

Thank you for the opportunity to comment on the Draft Energia Sierra Juarez U.S. Transmission Line Project. We understand the DEIS was an action on the part of the DOE in response to an ESJ-U.S. request for a Presidential permit because the project crosses the U.S.-Mexico border. After reading parts of the substantial DEIS for this project, we have comments to offer for consideration.

Briefly stated, we support Alternative 1 - No Action, and recommend the DOE not to issue a Presidential permit for the ESJ U.S. Transmission Line so the line would not be built. We are recommending this action because we believe it is not in the public interest based on the cumulative impacts that were identified with regard to visual and biological resources, recreation, and fire and fuels management. We disagree with some of the conclusions in the DEIS, and offer some of ours for consideration.

## VISUAL RESOURCES

The DEIS states,

“With regard to visual resources, the combined presence of the actions considered in the cumulative analysis would result in an increase in industrialization of the landscape, diminished visual quality, and an increase in visual contrast in eastern San Diego County and western Imperial County. The combined size and character of introduced structures associated with each action would result in considerable structure contrast, view blockages, and skylining in the region and could cumulatively cause long-term, major impacts to the existing visual character of the region.”

We disagree with the conclusion in the DEIS that because the ESJ U.S. Transmission Line project would be a relatively small contributor to the cumulative impacts to visual resources when combined with the impacts of other past, present and reasonably foreseeable future actions in the area, that it would then be considered a minor but long-term impact.

Although it is true the transmission line itself is only 0.65 miles in distance on the U.S. side of the border, it SETS A PRECEDENCE with the purpose of connecting with transmission to be built in Mexico. Thus, it will be the first cross-border transmission line and will open up numerous opportunities for Mexico to build large-scale wind turbine projects that will connect to it. The ESJ Wind project Phase I wind turbines will be located only 0.7 mile south of the U.S. border. There are already other future phases for large-scale wind turbine projects proposed that will also be built in the Sierra Juarez Mountains in Mexico. In our opinion, the purpose of connecting to these large-scale wind turbine projects in Mexico AND its implications must be taken into consideration. The ESJ U.S. Transmission Line will be a MAJOR contributing factor as the FIRST LINKAGE TO A HUGE CHANGE IN THE VISUAL CHARACTER OF THE REGIONAL AREA because it will facilitate future large-scale wind turbine projects that will be built in Mexico. Together, these projects could result in a MAJOR INCREASE IN THE INDUSTRIALIZATION of the landscape and affect people residing in or visiting the area for recreational activities in both the U.S. and Mexico.

The ESJ Wind project Phase I could consist of up to a maximum of 52 wind turbines that would be built in Mexico.

The DEIR states,

“Wind turbines constructed in Mexico as part of the EJS Wind project would be visible from several U.S. locations, including locations in or near the communities of Jacumba and Boulevard; Interstate 8; Old Highway 80; Anza Borrego Desert State Park; and BLM-administered lands, including Table Mountain (ACEC), Jacumba Wilderness, and certain lands in the Yuha Desert.”

“Predicted visual impacts from wind turbines in the U.S. would be moderate to high for viewers at observation points in Jacumba and Table Mountain ACEC. and low-to-moderate for viewers at an observation point on Interstate 8. During clear weather, aviation safety lighting on wind turbines (if lighting is required by Mexican agencies) would also be visible from viewing points in the U.S.”

“Future phases would increase the number of wind turbines in Mexico.”

“These impacts are unavoidable, major and permanent. NO MITIGATION IS AVAILABLE to reduce the impact to minor levels short of relocating the project to an entirely different location.”

The specifications for the wind turbines according to the DEIS, are:

“The total height of the combined tower structure and rotor blades would likely be up to 431 feet. The rotor diameter could be approximately 333 feet. The total distance from blade tip at the six ‘o clock position to the ground surface would be at least 97 feet. Up to approximately 30 percent of the wind turbine units would be lighted.”

Unfortunately, the U.S. cannot mitigate the adverse impacts from the ESJ Wind project that are UNAVOIDABLE, MAJOR, AND PERMANENT to a minor level. The project is located in Mexico and outside U.S. jurisdiction. If the U.S. does not have control of the adverse impacts from this project or any other future large-scale wind turbine projects to be built in Mexico to our visual and biological resources, or any other issues that arise when building them adjacent to our border with Mexico, we should not build this line to connect with their line. In our opinion, this is not in the public interest and one of the reasons we recommend Alternative 1 - No Project.

