

DOCKETED

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May 28, 2015

Karen Douglas
Commissioner and Presiding Member
Hidden Hills SEGS AFC Committee

David Hochschild
Commissioner and Presiding Member
Hidden Hills SEGS AFC Committee

California Energy Commission
1516th Ninth Street
Sacramento, CA 95814

Via email to: docket@energy.ca.gov

Re: Energy Commission Staff's Motion to Terminate Proceeding for Hidden Hills SEGS, Docket No. 11-AFC-02

Dear Commissioners Douglas and Hochschild;

Thank you for the opportunity to submit comments on the California Energy Commission (CEC) Staff's Motion to terminate the proceedings for the proposed Hidden Hills SEGS project located in the Pahrump Valley, Inyo County, California. Staff's motion to terminate the proceeding for the Hidden Hills SEGS is based largely on the applicant's failure to comply with the due diligence requirements as per California Code of Regulations, Title 20, Section 1720.2.

Defenders of Wildlife (Defenders) fully support the staff's motion to terminate the proceedings for the proposed project. Dockets filed for the proposed project indicate the applicant has failed to provide meaningful status reports in addition to failing to file them by the required due date. The AFC for the proposed project was filed by the applicant in 2011 and the CEC published a Final Staff Assessment in 2012. Several months later in April 2013 the applicant notified the CEC that it sought to have the proceedings suspended, which was approved by the CEC. The proceedings have been in a state of suspension for approximately two years.

Defenders actively participated in the development of the Renewable Energy General Plan Amendment for the County of Inyo, which resulted in designation of a Solar Energy Development Area (SEDA) in the Pahrump Valley, referred to as the Charleston View. The Board of Supervisors approval of the Charleston View SEDA included conditions requiring protection of groundwater, the use of only photovoltaic technology and a reduction in the land area available for project siting. The proposed Hidden Hills SEGS would not conform to any of these requirements.

The County of Inyo prepared a detailed analysis of the Hidden Hills SEDA and also actively participated in the Hidden Hills SEGS proceedings as an intervenor. They, along with other state and federal agencies, and numerous organizations, were instrumental in providing evidence of the numerous significant impacts to natural and cultural resources that would result from the project. The CEC staff determined in their Final Staff Assessment that those numerous impacts were certain or highly likely to occur and that they could not be mitigated to an insignificant level.

In consideration of the findings contained in the Final Staff Assessment, the Inyo County Renewable Energy General Plan Amendment, failure of the applicant to submit meaningful and timely status reports, and the significant and immitigable adverse impacts the project would cause, Defenders urge the CEC Commissioners to terminate the proceedings for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Delfino". The signature is fluid and cursive, with the first name "Kim" and last name "Delfino" clearly distinguishable.

Kim Delfino
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