

NOVEMBER 10, 2009

To: Richard Coel, Director
Community Development Department
County of Lake
225 North Forbes St, Lakeport, CA 95426

DOCKET
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DATE NOV 10 2009

RECD. NOV 16 2009

To: Mark Winsor
Project Manager
EDAW/AECOM
150 Chestnut St, San Francisco, CA 94111

Re: Comments and Questions Concerning the Preparation of an
Environmental Impact Report Bottle Rock Power Steam Project.

The Coleman Families has owned our property on High Valley rd since 1875. They are part of three homesteads. Two of the homesteads are the Francisco leasehold Operated by Bottle Rock Power (BRP LLC). BRP LLC does not own the property or the mineral rights to this leasehold. BRP LLC does not have any contracts with any part of the Coleman family. The part of the family that owns the Francisco leasehold does have a contact with Dept of Water Resources (DWR). This is important information. This ties DWR to BRP LLC. Since BRP LLC and Bottle Rock Power GeoResource (BRPGR) are part of the same group of companies. Where does DWR fit in. The proposed steam from BRPGR lease is intended to power BRP LLCs power plant. The Coleman/Francisco family should have some say.

After reading the 700 plus page Bottle Rock Power Steam project report. We have found the proposal bias and flawed. A large amount of the material was dated. The idea of a peer review for this document as proposed by BRPGR and BRP LLCs management could compromise EDAW/AECOMs credibility. Because of the expected environmental impact to the leasehold and area surrounding it, EDAW/AECOM should do the best job possible. To reinforce this Bob Giguere the Project Manager for BRPGR. And Brian Harms the General Manager BRP LLC. Stated in a taped interview. That no design is 100%, it is more like 10 to 30%. Is there project design only 10 to 30% correct?

We feel due size and complexity of the proposed project. Also there are a large number of unaddressed questions. We are asking that Petition to Amend by the Calif Energy Commission. Any and all permitting by the County of Lake. Any and all permits that are required by the BLM. Any permits required by Army Corps of Engineers. Any zoning or changes in the County of Lake general plan concerning this project. Any and all permits required by Calif Fish and Game. That all this needsto put on hold until the Environmental Impact Report is complete and finalized. BRPGR and BRP LLC have already attempted to start this project. There are numerous laws, rules, regulation, codes, and statutes that have to adhered to. We would not like to see any bias or favoritism happen inthis process. We do not know why they know want to move so quickly. They have had the BRPGR lease hold for several years ow. Please let the process proceed as it was designed to. We hope the questions we have submitted will be addressed correctly and completely. We would like a Community Advisory Panel created to help the County of Lake monitor this project.

1. How does CEQA apply to BRPGR project. How will it be implemented. Will the Calif Public Resource Codes be taken into account. Which of these codes apply to the proposed project. How will you identify them.

2. In Location they refer to township and range figures. Are they correct. When was the last time the leasehold was surveyed. Was it a legal survey. Are all the parcel numbers correct. Do they include all the parcels of the access roads. How many roads access the leasehold and do they have easement rights to use them for this project.

3. What is the history of the leasehold environmentally. Has the property ever been mined. If so what for. Has any material from mining been dumped or stored on the leasehold. Have any noncompliant, hazardous or toxic materials been dumped or stored leasehold. How will EDAW/AECOM determine a baseline for what has happened environmentally to the leasehold before this project begins. If there are noncompliant, hazardous or toxic materials on the leasehold who is responsible for cleanup, abatement or mitigation. This should be done before the new project starts

4. Is this proposed project exploration. Is it a continuation of an existing project. If so who responsible for Insurance and Bonding. Which company will carry the Insurance and Bonds. How many companies are currently involved with the leasehold. Is Bottle Rock Power LLC and BRPGR the same company. Do some other corporations own all the different Bottle Rock Power LLCs. Will they be responsible if something go's wrong. How is the Dept of Water Resources involved. They use to have the lease hold in there pocesstion. They required a \$10,000,000 Bond for Bottle Rock Power. What is for. Did DWR create any environmental problems when they had the leasehold. Were there any legal problems. The BLM in Sacramento told me there is a large file on this subject. Were these possible problems from them being on the

leasehold or from the existing Francisco steam field and power plant. Were there any spills, over topping of the sumps or other environmental problems. It seems that any thing that is not part of the native environment that has flowed or was deposited on leasehold should be investigated. Will EDAW/AECOM look into this.

5. Does this new company have the finances to see the project thought to completion. How is it being funded. At the scopeing meeting The Energy Commission said that if they what to throw there money away it was there problem. If the project turns out not to worth while every one living in the area will be seriously impacted. Do they have a plan B. What happens if there is not enough steam. This is the problem on the Francisco leasehold. Is there any supporting data to show that there is enough steam reserves to compensate for the effort to retrieve it.

6. Will EDAW/AECOM or a third party do a complete survey of the geology and hydrology of the lease hold. Will USGS be involved. There have been so many failures in this area because of poor, incomplete or fabricated data. The time is right to determine is there enough steam. How much information is available on the geology and hydrology for the lease hold. It seems like every one is still guessing.

