

From: Christopher Meyer
To: Docket Optical System
Date: 5/28/2010 8:57 AM
Subject: Fwd: RE: Comments Re Docket No. 08-AFC-5-solar Two Proposed Project
Attachments: Bighorn Sheep Siting 5_24_10.doc; IV Solar 05_27_10.doc

DOCKET	
08-AFC-5	
DATE	MAY 28 2010
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>>> Denis Trafecanty <denis@vitalityweb.com> 5/27/2010 4:13 PM >>>
Attached is my comment letter and it includes my public comments on Monday May 24th at the offices of our adversary (SDGE). I respectfully request that you consider each of these comments and that you do not rush to judgment on this proposed project just to enable the applicant to obtain Obama stimulus money by the end of this year. In summary, it is very clear to me that much more work needs to be done on the proposed project before any decision is made. And one of the CEC panelists so indicated this to us when he stated to us that they will NOT rush this project through until all issues are resolved. I request that the public continue to be included in this process.

While I am the President of The Protect Our Communities Foundation, the comments in the attachment are mine as a public citizen.

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Report of Sighting of Bighorn Sheep

When: May 24, 2010, 5:10 pm

Where: Approximately 4 ½ to 5 miles west southwest of Phase I of the Imperial Valley Solar Site, about 50 feet west northwest of Interstate 8 eastbound

Description: I was a passenger in a vehicle traveling about 60-65mph eastbound on I-8 when I observed what appeared to be five adult ewes (no circular horns as on rams) about 50 feet west northwest of I-8 eastbound, that were facing southwest towards the freeway grazing on some natural vegetation. The bighorn sheep were sighted at the northeast end of the stretch of I-8 where east and westbound are separated, just west of Ocotillo.

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RE: Imperial Valley (IV) Solar Project Comments – Docket No. 08-AFC-5

1. First and foremost, while my wife and I were in transit to the SDGE Office meeting in El Centro observed a herd of Big Horn sheep grazing approximately 4-5 miles west of the western end of the proposed IV project site on May 24th at 5:10PM. My wife had a clearer picture of the siting as I was driving. After the meeting, we got a better picture of the location although it was too dark to get a precise location. We plan to visit this location again to obtain more details. I strongly believe that we should not treat the original siting on the proposed IV Project site as an anomaly and treat it as a presumed re direction of the Big Horns due to someone's thought that four wheel drive vehicles caused the incident. I plan to visit the IV site on many occasions to determine if there will be additional sitings of Big Horn Sheep. I will need about 6 months to complete this effort due to the increased temperatures currently.
2. As I indicated in my public comments, I feel it was totally unfair to have a public meeting in an office of our adversary SDGE. While I was looking at the panel of officials during this meeting, all I saw was pictures of the proposed Sunrise Powerlink and their logos, etc. I'm sure you know how difficult is to begin with to speak from the heart in a public setting and all this does is make it more difficult. I request that we have an additional public meeting on a neutral site without all the banners of an SDGE ill conceived project that is in the midst of numerous lawsuits due to a lack of need for the proposed project.
3. I call your attention to the 2003 Energy Action Plan and the resulting loading order that was referenced by one of the CEC officials during the public meeting on May 24th. In that meeting one of the CEC officials referred to the second priority (after energy conservation) for future energy needs as "renewable energy sources". In my public comments, I mentioned that the second priority is renewable energy sources AND DISTRIBUTED GENERATION. I believe that the omission of the distributed generation is an omission of an important goal, which is renewable energy in the metropolitan areas where the demand for energy is most needed. Using distributed generation eliminates the need for ill conceived projects like the aborted Green Path North project and the hotly contested proposed Sunrise Powerlink project.
4. One of the CEC officials in summarizing the results of the public meeting on May 24th referred to the RETI as a source for getting more details as to why we needed these desert renewable projects such as IV. In his discussion, the official stated that ALL groups were represented in RETI and that we should follow closely their actions and meetings. I pointed out to the CEC official that RETI

DOES NOT represent the opinions of the “people on the ground” here in the desert. I also indicated that the environmental groups represented were two national organizations (NRDC and Sierra Club) and their representatives Joanna Wald and Carl Zichella and their opinions are not those opinions of the people here in the desert. I went to a RETI meeting in Palm Desert last Fall/Winter, and we demanded further representation with people on the ground and we were ignored. There is no one on the RETI board other than developers and utilities from the area where all this destruction is planned to occur.

5. One of the CEC officials stated that we needed renewables in the desert due to the mandates of 20 percent and 33 percent and that his opinion is that we can't do this with rooftop solar in cities alone. Well I say that you need to prove your point. I referenced the San Diego Smart Energy 2020 Plan http://www.etechnicalinternational.org/new_pdfs/smartenergy/52008_SmE2020_2nd.pdf to the official and he said he has read the plan and he is not convinced that we can do enough in basin generation of energy. This sounds like a problem that needs to be solved. I challenge the CEC to have an open debate with the author of the plan, Bill Powers, before you approve this project and other desert projects. It is not proper to ignore the above plan without vetting it properly. Projects like the proposed IV project which will desecrate our beloved desert should not be approved without discerning the facts and analyzing them.
6. The proposed IV project has problems with its technology which is the main reason that it has taken so long to move it through the approval process. There were six of these Stirling Solar machines at Sandia Labs in New Mexico for years and years and now recently only 60 units in operation in Arizona. Are we sure that these machines work? Building a few machines at a lab is not the same as mass production. All that has happened so far is prototypes. You can't permanently destroy 6,500 acres of our public lands for an unproven product still in the R&D stages of development! You can't rush this decision based on unproven technology.
7. Is 100% of the financing for this proposed project in place? I doubt it! What are the conditions of this financing? Has the CEC looked at it? Should we raze our public lands only to find out that the project is abandoned? Who is going to restore our public lands if this occurs? If this project is ever approved, one of the requirements has to be that the applicant must post a bond that will remove all the concrete and infrastructure for this project and restore the public lands to their original condition including restorations of new roads should the project fail. This bond must survive the bankruptcy of the project by the applicant.
8. As I indicated in my public comments on May 24th, there is plenty of disturbed land about 80 miles west of El Centro in San Diego. Southern California Edison has found this out in Riverside and San Bernardino counties. It's called “In Basin Renewables and Distributed Generation”. Recently when an issue came up regarding building power lines over public lands in a Senate Appropriations Committee meeting, Senator Alexander from Tennessee stated that we aren't

going to allow these power lines to go through our wilderness after fighting for the protection of our wilderness for over 60 years!