As for our opinion of large scale wind turbines:

**WE DEPLORE THEM BECAUSE WE CAN'T IGNORE THEM!!!**

These types of large-scale wind turbines are an eyesore. They are gigantic and have monstrous fan blades that rotate ‘round and ‘round, have red lights that blink off and on at night, and are noisy. They also have a myriad of other adverse impacts, especially on bird and bat populations. They are not eco-friendly and not “green” energy. The wind turbines located on the Campo Indian Reservation have already had malfunctions. Under certain conditions, they could potentially be an ignition source for a catastrophic fire if a Santa Ana condition with strong winds was present and a malfunction occurred. These gigantic structures and associated infrastructure would be hazards to aerial firefighting.

There are better renewable energy sources such as small solar and small wind that can be

located onsite where the energy is used eliminating the need for mega wind farms in the backcountry of either the U.S. or Mexico. It would not be necessary to build the miles and miles of auxiliary infrastructure associated with them that ruin the visual resources if we use these other sources of renewable, onsite energy. For example, the BLM uses solar energy to pump water into its reservoirs at Cottonwood Campground in McCain Valley. The County of San Diego just established an ordinance for small solar and small wind that we support.

## RECREATION

The DEIS Summary states,

“To the extent that distant views of the surrounding landscape are a valuable component of recreational use of the region, then any diminishment of this character is considered an indirect and potentially major impact to recreational resources. Accordingly, once operational, the ESJ U.S. Transmission Line project structures, in combination with the other actions considered in the analysis, would result in indirect impacts on recreational use of BLM-managed lands.”

We again disagree with the conclusion that the ESJ U.S. Transmission Line would have a minor but long-term contribution to the major adverse cumulative impact on recreational users like us in the region. The DEIS states the effect would be minor because the transmission towers would not substantially change the character of the views from these areas due to the tendency of transmission towers to blend in with the surrounding desert landscape when viewed from a distance because the new towers would be substantially similar in appearance to the existing SWPL transmission towers. But, as the DEIS also clearly states, ANY diminishment is considered potentially major.

The Bureau of Land Management, Anza-Borrego Desert State Park, County of San Diego, and the Sawtooth, Carrizo Gorge, and Jacumba Wilderness Areas and Table Mountain (ACEC) have many recreational opportunities to enjoy and experience in this regional area. We like to hike, jeep, camp, star gaze, take photos of animals, birds, wildflowers, waterfalls, landscape features, etc. while frequently visiting here and have done so for decades. Some of the existing transmission towers and lines already adversely affect our ability to view or take pictures of the surrounding landscape when we do the things we like to do out here because of their scale. (Please see attached photos.) In reference to this project, the proposed towers and lines would be similar to the existing ones and be seen from numerous surrounding recreational destinations people like us visit specifically for the VIEWS they offer.

Transmission towers are tall, linear, unnatural, structures. Many times their powerlines have brightly colored orange and white balls attached to them, as they do in this area, so they show up better for border patrol personnel to avoid when pursuing illegal border crossers by helicopter. Some towers have red lights on top at night and, in some areas, even the lines hanging between them have lights on them. Some lines form unnatural scallop patterns that go on for as far as the eye can see, snaking all in a row over ridgetops and through valleys. Some of the lines are even rainbow-colored now. Some lines glint in the sunlight and rivers of shining steel seem to “flow” over the landscape when observed at some locations, especially at sunset. When located near ridgetops, skylining occurs and the tower design and attached lines with balls hanging on them are obvious. When taking pictures of the landscape while

hiking at ground level, towers interfere with the subject to be photographed, whether near or distant. When seen from above, their lines disrupt the continuity of the natural landforms and can visually dissect it. They can also “buzz”. Adding ANY more towers and powerlines only diminishes and devalues the VIEW and intrude upon the outdoor experience of being in a rural, open space area which is one of the main reasons people like us come to visit the area.

The BLM highlights the views in the area on its website. Two of the three reference books we use when coming to this area are Jerry Shad’s, “Afoot and Afield San Diego County” and Lowell and Diana Lindsay’s “The Anza-Borrego Desert Region”.

