

Comment Set H0033

Gregory Courson & Jeffrey Holt (Portions of this comment appear on DVD only)

To:
The California Public Utilities Commission
and the Bureau of Land Management
C/O Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

From:
Greg Courson
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Dear C.P.U.C.,

I received in the mail a notice about the Proposed Sunrise Powerlink Project. The notice concerns the *Recirculated* Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement. From: Billie C. Blanchard, CPUC, and Lynda Kastoll, BLM, EIR/EIS Project Managers. The notice is dated July 8th, 2008.

The notice explained that the CPUC is seeking further public comment.

I have comments regarding the following:

1. SDG&E Santa Ysabel Partial Underground Alternative Revision, whose place within the Supplemental Draft EIS is section 3, page 13.
2. La Rumarosa Wind Options.

For #1 above I've included photographs to help describe my remarks.

Sincerely,
Gregory D. Courson
Jeffrey S. Holt

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I. ABOUT THE EIR/EIS:

The language in this document is daunting and poses difficulty for readers unaccustomed to technical writing.

In the notice I received, it says "Comments . . . are limited only to the topics in the document. The Final EIR/EIS will present responses to all comments on the Draft EIR/EIS and all relevant comments submitted on the Recirculated Draft EIR/Supplemental Draft EIS."

I have tried to stay within these guidelines as much as possible.

ABOUT MY COMMENTS:

I am not a technical writer. I've written my comments in "discussion style," which naturally makes them longer. I've been writing for the local newspaper, The Julian News, for eight years now, and I do know how to write. I've read and re-read, written and re-written my comments many times, editing them as best I can.

If the Discussion section is too long, please see the Conclusions section. If any of the conclusions are puzzling, note the page number(s) at the end of each conclusion. On those page(s) you will find the discussion.

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II. SDG&E SANTA YSABEL PARTIAL UNDERGROUND ALTERNATIVE REVISION.

Names and Geographical Extent of the Preferred Route:

In this part of my comment, I want to clarify what I'm discussing by looking at the current names of the routes in the Santa Ysabel area, and noting their geographical extent. The names are: The Preferred Route, The Santa Ysabel All Underground Alternative, The Santa Ysabel Partial Underground Alternative, and finally the Santa Ysabel Partial Underground Alternative Revision.

To summarize, I will only say that according to the naming here, and according to the names' geographical extent, what is known as the "Santa Ysabel so and so" extends from Moretti's Junction at the northern point until the point just west and south of the junction of highways 79 and 78 (see map). This is irrefutable according to the logic of how these segments of the line have come about and how they have been named.

We have to establish this, so that in talking about the various segments of the entire line, we understand what everyone is talking about. Hence, the Santa Ysabel Partial Underground Alternative Revision runs from Moretti's Junction to just west and south of where highway 79 meets highway 78.

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Main Discussion:

It seems some praise might be justified about the company's (SDG&E) Revision of the Santa Ysabel Partial Underground Alternative, in that the Revision circumvents the cemetery at the mission and, thus, sensitive cultural remains. Yet SDG&E's activities throughout the course of this controversial proposal make me mute on the matter of praise. Through mitigation, the impact to agriculture is also reduced by the Revised Route. I am not in favor, however, of the idea that the visual mitigations to certain parts of the line, in the Revision, will have the desired effect. These visual mitigations involve the part of the Revision which is above ground. Those of us who live in the area will, if the proposal is approved, see this enormous project from all angles and altitudes because we hike the land and use non-public driveways and roads. This is our home. We live here. We're not visitors who only use the main roads and highways.

About the mission and cemetery: As a lot of us know, many American Indian tribes

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revere the remains of their ancestors and consider burial grounds sacred. Then too those Europeans among us who have similar sentiments about the remains of their own dead. This subject, I assume, is what SDG&E is avoiding treading upon.

