

May 7, 2009

<b>DOCKET</b>	
<b>07-AFC-8</b>	
DATE	MAY 07 2009
RECD.	MAY 08 2009

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

Subject: Carrizo Energy Solar Power Plant (07-AFC-08)  
Intervener Michael Strobridge's Concerns and Comments pertaining to noise  
pollution generated from Carrizo Energy

I am resubmitting these documents to the Commission per the advice of Mr. John Kessler as I initially submitted my noise response to the project manager in error.

In Carrizo Energy's Objection to the Intervener Petitions for the extension of the 180 day Discovery process Carrizo states on page 5 section C" that the petition fails to demonstrate the reasonableness of the proposed project design modification." On March 13<sup>th</sup> I submitted a review of Carrizo's Noise Mitigation Plan from Bollard Acoustical. Mr. Bollard found discrepancies in Carrizo's Noise Mitigation Plan in regards to the Strobridge Residence such as db levels from the Air Cooled Condenser Fans. Since Carrizo seems to feel that excessive noise at nearby residences is not a reasonable reason to relocate the power block I had Bollard Acoustical review the April 14<sup>th</sup> Objection submitted by Carrizo. As you will see I am fully warranted in my request to move the Power Block to the center of the Carrizo Site. I have the right under California Code of Regulations, Title 20, Section 1723.5(c) to request a plant modification to ensure public health and environmental quality, ensure safe and reliable operation, **or to meet the standards, policies, and guidelines established by the commission. One of these guidelines would be Noise 4 established in the PSA which limits noise at the Strobridge Residence to 39db.** Carrizo goes on to state that Mr. Strobridge has not presented further technical analysis or studies to support the claim that moving the power block will avoid " the potential harmful effects of Noise Pollution." I adamantly disagree as the March 13<sup>th</sup> Noise Review provided by Bollard Acoustical is an example of further analysis as is the April 14<sup>th</sup> Response also provided by Bollard Acoustical. I urge the Commission to take into account the Bollard Acoustical Reports. I still request that the Power Block be relocated to the center of the Carrizo Energy Site. I firmly believe I am justified with this request as Bollard Acoustical has found errors in Carrizo's noise evaluations at the Strobridge Residence showing noise levels at a minimum of 9db higher than the 39db required by the Commission for just the Air Cooled Condensers alone. Attached is the new April 17<sup>th</sup> Response from Bollard Acoustical.

Thank you for your time,

Michael Strobridge



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
 COMMISSION OF THE STATE OF CALIFORNIA  
 1516 NINTH STREET, SACRAMENTO, CA 95814  
 1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)

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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\*indicates change

**DECLARATION OF SERVICE**

I, Michael Strobridge, declare that on MAY 7, 2009, I served and filed copies of the attached Strobridge Noise Response\_. 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:

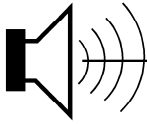
**CALIFORNIA ENERGY COMMISSION**

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

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

\_\_\_\_\_/S/\_\_\_\_\_

Michael Strobridge



Friday, April 17, 2009

Mr. John Kessler  
Project Manager  
Attn: Docket No. 07-AFC-8  
California Energy Commission  
1516 9<sup>th</sup> Street, MS-15  
Sacramento, CA 95814-5512

**Subject: Bollard Acoustical Consultants, Inc. (BAC), response to Objection to Intervenor's Petitions (April 14, 2009) for the Carrizo Energy Solar Farm Project on behalf of Michael Strobridge**

Dear Mr. Kessler:

I respect that you are receiving considerable interest and information on this project from many directions, so I very much appreciate your diligence in evaluating the potential environmental consequences of the project, and not just the project benefits. I respect that the applicants believe they have endured what they believe are more than reasonable delays, and that they want to move forward, so I appreciate the opportunity to briefly comment on the above-referenced objection letter. I will try to be brief with my comments.

The noise-related comments in the objection are mainly contained within pages 7 and 8. On page 7, the objection specifically states that Mr. Strobridge has not presented any further technical analysis or studies to support his claim that moving the power block will avoid the potential harmful effects of noise pollution. I respectfully disagree, and point to my March 13, 2009 letter to you as a specific example of "further technical analysis". What is lacking in the objection is "further technical analysis" that the applicant cannot reasonably relocate the power block.

In response to the statement in the objection that the BAC analysis "does not consider the highly directional propagation characteristics of noise from this equipment as provided in the manufacturers specifications", I say where, exactly was that information provided? I did not see such information included in any of the noise-related documentation for the project, so it appears to me that this statement is completely unsupported.

