BOULEVARD PLANNING GROUP

P.O. BOX 1272, BOULEVARD, CA 91905

May 21, 2010

Ken Salazar, Secretary of Interior

Department of the Interior
1849 C Street, N.W.
Washington DC 20240

RE: REQUEST TO INVESTIGATE CASTASTROPHIC FAILURE AND ACCIDENTS AT KUMEYAAY WIND FACILITY & TO DENY FURTHER CATEGORICAL EXCLUSIONS FOR MET TEST TOWERS NEAR PRIVATE LAND.

Dear Secretary Salazar,

Our group is an elected community land use group advisory to the County of San Diego. The Boulevard Planning Area covers private land surrounding /abutting the Campo tribal lands in eastern San Diego County. Tribal members registered to vote in the area vote in our elections. **With this letter we are requesting three very important actions from you:**

- **Please conduct an investigation into the catastrophic failure and string of accidents at Kumeyaay Wind facility on the Campo Reservation.**
- **Address timely and proper disposal of damaged turbine blades and waste oil.**
- **Please deny further Categorical Exclusions for MET Towers for industrial wind energy projects on tribal lands within at least one mile of private lands.** *MET test towers represent industrial wind turbines. They are controversial and should be subject to the NEPA review process, public notice, and comment.* Six MET towers have been installed on the Campo Reservation by Invenergy Wind with more being planned in close proximity to private land and residences. Industrial wind projects represent negative impacts to public health and safety, quality of life, property values, and more. Impacted residents / property owners have a right to participate in the MET tower location process.

Call to investigate catastrophic failure and accidents at Kumeyaay Wind

Our group voted unanimously to send this letter requesting a formal investigation into the catastrophic failure at the Kumeyaay Wind facility during a significant weather event on December 7, 2009 where winds reached a reported 70 mph. The turbines are located on the Campo Reservation adjacent to Interstate 8. Witnesses driving on I-8 reported seeing a huge

electrical blue light flash that started near the center of the string of 25 Gamesa 1.5 MW turbines that lit up the sky and then arced out to all the turbines in both directions. See the linked articles: http://www.eastcountymagazine.org/node/2734 and http://www.signonsandiego.com/news/2010/jan/13/damaging-blow/ .

Another resident, a Manzanita tribal member who lives near the turbines, witnessed the same blue flash and arcing event from their yard and informed me that the following morning they saw large chunks of blades flopping and dropping as the damaged turbines continued to spin. The witness suspected that the brakes had become inoperable through a systemic failure. Employees were also seen collecting turbine parts. At various times since the 2005 startup of Kumeyaay Wind, witnesses have seen turbine and blade parts being collected from traffic lanes and center divider of adjacent I-8.

We are lucky that the December 7th electrical meltdown did not occur during a dry high-wind event which could have resulted in a catastrophic fire storm in this high fire danger zone. Eastern San Diego County, subject to Santa Ana wind events, suffered massive wildfires triggered by high winds and powerlines in 2003 and 2007. Other historic fires have devastated East County before, burning almost to the coast. Industrial wind turbines are subject to malfunction and to burst into flames spitting flaming debris onto the ground and vegetation around them. We see them as fire ignition sources in a remote area with limited emergency service capabilities.

Kumeyaay Wind facility was inoperable from the December 7th storm through March 2010. After extensive and repeated day and night crane work, the final turbine finally went back on line in late April. We suspect the last turbine, near the center of the string of turbines, may have been involved in the original failure and suffered the most damage. It is still undergoing frequent crane work.

The FAA required red warning lights located atop the 325 foot turbines do not appear to be in full operation. Some do not appear to be operating at all, while some are operating but are much dimmer than they were prior to the December 7, 2009 catastrophic failure event which took them all out. It is our understanding that the entire project has been plagued with problems since that failure which appears to have been electronic in nature.

After Kumeyaay Wind's failure, arguments ensued between insurance carriers, the turbine makers, and the project operators over who was at fault. Was the failure caused by a turbine / blade design flaw, a problem generated during construction / installation, operator error, a combination of problems, or what? There were online reports that the failure had become the topic of risk management conferences due to the incredibly expensive insurance payouts to replace the damaged turbine parts and to pay for the lost power generation**.**

Was /is the site properly grounded? Was / is it wired properly?

