



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

February 18, 2008

Mary Dyas, Energy Commission Project Manager
California Energy Commission
1516 Ninth St.
Sacramento, CA 95814-5512

DOCKET 07-AFC-8
DATE FEB 18 2008
RECD. FEB 22 2008

RE: Agency Response to Review of the Carrizo Energy Solar Farm Project (07-AFC-8)

Ms. Dyas,

Thank you for providing all of the information on the CEC's permitting process, and the functional equivalent environmental review process, and URS's project information documents. The County of San Luis Obispo Planning and Building Department appreciates the opportunity to review and comment on the above-referenced project for issues of concern to the local community and county.

In general, the environmental analysis prepared by URS was detailed and provided very useful information for county review. Attachment A" lists key issues identified by the county, including agricultural use, water, biological resources, visual resources and housing. Attachment B includes comments on the URS documents with minor changes or where additional information or analysis would be appropriate. Attachment C provides a County response to CEC questions raised in your 1/28/08 Data Request letter to Ausra that relates to County regulations.

We appreciate your consideration of our comments as the CEC conducts their internal analysis and completion of the Preliminary Staff Assessment. We look forward to reviewing the draft environmental document. Should you have any questions, please give me a call at (805)781-5452.

Sincerely,

John McKenzie
Environmental Specialist

PROOF OF SERVICE (REVISED 2/5/08) FILED WITH ORIGINAL MAILED FROM SACRAMENTO ON 2/22/08 CF

Attachment A – Key Issues

The following is partial list of the more significant concerns identified by the county relating to the proposed project:

Water – The groundwater basin is considered in a state of overdraft. This groundwater basin provides water for surrounding ag and residential users. All feasible measures should be evaluated (e.g., develop rainwater catch and storage system, require dual flush toilets and auto shut-off water fixtures, etc.) with the goal of no net increase in water consumption.

Biological Resources – A number of state- and federally-listed wildlife and plant species exist within the Carrizo Plains that could be directly and indirectly impacted by the proposed development. Indirect impacts relate to night lighting impacts to nocturnal species, and project design that may encourage predator species that prey on sensitive species. Regarding the kit fox, the existing replacement ratio program is intended to target very small development within the kit fox range that will have a cumulative effect but do not result in any direct impacts to the kit fox. Additional analysis and mitigation should be discussed.

Visual Resources – The Carrizo Plains is considered to have reasonably high natural and rural visual qualities. Due to the industrial appearance of this facility combined with its size, all efforts should be made to reduce heights of all structures, minimize night lighting to the maximum extent possible (e.g., keeping light standards as low as possible, illumination levels should be at the lowest levels possible, and all lights fully shielded from all surrounding properties). Perimeter landscape screening should be used to soften these impacts and designed in a manner to have as much of a natural appearance as possible.

Cumulative – At this point, we have had pre-application meetings with two firms that may go forward with large photovoltaic systems on nearby properties. While both are planning phased projects, they are hoping to be on similar construction time tracks as the Ausra project. Impacts to roads and water resources should be evaluated for cumulative effects.

Safety – Given the close proximity of the San Andreas Fault line, will the project be designed in a manner to minimize safety problems should a large seismic event occur (e.g., what provisions included to address pipe breakage, does design include generators or other manual means to turn the system “off” in an emergency situation; adequate emergency water/steam shut off devices, etc.)? Are the structures designed to withstand very high wind events that occasionally occur in this area?

Construction phase – Given the remoteness of this site, combined with the lack of available work force housing in the area, an analysis of the need and impact of temporary on-site housing (e.g., trailers) and secondary effects (e.g., wastewater disposal, water consumption, etc.) should be included. Traffic impacts on Highway 58 and other alternate local roads should be analyzed.

