

To: Department of the Interior (DOI)
Bureau of Land Management (BLM)
C/O Greg Thomsen
22835 Calle San Juan des Los Lagos
Moreno Valley, Ca. 92553

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From: Michael W. Cuff
PO Box 36
Ocotillo, Ca. 92259

Mr. Thomsen,

Public meetings should be held on weekends (so that folks that live in the areas of concern will be able to attend) in the areas of concern. Providing maps and ways to identify the areas and pads for the Wind Turbine Generators would assist us in being able to properly assessing the project and its affects of the area.

First of all, I would like to remind you of the “Intent of the California Desert Conservation Area (CDCA) Plan” “Is to ensure that as nearly as humanly possible that the recognition brought by Congress and the people into Law- that the California Desert is not a wasteland but a precious public resource – is effectively guaranteed in its management, that the uses of today do not preclude the users of tomorrow, and that we preserve and develop these assets wisely with full regard for their social and environmental as well as economic values”. Quoted from the BLM’s CDCA, passed by Congress in 1976.

Additionally, “the year 2010 marked the 10th Anniversary of the National Landscape Conservation System. The treasured landscapes of the Conservation System are specially designated and managed to conserve, protect, and restore their exceptional scientific, natural, cultural, ecological, historical, and recreational values” quoted from the front page of the Department of the Interior, Bureau of Land Management California website.

How much revenue (In dollars) will the Department of the Interior, Bureau of Land Management receive in granting this project during the course of its operation?

How much revenue (In dollars) will the State of California receive in the granting of this project during the course of its operation?

How much revenue (In dollars) will the County of San Diego receive in the granting of this project during the course of its operation?

The black water, gray water, hazardous materials and hazardous waste become an issue. Who will be monitoring this site to ensure that Tule Wind is in compliance with federal, state and local regulations during the duration of the project? How would spills or contamination be remediated?

Currently, the El Centro Field Office does not have its own Environmental, Health and Safety professional. Who from BLM will be monitoring Tule Wind's project and how often? Who will be the Environmental, Health and Safety professional for Tule Wind? What is the person's qualification? Who will be BLM's Contracting Officers technical representative (COTR)? Will California EPA be informed of Tule Wind project and will they be observing the project site during the duration of the project?

Currently, the local fire department is able to respond to most emergency calls. Unfortunately, they do not have the capability of responding with the proper equipment to combat a fire in the Nacelle surrounding the transmission of a WTG. When a WTG catches on fire, the embers from the WTG could travel quite a distance. Are you willing to be liable for the land and resources being destroyed by a fire caused by one of the WTG? Additionally, if one of the blades catches fire then we have a toxicity issue that I'm not sure the fire department has the proper personal protective equipment (ppe) to wear in order to combat this type of fire.

Has BLM approached the local Native Americans to inform them of the project? According to BLM's required permit process as stipulated in Federal Land Policy and Management Act of 1976, BLM Planning Regulations (43 CFR Part 1600), BLM Land Use Handbook (H-1601-1) "Indian tribes must be consulted to identify sacred sites and other places of traditional religious and cultural importance".

How many full time employees does Tule Wind plan to hire. How many will be from San Diego County?

Has Tule Wind conducted preliminary analysis to describe soil and geological suitability and what were there results? Where can the public observe these results and the approved special permits for Tule Wind to conduct these tests? Who has the final approval for the foundation design and construction quality control of this project? Are seismic studies for the planned project area in favor of WTG sites with no potential for collapse or failure? What is the material composition of the Nacelle and the turbine blades? What agency provides guidance and approval of the construction materials used for this project, specifically fasteners used on high torque equipment and machinery? Which agency will monitor Tule Wind to ensure that they will use the proper materials for the construction of the WTG to avert what happened on the WTG site across from Golden Acorn Casino by Live Oak Springs in San Diego County, resulting in turbine blade fasteners failing?

Understanding that the FAA requires lighting for the WTG, I have a concern for pilot and aircrew safety during daylight and night time operations. There is daily air traffic from Customs and Border Protection, as well as US Navy and US Marine aircraft in this area. Additionally, there is occasional illegal aircraft, suspected to be from south of the US Border that could be affected the construction of these WTG.

Best management practices, developed by the Bureau during the planning process outlined in the Clean Water Act, Section 208 and subsequently, will be used to avoid degradation and to comply with Executive Order 12088". Who will monitor BLM to ensure that they are in compliance with their own guidelines, given the fact that they found themselves to be not in compliance with their own directives regarding the approval and observance of Special Recreation Permits?

Have there been any studies conducted on the affects of the WTG lubricating oil on the flora, fauna, birds, fish, mammals, reptiles and plants in the project area? What were the results of these studies? If studies have not been conducted, when will they be conducted and when will the public be able to view the results?

Who will be onsite daily to monitor Paleontological Resources at the Pattern project during the course of the project?

BLM has a responsibility to the public regarding Visual Resource Management Designations its Scenic quality and Viewer Sensitivity. There are multiple viewing areas associated with this project. Given the proximity to Interstate 8, what is the VRM classification of this project? Who made the final determination that the project areas were rated in this manner? Who monitored their decision to ensure that the decision was made properly using the established guidelines?

How will BLM ensure Tule Wind will comply with Air Pollution Control District Air Quality and PM-2.5 and PM-10 requirements? Who on the BLM staff from the El Centro Field Office is qualified to monitor this requirement during the duration of this project?

How will BLM and the County of San Diego be notified when they commence transport of the equipment and materials required for this project? Has the local school district been contacted by Tule Wind, in regards to traffic flow and proximity to bus routes and bus stops? Will there be independent oversight?

Who will conduct Resource Conservation Measure training and ensure the compliance and accountability of Tule Wind in the areas concerning this project? Who will certify that their archaeological monitors are qualified to support the discovery plan? When will El Centro Field Office be completed with their Wind Energy Protocol? Who ensures that their protocol is in compliance with Federal Regulations, taking in to account state and local regulations concerning Wind Energy and the Wildlife and Monitoring?

In closing and after considerable thought, I ask you and your staff to give more attention to this project that Tule Wind is requesting. To quote "BLM Management Principles contained in the Federal Land Policy and Management Act (FLPMA) of 1976 recognizes that multiple use, sustained yield, and the maintenance of environmental quality are not simple guides. This act recognized the value of our Nation's public lands and provided a framework in which they could be managed in perpetuity for the benefit of present and future generations. It defined BLM's mission as one of multiple use -- a new concept for the times, but which today stands as your agency's greatest strength.

BLM's mission is unique among federal land-managing agencies and you provide us with the best opportunity to meet the many and varied demands of the changing West. In 1976, few anticipated the West's rapid growth and its associated demographic and economic changes, all of which have placed increased demands on the public lands. But because of the insight and vision of the people who crafted it, FLPMA provides us with the tools we need to cooperatively and creatively manage the public lands, and in the process, dispel the notion that a variety of uses and resources cannot co-exist"

Understanding and responding to priority needs of resource use and development, both today and in the future, including such paramount priorities as energy development and transmission without compromising the basic desert resources of soils, air, water, and vegetation, or public values such as wildlife, cultural resources or magnificent desert scenery. I ask you and your staff what this means, in the face of the unknowns, erring on the side of conservation, in order not to risk today what we cannot replace tomorrow".