

# BOULEVARD PLANNING GROUP

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**DATE:** November 20, 2016

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**FROM:** Donna Tisdale, Chair & as an individual; 619-766-4170; [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

**RE: COUNTY OF SAN DIEGO CLIMATE ACTION PLAN AND GENERAL PLAN AMENDMENT; PDS2015-POD-15-002, PDS2016-GPA-16-007 & LOG NO. PDS2016-ER-16-00-003- NOTICE OF PREPARATION COMMENTS**

**At our November 3<sup>rd</sup> meeting**, our community planning group voted unanimously to authorize me to submit comments on behalf of our group.

It is our understanding that the CREP and CAP are moving along together and will be combined to address mandates to reduce Green House Gas (GHG) emissions and to comply with the court order related to the Sierra Club litigation.

There is no need for industrial scale rural energy or transmission projects that increase fire risk, impede firefighting, destroy carbon sequestering arid soils and vegetation, increase dust and dust borne pathogens, consume millions of gallons of water, and degrade property values and tourism draw. Point-of-use self generation renewable alternatives, where the energy is consumed, should be prioritized.

The Boulevard/Jacumba area, which is predominantly low-income, has already been disproportionately targeted for numerous industrial wind, solar, and related major infrastructure projects (see attached list of projects to date). We are concerned that the pending combined CREP / CAP may further adversely impact our rural communities, community character, quality of life, a wide variety of natural resources including sole-source groundwater, clean air, wildlife, public health and safety, increased fire risk and heat islands, and other socio-economic issues, *unnecessarily*.

1. **Environmental justice impacts/issues**, including disproportionate adverse, cumulative, and cumulatively significant impacts, must be fully and honestly addressed and analyzed in the CAP/CREP.
2. **Real world Eco-system services must be included and analyzed.**
3. **Feel good mitigation measures** that are artfully weasel worded to downplay and marginalize the very real impacts felt at ground – zero in our rural communities must be avoided.
4. **We support the identification of, and incentives to support and prioritize, on-site renewable energy capacity**, with the clarification that any wind energy capacity is limited to small-scale.
5. **SDG&E reports they are on track to meet the mandates for 40% renewable energy by 2018 and 50% by 2030<sup>1</sup>**. They met the required 33% renewable energy mandate 6 years early.

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<sup>1</sup> <http://www.sdge.com/taxonomy/term/73>

6. **Alternative Direct Access or Community Choice Aggregation (CCA) options** may be available to provide even higher rates of renewable energy at competitive prices, and must be analyzed.
7. **We want to emphasize and repeat requests for the County to pursue/support legislation to lift the current cap and to open Direct Access to residential customers and to lift the cap and start counting Net Energy Metering (NEM) (self-generation) towards the renewable energy mandate.**
  - Currently, NEM capacity does not count towards that mandate. *It should count!*
  - As of their last update on June 29<sup>th</sup>, SDG&E's website reports that their 5% cap has been met with 612.9 MW already installed and 4.2 MW in the queue<sup>2</sup>. Total installed and applications in queue total 647.4 MW.
  - *NEM's uncounted cap of almost 650 MW has been met in just a few years, far faster than the 13 years it has taken Tule Wind's approved 186 MW to almost reach production.*
  - *NEM capacity equals 3.5 times as many MW's as Tule Wind's pending capacity without destroying approximately 13,000 acres of previously protected sensitive public lands and private ranch land in and adjacent to the designated McCain Valley National Cooperative Land & Wildlife Conservation and Management Area & Recreation Areas.*
8. **Any Potential Renewable Energy Overlay Zones should be limited to existing commercial and industrial zones and public and private facilities located closer to where the energy is consumed.**
  - This will avoid the release of the current and future carbon sequestration in backcountry soils and chaparral/vegetation, during clear grading needed for utility-scale projects, and avoid the need for expensive and destructive transmission lines/new fire ignition sources through fire-prone neighborhoods.
  - Full disclosure of the environmental and economic cost of related transmission upgrade requirements should be included in any overlay zone studies, along with an honest analysis on reduced property values in the impacted areas.
  - The CEC's Transmission Technical Input Group (TTIG) for the Renewable Energy Transmission Initiative 2.0 includes SDG&E's \$700-900 million proposal to increase import capacity on the Southwest Powerlink by 500-1,000 MW, and to reduce Local Capacity Requirements in the San Diego area, by converting portions of existing infrastructure (*within existing right-of-way between Arizona and Miguel Substation near Bonita*) from AC to High Voltage Direct Current (HVDC) by 2025, as described on the last page of the TTIG's Revised Interim Report dated June 21, 2016.<sup>3</sup> This project is in addition to numerous other approved or proposed upgrades, overall.
  - Increasing SDG&E's import capacity limits the need for local on-site capacity which appears to be SDG&E's goal. New infrastructure projects generate lucrative guaranteed rates of returns/profits for SDG&E and their shareholders.
9. **Any legitimate CAP/CREP must include the full Life Cycle / Impact Assessment<sup>4</sup>:** A comprehensive ecological assessment identifies the energy, material, and waste flows of a

