks sequester carbon, provide oxygen, habitat, beauty, shade, and more



- Failure to include the increased green house gas emissions related to the manufacturing of wind, solar, transmission components and infrastructure, in addition to battery storage components and back-up gas-fired power plants.
- Omissions must be addressed in a revised and re-circulated EIR/EIS.

Groundwater, Water Supply and Water Quality Impact GW-2:

- We strongly object to the Less than Significant rating for water use for Solar and Wind based on experience; *and what about transmission infrastructure?*
- Current available yet limited information on existing industrial scale energy/transmission projects have used an average of 3-10 times more water as originally estimated.
- The DRECP agencies and Dudek should have access to valuable information on many major projects that should have been gathered and included in the Draft EIR/EIS
- SDG&E's ECO Substation construction estimated 30 million gallons of water in the EIR/EIS when the project actually used over 90 million gallons as documented in Amended Water Supply Plans, required project reports to the CPUC and in Volker Law complaint¹⁴
- SDG&E contractors accessed and paid for unauthorized groundwater sources that were later curtailed after public intervention, impacts to springs and wells that served existing users, and reduced well recharge.
- ***SDG&E far exceeded their estimated 1.5 million truck miles required to haul water to their ECO Substation site, as documented by Volker Law during complaint filings. How green is that?***



- SDG&E belatedly and questionably amended their water supply plan yet again, and got a revised letter approving even more water to be long-hauled from the City of San Diego
- Our intervenor complaint was then withdrawn as moot and SDG&E prevailed in yet again, with CPUC assistance.
- ***Dudek's involvement and groundwater/water use estimate failures and omissions at ECO Substation, Soitec Solar (per Snyder Geologic letter¹⁵), Madera Golf Course (see Tisdale's Dudek v Ponce comments dated 2-3-14¹⁶) raise alarms and results in lost confidence in DRECP validity.***

¹⁴ <http://www.eastcountymagazine.org/sites/eastcountymagazine.org/files/2014/March/BAD%20vs%20SDG%26E%20ECO%20Sub%20water%20CPUC%20complaint%203-10-14.pdf>

¹⁵ <http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Record-Documents/2015-01-30-ScottSnyder-Soitec-Solar-Comments-on-Final-PEIR.pdf>

¹⁶ <http://www.sandiegocounty.gov/content/dam/sdc/dplu/ceqa/Soitec-Documents/Record-Documents/2014-02-03-and-02-10-DonnaTisdale-email-Comment-Fwd-For-Soitec-DPEIR-Record-Dudek-vs-DrPonce.pdf>

- For Soitec Solar projects in Boulevard, Dudek omitted a significant number of project comments that required an increased water use estimate of 40% after the DEIR was released.
- Based on the actual water use of over 78,000 gallons /acre at Soitec’s Desert Green Solar, Dudek should have increased the Boulevard project water use by another 60%--for a total of 100% over original estimates.
- Soitec’s Desert Green project used approximately 40% more water than was estimated in the EIR despite the original estimate including a 30% contingency!

Agriculture Land and Production – All Alternatives:

- Over 20,000 acres of productive Imperial County farmland has already been impacted by controversial solar conversion—including Prime Farmland, Farmland of Statewide importance, and Williams Act contract farm lands.
- At this late date, even the Imperial County Board of Supervisors has made public statements that they do not plan to approve any additional solar-farm conversion projects.
- ***These non-renewable irrigated/productive farm lands are critical to the long-term socio economic well being of Imperial County and they also serve as valuable biological habitat for resident and migrating species.***
- The Preferred Alternative and Alternative 2 Development Focus Areas that cover virtually all Imperial County farmland are not justified, are strongly opposed by a growing number of farmers/residents and would appear dead on arrival.