Jerry Shad’s book states, “East of Jacumba, pressed against the California-Baja border, lies a series of scenic peaks and valleys in the Jacumba Mountains affording vistas of two counties and two nations. Although American mapmakers consider this rugged area to be a part of the Jacumba Mountains, it is more closely associated with the 100-mile long Sierra Juarez, Baja’s northernmost link in the chain of Peninsular Ranges.” He describes a hike to Blue Angels Peak and the border marker nearby, among others. He states, “Blue Angels peak, one of several crags along a high north-south ridge spanning the two Californias, happens to be the highest point in “Alta” California within 6 miles of the international border.” People who hike on this particular trail or the surrounding high-elevation peaks nearby would be negatively affected upon looking west while viewing the proposed project in its valley setting because it is adjacent to this public area. Referring to Valley of the Moon, Jerry Shad’s book states, “Strolling through the aptly named Valley of the Moon, you might think that a square-mile patch of Joshua Tree National Park has been magically transported there - minus the famous Joshua trees. Ponderous outcrops of granitic rock, seamed with horizontal and vertical cracks, ring the valley. Old four-wheel-drive trails meander amid the statuesque boulder heaps on the valley’s south side. Photographers should be here early or late in the day, when the sun bathes the stone battlements in warm light, and crisp shadows march across the valley.”

Lowell and Diana Lindsay’s book states, “South fork of Boulder Creek. Enticing destinations for hikers, riders, and backpackers just ahead include the Elliott Mine, Valley of the Moon (headwaters of Pinto Canyon), and the Jacumba Wilderness. It just doesn’t get any better than this for training and practice in orienteering, map and compass work, and GPS because of the abundance of named checkpoints, known in Baja Spanish as “picachos,” in all directions: Quirk, Gold, Tahe, Blue Angels Peak, Whip and Nopal. After a hard soaking rain, many of the little creeks in Valley of the Moon flow with water.”

We have hiked and jeeped in this part of the regional area several times in different seasons, along with our children when they were growing up and still do, and it’s as incredible as they say it is, especially Valley of the Moon! Once you get back into these places, modern-day technologies disappear from the landscape and the outdoor experience takes over.

Lowell and Diana Lindsay’s book states, “The old mining roads visible to the northwest (left) climbing up onto Table Mountain, are closed to vehicles now but offer excellent hikes with superb views from the 4000’ summit” We have seen the views from this public area in the past which is directly north of the project site, and they would be adversely affected when looking south down upon the project site in its valley setting.

The DEIS states,

“The transmission line would encroach upon the views and compromise the integrity of the largely intact desert setting, but the overall change to the views from recreation areas would be low.”

Another related adverse visual action mentioned in the ESJ DEIS that would compromise the integrity of the largely intact desert setting of the project site besides the presence of the transmission line itself is the damage to the land to build it. Land scarring from clearing land of vegetation/habitat for wildlife for the ESJ Transmission Line is approximately 10 acres and will remain that way permanently for the life of the project for fire prevention purposes. In addition, the ECO substation switchyard will destroy another 74.3 acres, and another 14.5 acres will be annihilated by the SWPL Loop-In. The total amount of acres to be cleared and have cumulative adverse impacts by these three projects is approximately 100 acres!

The two other projects mentioned above to be considered that are connected with the project would also have tall structures and lines that would be viewed from high elevations in the surrounding recreation areas.

Our favorite regional area to visit here is one of those included to be considered: McCain Valley where the Tule Wind project is to be located. In his book, Jerry Shad describes this area: “The area between County Highway S-2 in the south end of Anza-Borrego Desert State Park and the BLM’s McCain Valley Resource Conservation Area constitutes some of the most wild, beautiful, and serene territory in San Diego County. With the exception of a few hunters chasing game in certain seasons, the east margins of McCain Valley Resource Conservation Area are essentially hikers’ domain.” That description is true and is what lures us to McCain Valley and the three Wilderness Areas located in this regional area.

Additionally, the transmission line continues on into Mexico for a greater distance than the portion located on the U.S. side. This continuation of the line over the U.S.-Mexican border, with or without the ESJ Wind project Phase I figured in, would still need roads and electrical substations to support it in Mexico as it does in the U.S. The amount of total acreage for this part of the project that will also cause land scarring from clearing and will be viewed from high elevations in the surrounding public recreational areas in the U.S. are not included. There will also be adverse visual impacts when viewing vehicles and personnel in the area when they do maintenance work.

In our opinion, a short distance of transmission line can still have an **INDIRECT AND MAJOR ADVERSE CUMULATIVE IMPACT** on recreational resources and its users, like us, depending on where it located and is being viewed from: both near and far, or at ground level or high elevations, along with the associated land scarring in a largely intact desert setting. These impacts increase even more when considered with the ECO substation switchyard and SWPL Loop-In projects, connected projects in Mexico and the regional area. Our previous comments on large-scale wind turbines in Mexico under Visual Resources would also apply here. The industrial structures in this area already intrude upon and **DIMINISH THE CHARACTER** and affect recreational users like us. We need to “draw the line”, not build this line, or **ANY** more in this area.

## **BIOLOGICAL RESOURCES**

We are concerned for all the wildlife and vegetation to be destroyed by the ESJ U.S.