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Yet what about those of us who venerate the trees? The northern part of the Partial Underground Alternative and the Revision both involve cutting down enormous numbers of Oaks and other trees, and destroying high, woody chaparral such as Manzanita, which are very old and beautiful. Is this something to be proud of? Is this not something sad, this proposed killing of trees for accommodating huge towers planned to go up the slopes just southwest of Moretti's Junction? (see map). And not only accommodating huge towers but the maintenance roads as well, which will require extensive grading considering the degree of slope that exists along the northeastern flanks of Mesa Grande. The roads will also have to be wider than presently anticipated due to the size of the equipment to be traveling on them, in the event that this corridor is approved. These slopes are what many of my comments concern.

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In general, both the southern part and the northern part of this section of the Preferred Route will involve the cutting of trees, yet most of my comments below emphasize the northern area near Moretti's Junction. Both the northern and southern parts comprise the entire Santa Ysabel Partial Underground Alternative, and the Alternative's Revised Route.

The more one sees the extent of the construction described in SDG&E's Proposal, the more one sees how extensive the damage will be to the slopes in question, and to the natural world there. I don't think many people understand what a proposal of this size implies. The company will, if the project is approved, have to clearcut a part of the slope to create a very wide corridor. (Please see #2 in the FIRE comments below, which explains the width of the corridor). Clearcutting is a very sad and very damaging practice.

The series of photos, numbers 1 through 4, when lined up together, are a panorama showing the slopes I am referring to, which is the northern part of the Partial Underground Alternative and the Revised Route. According to the diagram and map in the EIR/EIS, the proposed Preferred Route will traverse the slopes on the far right of the panorama, and then gain the long meadow/pasture of the first ridge, the ridge shown in the center of the panorama. Now, I am not an engineer, and I don't know what the company has in mind, but reason suggests that the corridor cannot go onto the Reservation

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behind the first ridge (see topo map). The corridor would skirt the Reservation boundary and then, perhaps, go for the second ridge in order to gain the top of the mesa. In any event, hundreds, perhaps thousands of Oaks and other trees and chaparral will have to be cut for the corridor, as you can see.

On the far right, photo number 5 shows how the slopes descend to the valley at Lake Henshaw. In the center of #5, a short row of trees, tiny in the distance, line a part of highway 76, which proceeds west to Mt. Palomar in the distance, and which proceeds east to Moretti's Junction. Moretti's Junction is hidden by the foreground of the photo.

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Is one kind of veneration of greater value than another ? To save cultural remains (the bones of the ancestors so to speak), on one side of the Mesa and destroy enormous numbers of trees on the other side would imply what? A contradiction: in one place preserve what is dear to some and in another place destroy what is dear to others: the trees the plant life, the natural beauty, and even perhaps animals and their young.

And, why point out the contradiction? Without wanting to denigrate the importance of the Mission as a cultural and religious center both presently and historically, I'll focus specifically on the company's action of selecting the Mission alone, an act showing a lack of depth and a lack of respect in that they have considered only the Mission and its cemetery as a culturally sensitive area; not demonstrating a culturally-sensitive respect for the varied and many local, traditional, and sacramental sentiments about the natural world here, in this area. Is not thoughtful, culturally-sensitive respect nonselective? The bones of the ancestors and the trees are all a part of such an all-inclusive, all-embracing respect; a state of mind the company obviously doesn't possess in this case.

Another part of this contradiction lies in the idea that Oaks are not just biological/botanical entities but are cultural entities also. The historic and milleniums-old American Indian presence here, plus the history of the Spanish, Mexican and then Californio/American presence all involve the Oaks. The Oaks are an intimate part of California's heritage, especially Southern California. Thus, noting their cultural value alongside them being trees ("biological resources" in the EIS), I find an omission on the part of Aspen in categorizing only the Mission and its cemetery as culturally sensitive, and not seeing the cultural value that the Oaks most certainly possess. In view of this, a re-assessment

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off the impacts is necessary.

Again, the Oaks have cultural and even sacramental value, not to mention some of the other plants, for example Manzanita, "Little Apple." In any class on the local heritage and historic plant use, some of these woody and herbaceous plants are famous. That they are well-known parts of historical culture implies their cultural value. Manzanita and Chamise stands thrive on the slopes on the far right of the panorama, in photo number 4. Photos 6 through 8 show a detailed closeup of these slopes and provide an excellent example of the plant life. The Chamise, already past their bloom and going to seed, are the reddish-brown of the mosaic. The light and dark green on the hillsides in the mosaic are varieties of Manzanita. The drainage bottoms hold Oaks.