Current DRECP preferred alternative Development Focus Areas¹⁷ disproportionately impact Imperial County:

- The preferred alternative includes up to 69,000 acres in Imperial County, most of which appears to be located on irrigated productive farmland—a non-renewable resource.
- 69,000 acres is 27,000 acres more than the 42,000 acres in the second most targeted San Bernardino County.
- A new alternative should prioritize truly distributed generation on already existing structures, new structures, parking lot solar shade structures, and contaminated lands.
- Solar energy can be generated virtually anywhere while food and fiber production requires fertile soil and water rights—valuable resources that can rarely be replaced.

DRECP transmission impacts to Imperial /Borrego Valley: Appendix K Table ES-1¹⁸:

- Appendix K shows a high of 16,073 acres of transmission impacts for Alternative 1 and a low of 6,429 for Alternative 4

DRECP transmission impacts to Eastern San Diego County—increased fire risk in Cal Fire designated Wildfire Corridors and Very High Fire Severity Areas;

- The Tisdale photo below was taken at Morning Star Ranch during the approach of the Shockey Fire that burned over 2,600 acres; destroyed 14 homes and killed one of the Tisdale’s Tierra Del

¹⁷ http://drecp.org/documents/docs/fact_sheets/DRECP_Development_Focus_Areas.pdf

¹⁸ <http://www.drecp.org/draftdrecp/>

Sol neighbors. The Tisdale family lost several hundred acres of mature 30 foot tall chaparral and related habitat, fencing, mature oaks, wildlife (like the tiny horned lizard below), and more. Turkey Vultures acted as nature's cleanup crew with an eerie buzzard's picnic.



- When professional fire fighters, from around the state, were mopping up from the Shockey Fire and were asked by the Tisdales if the presence of proposed high-voltage transmission lines and wind and solar projects would have impeded their fire fighting abilities and forced changed strategies—the unanimous answer was a resounding YES.
- Firefighters further stated that they would not recommend the addition any new fire sources /impediments due to the high flammability of San Diego's impacted backcountry and lack of adequate services and water sources.

DISPROPORTIONATE & CUMULATIVE ADVERSE IMPACTS - IMPERIAL COUNTY

- The 69,000 acres of Development Focus Area and 16,000 or so acres for transmission impacts appear to be in addition to:
 - 20,000 or so acres of productive farmland already approved for solar conversion.
 - 12,440 acres of BLM land for Ocotillo Wind Facility.
 - 10,760 acres in BLM's West Chocolate Mountains Solar Energy Zone
- **Total Imperial County sacrifice area = approximately 112,195 acres—that's a lot of land!**
- Increased air quality impacts and loss of carbon sequestration from converted farm lands, desert lands, and increased Salton Sea bed exposure.
- Loss of Imperial County tax base due to unnecessary solar conversion of farm land.
- Adverse impacts to public health and safety, quality of life and property values.
- Loss of open space, habitat value, and cooling effects from irrigated crops.
- Injury, displacement, and loss of endangered wildlife during construction and operation of utility scale wind/solar.
- Biologists in the field report significant impacts

MISSING FROM DRAFT DRECP AND CEC-FUNDED IMPERIAL COUNTY GENERAL PLAN UPDATE-RENEWABLE ENERGY & TRANSMISSION ELEMENT:

- Where are the independent socio economic impact studies for the already built utility scale solar projects that document the real world impacts compared to promises made?
- How many solar / wind workers have contracted Valley Fever?¹⁹ Who is keeping track?
- Where are the dedicated funds to help impacted /displaced families, farmers, and farm businesses and labor?
- Have all funding and conservation promises been kept by existing solar / wind developers?
- What is the comparison of local funding / benefits to profits exported and spent out of the area by wealthy developers like Google, Tenaska, Southern Company, First Solar and others who are reaping billions?
- How many permanent /annual seasonal farm labor jobs have been displaced by temporary construction jobs?
- How many farm support businesses have been negatively impacted or forced out of business?
- How much good top soil has been moved off-site or lost to wind erosion?
- How many air quality and dust calls / complaints have been logged for these massive projects?
- What are the known impacts to adjacent farmers and residents?
- How many homes have been purchased and residents displaced by solar developers?
- What are the impacts to adjacent livestock operations?
- How many solar inverters have caught fire or exploded and at what cost? Where reports made to appropriate authorities/agencies?
- What long-term impacts do utility scale solar energy facilities and infrastructure have on the fertility of currently productive soils? Is the soil permanently sterilized?
- How much base-load back up generation or energy storage will be needed to balance the grid and prevent disruption of service, and at what additional cost?