Attachment B (Response to URS documents)

The following comments relate to the URS documents and focus on those areas of concern for the county or where additional information would seem appropriate:

1. Under Table 5.3-4 and 5.3-5, the "Environmental Coordinator" should be referenced, who would then redirect questions to the appropriate geologist. For table 5.3-5, please reference:
Ellen Carroll, Environmental Coordinator
976 Osos St., Room 300
San Luis Obispo, CA 93408
(805)781-5010
2. Under Table 5.3-5 for Cheryl Journey the address should read 976 Osos St., Room 200, San Luis Obispo, CA 93408;
3. Under Table 5.3-6, 5.4-3 and 5.4-5 for Local permits, neither land use or construction permits will be required.
4. Under Section 5.4., all three soils found on the subject property (Pinspring, Yeguas, and Thomhill) are identified as Class II soils if irrigated (prime by County definitions), which would be lost as a result of this development.
5. Under Table 5.4-4, please 1) change the county's address from County Government Center to 976 Osos St., Room 200 for Elizabeth Szwabowski; and 2) include John McKenzie [(805)781-5452] as another County contact (review grading permit for CEQA consistency).
6. Under Section 5.5 (Water Resources), the San Luis Obispo County Master Water Plan is cited, identifying an overdraft condition. It was not clear what cumulative water impacts would result from the project's proposed 22 afy.
7. Under Section 5.6, Biological Resources, the one mile radius distance used for species presence should be reviewed by CDFG and USFWS for adequacy.
8. Under Section 5.6, Biological Resources, it would appear additional consultation with CDFG and USFWS would be appropriate to determine the appropriate course of action for analyzing impacts to and mitigating for the kit fox and the "fully protected" blunt nose leopard lizard.
9. Under Section 5.7, Cultural Resources, several references are made that do not appear to apply to this project and should be reviewed for applicability and/or accuracy (e.g., "Near the Project area, evidence of FPT sites has been found near the old shorelines of Tulare Lake"; "submit applicable Department of Parks and Recreation forms to the CCIC", etc.).
10. Under Section 5.7.4, while the following is generally discussed in the mitigation measure section, reference could be made to the County's Land Use Ordinance Section 22.10.040 and that construction activities adhere to the following:

In the event archeological resources are unearthed or discovered during any construction activities, the following standards apply:

 - A. Construction activities shall cease, and the Department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.
 - B. In the event archeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the County Coroner shall be notified in addition to the Department so proper disposition may be accomplished.

11. On table 5.7-5 under all county references (e.g., SB18 and LUO Title 22, etc.), remove reference of Victor Holanda and replace with Jeff Oliveira.
12. On Table 5.7-6, remove reference of Victor Holanda and replace with Jeff Oliveira at 805-781-4167.
13. On Table 5.8-2, remove reference of James Caruso and replace with Jeff Oliveira at 805-781-4167.
14. On page 5.9-2, 3rd paragraph, 1) delete the "Agricultural District" reference when referring to the land use category (the category name is "Agriculture"); and 2) the two advisory committees mentioned do not "govern" the area, but have an advisory role to the governing body (County of San Luis Obispo).
15. On page 5.9-2, 5th paragraph, with the addition of 75 employees in this remote location, it is likely that some of these employees will find homes within the area (e.g., 1-2 hour daily commutes is very long, and gas prices continue to rise). Given that many of these employees may bring families, there will likely be some impacts to the Carrisa Plains School and Paso Robles High School that should be noted.
16. On page 5.9-2, 6th paragraph, while the proposed project is an "allowed" use in the Agriculture land use category, it would normally have needed to go through a county discretionary review process and, at the discretion of our decisionmakers, then approved or denied. In this case, as you know, PRC Section 25500 precludes the county from issuing such a discretionary permit, as the CEC becomes the decision-making body for this type of project.
17. Under Section 5.9.2.2, the ag use is described as "not currently in agricultural production but is fallow disturbed rangeland". However, the biological section identifies the entire area as "highly disturbed with chronic agricultural use including disking". Section 5.9.5.3.5 says the project is rangeland. The document should be reviewed for consistency on agricultural use characterization and applied uniformly throughout, which will then carry through to the analysis and necessary revisions.
18. For Sections 5.9.5.3.1 and 5.13.1.1, remove "Agricultural District" and replace with "Agriculture". Also, reference is made to a Minor Use permit being required at the County level. It is our understanding that PRC Section 25500 precludes the county from issuing such a permit.
19. Under section 5.9.5.3.7, reference is made to a Minor Use permit being required at the County level. It is our understanding that PRC Section 25500 precludes the county from issuing such a permit. This section should be modified accordingly;
20. Under Section 5.10.2.4, since employees will be on-site around the clock, there will be an increased impact on life safety assistance. Also, 75 employees with a daily commute of one to two hours over narrow winding roads increases the potential for accidents in the area. Given that emergency help is likely to be an hour away and fully equipped facilities two hours, additional analysis should be performed to identify which types of emergencies could occur that could be life-threatening with an hour or two-hour delay for treatment and what, if any, measures could be installed either at the local fire station or on-site to increase safety (e.g., install a helipad area near the administration building, etc.). This could be further discussed in the Worker Safety section.
21. Under Section 5.11, it is not clear how the use of buses would substantially reduce traffic impacts, given that the 75 to 400 employees could be spread out over a wide two-county (or greater) area. While the LOS aspect of road capacities appears generally adequate, some additional discussion should be included about traffic safety (e.g., are there any site distance issues for ingress and egress, what potential is there for slow-moving traffic making left turns

