

# BOULEVARD PLANNING GROUP

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Supervisor Dianne Jacob  
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San Diego, CA

January 9, 2013

## **RE: Boulevard Planning Group requests for SDG&E A.12-12-007 TL 6931 / Wind Interconnection**

On behalf of our constituents within and adjacent to the rural Boulevard Planning Area, as approved at our meeting held on January 3rd, I am submitting the following requests related to SDG&E's Shu'luuk Wind Interconnection Project. Based on new restrictions regarding Planning Group comment letters, the following requests are addressed to you and copied the CPUC and PDS Director Mark Wardlaw:

1. Require SDG&E to apply for Certificate of Public Necessity and Convenience in lieu of SDG&E's request for an expedited ex-parte hearing with no EIR and no public hearings.
2. Require a full EIR in addition to need and cost-benefit analysis including property value losses.
3. Require public hearings to be held in the disproportionately impacted community at the Boulevard Volunteer Fire Station equipment bay.
4. Conduct an updated review on EMF Guidelines and emerging adverse health impacts related to increased and unsafe levels of electrical pollution that can be generated by industrial scale energy and transmission projects (covering hundreds to thousands of acres), including increased ground currents, radiation, and electromagnetic interference (EMF/RFR/EMI). Preliminary testing shows unsafe levels in and around homes.
5. Conduct scientifically valid investigations into project and cumulative project adverse impacts to power quality and the safety and the reliability of the local distribution networks that are connected to these precedent setting energy projects through common substations and neutral ground wires, in order to determine the extent of impact and any potential mitigation options.
6. We have a right to equal protection under the law, including Health in All Policies.

SDG&E's gen-tie project is a connected action project for 250 MW Shu'luuk Wind project proposed by Invenergy, the Campo Kumeyaay Nation in partnership with SDG&E (per 2010 documents). The turbine project spans close to 5,000 acres with significant adverse and cumulative adverse off-reservation impacts to private properties, residences, small livestock operations, and other sensitive resources.

The Attorney General has interpreted CEQA to include Environmental Justice requirements, especially for disproportionately impacted low-income and rural communities like Boulevard that is targeted for an unprecedented level of rural-to-industrial conversion, with over 800 MW of wind, solar, and transmission projects in close proximity to homes. We know that a Health Impact Assessment is already underway for tribal members of the Manzanita Band who feel they are being adversely impacted by the existing 25 Kumeyaay Wind turbines adjacent to where they live, work, and play. Increased risk of fire, and adverse impacts to groundwater resources, to our families, pets, livestock, wildlife, property values, sense of place, and enjoyment of our properties are other key issues of concern. Please contact me with any questions at 619-766-4170 or [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

Regards,

  
Donna Tisdale, Chair

CC: CPUC Commissioners & Public Advisor; Director Mark Wardlaw, Planning and Development Services