¹⁹ http://coagoldengate.org/wilken_ggcoa_valley_fever_0.pdf

PLEASE TAKE NOTICE THAT WIND TURBINES WERE RECENTLY DECLARED A PUBLIC HEALTH HAZARD:

- On October 14, 2014, the Brown County Board of Health passed a motion *"To declare the Industrial Wind Turbines at Shirley Wind Project in the Town of Glenmore, Brown County, WI. A Human Health Hazard for all people (residents, workers, visitors, and sensitive passersby) who are exposed to Infrasound/Low Frequency Noise and other emissions potentially harmful to human health."*²⁰
- The declaration followed a yearlong study linking the signature of inaudible low frequency noise (created by the passing of the massive turbine blades past their supporting towers) to the homes that have been abandoned and to the homes where people continue to suffer. The Board of Health looked at the study's raw data, the evidence linking the sound data to the wind turbines, peer-reviewed medical research and the complaints of the people living in the conditions around Duke's Shirley Wind project.
- The DRECP EIR/EIS, agencies and decision makers should show similar concerns and respect for the ongoing suffering, stress, adverse health impacts being reported by Ocotillo residents impacted by Pattern's Ocotillo Wind--instead of turning away. The same holds true for Kumeyaay Wind turbine neighbors and others.
- In addition, one analyst estimated that each average industrial scale wind turbine contains **45 tons of rebar and 481m3 of concrete** that translated into a massive carbon footprint of 241.85 tons of CO₂.²¹
- Wind turbines also emit electrical and noise/infrasound emissions that are harmful to human health and well being.
- A new wind turbine noise /infrasound study by acoustics expert Steven Cooper²², of the Cape Bridgewater Wind farm in Australia, helps disclose the reason behind the complaints that correlates to US studies 20 years ago²³

Appendix O Existing RE Projects within the Plan Area—is out dated and inadequate

- The list of existing and approved projects is out of date and vastly undercounts the cumulative impacts in Imperial County, San Diego County and elsewhere.
- Eastern San Diego County is not included in the list despite being included in the CREZ 26 located in the Boulevard /Jacumba/ Mountain Empire Planning areas²⁴ where the following renewable energy projects /transmission have been approved / proposed/constructed:
 - SDG&E's \$1.9billion 500kV Sunrise Powerlink—that has already reached 1,000MW²⁵
 - SDG&E's \$435 million 500kV/230kV 85-acre ECO Substation (photo below)and new

²⁰ <http://bccrwe.com/index.php/8-news/16-duke-energy-s-shirley-wind-declared-human-health-hazard>

²¹ <http://stopthesethings.com/2014/08/16/how-much-co2-gets-emitted-to-build-a-wind-turbine/>

²² <http://www.pacifichydro.com.au/files/2015/01/Cape-Bridgewater-Acoustic-Report.pdf>

²³ <http://www.windaction.org/posts/42040-turbines-may-well-blow-an-ill-wind-over-locals-first-study-shows#.VOpbIC6rEuc>

²⁴ http://www.energy.ca.gov/reti/documents/phase2B/CA_CREZ_Conceptual_Transmission_Segments_Phase_2B_final.pdf