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<sup>2</sup> <http://www.sdge.com/clean-energy/net-energy-metering/overview-nem-cap>

<sup>3</sup> [http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN211927\\_20160621T144839\\_Revised\\_Transmission\\_Technical\\_Input\\_Group\\_Interim\\_Report.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN211927_20160621T144839_Revised_Transmission_Technical_Input_Group_Interim_Report.pdf)

<sup>4</sup> <http://www.businessdictionary.com/definition/life-cycle-assessment.html>

produce and their impact on the environment. This cradle to grave evaluation begins with the design of the project and progresses through the extraction and use of its raw materials, manufacturing or processing with associated waste stream, storage, distribution, use and its disposal or recycling. The objective is to identify changes, at every stage of life cycle that can lead to environmental benefits and overall cost savings. Certain wind turbine components and solar cells are not fully recyclable.

**10. Wind energy is included in the CREP. However, a clarification is needed to address the fact that the Wind Energy Ordinance (POD 10-007) limits large-scale wind projects solely to the mapped wind resource area in Boulevard, north of I-8, where Tule Wind has already been approved.**

- In addition, the Planning Commission's previous 2012 direction to staff, to conduct literature reviews on adverse health impacts related to wind turbine generated low frequency noise and other forms of pollution, every two years, has not yet been complied with, to our knowledge.
- Wind turbine or other energy projects located or proposed on federal, state, or cross-border lands, that impact San Diego County residents, must also be addressed. Adverse impacts and resources don't recognize borders.

**11. Transportation:**

- Currently, electric vehicles are not adequate or viable alternatives for rural backcountry residents who may have long distances to commute for work and for other business or errands in the urban/suburban areas.
- Limits on charging capacity and rural charging stations pose major roadblocks that must not be ignored.
- Rural bus routes have been reduced and or eliminated. One potential ride-sharing plan could potentially include negotiations with willing local tribes to allow use of their casino buses for public non-gaming transportation options when seats are available, at preapproved rates.
- Similar Park and Ride options at willing local tribal casinos may also be a potential ride sharing tool.
- Industrial scale energy /transmission projects also include major GHG impacts related to transportation and energy used to pump millions of gallons of drought stressed groundwater.
- SDG&E's ECO Substation project generated over 1.5 million truck miles and used almost 100 million gallons of water, according to project related documents.