onto the site and is there enough concern to warrant improvements?). In addition, two other solar plants have initiated a dialog with the county to install photovoltaic systems with similar construction timetables and similar construction work force as the Ausra project. A cumulative assessment should be conducted with these projects in mind.

22. Under Section 5.13.1.3.1, this "industrial-appearing" project will block views for about one mile along Highway 58 and be visible from much greater distances. Additional discussion would seem appropriate to evaluate mitigation that could provide screening and how it could have a more natural appearance than a simple windrow of trees/shrubs.
23. Regarding night lighting, please provide details on what types of fixtures will be used, illumination levels, heights of standards, etc. Substantial reductions could be expected if all lighting was proposed very near to the ground with low lumen level fixtures (vs. 10-15 foot standards).
24. On Table 5.13-7 replace John Busselle with John McKenzie at 805-781-5452.

Attachment C (Response to Data Adequacy)

The following are county responses to CEC's 1/28/08 letter to URS relating to queries on county ordinance or position on an issue:

Item #11 – See attached Guidelines brochure on the county's kit fox program.

Item #19 – Had this project been processed through the county, the ordinance specifies that a Minor Use Permit would be required for a power plant. The LUO also specifies that if a project needs to prepare an EIR, the MUP would be elevated to a Conditional Use Permit.

Item #21 - For habitable structures within the Agriculture and Rural Lands land use categories the height limit is 35 feet. Under the exception provision of the ordinance (LUO 22.10.090.C.2) a modification can be requested if the following findings can be made:

- 1) the project will not result in substantial detrimental effects on the enjoyment and use of adjoining properties, and
- 2) that the modified height will not exceed the lifesaving equipment capabilities of the fire protection agency having jurisdiction.

The further from any property line the habitable building can be located, the easier the argument can be made to meet item #1. If the county were processing this permit, on item #2, we would be asking for a response from Cal Fire on the significance of the proposed height, and if supportable, what specific measures they would need to see to maximize fire protection.

After speaking with Rick Swan (Cal Fire), please be aware of the following additional concerns/requirements that would be likely if the permit were going through the county:

- 1) one, possibly two interior, fire-rated stairwell access(es) to the roof;
- 2) building would be sprinklered;
- 3) adequate widths and vertical clearances would be needed for fire and life safety vehicles to access to most interior areas;
- 4) perimeter access around entire site would be necessary;
- 5) while not a requirement, due to the long distance to any medical facility, a paved area (away from any potential fire sources) should be designated for helicopter landings.

Item #22 – The intent of the additional 5 foot exception for solar collectors was intended to allow individual photovoltaic panels to be installed on top of a 35-foot tall structure.

Item # 68. On wind erosion, please note that the NRCS recognizes this soil as having a "moderate" erodibility from wind. Mitigation should be included. If water is proposed for dust control, given the size of the project, this should be quantified, if not already specified as part of the proposed 22 afy total.