I hope the Commission sees the validity of the idea that the Oaks and some chaparral are cultural as well as biological entities. What would our heritage in Southern California be without the Oaks? The *quality* of our heritage as Southern Californians would be different, no doubt, if there were no Oaks. The matter is similar to the Salmon in the Northwest, which are an intimate part of life there for many people, and which have a folklore and a deeply religious significance for the Northwest Coast Indians. Then too the Bodhi Tree for Buddhists and the sacred cows of the Hindus, not to mention the Bison of the Plains Indians which, once destroyed, was the destruction of their culture.

Lastly, one could conclude that a proposal built on contradiction is a proposal built on sand, so to speak. Built on sand? Yes. This powerline proposal is weak on account of its inherent contradictions.

In view of the number of professionals who've deemed the entire powerline unnecessary, how on earth could the annihilation of these wonderful trees and other plants, and the damaging of the ground by extensive grading, be justified?

(At the CPUC hearing in Ramona on Tuesday, February 26th, 2008, Supervisor Dianne Jacob quoted an economist, saying that California is "at the dawn of a revolution which could be as powerful as the Internet revolution." The Supervisor went on to say that the powerline "will be outdated before it is even finished." (See the Ramona Sentinel, March 6th, 2008 issue). In spite of this, the company, wearing blinders focused only on its personal goals, forges ahead with these Revisions, not seeing a larger picture and the far-less-destructive options available).

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On mitigation: In addition to the above, I find myself questioning the idea that if we cut down Oaks and chaparral in one area, that this can be mitigated by setting aside acreage somewhere else; acreage where Oaks will be planted and/or preserved in perpetuity. On this issue are two points. One: Has some of this area already been designated as mitigation for prior development projects? Two: That it takes hundreds of years for Oaks to come into full maturity suggests, to me, that mitigation of this kind, in this case, is a very poor solution. In addition, this kind of agreement, in which Oaks and other trees will be protected in certain areas by future generations, seems wishful thinking at best, or even magical thinking, concerning our descendants. One remembers the endless breaking of treaties and shallow "promises" of history, and eyes the future with this in mind.

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The Moretti's Junction area is just below, and to the west/northwest of the new casino on the Santa Ysabel Indian Reservation. Would the Santa Ysabel Band appreciate an enormous mar on the vista one beholds from the casino grounds? Photos 1 – 5 are taken from the casino grounds. Would such a marring of the view reduce the number of visitors to the casino, and thus reduce the Santa Ysabel Band's earnings?

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Photos 11 and 13 show Moretti's Junction itself. Photos numbered 10 –15 show the area around the junction from points along both highway 76 and highway 79.

Thousands (yes, thousands) of people coming from the coastal cities use both highway 76 and highway 79 as a way to access the desert to the east, and to access campgrounds in the mountains. The lines of cars, campers, truck/trailers, winnebagos, and motorcycles disappear into the distance on weekends throughout the year. How will it be for them to approach this simple, tree-lined, rural junction (Moretti's Junction) and find it totally transformed into industrial towers and dirt marching up the once beautiful and greened slopes near the junction? The woodlands there will have be obliterated to accomplish this.

The photographs are far more descriptive than the simplistic phrase "sensitive vegetation community." It is a beautiful, rural junction whose beauty would be annihilated if either the Partial Underground Alternative or the Partial Underground Alternative Revised Route is approved.

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If either the Partial Underground Alternative or its Revision are approved, as part of a larger approval of the Preferred Route, the grading that will be done on those particular slopes, in order to build the maintenance road and spur roads, will be extensive. Judging from the size of the footprint for the tower pads, the grading for the towers will also be extensive. The terrain in places is steep. Look at photos 1 – 5 and imagine it. Can you imagine the impact to the landscape?

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My purpose in mentioning the grading is two-fold. One: the marring of the beauty. Two: the subject of silt runoff during rains. There is already a problem with this in the area, due to the recent construction of the casino. The Santa Ysabel Band did such extensive grading above highway 79, that the silt flows during rains are heavy, washing down the slope, going over the Reservation boundary and filling the fields of a large, neighboring ranch with mud. Photo 16 shows the ranch from the casino grounds. (I know this issue well).