**12. Protection and conservation of existing oak groves, forests, other mature trees, chaparral, growing crops/vegetation, and undisturbed soils, must be addressed based on their recognized capacity to sequester carbon and produce oxygen, in addition to their cooling effects that help reduce the need for additional air conditioning and related energy consumption.**

**13. Grants or incentives to conserve, treat, and maintain mature trees and other chaparral, vegetation and undisturbed soils are one option to help retain critical carbon sequestration/storage resources.**

**14. These comments are limited due to personal time constraints.**

**Thank you for your consideration of these comments...Please see list of projects below.**

**List of energy / transmission projects proposed, approved, and/or  
constructed in the Boulevard/ Jacumba area between 2005-November 2016:**

1. Infigen's 50 MW Kumeyaay Wind on land leased from the Campo tribe (operational since 2005).
2. SDG&E's \$1.9B 500kV Sunrise Powerlink through Boulevard and Jacumba (operational).
3. SDG&E's \$435M ECO 500/230/138kV Substation, new and expanded Boulevard Substation, and 14 miles of new 138kV line between ECO Substation in Jacumba and Boulevard (operational).
4. Southwest Powerlink 500kV loop in from ECO Substation (operational).
5. Sempra's 1,200 MW Energia Sierra Juarez Wind (ESJ) project starting at US/Mexico border just east of Jacumba Hot Springs (155 MW phase 1 operational June 2015) .
6. Sempra's cross-border ESJ Wind transmission line to connect ESJ Wind to ECO Substation (operational).
7. Iberdrola's 186 MW Tule Wind on approximately 15,000 acres (construction pending).
8. SDG&E's fire hardening of TL6931/MSUP with increased carrying capacity (under construction).
9. Enel Green Power's 92-158MW MW Jewel Valley Wind and solar (withdrawn in 2013 after wind ordinance passed with low-frequency noise component).
10. 57 MW Manzanita Wind (withdrawn 2013) (SDG&E's 2014 auction attempt failed)
11. Invenergy's 160-300 MW Shu'luuk /Campo Wind (rejected by tribe & withdrawn June-2013)
12. SDG&E's Shu'luuk Wind 138kV gen-tie line to Boulevard Substation (withdrawn 6-19-13)
13. Debenham Energy wind application for BLM land Miller Valley (status unknown)
14. A. Brucci LLC MET tower application (AD10-023) approved Miller Valley/ La Posta area
15. Sol Orchard's approved PPA (CPUC E-4466) for 1.5-2MW Boulevard 1 (withdrawn)
16. Sol Orchard's approved PPA (CPUC E-4466) for 1.5-2MW Boulevard 2 (withdrawn)
17. Sol Orchard's approved PPA (CPUC E-4466) for 1.5-2MW Boulevard 3 (withdrawn)
18. Sol Orchard's approved PPA (CPUC E-4466) for 1.5-2MW Boulevard 4 (withdrawn)
19. Sol Orchard's approved PPA for 1.5-2MW Crestwood (Boulevard) (withdrawn)
20. Sol Orchard's 5MW 100 acre Boulevard B project MUP 12-025 (withdrawn 7-1-13)
21. Amonix Solar MPA 11-014 for 860 acre in Jacumba (withdrawn)
22. BP 30MW Jacumba Solar MPA 11-023 on 300 acres (withdrawn)
23. NextEra's 22MW Jacumba Solar on 108 acres of 304 acre site (approved by BOS October 2016)
24. Soitec Solar's 80 MW-765 acre Rugged Solar P12-007 (approved 2016)
25. Soitec Solar's 60 MW-420 acre Tierra Del Sol Solar P12-07 (approved 2-4-15)
26. Soitec Solar's 22MW LanEast Solar (withdrawn)
27. Soitec's 7.5 MW LanWest Solar MUP 12-002 (withdrawn 9-5-13)
28. Infigen's 30 MW Fox Solar MPA 13-01 on 182 acres at Hwy 94 & Tierra Del Sol in Boulevard (withdrawn 3-12-14)
29. Infigen's 12.5 MW Kumeyaay Solar proposed for 75 acres of Campo tribal lands (withdrawn)
30. 2.9MW Chapman Ranch Solar proposed for 31 acres (terminated by sPower on 12-1-15)
31. 2MW Mountain Empire Community Solar Garden proposed 10 acres as of November 2016

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