**County of San Luis Obispo
Department of Planning and Building**



FEDERAL AND STATE REGULATION PERTAINING TO THE SAN JOAQUIN KIT FOX

This pamphlet was prepared by the San Luis Obispo County Department of Planning and Building to help project applicants understand the federal and state regulations pertaining to the San Joaquin kit fox and how they relate to the County Permit Process.

INTRODUCTION

The San Joaquin kit fox is the smallest fox in North America. It typically weighs about five pounds and is about twelve inches high at the shoulder. Kit foxes have long legs, large ears, a black-tipped bushy tail, and a tan or silvery gray colored coat. Kit foxes are nocturnal animals (mostly active at night) and spend most of the daylight hours in underground dens that look much like ground squirrel dens.

In San Luis Obispo County, kit foxes range from the grasslands and oak woodlands of the Salinas Valley in the north-central part of the county to the arid scrub habitat of the San Joaquin Valley and Carrizo Plains in the southeastern part of the county. Due to the loss and fragmentation of its habitat, kit fox numbers have greatly declined in recent years, which led to its listing on the federal and state endangered species lists.

REGULATION

The San Joaquin kit fox is listed as endangered under the Federal Endangered Species Act and as threatened under the California Endangered Species Act. Therefore, it is illegal to take kit foxes. Under the Federal Endangered Species Act, "take" means harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Harm is further defined to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or shelter. Harassment is defined as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns, which include, but are not limited to breeding, feeding, or sheltering.

Under the California Endangered Species Act, "take" means to hunt, pursue, catch, capture, or kill, or attempt to do any of these activities to kit fox.

CEQA requires the County to evaluate potential impacts to kit foxes and other listed species from project activities and requires the County to ensure that impacts to kit foxes from project activities are mitigated to an insignificant level before permits can be issued. Over time, the cumulative effects from the permanent loss of kit fox habitat from development projects would likely constrict the range of kit foxes and further reduce kit fox numbers in the area.

Therefore, the County worked with the California Department of Fish and Game (CDFG) to develop measures (mitigation measures) that will reduce impacts to kit fox habitat from these activities to an insignificant level. These mitigation measures are described in the information brochure titled "A Guide to San Luis Obispo County San Joaquin Kit Fox Mitigation Procedures for the California Environmental Quality Act (CEQA)". The mitigation measures **only apply when the project site is located within the kit fox habitat area and when no kit foxes are present on the project site. Implementation of the CEQA mitigation measures does not authorize the Applicant to take kit fox.** If kit foxes are determined to be present on a project site, the Applicant must demonstrate compliance with the Federal and State Endangered Species Acts by contacting the U.S. Fish and Wildlife Service (USFWS) and CDFG to obtain the appropriate federal and state permits before their project can proceed.

Contact Information

For questions about the County permitting process, please contact Trevor Keith or Murry Wilson at the County Department of Planning and Building at (805) 781-5010.

For questions concerning state requirements, contact CDFG at (805) 528-8670 or (805) 772-4318.

For questions concerning federal requirements, contact the USFWS at (805) 644-1766.



County of San Luis Obispo
Department of Planning and Building



**A GUIDE TO SAN LUIS OBISPO COUNTY SAN JOAQUIN KIT
FOX MITIGATION PROCEDURES FOR THE CALIFORNIA
ENVIRONMENTAL QUALITY ACT (CEQA)**

This pamphlet was prepared by the San Luis Obispo County Department of Planning and Building to help project applicants understand the County permitting process and the California Environmental Quality Act (CEQA) mitigation requirements for discretionary projects that occur within the San Joaquin kit fox habitat area. Discretionary permits are permits that the County has discretion over whether or not to issue, and include land divisions such as Parcel Maps and Tract Maps, Minor Use Permits, Conditional Use Permits, Lot Line Adjustments, and General Plan Amendments.

STANDARD KIT FOX CEQA MITIGATION MEASURES

The following mitigation measures are standard measures required by the County that when implemented, will avoid take and reduce impacts to kit fox habitat to an insignificant level.

April 7, 2007

However, the requirements for individual permits may vary depending on the type of project, extent of disturbance, and other project specifics.