Just so my purposes are clear, it's important to note that I want the applicants calculations to be correct and the ultimate noise levels to be as low as projected at all of the nearby residences. So if, in fact, the ACC fan equipment noise propagation is highly directional, then I agree that directionality should be accounted for in the noise modeling. But rather than take the applicants word that the directional nature of the noise source was properly accounted for, I'd like to see the exact directionality coefficients and analysis (manufacturer's data, as well as CADNA input and output files) for this equipment, and verify the results for myself. As I stated, this information was NOT provided in the earlier analysis, as asserted by the applicant. I'm professionally curious as to how horizontally-mounted fans with openings 69 feet in the air are so directional, as I am not currently convinced.

I reiterate the findings of my earlier analysis. That is, using industry standard sound propagation algorithms and using very conservative estimates (i.e. favorable for the applicant) of attenuation by distance, the atmosphere, and the intervening ground, the noise level computed level at the Strobridge Residence from the ACC units alone would be approximately 9 dB higher than levels predicted by the applicant for the entire facility! This is not simply a minor technical difference of opinion, but a major divergence in analysis. A 9 dB difference in noise levels is comparable to the difference in noise generation between one (1) Carrizo plant and eight (8) Carrizo plants. This is well beyond a minor difference of professional opinion or analysis methodologies.

As noted in my previous letter, at the position currently proposed for the power block, the noisiest project component (ACC) would be approximately 3200 feet from the Strobridge Residence. If the power block were relocated to the center of the site, the distance would increase to approximately 5,400 feet. The resulting decrease in noise would be approximately 8 dB based on spherical spreading of sound and 1.5 dB attenuation due to atmospheric absorption and excess ground attenuation. An 8 dB difference would nearly negate the 9 dB difference in analysis results described above should the applicants assumptions about the directionality of the ACC units prove incorrect.

In the applicant's objection, the applicant states that the relocation of the power block (a distance of approximately 2,200 feet), would only result in a reduction of 2-3 dB at the Strobridge Residences. Analytically, this equates to a sound decay rate of 4 dB (3.97) per doubling of distance from the noise source. If this decay rate is completely inconsistent with the rate used by the applicant to predict noise levels at the Strobridge Residence from the project. If the same decay rate had been used, project noise levels predicted at the Strobridge Residence would have been DRAMATICALLY higher. Specifically, the 112 dB Sound Power Level reported by the applicant for the ACC Unit would only attenuate by approximately 46 dB, to a level of 66 dB at the Strobridge, which is nearly 30 dB higher than the applicants predictions. As a result of this huge difference, there has to be an error in either the applicants noise propagation coefficients initially used to predict project noise impacts, or an error used in predicting the 2-3 dB difference cited in the objection for the relocation of the power block. Scientifically, it simply can't be both ways.

Because of the huge technical inconsistencies in the applicants modeling results, and the considerable level of faith nonetheless placed on those modeling results, I am frankly surprised at the applicant's confidence in dismissing such a difference so casually. Given the considerable financial gamble that is at stake here associated with acoustically retrofitting the facility following project start up should their modeling prove incorrect, it escapes me as to why the applicant, and their noise consultant who is ultimately responsible for the computations, would not want to err on the side of caution and seriously consider relocating the power block in the center of the site. But because this is, apparently, a risk they seem willing to take, I want to reemphasize the importance of the follow-up testing program to ensure that the considerable faith that has been placed in the applicant's noise modeling effort is justified.

Mr. John Kessler  
April 17, 2009  
Page 3

As I stated earlier, I hope the applicants computations are correct, and that the project's noise impacts will be fully mitigated at the nearby neighbors. I am highly concerned however, that if the applicants computations are incorrect and the power block is constructed at the northern edge of the site as proposed, feasible options for post-project mitigation will be limited, and the opportunity which exists now to create greater setbacks from the nearest residences will have been lost.

In conclusion, I continue to understand that this is a very complex acoustical situation, and I appreciate your willingness to work with Mr. Strobridge and his neighbors to ensure that the project is ultimately successful in achieving compatibility between the power plant and those neighbors. I do not, however, share the applicant's noise consultant's unwavering faith that their noise models will prove infallible.

Please contact me at (916) 663-0500 or [PaulB@bacnoise.com](mailto:PaulB@bacnoise.com) if you have any questions regarding this letter, or if I can otherwise be of assistance to you.

Sincerely,

Bollard Acoustical Consultants, Inc. (BAC)

A handwritten signature in black ink that reads "Paul Bollard". The signature is written in a cursive, flowing style.

Paul Bollard  
President