The original statement that the turbines had been struck by lightning in the December 7th storm was later denied. It has been speculated that the turbine blades had been turned to the wrong position which may have allowed too much friction to build up on the blades that then discharged creating the blue light ball and arcing. There are also concerns with the grounding of the turbines. It is our understanding that the re-bar in a properly constructed foundation is a key part of the grounding system. Sufficient bonding is required inside the foundation to allow lightning and fault currents to pass.

If bad or damaged wiring is involved it can lead to loss of turbine control and tower collapse. Here is a linked article on the investigation of collapsed wind turbine tower in New York state that was traced back to "questionable" wiring that did not allow the turbine to be properly controlled. http://www.brighterenergy.org/10427/news/wind/noble-environmental-power-faces-questions-over-wind-turbine-collapse/

The investigation into the New York turbine collapse reportedly uncovered *"a number of instances where best practices may not have been followed in terms of monitoring operations and where compliance with quality assurance/quality control measures and manufacturer's recommendations for inspection and maintenance of turbines may not have been fully implemented by Noble".* The New York Public Service Commission stated that, "*We must make sure that those installing and operating wind turbines do so properly"*. We hope you agree.

Where will the damaged blades and waste oil be disposed?

The December 7th storm damage resulted in all 75 blades from all 25 turbines being removed and replaced along with some of the nose cones. The damaged and discarded blades are still littering the ground at the base of the turbines, visible from I-8 and surrounding areas. It is our understanding that due to their composite makeup these multi-ton 150 foot or so long blades cannot be easily recycled and must be disposed of in a special manner. The cost to long-haul these huge blades, one per truck, to a distant special disposal facility must be incredibly expensive. There are also significant amounts of waste oil and hydraulic fluid generated by these enormous wind turbines. Where does it go? What are the waste storage / handling / disposal plans at this and other wind energy projects on the lands under your jurisdiction? Who is in charge of enforcing them? The Kumeyaay Wind facility is located within the federally designated Campo / Cottonwood Sole Source Aquifer which means we are totally reliant on our at-risk groundwater resources. Protection of our shared and priceless water resource is critical.

Kumeyaay Wind accidents

Tuesday, April 19th, several workers were injured by a high-voltage arc flash while inside a turbine nacelle at Kumeyaay Wind. One worker was struck in the face and was airlifted out. http://www.signonsandiego.com/news/2010/apr/20/one-worker-in-campo-accident-remains-hospitalized/

We have also received information that a large wind turbine motor was recently dropped during installation via a heavy duty crane and that a vehicle sitting on the ground below was crushed. Luckily, we heard that no workers were injured in this accident.

Who is responsible for quality control / assurance / oversight & regulation?

Is someone monitoring the accident rates at this and other wind energy projects on federal lands? Can more be done to prevent them? As you know, state and county agencies generally have no authority over operations conducted on tribal or other federal land. Our community cannot go to them for help with this project. Kumeyaay Wind is a private operation, approved through a lease agreement by the Bureau of Indian Affairs. It is located on sovereign tribal land that is held in trust by your agency. The Campo Band has informed us they are not in control of the project, in fact, they reportedly did not even receive any revenue from the project until last year, four years after it went into operation.

Our question to you, sir, is who is ultimately responsible for oversight and regulation of the Kumeyaay Wind energy project and those that are currently under consideration for the Campo, Manzanita and Ewiiapaayp tribal lands, and the Tule Wind project which is proposed on a combination of BLM and tribal lands--all of which fall under your jurisdiction? Does the buck stop with you? Please tell us.

Documentation of concerns

For your information, we have attached a copy of our well-researched letter submitted on February 15th during the formal comment period for the joint NEPA/CEQA review for the ECO Substation, Tule Wind and Energia Sierra Juarez projects. Tule Wind is proposed on both BLM land and tribal land, under your jurisdiction. The Bureau of Indian Affairs is a cooperating agency. A copy was previously provided directly to John Rydzik at the Pacific Regional Office.

Please contact me at 619-766-4170 or donnatisdale@hughes.net with any questions you may have. We thank you in advance to your prompt reply.

Sincerely,

Donna Tisdale, Chair

cc: Dale Morris, Pacific Regional Director

Robert Eben, Acting Superintendent, So Cal Agency

Interested Parties