- a. Mitigate for the loss of kit fox habitat either by:
 - 1) Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
 - 2) Depositing funds into an approved in-lieu fee program;
 - 3) Purchasing credits in an approved conservation bank in San Luis Obispo County.
- b. Retain a qualified biologist to conduct a pre-construction survey of the project site and conduct a pre-construction briefing for construction workers on kit fox biology and protection measures to be implemented.
- c. Include kit fox protection measures on project plans.
- d. Require a maximum 25 mph speed limit at the project site during construction.
- e. Stop all construction activities at dusk.
- f. Cover excavations deeper than 2 feet at the end of each working day or provide escape ramps for kit fox.
- g. Inspect pipes, culverts or similar structures for kit fox before burying, capping, or moving.
- h. Remove food-related trash from project site.
- i. If pesticides or herbicides are used, they must be used according to local, state, and federal regulations to prevent secondary poisoning of kit foxes.
- j. If a kit fox is discovered at any time in the project area, all construction must stop and the CDFG and USFWS contacted immediately. The appropriate federal and state permits must be obtained before the project can proceed.

k. Permanent fencing installed as part of the project must allow passage of dispersing kit foxes.

**PERMIT PROCESSING STEPS FOR PROJECTS
OCCURRING WITHIN THE KIT FOX HABITAT AREA**

The following steps are intended to describe the process by which the County processes permits for projects proposed within the kit fox habitat area and to assist Applicants in estimating the timeline and potential costs involved for their project.

1. **Applicant** submits application for County discretionary permit (e.g. Land use permits, subdivisions, or grading permits on slopes equal to or greater than 10 percent).
2. If the project site occurs within the kit fox habitat area, and project site is less than 40 acres in size, County informs Applicant of the pre-determined standard mitigation ratio for the project area. The standard mitigation ratio is based on the results of previous kit fox habitat evaluations and determines the amount of mitigation acreage based on the total area of disturbance from project activities. For example, if a project results in 2 acres of permanent disturbance and the standard mitigation ratio is 3:1, Applicant must mitigate for a total of 6 acres (2 acres X 3:1 ratio = 6 acres). **Applicant** has the option of accepting the standard mitigation ratio or hiring a biologist to conduct a kit fox habitat evaluation. If the project occurs on a site at least 40 acres in size, a habitat evaluation must be conducted.
3. County staff reviews application and makes site visit.
4. County either sends Applicant an acceptance letter stating that the permit will be processed, or letter requesting additional information. If a kit fox habitat evaluation is to be conducted, the Applicant is provided a Partial List of Qualified Kit fox Biologists, which is a list of biologists that have verified experience and training in conducting kit fox habitat evaluations. If Applicant chooses to hire a biologist not on the County list, the biologist must contact the County before conducting the evaluation.
5. **Applicant** hires a qualified biologist to conduct the habitat evaluation and provides the results of the evaluation and other required information to County.

6. County meets with CDFG biologist every month, who reviews the habitat evaluation. CDFG determines the mitigation ratio and the mitigation ratio determines the total amount of acreage needed to mitigate for loss of habitat based on the total area of permanent disturbance.

7. County prepares and sends Applicant a Developer's Statement to sign, which includes standard kit fox mitigation measures and other environmental protection measures that will reduce environmental impacts to an insignificant level.

8. If the **Applicant** agrees, they sign the Developer's Statement and return it to County. If the Applicant has questions or concerns, the County project manager should be contacted.

9. County completes environmental determination and, if appropriate, issues a Negative Declaration. The issued Negative Declaration includes impacts the project may have on the environment and a signed Developer's Statement that lists mitigation measures developed to reduce kit fox impacts to a less than significant level.

10. County publishes notice in newspaper and schedules public hearing with the appropriate hearing body (e.g. Planning Commission, Subdivision Review Board, etc.). Grading permits do not require public hearings. A 30-day public review period is required for projects requiring kit fox mitigation.

For grading permits, go to section A. For subdivisions and land use permits, go to section B.