²⁵ <http://www.prnewswire.com/news/san-diego+gas+%26+electric+%28sdg%26e%29>

Boulevard Substation with 14 miles of new 138kV²⁶



- Sempra's Energia Sierra Juarez cross-border high-voltage line connecting to ECO Substation, with import capacity of 1,200MW will serve IEnova/Intergen's Energia Sierra Juarez wind facility²⁷. The \$300million 156MW phase 1 is now under construction on 13,100 acres of Ejido Jacume, Baja California Norte²⁸.
- Iberdrola's 201 MW Tule Wind on BLM, tribal, State Lands Commission and private lands (approved)
- Soitec Solar's 140 MW of CPV projects known as Rugged Solar (80MW) and Tierra Del Sol Solar (60MW) & 160 MW of Battery Storage / 160 cargo containers.
- Solar Electric Solutions 2.9MW Boulevard SPEV project
- NextEra's proposed 20 MW Jacumba Solar LLC project adjacent to SDG&E's ECO Substation; San Diego County PDS ID: PDS2014-MPA-14-015; APN: 661-041-02, 03,661-080-01,04,05,08.
- Additional San Diego County solar projects have been approved, constructed and/or proposed in Boulevard, Campo, Pine Valley, Descanso, Alpine, Lakeside, Ramona, Valley Center and Ocotillo Wells.
- **Borrego Springs area:**
 - Soitec/Invenery's 7MW Desert Green CPV project started construction in 2014 and is now operational.²⁹
 - **See Desert Green Solar CPV project photo below and note the clear grading and massive industrial structures.**



²⁶ <http://www.prnewswire.com/news-releases/sdgc-completes-and-energizes-new-east-county-substation-project-300016578.html>

²⁷ <http://www.ienova.com.mx/english/services-esj.html>

²⁸ <http://zetatijuana.com/noticias/reportajes/18466/invaden-con-turbinas-la-rumorosa;>

²⁹ <http://news.pv-insider.com/concentrated-pv/cpv-news-brief-10-%E2%80%9316-december-2014>

- SDG&E’s **Borrego Springs existing micro grid** just received another \$5million CEC grant for expansion³⁰ that will connect to NRG’s existing 26 MW solar project.
- **Gildred Companies 50MW Ocotillo Wells Solar approved on 440 acres on Hwy 78** in San Diego County³¹ that will use precious desert groundwater resources in an overdraft area (approved).
- **Seville Solar approved for abandoned farmland on Hwy 78** in Imperial County, just east of Ocotillo Wells Solar that will also use precious desert groundwater resources in an overdraft area (approved)
- Clear and detailed maps showing the locations of existing, approved and proposed projects should be included showing their locations in relation to various DRECP alternatives and DFAs.
- Numerous energy project maps are posted on Imperial County Planning and Development Services website³².

IV.25 Cumulative Impacts Analysis—misrepresentations and omissions

- The CEC funded Imperial County Alternative Energy Update³³ to the existing “Geothermal /Alternative Energy & Transmission Element” comment deadline is February 25th, only two days after the extended February 23rd comment deadline for the DREP.
- These comment deadlines are in addition to individual industrial scale renewable energy project comment deadlines that have taken place throughout the DRECP and Imperial County update.
- Teams of paid agency and applicant staff and consultants have worked on all these projects for years while disproportionately impacted rural communities and residents have been forced to respond to each in an insufficient manner as limited time and funds allow.
- The deck is stacked in favor of these unnecessary projects/plans at the expense of those people and resources that are the most adversely impacted.
- At page IV.25-22, the San Diego General Plan (2011) as described is misrepresentative of changed circumstances and numerous utility scale energy /transmission projects that have been proposed/approved throughout San Diego County prior to the August 2014 date of the Cumulative Impacts Analysis.
- At page IV.25-28, the San Diego County description includes the Mountain Empire Regional Plan
- The description is misrepresentative of real world impacts and inexplicably omits the Mountain Empire subregional Boulevard and Jacumba Community Planning Areas that are the most disproportionately impacted as detailed in these comments
- The Borrego Planning Area, which is also disproportionately impacted, is also inexplicably omitted from this section.
- The DRECP linked REAT Generation Tracking Map³⁴ is also out of date and does not represent on- the-ground impacts for approved, constructed and/or proposed projects.

