## Comment Letter I22

From: Mark
To: Harris, Susan

Subject:Campo Wind Project with Boulder Brush FacilityDate:Wednesday, January 29, 2020 8:27:53 PM

Attachments: Boulder Brush[6590].docx

Hello Susan,

Attached are my comments.

Thank you, Mark Ostrander

Sent from Mail for Windows 10

122-1

I am opposed to the Campo Wind Project with Boulder Brush Facility on some of the following areas and not in order of priority.

122-2

Aesthetics: Views will be altered and alteration of visual landscape. This also will help proposed large wind projects which will further degrade views. The cumulative Impacts of past and present project impacts as well as proposed or foreseeable future projects within the Campo, Boulevard, and Jacumba area. Ocotillo should also be included because of its close proximity to project area.

Noise: Although the DEIR for the facility does not show significant noise impacts it will be a connected project for Campo Wind as well as other wind projects in the future. The wind turbines for Campo wind will significant and un-mitigatable impacts. The noise studies for Campo wind were put in question as to accuracy after third party testing paid for by Back Country Against Dump (BAD). Noise levels were tested at my home in Jacumba and recorded noise from Ocotillo wind, Tule wind, and Campo wind facilities. Sierra Juarez wind in Mexico was not producing power at time of testing which is closer to me than the other wind facilities. The Wind Energy Association gives the benign moniker of Wind Farms to make it more appealing publicly so I use facilities instead.

122-5

Fire: This is of the greatest concern to me living in a Very High Fire Danger Area. The DEIR does address this but however putting more infrastructure with potential ignition sources where none previously existed is going to greatly increase the chance of fire to start. Also the overhead lines will also hamper aerial operations. The area already has several overhead lines and I have witnessed a phase to ground strike from Sunrise Power Link when an air tanker drop on a fire at Weeping Buffalo in Jacumba. The retardant drifted into the lines causing the strike luckily no one was on the ground in area of the strike, if anyone had been in the area it would have caused serious injury if not death. The residents in the area currently are having their fire insurances policies being cancelled and rates on others are going up regardless of the ISO rating for our area going down. It is not if a fire will start but when can we afford to have more hazards of fire risk in the area? The construction phase gives us a number of incidents anticipated during construction. This could potentially cause resources to not be available to residents unless more personnel and equipment are put in place during construction.

122-6

Social and economic impacts: Property values have decreased since all the wind projects have operational and many owners are unable to sell their homes. They are stuck living here as they have all their investment in their homes. When the project starts the trucks, equipment, dust, water trucks continuously traveling on the roads have taken the peace and quiet we once had is gone. Past construction projects burglary rates increased towards the end of construction phase this happened during Sunrise Power Link project. Also trespassing on private property has occurred. Tourism which is the communities' main industry is declining because of the past projects. More projects will kill off what is left which will devastate the already economically depressed area.

122-7

Water: The projects in the past have purchased water from local sources, the residents in the communities are ground water dependent and some have had their well levels drop during the construction phase. The projects have underestimated their water needs just look at ECO Substation project projected use to the actual use, quite a lot more than what the, quite a lot more than what the

122-11

projected. Even though they went past their projected use they were granted a waiver. I am concerned that my well will drop again during the project construction if Jacumba Service District sells water to this proposed project. The County has in the past monitored my well.

122-1<sup>2</sup> Cont.

In conclusion and summary our community has been greatly impacted by the continuous projects for several years and has reduced our quality of life. Many of us are on retirement incomes and have invested our savings on our properties and to yet have another project to further reduce our property values and quality of life. The views we once had are gone and replaced with wind turbines, solar farm, and power lines and now they want to take more areas away with the Boulder Brush project. This project will increase our risk of wildfire no matter what mitigation may be done. It would not be zero percent risk. Why add this additional risk to our communities haven't enough risk been added from the past projects?

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According to reports, the cost of a fire that damages or destroys a wind turbine can be as much as \$2 million. Property damage to the turbine, and nearby areas, from fires reported in the past decade range between \$750,000 and \$6 million. Imminent hazards of a burning turbine can cause the risk of sparks, Embers, or debris falling to the ground and setting off a wildfire due to remote location of many wind farms. Even if the turbine is not fully burned or damaged, or a potential fire doesn't spread to the surrounding countryside, costs can be considerable. Turbine fires and particularly, those that spread should be a significant concern, affecting the planning stages of any project. Technical equipment and combustible material are concentrated in the nacelle and, once a fire starts in a turbine, it can be fueled by up to 200 gallons of hydraulic fluid and lubricants. The nacelle itself is constructed from highly flammable resin and glass fiber, and internal insulation can become contaminated by oil deposits, adding to the overall fuel load. The most common cause of a turbine fire is a lightning strike, a risk that is heightened by the installation of taller and taller wind turbine.

122-15

Source: http://northgowerwindactiongroup Wind turbine fires: not "if"-when

Fire and Fuels need to be evaluated by all parties from the Federal, State, and Local Fire Agencies. San Diego County is in a fire prone environment and adding yet more projects that have the potential to start fires increase the risk to Life and Safety not to mention the revised tactics that would have to be deployed by firefighters due to the turbines. This could also potentially increase insurance cost to local residents. The document needs to address UL6140, UL6141, and NFPA 850 as well as current standards in regards Generating Plants, High Voltage Direct Current Converter Stations, and

Boulevard, Manzanita, and Jacumba are communities at risk, fire history over 50 years show 29 wildfires greater than 10 acres. States fire small either from lack of fuel or quick response. The response area within the project area traditionally had minimal foot traffic to minimal vehicle traffic with portions no traffic due to limited access. These response areas now will have infrastructure that could potentially increase fire activity. increased traffic and traffic control points because of construction. The roads in the area are narrow, two-lane rural roads paved with some in the project area being narrow dirt roads. The response of aerial resources and modified tactics that would need to be implemented due to the aerial hazards such as overhead lines and wind turbines are of concern and that when a fire happens the

modified tactics fire service would employ such as perimeter control defined as waiting for the fire to come out of hazard area. This would only be successful in a no to low wind conditions. This would not be successful in a Santa Anna wind event. The project is located in a Very High Hazard Fire Severity Zone; this should be reason enough to deny project as San Diego is in a year-round fire prone environment. The County does not need more impact added to it as it has seen an increase in large devastating fires such as seen in 2003 and 2007 and the current number of large fires this year. Past Governor Brown had stated this is the new normal for California so why would you add more hazard if this is the new normal.

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These fire impacts are un-mitigable and will leave residents with no alternative but to evacuate their residence in the event of a fire happening to be safe. This is unacceptable as this poses a communication, resident accountability, and safety to all who reside in the project area.

There are other concerns such as our roads which are in bad shape from past projects as the area has been subjected to continuous projects for several years and only get patched when a project is finished if they do it at all. Water is another concern as these projects have constantly pulled water locally. We are a ground water dependent community and the projects should get their water from outside our area.

The County need to look at the cumulative impacts of this project as required by CEQA from the past projects which I believe are connected actions to current and future projects. The County is required to do due diligence when evaluating these projects. The concerns of local residents need to be the priority and not the project owners who do not reside in the area nor care about the area.

Respectfully

Mark Ostrander

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I22-15 Cont.

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