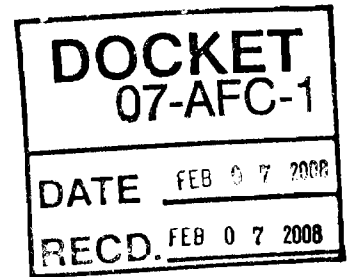


Ecosystem Solar Electric Corp.  
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Chino Hills, California 91709  
Tel (909)263-2868 Fax (909)923-8520  
[email@esecorp.org](mailto:email@esecorp.org)



February 7, 2008

California Energy Commission  
Attn: John Kessler, Project Manager  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512

Re: Victorville 2 Hybrid Power Project, 07-AFC-1  
(Termed by others as: "Victorville 2 Solar-Thermal Electric Integrated Multi-Fuel Combined Cycle Power Generating Project")

Dear Mr. Kessler:

On behalf of Ecosystem Solar Electric Corp., hereinafter the "Commenter", this letter provides comments on issues, resulting therefrom the above referenced project, currently under review by the California Energy Commission, which may affect other stakeholders, not limited to this Commenter.

Although, at this time, the Commenter is not an Intervener, depending on the proceeding of this project, the Commenter could take position as an Intervener, particularly in evidentiary proceedings.

At all time herein mentioned, the Commenter takes position in supporting Victorville 2 project of being licensed by the Commission, particularly and with strong emphasis on implementation of the Solar-Thermal Electric component, being not only an integral part thereof the project, but in support thereof the Federal and State's mandates, seeking implementation of Renewable energy in the generation's fuel mix.

A nominal nameplate of 50 megawatts solar-thermal electric component shall be construed as somewhat substantial, considering the issue of striving to meet the mandated percentage of 20% by 2010 and the economic objectives as well.

#### The Commenter Concerns

##### A. Victorville Translocation Plan

1. In the selection of suitable site for translocation desert tortoises, ground squirrels, borrowing owls and other species from the Victorville 2 project site, if such found, the Commenter hereby also takes position as the Affected Landowner and hereby seek consultation with all Interveners in Victorville 2 project, not limited to with Ms. Tonya Moore from the California Department of Fish and Game (CDFG).

2. Considering not only the vastness of the California Mojave Desert, but alternative sites, in translocation said species within said 6 mile radius from the Commenter land held in private ownership, could be construed as highly injurious to the Commenter land.
  3. Therefore, the Commenter hereby request that in observance of the due process, the Commenter is dully informed of the event involving said translocation within said boundary.
- B. The Commenter is positioned to perform as a developer of Solar-Thermal Electric Integrated Multi-Fuel Power Generating Plant
1. It is presumed that, not only the California Energy Commission is aware of the Commenter intent to develop Solar-Thermal Electric Integrated Multi-Fuel power generating facility near the town of Boron, California, but many other Federal and State Agencies, not limited to others in the masses.
  2. The Commenter has developed certain methodology in land mitigation, and agrees with the Commission of having mitigation ratio not to exceed 1.5:1 as maximum ratio in satisfying the cumulative impacts. The Commenter, can further elaborate on such methodology, in further and distinct consultation, particularly with CDFG.
  3. It has been very burdensome for Renewable Energy projects in mitigating higher ratio, construed as deterring developers in implementing renewable energy projects, particularly one of the most viable, being CSP' parabolic trough solar farms, specifically in the vastness of the Southern California Mojave Desert.
  4. Such uncertainty could also deter project sponsors and regardless implementation of mandates to bring renewable energy projects to fruition, lack of implementing level playing field methodology could again place renewables in long dormancy. Lesson learned from SEGS IX, which did not materialize, as well as could impact others, currently in the pipeline.
- C. We applaud Abengoa Solar / Solucar
1. The Commenter hopes that the issue of "glare from parabolic trough mirrors" and "solar field's mirrors reminiscent body of water" is put to rest.
  2. If in the contrary, the Commenter has develop, since 1996, being frequent to SEGS III-VIII in developing the R&D for the Commenter solar farm, virtually a Volume, sufficient to introduce, in substantial magnitude, all that is needed to finally put to rest such issue, and can take position as an Intervener in the Victorville 2 proceedings.

D. Increased Wildlife Mortality on Paved Roads is a Potential Significant Impact

1. Clearly distinguishing significant from some impact is a speculative methodology.
2. Whereas, project-specific road, presumed having 3-shift at most of power plant's operators, will not amount to more than 15 cars during 24 hour period, particularly when, if either closed to the public, or dead-ending at a power plant.
3. If an access road to private property is at-issue, whether paved, or unpaved, there are certain constitutionally issues in effect and such could be resolved in due process at appropriate venues.
4. In summary, clear distinction is to be implemented of what is significant and what is not. Definitely, highways and major roads could trigger the issue of significance. Introducing project-specific limited access road, whether paved, or unpaved is deemed to be more than burdensome, considering its substantial insignificance in impact, construed not really as a cumulative.

The Commenter may have substantially more further and distinct comments in future, particularly aimed at Victorville 2 project.  
There could be other affected stakeholders.

Sincerely,

Nick Panchev, CEO  
[email@esecorp.org](mailto:email@esecorp.org)

cc: General Counsel

f//ese\_victorville\_letter1

cc: [POA@energy.state.ca.us](mailto:POA@energy.state.ca.us)

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**Docket Optical System - Fwd: Victorville 2 - Comments on behalf of Ecosystem Solar Electric Corp.**

**From:** John Kessler  
**To:** Docket Optical System  
**Date:** 2/7/2008 8:56 AM  
**Subject:** Fwd: Victorville 2 - Comments on behalf of Ecosystem Solar Electric Corp.  
**CC:** Arlene Ichien; Caryn Holmes; Eileen Allen; Eric Knight; Misa Ward; Rick York; Robert Worl  
**Attachments:** ese\_victorville\_letter1.doc

Dear Docket Staff:

Please docket the attached letter to Victorville 2 (07-AFC-1).

This is a letter from another solar-thermal developer, Ecosystem Solar Electric Corp., providing opinion on some of the issues we have analyzed for Victorville 2. They are advocating the position that the habitat compensation ratio should not exceed 1.5:1, and to do so would discourage development of solar-thermal renewable generating resources. At this time, they have not filed for Intervener status.

Thank you,

John

John S. Kessler  
CEC - Project Manager  
Office: 916-654-4679  
Cell: 530-306-5920  
Fax: 916-654-4421

>>> "Nick Panchev" <nick.panchev@esecorp.org> 2/7/2008 6:30 AM >>>

Attn: POA  
California Energy Commission

Please docket and forward to Mr. Kessler.  
Attached comments hereto.  
Victorville 2 Docket 07-AFC-1

Thank you.

Sincerely,  
Nick Panchev, CEO  
Ecosystem Solar Electric Corp.  
[email@esecorp.org](mailto:email@esecorp.org)