³⁰ <http://www.prnewswire.com/news-releases/sdge-receives-5-million-grant-to-expand-borrego-springs-microgrid-300037273.html>

³¹ <http://gildredco.com/index.php/home/ocotillo-wells-solar>

³² <http://www.icpds.com/?pid=4036>

³³ <http://www.icpds.com/?pid=4030>

³⁴ http://www.energy.ca.gov/33by2020/documents/renewable_projects/REAT_Generation_Tracking_Projects_Map.pdf

Wind turbine adverse health impacts:

- **Down Wind – Wind Farm documentary is incorporated by reference.** It discloses the misery and adverse health impacts inflicted on wind turbine impacted communities in Ontario Canada: <http://www.windaction.org/posts/42183-down-wind-wind-farm-documentary#.VOZCdPnF98E>
- Down Wind is representative of other turbine impacted communities and residents –including those impacted by Pattern Energy’s Ocotillo Wind project surrounding homes in tiny low-income community of Ocotillo in Imperial County and by the tribal and off-reservation neighbors of Infigen’s Kumeyaay Wind turbines located on the Campo Reservation in Eastern San Diego County / Boulevard—also a predominantly low-income area.
- This vimeo **Infrasound & Motion Sickness** presentation, by Kevin A Dooley, (incorporated by reference) describes the basics of sound, and proceeds to draw a compelling relationship between motion sickness symptoms, and infrasound exposure, with specific reference to wind turbine installations and their proximity to homes. His presentation suggestions are backed by multiple, independent studies conducted on infrasound, and / or motion sickness incidence: <https://vimeo.com/103602357>

Poor performance and need to replace underperforming PV sooner than expected:

- The PV Insider recently reported ³⁵that some projects are not performing to expectations because mistakes in planning, or in installation, have resulted in lower than optimal performance.
- These lower yields can also be the result of poor O&M management, or even component failure.

Energy Storage System is still experimental with no set CSRs:

- The project description is vague and inaccurate regarding the number, the size, the type and location of the battery storage projects; it does not disclose the amount of battery storage that will be mandated; it misrepresents the potential increased risk of thermal runaway, cascading failures, fire, explosion, toxic smoke/emissions, soil and water contamination, need for specialized firefighting equipment and ongoing training; hazardous materials and potential for HazMat incidents, special waste cleanup and disposal at an unidentified licensed facility.
- **Each cargo container full of batteries generally requires its own HVAC unit, transformer, inverters.**
- The US Department of Energy released a Battery Safety Strategic Plan in December 2014³⁶ trying to understand and address the safety of grid energy storage systems.
- They don’t even know if they are safe or not!
- ***They are still trying to determine what safety related codes standards and regulations are needed! Rural communities are not lab rats!***

³⁵ http://news.pv-insider.com/photovoltaics/plant-upgrades-case-repowering-pv-installations-early?utm_source=http%3a%2f%2fuk.csptoday.com%2ffcsp_pv%2f&utm_medium=email&utm_campaign=PV+eBrief+27+January&utm_term=%0d%0dPlant+Upgrades%3a+the+case+for+repowering+PV+installations+early+&utm_content=272299&gator_td=8PQTTiTmSnbqx9aoKEZKXMQMT9BEV%2bXnRmZJ7P7Jpxv8hVRyeXvkeKlfzLDY4obmCYmxkBp3OcE1QAO%2f%2bi0WCmsTMOGOoSjYjTlS19z0cBs7qYPP%2fwdiUTuFYAvXg6xdAl1li%2bVx1bOJ3C9w8tsODIR7rX7iO2bDOlciAFSi%2bxaMAhrrFi83gNxxM7bwZ1cpuG2zI27IGlc6zgidA8PyyMQaGBnLqCLiYMjvAqUBvI73wz%2bRA8F6B2I0i25Utihj

