

**From:** Hilarie Anderson  
**To:** Docket Optical System  
**Date:** 8/4/2009 8:46 AM  
**Subject:** Fwd: FW: Carrizo Energy Solar Farm

# DOCKET

## 07-AFC-8

DATE \_\_\_\_\_

RECD. 8/4/2009

>>> John Kessler 8/3/2009 4:45 PM >>>  
 Dear Hilarie:

Could we go ahead and docket this email to Carrizo (07-AFC-8) and include the phrase in the file name, "RWQCB's PSA Comments".

Thank you,

John

John S. Kessler  
 CEC - Project Manager  
 Office: 916-654-4679  
 Cell: 530-306-5920  
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>>> "Mark Lindley" <[M.Lindley@pwa-ltd.com](mailto:M.Lindley@pwa-ltd.com)> 8/3/2009 4:38 PM >>>  
 John:

Please see the e-mail below from David Innis at the Regional Water Quality Control Board. I respond to David's comments in the FSA, but I understand from Hilarie that this e-mail has not been docketed.

Also, as follow up to this e-mail, I had brief conversations with David LaCaro and Corey Walsh at the RWQCB. I did reference my conversation with David LaCaro related to the need for Waste Discharge Requirements, and that the RWQCB would not issue WDRs for collector wash water. I'm not sure how to handle that, I looked at it as a relatively informal conversation basically verifying an earlier discussion. Perhaps we could call it out as a telephone conversation in the PSA discussion.

Let me know if you need me to take any action on these two references.

Thanks, Mark

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 P Please consider the environment before printing this e-mail

-----Original Message-----

From: Paul Marshall [<mailto:Pmarshall@energy.state.ca.us>]

Sent: Friday, March 13, 2009 5:43 PM  
To: John Kessler; Mark Lindley; [DBInnis@waterboards.ca.gov](mailto:DBInnis@waterboards.ca.gov)  
Cc: Eric Knight; Robert Worl; [cwalsh@waterboards.ca.gov](mailto:cwalsh@waterboards.ca.gov); [DLaCaro@waterboards.ca.gov](mailto:DLaCaro@waterboards.ca.gov)  
Subject: Re: Carrizo Energy Solar Farm

David, thanks for your prompt reply and thoughtful questions. I would like to get your team together for a conference call to discuss our program and response to Q1.

John, please send these folks a copy of our project schedule and set up a time for us to talk with these folks so we can find out more about their permit requirements and address their CEQA needs in the FSA.

Mark, please respond to David's questions.

Thanks

Sent via Blackberry  
-----Original Message-----  
From: "David Innis" <[DBInnis@waterboards.ca.gov](mailto:DBInnis@waterboards.ca.gov)>  
To: Paul Marshall <[Pmarshall@energy.state.ca.us](mailto:Pmarshall@energy.state.ca.us)>  
Cc: Corey Walsh <[cwalsh@waterboards.ca.gov](mailto:cwalsh@waterboards.ca.gov)>  
Cc: David LaCaro <[DLaCaro@waterboards.ca.gov](mailto:DLaCaro@waterboards.ca.gov)>

Sent: 3/13/2009 3:46:38 PM  
Subject: Re: Carrizo Energy Solar Farm

Thanks Paul,

I found a note indicating Mark Lynlee contacted some one here on Oct 28, 2008 about our review process. My review of section 4.9 of the Preliminary Staff Assessment indicates the Commission covered the issues Water Board staff provided in our Dec 6, 2007 comment letter concerning data adequacy.

Our players in the regulatory oversight for these Solar Energy projects are:

David LaCaro - waste water, ground water (805-549-3892)  
Corey Walsh - above ground storage tanks (805-542-4781)  
myself - stormwater construction, industrial, and SLO County municipal (805-549-3150)

I have a few basic questions to start with and others will arise as we learn more about the project and its processes.

- 1.) As the Commission goes forward, are there certain time schedules established for various stages of the permitting process?
- 2.) I see on your web page, listings for other solar projects in our area. What stages of review are you or other Energy Commission staff "at" for the other two Solar plants?

SunPower CA Valley Solar Ranch (250 MW) DRC2008-00097 SCH# 2009021009  
OptiSolar Topaz Solar Farm (550 MW)

- 3.) I would like to see the cumulative impact on ground water and recharge addressed for all projects collectively. Can your office require that?

To me, it seems reduced evapotranspiration could be a major factor to result in an increase in groundwater in the upper aquifer. Could this be interpreted as an aquifer banking approach?

3a.) The Staff Assessment (Soil & Water-6) indicates the process wastewater will be treated with a zero liquid discharge system. I assume this applies to the process waters used in the steam cycle or cooling towers. But how will the high TDS water from the lower aquifer be treated before washing the mirrors and lenses? If untreated, it could create salt problems in the upper aquifer.

3b.) Is the estimated reduction in the lower aquifer of 0.5 ft on an annual basis? Does your staff or the applicant's consultant(s) have estimates of the recharge rates for the lower aquifer?

4.) From what we learned this week in Victorville, I think we need to look carefully at the stormwater drainage routes proposed to go around the plant and how the basins can handle the large rain events.

5. Section Soil & Water-5 may not apply in this part of SLO County. I'm not aware of requirements for a Permit for Industrial Wastewater Discharge. This seems to be a permit to discharge into the sanitary sewer, which is not available in the Carrizo Plain. This section seems to be left over from the High Plains project in Victorville.

Again these are my first impressions. Our staff will need more time to go through the documents more thoroughly. Please let us know the time frames so we can provide adequate time for reviews.

- Dave

David Innis  
Environmental Scientist  
Construction, Industrial Stormwater

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or

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(805) 549 - 3150 (voice)  
(805) 788-3586 (Fax)

>>> "Paul Marshall" <[Pmarshall@energy.state.ca.us](mailto:Pmarshall@energy.state.ca.us)> 3/11/2009 3:52 PM >>>

Mark, I was talking with David Innis of RWQCB 3 yesterday about permitting issues for the CESF. He mentioned he was reviewing the AFC and I asked him if he could take a look at your Preliminary Staff Assessment. As you may know they will be counting on our FSA to address CEQA compliance for their permits. He mentioned he would be willing to take a look at your PSA and let us know if we have or will need to cover their bases for permits they would issue for this project. Could you please coordinate with him and keep me in the loop when important observations or comments come up. His number is (805) 549-3150.

David, here is the link for the PSA Mark authored. Look for the Soil and Water resources section. We look forward to working with you and the region 3 team.

Thanks

<http://www.energy.ca.gov/2008publications/CEC-700-2008-011/CEC-700-2008-011-PSA.PDF>