



DOCKET

07-AFC-8

DATE FEB 13 2009

RECD. FEB 17 2009

February 13, 2009

Mr. John Kessler
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Wildlife Corridor Study for the Carrizo Energy Solar Farm Project, Docket No. 07-AFC-8

Dear Mr. Kessler,

In response to your request, OptiSolar Inc (“OptiSolar”) has reviewed the Carrizo Plain Wildlife Corridor Study Input Data that was provided to us on January 28, as well as additional information and clarifications provided by South Coast Wildlands (SCW) after that date. We understand these inputs will be utilized in the Wildlife Corridor Study being conducted by SCW under contract to the California Energy Commission (CEC) as a part of your review of the Carrizo Energy Solar Farm Project (CESF). In this letter, we provide our comments and questions on the inputs and purpose of the study. OptiSolar’s consulting biologist, Dan Meade of Althouse and Meade, Inc., has submitted an additional letter commenting on the study and its inputs on OptiSolar’s behalf.

Use of Study

We understand that this study has been initiated by the CEC as a part of the cumulative impacts analysis required for the Final Staff Assessment (FSA) of the CESF. The two other solar farms proposed for the Carrizo Plain area, the Topaz Solar Farm (Topaz) and the California Valley Solar Ranch (CVSR), will also be evaluated in this study. Topaz and CVSR do not fall under the jurisdiction of the CEC, and are pursuing Conditional Use Permits (CUP) through San Luis Obispo County (the County). It is important for OptiSolar to understand how this study will be utilized by the County to evaluate the Topaz project in the California Environmental Quality Act (CEQA) review process. We therefore request that the County provide, as a part of the SCW study process, a clear framework for how this study and its results will be used in the CEQA review of Topaz and CVSR.

OPTISOLAR

31302 Huntwood Avenue  Hayward, California 94544

Phone: 510.401.5800

Fax: 510.401.5859

www.optisolar.com

Mitigation

As Task 3 of their proposal, SCW plans to model proposed mitigation and provide alternative mitigation strategies that maintain adequate buffer width and habitat connectivity. How does the CEC propose that these alternative mitigation strategies be implemented for individual projects? Under the Incidental Take Permit Process of the California Endangered Species Act (CESA), the projects will be required to fully mitigate their impacts to the San Joaquin Kit Fox. How will these alternative mitigation measures contribute to each project's requirement to provide full mitigation under CESA?

Timing of the Study

We understand that the CEC must adhere to a specific timeline in processing the CESF project application. Given the importance of these three solar projects to statewide climate change reduction goals, however, we believe that it is imperative that the inputs to this study are carefully compiled and evaluated in order for its results to be accurate. We encourage SCW and the CEC to thoroughly review and respond to the comments received on the inputs, and carefully evaluate what additional data should be collected and reviewed before running the model. It is crucial that the correct inputs and modeling tools are used to ensure unbiased results, and that a clear framework for how any results will be incorporated into each project's CEQA analysis be established early on in this process.

OptiSolar appreciates the opportunity to comment on every aspect of this study as it proceeds, and we look forward to continuing to work with the CEC and other agencies to accurately evaluate the impacts of the Topaz Solar Farm. Please contact me at (510) 401-5817 and karbeit@optisolar.com, or Wayne Hoffman at (510) 401-5721 and whoffman@optisolar.com, if you have any questions.

Sincerely,

Kathryn Arbeit, Director of Business Development
OptiSolar Inc.