³⁶ <http://energy.gov/oe/downloads/energy-storage-safety-strategic-plan-december-2014>

Repowering may be needed sooner than might normally be expected to resolve this issue:

- It is our understanding, as confirmed by those present, that recent a speaker at Farm Bureau, who manages a solar project north east of Niland, stated his belief that it may cost in excess of \$100,000 per acre to dismantle and remove some of these solar projects and related contaminants when their economic life is done.
- Some of the projects using thin film technology reportedly have a high amount of benzene and other toxic chemicals that would currently need to go to a toxic waste site.
- This scenario needs to be addressed now, not later when clean up costs may fall back on local and other taxpayers after solar developer's milk their projects dry and walk away when they are no longer profitable.
- We have had additional reports that Centinela Solar, and perhaps others, had to replace several inverters that had blown up not long after installation, at over \$1 million each.
- These types of malfunctions can result in toxic fumes and contaminated soils and should be required to be reported to County / state agencies.

Fire Protection & HazMat issues

- The DRECP EIR/EIS is inadequate due to need for specialized foam firefighting equipment, specially trained staff, and ongoing training needs, related to massive electrical facilities that cannot be turned off during daylight hours and some moonlight conditions.
- The Energy Storage System, as noted above, requires additional specialized equipment, training, and hazmat response capabilities and disposal. Failed or low-performing PV may result in early removal and need for special handling and disposal in addition to increased potential for soil and water contamination and need for costly remediation. At whose expense?
- Failed solar panels /toxics reported in the New York Times:
http://www.nytimes.com/2013/05/29/business/energy-environment/solar-powers-dark-side.html?pagewanted=all&_r=0

Electrical Ground & EMF impacts not recognized, analyzed, or mitigated:

- When you stand outside next to these massive solar projects with all the inverters, cooling and transmission equipment, it sounds like you are in a giant electronic beehive. It is not a good or relaxing feeling. The noise and electrical pollution emissions can trigger the fight or flight stress reaction that translates into a rush of adrenaline. *Over time, adrenal glands can be depleted.*
- **The Tisdale photo below (left) shows the humming inverter compounds that stand out over the heat waves being radiated by the solar panels, and the DANGER ELECTRICAL HAZARD sign at existing PV projects in Imperial County south of I-8.** The 3rd photo shows new invasive and polluting electrical infrastructure at Campo Verde Solar project new Hwy 98 and the Imperial Valley Substation on previously productive farmland.