I imagine that the grading to be done to construct the maintenance road and the pads for the proposed towers will produce equally large, or perhaps larger, silt flows. Then is the question of fire: if the slopes here burn after such extensive grading, the silt flow will be enormous, and more grading will be necessary to control future flows. These slopes have not burned, I believe, in forty to sixty years, perhaps more. What this means (40 to 60 years) is that this area is due for a fire any time now.

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Am I thinking in improbable, worse-case scenarios when mentioning fire and erosion? A few such scenarios have already happened in the area: The La Jolla Fire of 1998, which burned the southern flanks of nearby Palomar Mountain; the Pines Fire of 2002, which burned the eastern flanks of the Volcan Range all the way to, and including, the area of the new, proposed substation near Ranchita; the Cedar Fire and Paradise Fire of 2003; and then the Witch Fire of 2007. And there's still a lot of fuel left to burn. It is sad indeed to think of what might happen to this most beautiful area around Mesa Grande, if put in the hands of people who appear unconcerned about what may be the long-term effects of their actions. (Note: the County cited the Santa Ysabel Band for various aspects of the grading they did to create the pad and entrance road for the Casino).

A last remark: Again, I don't think the Commission realizes the extent of the damage implied by the size of this proposal. This is an enormous project that is being proposed and the impact that it will have on the area around Moretti's Junction will be heart-

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breaking if this Preferred Route is approved. And this idea is not mine alone. Discussing the size of the proposal with a long-time resident experienced in roadbuilding, he said the same thing without any prompting. Those of us with on-the-ground experience in natural resource work see this enormous impact immediately when looking at the proposal. (See the page explaining my background).

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Looking at photographs 6, 7, & 8, plus the previously-mentioned panoramic view, you can see the lay of the land and the extent of the slopes across which the Preferred Route is now mapped. The beautiful mosaic on these slopes would, if the proposal is approved, have a large, wide, long stripe cut through it. I would estimate the width of the corridor at up to two- to even perhaps three-hundred feet.

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What would be done with the waste? The piles and piles and piles and piles of it? Also, what about the increased fire hazard if the waste is left there for years and never disposed of? And what about the damage due to the logging operation itself and the damage due to the log-trucking, if any?

While writing about this aspect of the Partial Underground Alternative, and its Revision, I remember the sadness we felt in the high country in the Northwest. Looking at the slopes above Moretti's Junction, I can't help but feel sad about it; the possibility of such a brutal attitude toward nature being allowed into the area. The chaparral here is thick and high, and the oak woodland and groves, and other trees, are many and very beautiful. It is one of the most beautiful areas in the backcountry.

Again - I am providing photographs in order to reveal what is actually here. These photos supplement the EIR/EIS and, to me, are far more descriptive than over-simplistic phrases like "sensitive vegetation communities," "northern mixed chaparral" "coast live oak woodland" "Engleman oak woodland" "meadow" "Diegan coastal sage scrub."

An additional comment would be to point out that any benefit or ultimate good from future renewables sites in the desert would be negated by the sacrifices necessary to construct the transmission line bearing that renewable energy. Here again is another contradiction: emphasizing the renewable and nonpolluting nature of a generation facility, while at the same time ignoring what you had to do to transmit the energy: cut down thousands of trees and plants in every woodland encountered between the desert

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and the coast.

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Fire:

1. The EIR/EIS has already stated that a powerline of this size, along the Preferred Route, would not only have unmitigable, significant potential to start a fire but also pose an unmitigable, significant threat to firefighting efforts.

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I feel this is especially true for this segment of the Preferred Route. Please note the long meadows along the ridges in the panoramic view shown in photographs 1 through 4. That SDG&E may place towers along these meadows, poses complications for any firefighting effort should the slopes below the meadow ignite for some reason. These meadows, in my opinion, could be crucial to firefighting strategy in the area. Firefighters often burn meadows such as this, as a way to quickly contain one flank of a going fire. Such a strategy, depending on the situation, could be delayed or deterred by a powerline of this size. Just on the other side of the last ridge in the photo is the mesa of Mesa Grande. There are homes and ranches up there.

