

Desert Protective Council
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Dr, Jerry Pell, NEPA Document Manager
Office of Electricity Delivery and Energy Reliability,
OE-20
U.S. Department of Energy
Washington, DC 20585

VIA email to Jerry.Pell@hq.doe.gov

November 1, 2010

Dear Dr. Pell,

On behalf of the Desert Protective Council (DPC), thank you for the opportunity to submit comments on the Draft Environmental Impact Statement of the Energia Sierra Juarez (ESJ) U.S. Transmission Line Project.

The Desert Protective Council is a 56-year-old non-profit membership organization. Our mission is to protect and preserve the unique natural, cultural, historical and recreational values of our southwest deserts and to educate children and adults to a better understanding of the deserts. We are presently focusing our conservation efforts on the Imperial County desert and the adjacent high desert and juniper woodland/scrub habitats of Eastern San Diego County, which provide forage area and migration corridors for the Peninsular Bighorn Sheep.

The Desert Protective Council supports the Department of Energy's choice of Alternative One-The No Action Alternative for the ESJ Transmission line project for the following reasons:

1. The Desert Protective Council is very concerned about the direct temporary and long-term major impacts to important wildlife habitat and to human communities in the vicinity from the construction and operation of the transmission line and the project's contribution to the cumulative impacts from the several other industrial energy proposals and transmission lines in the vicinity.
2. This transmission line project's delivery of wind energy entirely produced in Mexico into the United States via Sempra Energy's environmentally destructive infrastructure to serve the California market will undermine the push toward more efficient, cost-effective and more environmentally sound in-basin energy solutions and point-of-use roof-top and distributed renewable energy development.
3. The ESJ Transmission line Draft EIS fails to adequately address impacts to and mitigation for permanent loss of foraging habitat for the Peninsular Bighorn Sheep. Neither are the impacts to the migration corridors for the bighorn sheep adequately addressed.

4. The construction of Phase One of the wind turbines could impact up to 7,500 acres of chaparral, pine forest and possibly some desert habitat in Mexico that may support bird species protected under the Migrating Bird Treaty Act. Future development phases could potentially increase the impact to migrating birds.

5. The large swath of disturbed land introduces the potential for the introduction of non-native, invasive plant species, which will increase the potential for the spread of wildfires and will adversely affect adjacent native plant habitats.

6. The Draft EIS proposed conservation easement area is tiny and inadequate to compensate for the large swath of ground which will be disturbed by the construction of the ESJ Transmission line.

7. The Desert Protective Council understands the fact that the ESJ Transmission project is part of extensive energy infrastructure development planned and occurring in the mountains of Baja California. The unique diversity of flora and fauna of the Sierra Juarez and the Sierra San Pedro Martir, including 404 species of invertebrates, 11 amphibians, 58 reptiles, 75 mammals and 260 species of birds, including protected golden and bald eagles in the Sierra Juarez, make them among the most important forests left in Mexico. We oppose projects that jeopardize these last intact Mexican forests, which are intimately connected with our Eastern San Diego County and Western Imperial County wild habitats.

8. Impacts to unknown and yet-to-be-surveyed cultural resources have not been adequately analyzed.

9. The DPC is very concerned with the serious multiple ongoing sources of wildfire ignitions from the cumulative presence of overhead transmission lines associated with the alternative actions discussed in the Draft EIS. This project adds to the risk of wildfires in rugged areas where vegetation is extremely flammable and fire is extremely difficult to fight. The consideration of the potential for devastating fires to some of the most pristine habitat left in San Diego County and in Mexico alone should be reason enough for the Department of Energy to choose the No Action Alternative. From Page S-34 of the Executive Summary for this project: "Implementation of the Fire Protection Plan proposed by ESJ-US 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-US Transmission Line project would have a major and unavoidable contribution to this cumulative impact." The Desert Protective Council urges the DOE to reject a project that would bring such risk to the vulnerable habitats and human communities of Mexico and the San Diego backcountry.

10. This project will add to the cumulative permanent impacts to the visual resources of the San Diego backcountry. Basically these projects will destroy the character of the San Diego backcountry. This area is one of the last remaining areas of southern California which is largely uncluttered by human industrial infrastructure. We treasure the dark skies and the beauty of vast expanses of open space and the knowledge that this habitat is home to unique plants and animals of the vulnerable chaparral community. This is part of our national natural heritage. This

project, in conjunction with the other planned energy infrastructure in the area will adversely and permanently impact the lovely visual character of the area and cause industrialization of the San Diego backcountry. It will adversely affect the renowned high-quality recreational experience of adjacent BLM public lands with view blockages and creation of a skyline.

11. The potential for transmission structure failure or damage from seismic activity on one of the myriad geologic faults in the area has not been sufficiently acknowledged and addressed. This is a serious and real possibility and could increase the potential for wildfires as well as interrupt electricity transmission, not to mention destroying the entire transmission infrastructure.

Once again, thank you for considering these comments of the Desert Protective Council and including them in the public record for the Energia Sierra Juarez Transmission Project. Please keep us on your mailing list for all future meetings and notices about this project.

Sincerely,

Nick Ervin
President of the Board of Directors
Desert Protective Council