

May 8, 2009

DOCKET

07-AFC-8

DATE MAY 08 2009

RECD. MAY 08 2009

**STATE OF CALIFORNIA
State Energy Resources
And Development Commission**

Subject: Intervenor Michael Strobridge's and Intervenor John Ruskovich's response to Robin Bells May 7th letter to John Kessler in regards to Alternate Sites

On May 7th Robin Bell sent a letter to Project Manager John Kessler explaining her position on alternate sites. In this letter Ms. Bell states that an appropriate alternative site would be Section 35. I would like to clarify my position and Intervenor John Ruskovich's position on this statement. We are not in agreement with Ms. Bell's May 7th letter. Section 35 is still in close proximity of Carrisa Plains Elementary, and as I and John Ruskovich have stated over and over the impacts on the Carrizo water basin will still be extremely significant. Also, the noise from Carrizo Energy will still easily carry over one mile.

I would like to clarify our position on Carrizo Energy so we are not associated with the May 7th letter from Ms. Bell. Carrizo Energy will be a negative impact on the Carrizo Plain; its impacts will destroy precious water supplies and will create unrepairable damage to the Carrizo environment and ecosystem. We do not believe an Industrial Site Belongs in the Carrizo Plain as it is one of California's most environmentally sensitive areas. We are not in agreement that Alternative Sites should be placed in the Carrizo Plain because anywhere this environmentally destructive site is placed in the Carrizo Plain will have an extreme negative impact on the Carrizo Plain and its environment. Myself and Mr. Ruskovich are also in agreement that a Solar Thermal Plant in the Carrizo Plain is extremely irresponsible as the water resources are not available as the Carrizo Water Basin is in an Overdraft State as stated in the SLO County Master Water Plan Update of 2001 the most recent water document.

Mr. Ruskovich and myself do agree with Ms. Bell that alternative sites do need to be evaluated, yet we believe Section 35 will not lessen any impacts brought forth by Carrizo Energy and would like to make it clear that in no way were we associated with the May 7th letter regarding Alternative Sites. We would also like to clarify in no way are we trying to lessen Ms. Bell's efforts we are simply clarifying our stance on this subject so there is no confusion now or in the future. We have attached the May 7th letter from Ms. Bell.

Thank you for your time,

Intervenor Michael Strobridge

Intervenor John Ruskovich



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
 COMMISSION OF THE STATE OF CALIFORNIA
 1516 NINTH STREET, SACRAMENTO, CA 95814
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APPLICATION FOR CERTIFICATION
 FOR THE *CARRIZO ENERGY*
SOLAR FARM PROJECT

Docket No. 07-AFC-8

PROOF OF SERVICE
 (Revised 4/10/2009)

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DECLARATION OF SERVICE

I, Michael Strobridge, declare that on MAY 8, 2009, I served and filed copies of the attached Strobridge & Ruskovich Response to Ms. Bell's May 7th letter to John Kessler regarding Alternative Sites. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: **[<http://www.energy.ca.gov/sitingcases/carrizo/index.html>]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

sent electronically to all email addresses on the Proof of Service list;
 by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below **(preferred method)**;

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-8
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

_____/S/_____/S/

Michael Strobridge

John Ruskovich

John Kessler
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: 07-AFC-08

Subject: Migration Corridor Study and Alternate Sites

Dear Mr. Kessler,

I am writing to follow up a recent phone conversation. As we discussed, it is apparent the results of the Corridor Migration study should be addressed in the Alternate Site section of the FSA.

The initial results of modeling the migration corridor baseline conditions, show the CESF is in the heart of the Kit Fox Corridor. Additionally, the baseline conditions support previous information stating the project site and laydown area are located on an important Highway 58 Pronghorn Antelope crossing. Actually, to a layman, the model appears to confirm the claim that the CESF site is in fact the only Highway 58 Antelope crossing on the plain.

After review of these baseline conditions, it is apparent the CESF site is a particularly sensitive location and an alternate site, even one slightly removed from the current site, may avoid these impacts. It is understood by local residents that Ausra has purchase options on several nearby parcels including Section 35. This parcel is one mile east of the currently proposed site and just one mile south of the transmission lines. Locating the power plant on this parcel would reduce the plants environmental impacts. Siting the plant here reduces the impacts to the Kit Fox corridor because this site is not in the most permeable areas of the corridor. It is also better choice regarding the Pronghorn Antelope because it would avoid impacting their ability to cross Highway 58.

In addition to minimizing environmental impacts, siting the plant on Section 35 would reduce other significant impacts. This location is a much less populated area of the plain and therefore would reduce impacts to residents. Significant noise impacts to residents would be eliminated because there are no homes to the north of the plant where the noise impacts are greatest. In fact there's only one home within a half mile of this site and should the noise source, the power block, be located on the northern boundary of the project, as originally designed, this home would be 1 ½ miles from it. This site would likely reduce noise impacts to insignificant and eliminate the need for costly noise mitigation measures.

Also, there are no homes located to the east or west of Section 35, with the exception of one which is over a mile away. This would reduce the impact any glare the plants rotating mirrors would have on residences. And, one would assume this one resident would not object because it is a property owner selling the much of the land to Ausra. Therefore, they would most likely support the plants construction regardless of which of their parcels the project was sited on.

The more remote location of Section 35 would also reduce overall visual impacts to residences because there are drastically fewer homes located nearby, The few that exist in the area are over a mile away, with the exception of just one at a half mile distance.

This alternate site would be no closer to Carrisa Plains School so the impacts there would not be different.

Section 35 is also adjacent to the Arco Solar site whose water tests the applicant has relied upon to justify appropriate water availability. Therefore, one would assume this site would not affect their ability to meet their water demands.

Because CESF has control of Section 35 and since the best mitigation of impacts is to avoid the impacts, I urge the CEC to include this site as an Alternate Site the FSA. In an effort to fully evaluate its potential, I also ask you include it as a mitigation option in the Wildlife Corridor Migration Study. Please include the results of the corridor study in your evaluation of the site in the Alternate Site Chapter of the FSA.

Thank you for your consideration of these requests regarding this important issue.

Sincerely,

Robin Bell
Carrisa Alliance for Responsible Energy