To go on listing the probable, possible scenarios, should a fire ascend these slopes, would take pages. What is the probability of a fire in this area? Very high. As was mentioned earlier, these slopes haven't burned in forty to sixty years. Also, the increased number of visitors due to the new casino nearby, and due to this area being a popular haunt for bikers, adds to the probability.

2. Because a fire has not occurred in decades here, fuel-loading on these slopes is high. The chaparral and woodland are very tall and thick also, in which case A VERY WIDE CORRIDOR, as I said, would have to be cut to protect the powerline from fire. Flame lengths are generally two to three times the height of the fuel. Flame or radiant heat from oak trees "crowning out" could reach the wires. Heat from the high and extensive chaparral could bake the wires. Hence extensive cutting of trees and chaparral should this segment be approved. Hence my term "clearcutting."

One of the things I did in researching the proposal was to learn the background of each of the commissioners. Each commissioner publishes a biography about themselves

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on the P.U.C. website. What I found was disturbing: no one with any years of on-the-ground experience in natural resource work. I asked myself: "How could they make an informed decision about such a project if they'd lived in and worked inside buildings all of their lives?"

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Do the commissioners really have any idea of the actual, on-the-ground damage implied by such a proposal? Do the commissioners have the experience to translate the language of this EIR/EIS into REAL terms? Do they have the understanding to see what is actually being proposed for the oak woodlands and other areas along these proposed corridors? This project, if approved, will be very damaging to the natural world in the areas along the route, due to the size of the proposal. And to damage the natural world so significantly, is to damage culture and people too. You cannot separate people from their environment. It's heartbreaking what this company is proposing to do. I saw such things with my own eyes, year after year after year, working in the forests of the North west. Note the sadness I mention on a previous page. The dismembering of serene, very-much-alive, beautiful forests and woodlands is something I've never forgotten.

Conclusions:

1. The mitigations for visual resources within the Revised Route may not have the desired effect for local residents who use nonpublic roads and trails. (Discussion pp. 1 & 5).

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2. It is a gross oversimplification to classify Oaks and some other plants only as "Biological Resources." Oaks also possess cultural value and can be categorized as cultural resources as well. Rethinking and reassessing the impacts mentioned in the EIS/EIR is therefore necessary. I think this is obvious to anyone who appreciates our heritage as Southern Californians. This, in light of the fact that thousands of Oaks have been killed in the recent conflagrations, would then increase the impact value when considering that the company proposes to cut down thousands of Oaks in order to construct this powerline. The company's attempt to preserve sensitive cultural remains at the cemetery is such a miniscule decrease of the impact in the Moretti's Junction/Santa Ysabel area that it is hardly worth noting. I feel this is true when seen within the overall context of the outrageous damage proposed throughout the entire Partial Underground Alternative Revision. (Discussion pp. 1 last sentence, 2, 3, & 4).

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3. The contradiction inherent in the Revision adds to the list of contradictions inherent in the entire Proposal. There are so many contradictions in this whole thing that it is a weak Proposal. It is not standing on firm ground, so to speak. (Discussion pp. 3 & 4).

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4. The impact to the area around Moretti's Junction may decrease the new casino's earnings, as well as discourage the thousands of visitors to the desert who use highways 79 and 76 to access the desert and mountain campgrounds. (Discussion p. 5).

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5. The extensive grading required for a corridor and roads on the slopes of Mesa Grande, near Moretti's Junction, will lead to heavy silt flows during rains. If a future fire happens to burn these slopes, the silt flows will be enormous. (Discussion pp. 6)

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6. I don't think many people, including the company and the commissioners, understand the extent of the damage implied in a proposal of this kind. This is especially true for the northern segment of the Santa Ysabel Partial Underground Alternative and its Revision. In addition, should the All Underground Alternative be approved, they will still have to cut down hundreds (perhaps thousands) of Oaks along the bottom of the small valley where Carrista Creek and highway 79 run. Anywhere Oak woodland obstructs the route, whether the powerline is above ground or below, there will be clearcutting, which is a very sad and very damaging practice. (Discussion p. 6 last paragraph, p. 7, and the top half of p. 9).

