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CC: "Bradshaw, Vikki Dee" <VDBradshaw@IID.com>, "Barajas, David L" <dlbaraja...
Date: 6/16/2010 1:30 PM
Subject: EIS for Stirling Energy Systems (SES) Solar 2 Project

Pursuant to the February 12, 2010 release of the Bureau of Land Management (BLM) Draft Environmental Impact Statement (DEIS) and the California Energy Commission (CEC) Staff Assessment (SA) for public comment on the Stirling Energy Systems Solar Two Project; considering that Stirling Energy Systems has applied for a right-of-way authorization to construct a 750-megawatt solar power plant on 6,144 acres of public land about 14 miles west of El Centro, CA., including a 10.3 mile 230-kilovolt transmission line, substation, water-supply pipeline, and access road; the Imperial Irrigation District (IID) has reviewed the above mentioned documents and offers the following comments:

1. Regarding the need for electric service for the Main Services Complex mentioned on page B.1-12: Electric capacity in this area is limited and some revisions (to be performed by the IID) to the distribution circuit serving this area will be required. These revisions will be at the developer's expense. Line extensions to serve this facility will be made in accordance with current IID Regulations. Due to unforeseen development, other projects could impact existing resources which could affect our ability to serve this load if not completed in a timely manner.
2. Conditions of Certification BIO-1 thru BIO-17 are not specifically found in documents or web site.
3. Any construction or operation on IID property or within its existing and proposed rights of way or easements will require an encroachment permit, including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities.
4. Any new, relocated, upgraded or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, and water delivery and drainage structures) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or upgrade of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail. Thank you for the opportunity to comment on this matter.

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