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June 1, 2009

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DOCKET
08-AFC-5

DATE June 01 2009

RECD. June 04 2009

Jim Stobaugh
National Project Manager
Bureau of Land Management
Division of Lands, Realty & Cadastral
BLM Nevada State Office
P.O. Box 12000
Reno, NV 89520-0006

Re: *Impacts of Stirling Energy's Proposed "Solar Two" Project, Imperial County
California (08-AFC-5)*

Dear Mr. Meyer and Mr. Stobaugh:

This firm represents EcoLogic Partners, Inc. and its four member organizations – the American Sand Association, the San Diego Off-Road Coalition, the Off-Road Business Association, and the American Motorcyclists Association District 37 (collectively, "EcoLogic"). EcoLogic is a non-profit organization dedicated to preserving and enhancing recreation on public lands in the American West, including, where appropriate, off-highway vehicle (OHV) recreation.

As described in the official publications of the California Energy Commission (CEC) and the Bureau of Land Management (BLM), Stirling Energy Systems ("Stirling") plans to install a solar energy collection and transmission facility on 6,500 acres in Imperial County, just south of Plaster City, between Interstate 8 and the Union Pacific Railroad. Approximately 6,140 acres of the proposed site (94% of the total) are located on public land currently administered by BLM. This land would be leased to Stirling for an undisclosed sum.

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The project itself consists of 30,000 25-kilowatt power dishes, each one 38'(H) by 40'(W). Although the project would be located on public land, Stirling would retain all profits (minus standard taxes) realized through the sale, distribution, and transmission of electricity generated at the site. The project is expected to generate enough energy annually to serve approximately 750,000 people, or 2.08% of the current population of the State of California.

We know that CEC and the BLM are currently in the process of preparing environmental documents necessary to comply with state and federal law. According to public notices issued by the two agencies, the project will require an Environmental Impact Report (EIR) to comply with CEQA and an Environmental Impact Statement (EIS) to comply with NEPA. (It is unclear whether the agencies will prepare a *joint* EIR/EIS as permitted by law). In light of these determinations, we want to apprise CEC and BLM of the project's specific impacts on OHV recreation so that these can be analyzed in the EIR and EIS and mitigated as appropriate.

EcoLogic and its individual members routinely engage in motorized recreation on the BLM lands now slated for conversion into the Solar Two project. In fact, the project is to be installed in a "limited use" area just south of Plaster City that is extremely popular with campers and OHV enthusiasts. Our surveys indicate that the project, if approved and developed as proposed, would result in the complete or partial loss of 12 trails which BLM has formally designated as open to OHV use in its current Resource Management Plan for the area. These trails include the following: 240, 246, 247, 248, 249, 251, 254, 255, 256, 257, 345, and 350. Public camping in this area would also be forfeit. EcoLogic and its members use these 12 trails and often camp in the affected area. To lose these recreational assets is a huge impact, especially given the extensive cumulative loss of OHV-open lands (local, state, and federal) throughout southern California in the last 10 years. Please ensure that this impact, including the mitigation for it, is analyzed in the EIR and EIS.

If you have any questions concerning this letter, please feel free to contact me.

Sincerely,



David P. Hubbard

cc: EcoLogic Partners, Inc., Board of Directors
Stirling Energy Systems

DPH:rlf