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7. Any benefit or ultimate good from future renewables sites in the desert would be negated by the many sacrifices carried out to construct the transmission line bearing that renewable energy. (Discussion p. 7, last paragraph).

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8. Fire: The EIR/EIS has already stated that a powerline of this size, along the Preferred Route, would not only have unmitigable, significant potential to start a fire but also pose an unmitigable, significant threat to firefighting efforts. I feel this is especially true for this segment of the Preferred Route. (Discussion p. 8).

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9. The significance of, and the beauty of the Moretti's Junction area has been eclipsed by all the concern for the valley at Santa Ysabel, a concern which is not misplaced. Yet to ignore this northern segment of the Santa Ysabel Partial Underground Alternative, and its Revision, which are within the Preferred Route, is to ignore an area as beautiful and as important as Santa Ysabel, especially in terms of the environmental impact and some economic impact also.

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10. I've followed this powerline proposal from its inception, when the idea became

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public knowledge. I believe a personal summary would be to say that in the face of error it is impossible to be indifferent. Hence my long comment. I encourage the commission to deny this application on account of the excessive and unnecessary damages it proposes to mete out on the natural world and on the people of the San Diego backcountry. As for Californians in general, I believe the Proposal is not in the public's best interest.

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My background:

U.S. Forest Service, Pacific Northwest region. 1975 to 1983. Olympic National Forest, Rogue River National Forest, Wallowa-Whitman National Forest. Fire Suppression. I worked during the timber-harvesting era prior to the Northern Spotted Owl Controversy. During those decades, mainly post-world-war-two, fire crews were an intimate part of the timber-harvesting regime. When we weren't on a going fire, we were used to prescribe-burn clearcut units of National Forest timber whose marketable logs had been removed from the slope. The units ranged anywhere from ten acres to fifty acres on steep slopes in the high country. The average size of the units was thirty acres, and we burned units whenever weather allowed. Some summers would see two to four units burned per week, by two to four separate, large crews working in different areas of the National Forest.

Out of this experience I learned what massive environmental degradation and destruction are. I worked in areas where entire forests had been removed from vast drainage and canyon systems in the coastal mountain ranges and in the Cascade Range in Central Oregon and Central Washington. On many occasions, it wasn't an uplifting experience to do this work or see such vast brutality committed against the natural world. Clearcutting is a very brutal and damaging practice. After the Spotted Owl Controversy in the Pacific Northwest, clearcutting became illegal on some National Forests, restricted on other Forests, and the same for BLM lands, all of this applying to the area west of the Cascade crest in both Oregon and Washington states (basically half of each state), and in the coastal mountains in Northern California.

Now retired, I've lived in the San Diego backcountry for fourteen years, twelve of those years in the Wynola Springs area near both Santa Ysabel and Julian. I've taken an interest in the area's fire ecology, natural history, fire history, and the land management practices of the pre-Spanish Indians. I've written extensively about fire issues for the local newspaper, The Julian News.

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Photo Index:

Photos 1 – 4 are a panorama of the northeastern flanks of Mesa Grande, just south and west of Moretti's Junction. These photos were taken from the casino on the Santa Ysabel Indian Reservation.

Photo #5 shows the northern flank of Mesa Grande on the left side of the photo. Just a little below the exact center of the photo, a short line of trees extends to the right. These trees line highway 76. Lake Henshaw lies in the distance, and behind the lake is Mt. Palomar. Note the denuded slopes on the southern flank of Palomar, burned off by the La Jolla Fire, 8,000 acres, in the autumn of 1998.

Photos 6, 7, & 8. Photos 6 & 8 can be placed on top of 7 to create a panorama of an example of the terrain over which the Preferred Route, and hence the northern segment of the Partial Underground Alternative Revision, is mapped. Extensive and beautiful mosaic of Oak groves and chaparral stands.

Photo #9. Standing on highway 76 near Moretti's Junction. The white dot on the distant slope is, essentially, the casino on the Santa Ysabel Indian Reservation. If you look at photo 5, we are standing on hwy 76 in the center of photo 5, looking southeast.