Transmission line, ESJ Wind, and by all the other associated projects under consideration in this regional area. More specifically, we are concerned with one terrestrial and two groups of avian species identified in the DEIS: the bighorn sheep, and the raptors and bats.

Local residents claim that in the past they have observed bighorn sheep roaming around and foraging in the area where the ESJ U.S. Transmission Line will be located. Bighorn sheep are also known to roam and forage in the designated critical habitat only two miles east of the project site. There are two websites on Google that people display photos of bighorn sheep: Hwy. 8 below the Desert View Tower and the Goat Trestle located near the Motrero Palms. However, try as we might, we have never been fortunate enough to have seen any in this area, but have seen some in other areas of the desert.

The DEIS states,

“The designated critical habitat and known populations of the Peninsular bighorn sheep are approximately 2 miles from the project site; thus, project construction would not affect the designated critical habitat for this species. However, vegetation clearing within the right-of-way and the main access road would result in permanent impacts to potential forage material for this species.”

We assume that if clearing the land would result in permanent impacts to potential forage material for this species, then it was considered possible for bighorn sheep to potentially be in this area to forage. Bighorn sheep roam around and forage at will according to their environment and seasonal changes, as all wild animals do, and the ESJ U.S. Transmission Line would reduce the acreage for them to do so and intrude upon its largely intact desert setting.

The DEIS also states,

“In addition, the construction and operation of the wind facilities, coupled with elevated levels of human activity from workers and visitors to the wind farm, could alter wildlife behavior, including possible avoidance of the area.”

When referring to the Table Mountain ACEC nearby, Lowell and Diana Lindsay state in their book, “Noteworthy species include the Peninsular bighorn sheep, the golden eagle, and the mule deer.”

On the BLM’s information board at Cottonwood Campground in McCain Valley, an informational paper posted on the Sawtooth Wilderness Area states, “Historically, Peninsular bighorn sheep made their home here, and today’s transient sheep use the area.” Another paper posted alongside it on McCain Valley states, “East of the valley, in several steep canyons, oases of native fan palms are found. These islands of vegetation provide habitat for many desert species, including a population of Peninsular bighorn sheep.”

Jerry Shad’s book states, “The palm-lined canyons known informally as “Four Frogs” and “Jacumba Jim” lie in the heart of the BLM’s Carrizo Gorge Wilderness Area, a region whose east boundary abuts a large expanse of state wilderness in adjacent Anza-Borrego Desert State Park. The area supports a sizable herd of bighorn sheep most of the year. During the springtime lambing season, the sheep cross Carrizo Gorge and take up residence in the Jacumba Mountains. It later goes on to state, “This area can be used as an excellent

dry campsite, with a panoramic view of Carrizo Canyon and its many tributaries. Bighorn sheep "beds" (scuffed areas) and scat are common in this area."

We have thoroughly enjoyed hiking to sections of these remote, spring-fed palm oasis mentioned above, and have hiked to many others in the regional area because of the abundant variety of wildlife and vegetation they support. We always keep watch hoping to spot a bighorn sheep because viewing them in their natural habitat is always a thrill to those fortunate enough come across them. It is also exciting for us when we spot deer in McCain Valley. This is another one of the reasons people like us come out here from the cities.

In our opinion, the above sources seem to indicate to us that bighorn sheep are known to roam and forage in areas of the Sawtooth Wilderness Area, McCain Valley and In-Ko-Pah Mountains, Carrizo Gorge Wilderness Area, Table Mountain ACEC, and the Jacumba Wilderness Areas! The ESJ U.S. Transmission Line, ESJ Wind project, and others to be built are located in a part of this regional area and the result would be permanent impacts to potential forage material for this species and activities that would potentially drive them out which would also affect the ability of people like us to view them in these areas. In our opinion, it is not in the best interest of the protected and endangered bighorn sheep or the public to build these projects here.

Regarding the ESJ Wind project on avian species, the DEIS states,

'. . . but construction of the Phase I wind turbines could impact up to 7,500 acres of chaparral, pine forest and possibly some desert communities in Mexico that may support birds protected under the MBTA.

" Future phases would increase this development footprint and thus potentially increase the impact to birds protected under the MBTA."

The report also states,

". . . operation of the turbines could result in the loss of migratory birds and migratory bats that collide with the turbine blades. Migratory raptors, in particular, may be vulnerable to collisions with wind turbines when hunting prey."

The Fact Sheet from the Center for Biological Diversity states, "Wind turbines at Altamont Pass kill an estimated 880 to 1,300 birds of prey each year, including up to 116 golden eagles, 300 red-tailed hawks, 380 burrowing owls and additional hundreds of other raptors including kestrels, falcons, vultures, and other owl species."