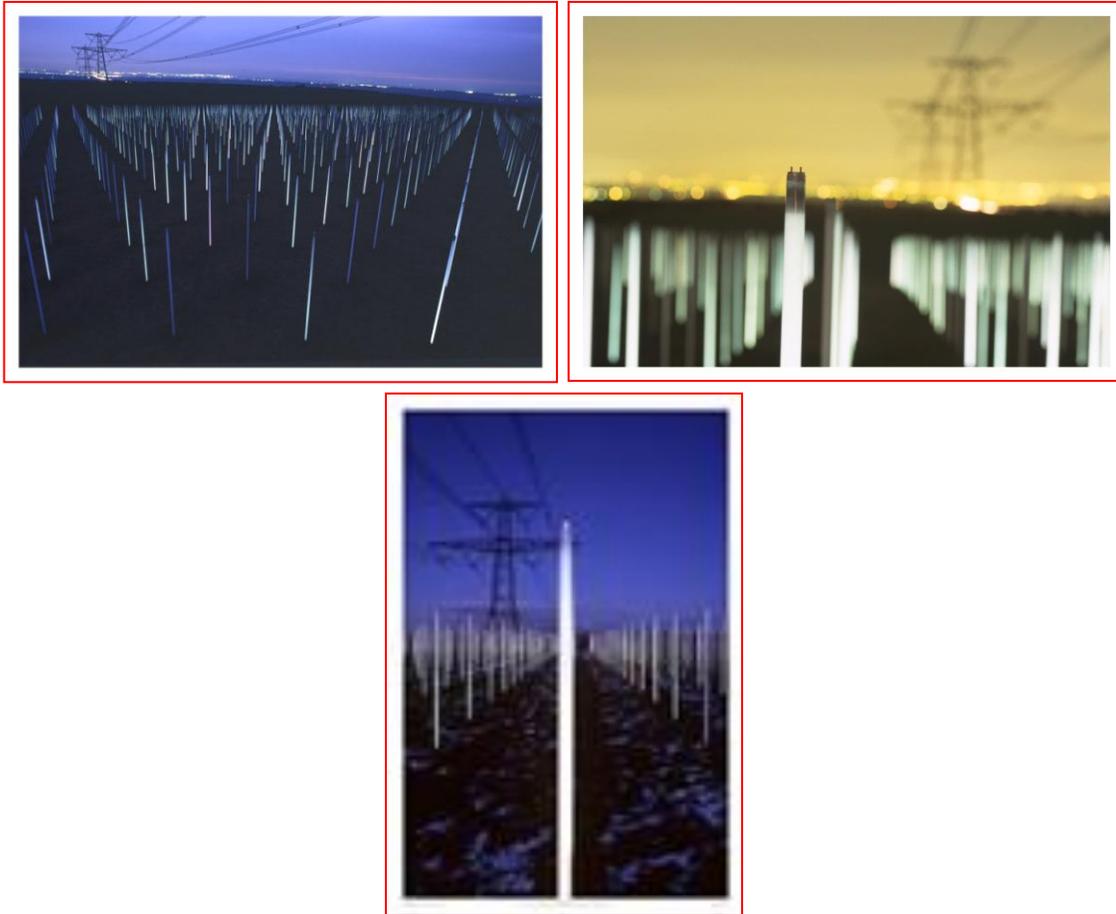


- The Tisdale photos below shows grounding wires that SDG&E installed onto a private fence post adjacent to their 500kV Sunrise Powerlink (in Boulevard’s McCain Valley) to address stray voltages that are now shunted into the ground –where Ground Currents are increased and create additional hazards. It is hard to see, but there is a yellow “cattle” grazing sign in the distance. Most dairy men know that electricity does not mix well with cattle and can result in reduced milk, reduced reproduction, spontaneous abortions, failure to gain weight, and more³⁷.



³⁷ <http://www.electricalpollution.com/documents/Hillman/ShockingNews3-072004.pdf>

- The photographs below, from Richard Box's Field of Lights project, demonstrate the stray voltage under high voltage lines that is strong enough to energize the fluorescent light bulbs³⁸



- The DRECP fails to address the significant and cumulative adverse impacts related to increased radiation, ground currents and stray voltage/dirty electricity generated by all of the project components, for this project and other similar projects in the area, that can migrate miles off-site into homes and livestock operations through the air, the ground, and through common utility / ground wires as discussed in the report ***Ground Currents An Important Factor in Electromagnetic Exposure by Duane A. Dahlberg, PhD***³⁹; in the ***2012 Bioinitiative Report***⁴⁰, Conclusions⁴¹, and updated information from the Bioinitiative Working Group on adverse health impacts related to EMF⁴² and more related to flawed EMR/RFR reviews.
- **Samuel Milham, MD MPH, has studied dirty electricity and workers health for 40 years and found it to be a human carcinogen**⁴³.
- I have been present when Dr Milham tested several PV and CPV solar energy projects and found high frequency transient voltages / Dirty Electricity (20KHz), generated by inverters, in the air

³⁸ <http://www.richardbox.com/>; http://electric-fields.com/HREG_front.htm

³⁹ <http://www.sandiegocounty.gov/dplu/ceqa/Soitec-Documents/Record-Documents/Undated-Duane-A-Dahlberg-Report-re-Ground-Currents-An-Important-Factor-in-Electromagnetic-Exposure.pdf>

⁴⁰ <http://www.bioinitiative.org/>

⁴¹ <http://www.bioinitiative.org/conclusions/>

⁴² <http://www.bioinitiative.org/potential-health-effects-emf/>

⁴³ <http://www.sammilham.com/>

and ground around the projects and in the common ground wires from pole mounted utility transformers miles down the road from the projects.