7. This information on the geology and hydrology will help determine where the ground water is. Know one has done this for BRP LLC. We will at least have some idea what water is there and how it might impacted. The other question is how has BRP LLC affected the ground water. Has it been contaminated what tests will be done to check this out. How will drilling affect the ground water, springs, wells and all the under ground water sources.

8. Where will BRPGR obtain the water needed to complete this project. Will they use the well on the Francisco leasehold. Will they drill new wells. If so where will they

drill them. Who has the rights to the water. Does it belong to the land owners or the leaseholder. Who has jurisdiction over the amount of water removed from the ground. There should be limits on usage by a large industrial facility in a rural setting. What recourse will the local residents have if there wells, springs and surface water dries up from over use by BRPGR. How will this effect the watershed and wildlife. Will you list all the County, State and Federal regulations involving water use and water rights for the new leasehold.

9. How many Calif Fish and Game Regulations or codes will apply to the project. Will they be listed. How many US Fish and Wildlife regulation and codes will also apply. Who will over see this. Will they be listed. How in depth will you address them. Will EDAW/AECOM use in house biologists or subcontract them. Will there qualifications be listed. Will you work with Calif and Federal Government biologists.

10. Are there any Timber or Oak woodland stands on the leasehold. Are they protected. To what level will you look into the plant life on the leasehold. How many seasons do look into. How in-depth will your studies be. Will EDAW/AECOM use in house botanists or will they be subcontracted. Will there qualifications be listed. Will you work with Calif and Federal botanist.

11. How will they prevent, mitigate or control invasive plants and animals on the leasehold. We have been fighting star thistle for years. Will there be a plan to control this and any other non native species from moving on to the leasehold. Will there be a plan to mitigate existing invasive species from moving on to the leasehold. Will these invasive species be identified before the are able to move on to the leasehold. How can they or will they effect the environment. Should this problem be addressed before this project starts. Are there any County, State or Federal regulations, codes or statues that apply to this.

12. According to the Lake Co geology maps. There seems to be large amounts of Serpentine at the location of the two drill pads. How much naturally occurring Asbestos (NOA) would be found in the Serpentine rock formations at these locations. What percent of asbestos is safe. Are there any other rock formations that contain (NOA) on the leasehold. How deep do these formations go. How much (NOA) will be exposed when they start moving the 319,000 cubic yards or material. Are there other locations on the leasehold better suited for the well pads that do not have (NOA). How dangerous is (NOA). Will the rock formations be tested for asbestos concentrations. How will this be done. What other minerals will they encounter in these rock formations. Are they potentially hazardous as well. Will there be Mercury in the rock formations. How do you test for it. What are all of the County, State and Federal regulations, codes and statutes that apply to these and any other potentially hazardous minerals that might be found. Will they be listed. Will USGS be involved. If not why.

13. What constitutes the impact area. What does cumulative impact mean. How do you determine what and whom will be effected. In there proposal they refer to a impact zone to be a 10-mile radius. Is this true. What is the population of the area. Will all cumulative impacts be taken into consideration. How do determine what are the key receptor sites are. Do they only have to fit in the impact zone.

14. What is a watershed. Is the leasehold in the High Valley watershed. Is the High Valley watershed part of a larger watershed. How does the High Valley watershed effect Clear Lake. What is impacted by what occurs in the watershed. Have DWR and BRP impacted the watershed. Have any other geothermal activities affected the watershed (UNOCAL, Union Oil, Calpine)ect. Has any activities polluted, contaminated,

disrupted, modified, altered, changed or impacted the High Valley watershed in or around the leasehold. How will you ascertain whether this has or has not occurred. Whom will you contact. Which County, State and Federal agencies will you contact. Will they be listed. If some of these actions occurred will the environmental impact be reserved to just the leasehold. If some or all these impacts have occurred will they have to be mitigated before the the new project is started. Will it be that the whole watershed is looked at. What are the potential problems that will occur to the whole watershed from this new project. If the leasehold has been contaminated who is responsible for its clean up.

15. How many species of fish are found in the High Valley and surrounding watersheds. How many of these fish are native. How many types fish spawn in the High Valley watershed and its tributaries. Are any of them endangered or threatened.

16. How was the engineering developed for this project. Were all possible contingencies taken into account. Does this project require Calif licensed engineers. It seems like the environment is affected by how well the project is thought out before it is started. I am concerned by this project. The company and the project managers seem well over there heads. Will the ERI address there ability to do the best job possible. So far all I have read and seen show lack thought and insight as far as this project is concerned. There main concern seems to going as fast a possible. This rarely produces the best results. Will any unions be involved

17. I have a thousand other questions. If I did this for a living I might be able put them all down. I am counting on the EIR and other more qualified parties to answer these questions for me. I am hoping that EDAW/AECOM will do the best possible job. I hope the few questions I have submitted fit into the perimeters set forth.

We will see what the draft EIR brings.

**Thank you the Coleman Family
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