Wind turbines are giant, elevated "choppers" in the air. Both migrating and local raptors and bats will have a rotating gauntlet to maneuver around that could have deadly consequences. We have seen local raptors such as the red-tailed hawk, Cooper's hawk, falcons, owls, and vultures use the updraft the mountains provide to soar above and hunt prey along the ridgetops where these large-scale wind turbines will be located. We have also seen bats in the area. The ESJ Wind project, along with the other large-scale wind turbine projects to be built in future phases in Mexico, would comprise an extremely large footprint of the Sierra Juarez Mountains, and could potentially have a wide-spread, devastating impact on some avian species.

ESJ has obtained an environmental permit from the Mexican government for the ESJ Wind

project because the project is located in Mexico. In our opinion, it would not be in the public interest for the U.S. to approve a Presidential permit for the ESJ U.S. Transmission Line itself or the ESJ Wind project associated with it that would be facilitated by it. Both projects could affect the bighorn sheep foraging areas or drive them away, and the wind project could affect the avian species that currently reside or migrate through here. The full effect on bird and bat populations from the ESJ Wind project and future large-scale wind turbine projects in Mexico are currently unknown, so no mitigation measures currently exist. Again, if the U.S. does not have control of these projects to be built in Mexico, or know the potential adverse affects to our biological resources that cross into Mexico and what mitigation measures would be proposed, we should not build the line to connect to their line.

## FIRE AND FUELS MANAGEMENT

The DEIS states,

“With regard to fire and fuels management, the cumulative presence of the overhead transmission lines associated with the actions considered in this analysis would create multiple ongoing sources of potential wildfire ignitions for the life of each respective action.”

“Implementation of the Fire Protection Plan proposed by ESJ U.S. would reduce the probability of igniting a wildfire and reduce the impacts of fires when they occur; however, the potential for ignition would remain. Therefore, the ESJ U.S. Transmission Line project would have a MAJOR AND UNAVOIDABLE CONTRIBUTION to this cumulative impact.”

“. . . and creation of a potential obstacle to firefighting.”

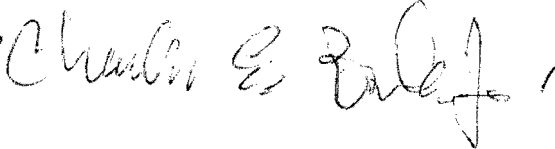
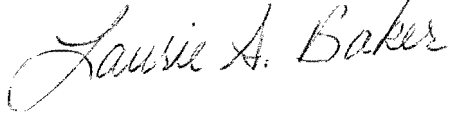
The last statement above is the most troubling to us about the ESJ U.S. Transmission Line and ESJ Wind projects, along with all the other regional projects, when considering the cumulative impacts these projects will have if a fire breaks out. It means that ANY fire from ANY source, including lightning, could spread out of control because transmission lines and wind turbines would hinder firefighting efforts to contain it, especially by air. The lives of people in the surrounding communities of Jacumba and Boulevard, and on the Campo Indian Reservation, along with the animal and plant communities in the area, could depend on the ability to effectively fight a fire. In our opinion, considering the risk, it is not in the public interest to build these obstacles in this rural setting that could limit our abilities to protect lives and resources.

In closing, we would like to express our opinion that this regional area is SPECIAL, JUST AS IT IS! That’s why we come. Industrialization would desecrate its present RURAL CHARACTER and SOMETHING IRREPLACEABLE WILL BE LOST FOREVER! The “Great Outdoors” won’t be so great here any more, just outdoors next to massive, industrial structures plastered all over the landscape with lines strung between them. In our opinion, recreation and industrial uses are INCOMPATIBLE.

The present experience to camp, hike, etc. at Cottonwood or Bow Willow Campgrounds, or Anza-Borrego Desert State Park for a weekend, or just to visit interesting places within the regional area for a day to enjoy the unique scenic beauty it has to offer would be GONE, and LOSING IT would QUENCH our desire to come out here in the first place. Our family



was fortunate to experience the wonders of this remote regional area with few modern man-made structures interfering. Will future generations be able to do the same? Public Lands in transitional areas such as these that are somewhat accessible by hiking or by jeep are few and far between in San Diego County. There's a sign posted by the State of California on the Pepperwood Canyon Trail in McCain Valley that reads, "FEATURES PROTECTED. THIS IS YOUR HERITAGE - HELP GUARD IT." That is what we are trying to do.

Sincerely,  , 

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