- The work of the UK's **Denis Henshaw, Professor of Physics and the head of the Human Radiation Effect Group at the [University of Bristol](#)**, also documents the adverse impacts related to EMF/RFR^{44, 45}
- Professor Henshaw's 2014 presentation **Scientific basis of the health effects of electric and magnetic fields associated with the electricity supply**⁴⁶ is submitted as additional evidence that must be addressed with DRECP plans to radically increase the number and size of electrical generation projects that represent major hazards to people, pets, livestock and wildlife.
- Increased electrical pollution is harmful to people, livestock and wildlife. It can interfere with navigation, concentration and cognitive abilities, circadian rhythms, reproduction, milk production in dairy cattle, overall health and safety impacts.
- Another summarized list of health impacts of man-made electronic frequencies and related research is posted on Life Energies⁴⁷

Avian mortality documented at PV solar projects, including dead endangered Yuma Clapper Rail at Solar Gen 2 (one of perhaps 500-1000 remaining):

- The Tisdale photo below shows a dead Turkey Vulture that fatally collided with SDG&E's Sunrise Powerlink in McCain Valley, Boulevard. The incident was reported to USFWS law enforcement.



- **The following articles have reported on dead birds at 3 large solar projects, including PV solar:**
 - *SOLAR POWER: Toll on birds needs scrutiny, state says Hundreds of birds, including rare species, have died at three big solar projects in Southern California deserts*⁴⁸
 - *Water Birds Turning Up Dead at Solar Projects in the Desert*⁴⁹
 - *Great Blue Heron Dies at Solar Project*⁵⁰
 - *Feds to Be Sued Over Solar Projects Harm to Endangered Bird*⁵¹

⁴⁴ <http://www.whale.to/a/henshaw.html>

⁴⁵ <http://www.powerwatch.org.uk/columns/henshaw/index.asp>

⁴⁶ http://www.electric-fields.com/Henshaw_Prof_Denis_Ireland_10_Feb_2014.pdf

⁴⁷ <http://lifeenergies.com/he-emr/>

⁴⁸ <http://www.pe.com/articles/birds-684500-energy-plant.html>

⁴⁹ <http://www.kcet.org/news/define/rewire/solar/water-birds-turning-up-dead-at-solar-projects-in-desert.html>

⁵⁰ <http://www.kcet.org/news/define/rewire/wildlife/great-blue-herons-die-at-solar-project.html>

- One relevant quote: *A large PV project would seem to offer an oasis for water birds in the desert, but coming in for a landing on such a “lake” could well prove routinely fatal, either at the moment of impact or after a disabled bird wanders off into the desert.”*

Conclusion: DRECP DEIS/EIR & Alternatives create unnecessary conflict and false choices:

- The choice of proposed DRECP alternatives seems to ensure conflicts between those who want to protect threatened agricultural resources and water rights and those who want to protect desert ecosystems.
- These are false choices when a superior alternative based on increased energy efficiency, conservation, and on-site point-of-use renewable energy generation can be prioritized and incentivized by decision makers --instead of the relying on the current unaffordable and unsustainable industrial scale model that requires expensive new transmission infrastructure with its bloated guaranteed rate of return.
- ***Please listen to the public –and do the right thing!***

Sunset at Tisdale’s Morning Star Ranch in Boulevard, CA—representative of so many at-risk viewsheds throughout our amazing and irreplaceable desert and high desert communities...



Any errors or omissions are unintentional

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⁵¹ <http://www.kcet.org/news/redefine/rewire/solar/photovoltaic-pv/feds-to-be-sued-over-solar-project-harm-to-endangered-bird.html>