

Steve Taffolla

From: Traci Verardo-Torres <Traci@calparks.org>
Sent: Friday, March 04, 2011 1:28 PM
To: ECOSUB; catulewind@blm.gov
Cc: Traci Verardo-Torres
Subject: Comments re: Tule Wind DEIR/EIS
Attachments: 030411_CSPF_Tule Comments.pdf

On behalf of the California State Parks Foundation, attached please find our comments on the proposed Tule Wind Energy Project. Please do not hesitate to contact me at the contact information below if there are any questions regarding our letter.

Thank you,
Traci Verardo-Torres

Traci Verardo-Torres
Vice President, Government Affairs
California State Parks Foundation
1510 J Street, Suite 120
Sacramento, CA 95814
TEL: (916)442-2119
FAX: (916)442-2809
traci@calparks.org
www.calparks.org

This footnote confirms that this email message has been scanned by
PineApp Mail-SeCure for the presence of malicious code, vandals & computer viruses.



CALIFORNIA STATE PARKS FOUNDATION

March 4, 2011

Iain Fisher, CPUC
Greg Thomsen, BLM
c/o Dudek
605 Third Street
Encinitas, California 92024
VIA ELECTRONIC MAIL and FAX

RE: Tule Wind Energy Project Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/EIS)

Dear Messrs. Fisher and Thomsen,

On behalf of the California State Parks Foundation (CSPF) and its 120,000 members statewide, I appreciate the opportunity to comment on the Draft Environmental Impact Report/ Environmental Impact Statement (DEIR/EIS) for the Tule Wind Energy Project (Project).

CSPF is the only statewide, independent nonprofit organization dedicated to protecting, enhancing and advocating for California's magnificent state parks. In the last several years, we have led statewide efforts to protect state parks from incompatible developments that impact and threaten public access, visitor enjoyment and the economic vitality of California's 278 state parks. In addition to pursuing state legislation, we have been integrally involved in regional and local campaigns to protect state parks from transportation, utility, and commercial developments that were wholly incompatible with the recreational, natural and cultural resources goals of the effected state parks. We were actively involved as an intervener in the proceedings on the Sunrise Powerlink project during the time when the project contemplated construction of new utility towers and transmission lines directly through Anza-Borrego Desert State Park.

CSPF's interest in this Project is related to its impacts to Anza-Borrego Desert State Park (ABDSP), located adjacent to portions of the proposed Project. We appreciate the willingness to extend opportunities for public comment on the Project. Based on the documentation provided in the DEIR/EIS, however, we believe the impacts from the Project to ABDSP are significant and unmitigable, and that the project is inconsistent with the natural resource goals and mandate of ABDSP, and with public enjoyment of the character of the park.

Headquarters

50 Francisco Street
Suite 110
San Francisco, CA 94133
OFFICE 415-262-4400
FAX 415-772-8969
EMAIL members@calparks.org

Southern California Office

714 W. Olympic Boulevard
Suite 717
Los Angeles, CA 90015
OFFICE 213-748-7458
FAX 213-748-7495

Sacramento Office

1510 J Street
Suite 120
Sacramento, CA 95814
OFFICE 916-442-2119
FAX 916-442-2809

www.calparks.org



Printed on Recycled Paper with Soy Ink

Your Voice for **Parks**

Anza-Borrego Desert State Park is California's largest state park, with more than 530,000 acres owned by the California Department of Parks and Recreation. Its land is located across three counties: San Diego, Imperial and Riverside. The park contains 12 wilderness areas that, together, comprise the majority of the entire state wilderness areas (as designed by Public Resources Code Section 5093.33) in California. During Fiscal Year 2008-09, the park hosted over half a million visitors (543,013), including Californians, out-of-state visitors, and international tourists. Such visitation generated more than \$412,000 in visitor fees and use of concessions. Preservation of the park in a manner that continues to draw such high visitation is critical to the 278-unit state park system, but also to the community of Borrego Springs, which is essentially surrounded by the park.

Impacts to ABDSP from the Project

Visual Impacts

As described above, one of the most unique features of ABDSP is its wilderness. The experience by a visitor in a state park with designated state wilderness is specifically and deliberately distinct from an experience in another state park or state recreation area. As discussed in Section D.5 of the DEIR/EIS, Public Resources Code Sections 5093.31 and 5093.33 define the need and purpose of wilderness designations in the state. Additionally, peaks and summits throughout the park allow vista points and viewsheds that are magnificent and unparalleled.

The park will experience significant visual impacts from the placement of the proposed 400-foot turbines. Placement of turbines along the McCain Valley ridgeline are, according to the DEIR/EIS, likely visible up to five miles away. Turbines may be visible from Sombrero Peak, Jacumba Peak, Tule Mountain, the In-Ko-Pah and Jacumba Mountains sections and Whale Peak in the Vallecito Mountains. Given that the DEIR/EIS acknowledges that impacts to scenic vistas from the Project are significant and unmitigable (D3.157-158), this Project will alter the character and distinctiveness of the park. Disruption of the experience currently present for park visitors is essentially a disruption of the character and nature of the park itself.

Biological

The California Department of Parks and Recreation (DPR) is submitting comments regarding specific impacts to sensitive and federally-listed and state-listed species that reside in or utilize habitat corridors located within ABDSP. We support those comments. We recognize concerns have already been raised by other state and federal entities with respect to the proximity of Project turbines to Golden Eagle nests and habitat. Additionally, we are concerned that the Project may disrupt or interrupt critical habitat for the federally-endangered and state-threatened bighorn sheep that are iconic and recognizable throughout the state park. Page D.2-59 indicates a portion of the Project area is located less than half a mile from critical habitat of the bighorn sheep.

Cumulative Impacts from Renewable Energy Projects

Meeting the state's renewable energy objectives is an important goal, but one that cannot be made to be at odds with continued protection of the state's natural infrastructure. We are additionally concerned about the presence and progress of other wind energy and renewable projects in this same Project area. We do not believe alternatives from this DEIR/EIS can be reasonably adopted or plans or permits issued by the approving agencies without clarity and specific identification of the cumulative impacts from all pending projects that are proposed to this area and these resources.

As currently envisioned among the alternatives, significant changes to the placement of turbines and associated infrastructure and operations of those turbines would be necessary to avoid the visual and biological impacts to ABDSP described above.

Thank you for the opportunity to comment on the proposed Project and DEIR. Please do not hesitate to contact me at 916-442-2119 with any questions regarding this letter or CSPF's position on this proposed Project.

Sincerely,

A handwritten signature in blue ink that reads "Traci Verardo-Torres". The signature is written in a cursive style and is positioned above the typed name.

Traci Verardo-Torres
Vice President, Government Affairs

cc: California Department of Parks and Recreation