A. Process for Grading Permits

11. Concurrently with public review period, **Applicant** has kit fox conditions printed on project grading plans and submits with other plan corrections that may be required by Public Works and/or Building Division.

12. **Applicant** chooses a mitigation option and informs project manager. If the conservation easement option is chosen, **Applicant** must coordinate with CDFG to establish the easement conditions, find a public agency or non-profit organization to manage the easement, and establish a non-

wasting endowment for the management of the property for perpetuity. **Applicant** provides verification to County that the easement was established. If the in-lieu fee option is selected, go to step 13. If the conservation bank option is selected, go to step 14.

13. **In-Lieu Fee Option:** Concurrently with the public review period, County sends project information to CDFG. CDFG sends letter to Applicant regarding the kit fox mitigation options (as described previously in item a). **Applicant** can pay the fee after receipt of the letter from CDFG. The fee is currently paid to the San Francisco office of The Nature Conservancy. The Nature Conservancy sends Applicant and County a letter indicating that the fee was received. Go to step 15.

14. **Conservation Bank Option:** Applicant purchases the appropriate number of credits from the Palo Prieto Conservation Bank and provides receipt to County. Go to step 15.

15. Within 30 days prior to start of any ground-disturbing activities, **Applicant** arranges for kit fox biologist to conduct pre-construction survey for kit fox dens and give on-site pre-construction briefing for contractor.

16. After **Applicant** has met all requirements from the Planning and Building Department, County issues permit.

17. During grading and/or construction, **Applicant** must ensure that all kit fox protection measures are implemented to avoid take of kit fox.

B. Process for Subdivisions and Land Use Permits (i.e. Minor Use Permits, Conditional Use Permits, Lot line Adjustments, Parcel Maps, and Tract Maps)
Follow steps 1 through 10 in previous sections and continue with step 18 below.

18. After 30-day public review period, a public hearing is held and the project is either approved or denied by the County.

19. If the project is approved, **Applicant** chooses a mitigation option and informs project manager. Follow steps 12-14 in the grading permit section, as appropriate.

20. For lot line adjustments, **Applicant** signs mitigation agreement prepared by County Counsel that identifies mitigation measures that must be implemented for the project. The mitigation agreement runs with the land and is applicable to future owners. For parcel and tract maps, the mitigation measures are entered onto a second map sheet. The mitigation measures run with the land and are applicable to future landowners. For Minor Use Permits and Conditional Use Permits, the kit fox mitigation measures are included as conditions of approval, and for General Plan Amendments they are included as standards.

21. If a subsequent grading/construction permit is required, **Applicant** completes items 15 through 17 of the grading permit section.

Note: It is the Applicant's responsibility to comply with all local, state, and federal regulations.

Contact Information

For questions about the County permitting process, in-lieu fee process, or purchase of conservation bank credits, please contact Julie Eliason at the County Department of Planning and Building at (805) 781-5029 or (805) 781-5010.

For questions concerning state requirements, contact CDFG at (805) 772-4318.

For questions concerning federal requirements, contact the USFWS at (805) 644-1766.

To pay in-lieu fees send to Tonja Glenn, The Nature Conservancy, 201 Mission Street, 4th Floor, San Francisco, CA 94105. Phone: (415) 281-0483.

To purchase conservation bank credits, contact Palo Prieto Conservation Bank, c/o Dan Meade at Althouse & Meade, Inc., 1875 Wellsona Road, Paso Robles, CA 93446. (805) 467-1041.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
For the CARRIZO ENERGY
SOLAR FARM PROJECT

Docket No. 07-AFC-8

PROOF OF SERVICE
(Revised 2/5/2008)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-8
1516 Ninth Street, MS-14
Sacramento, CA 95814-5512
docket@energy.state.ca.us

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esaltmarsh@eob.ca.gov

INTERVENORS

* California Unions for Reliable Energy (CURE)

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DECLARATION OF SERVICE

I, Christina Flores, declare that on February 22, 2008, I deposited copies of the attached SLO County Comments – Review of CESF AFC for the Carrizo Energy Solar Farm Project in the United States mail at with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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



Christina Flores