Photo #10. Taken from hwy 76 near Moretti's Junction. An example of the blanket of chaparral and Oak groves covering the first slope ascending south to the top of Mesa Grande. The proposed corridor would be clearcut through similar terrain just east of the slope shown in this picture. Note the house on the far right of the photo.

Photo #11. Highway 76 ends at Moretti's Junction, in the distance between the Oaks. Note the beauty of this rural junction. In the background are the lands of the Santa Ysabel Indian Reservation.

Photo #12. Looking east toward highway 79 from highway 76. The line of trees at center-left run along hwy 79.

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Photo #13. Standing on highway 79 near Moretti's Junction, looking south. Note the blanket of Oak and chaparral, and imagine a two- to three-hundred foot wide corridor cut through the green here! Note the present powerline blending in nicely.

Photo #14. Beautiful green of the Moretti's Junction area.

Photo #15. #15 can be placed on the right of #14 to get a reasonable panorama. Note the house on the far right of #15, same house as in photo #10.

Photo #16 & 17. #16 can be placed on the right side of #17 to get a panoramic view of the eastern flank of Mesa Grande, and a view to the south toward the Santa Ysabel Mission. This photo was taken from the casino. Highway 79, south of Moretti's Junction is at the foot of the slope.

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III. LA RUMAROSA WIND OPTIONS:

My comments on this Revision have to do with economic concerns. I understand that when considering the ecological impacts of a project, that economic concerns have to be considered also. Naturally, social and political realities are a part of economics.

That SEMPRA/SDG&E are arranging their affairs on both sides of an international border makes me uneasy. I will explain my sense of caution as briefly as possible, yet I don't want to be so brief that important content is left out.

I'm a student of comparative religious studies, with a focus on the Middle East and the Far East. I've been doing this for over a decade. In addition, along with understanding the religions of these regions, one learns the cultural, historical, and political trends - not only those of the modern era but also the prior colonial era and then the eras before that.

Looking through this prism, I'm concerned about the possible, long-term effect of these various wind and natural-gas projects.

We've seen horrible manipulation of the common people of the Middle East in the history of colonialism, where affluent Europeans, alongside corrupt leadership, played a Great Game with these people's natural resources. Without going into long historical explanations, I can truthfully say that this Game led to the current rise in religious extremism in the Middle East.

Is the Game that SEMPRA is now playing, on both sides of the border, going to result in something similar, that is, that the common Mexican and the common American are going to lose while the already wealthy get even wealthier? All of which could create increased tensions across, or in the area of an international border. Are the big investors citizens of Mexico intending to help Mexicans? Will the investment scheme employ mostly Mexican citizens? Will it provide them a living wage? Will the employment plan provide benefits? Will the investment scheme strengthen or weaken the Mexican people's aspirations and goals for stronger democratic institutions in Mexico? Will it build a vital and healthy economy in the area around La Rumarosa, an economy which will not shove the poor out and over the border to the north? Is the investment scheme democratic in nature or corrupt and autocratic? Is the project, for all of its supposed "Green"

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qualities (only on paper at this point), ecologically safe for the area? What exactly do the investors have in mind? Do they have the money? Where is the money coming from, and can the investor(s) maintain the project economically through all of its stages UNTIL IT IS FINISHED AND OPERATING? Do the wind generators actually work?

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Another concern: Such an enormous area of land for wind generation seems to suggest that these projects are simply a synonym, so to speak, of the enormous coal- and oil-fired electrical generation plants of the ever-receding present. And why the enormity? What ever happened to the idea of smaller units of citizen-run, electrical-generation projects serving small, local areas? Thus a more democratic system of operation and regulation in comparison with a corporate structure where one individual at the very pinnacle of the hierarchy controls EVERYTHING and EVERYONE (controlling even our elected representatives and their appointments).

I'm uneasy about the matter.

I urge the Commission to decide on this issue in a way which prevents, as much as possible, a repetition of the human and ecological tragedies which have resulted from the Great Game of the not-so-distant past.

Thank you for hearing my concerns.

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