

DOCKET

07-AFC-8

DATE MAR 29 2009

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March 29, 2009
Mr. John Kessler
Project Manager

Attn Docket No. 07-AFC-8

California Energy Commission
1516 Ninth Street, MS-15
Sacramento, Ca 95814-5512

Subject: Carrizo Energy Solar Farm (07-AFC-8)
Resident concerns
From: Michael Strobridge
Carrisa Plains Resident

Dear Mr. Kessler:

I am concerned about many issues in regards to the Carrizo Energy Solar Farm (CESF) the comments express my concerns.

Water Resources: It is extremely disturbing that URS/Ausra has been allowed to base all of their Hydrology and Hydrogeology conclusions on data that is 25-40 years old. The Betchel Report and Kemnitzers should not be allowed to be used for the CESF. I agree that it gives some history of the water situations in the Carrizo Plain- but that is all it is, history not current and applicable data. Kemnitzer's report was written in 1967 yet the data used for this report was mainly from 1957 and some dates back as far as the 1920's. Kemnitzer's Report was already out of date when published in 1967. It is unacceptable that assumptions are being made on perennial yields, basin sizes, and on-site well capabilities using **prehistoric data**. The Betchel Report is vague and pump tests done for the Arco on-site well are inaccurate as the diesel generator had mechanical problems and Betchel had to choke back the submersible pump.

New water data should be produced including a complete water basin study and an aquifer test. I would also like to see URS/Ausra do a proper test on the CESF on-site well pumping from the lower aquifer while monitoring the upper aquifer for draw down. URS pumped the on-site well but from the upper aquifer for less than 4 hours with a 5hp submersible. Pumping needs to be done for 10 days, with the size submersible planned for the CESF.

Cumulative impacts regarding water need to be addressed between the CESF, OptiSolar/ First Solar and SunPower. URS states that they do not need to acknowledge SunPower's water consumption because they are 6 miles away. I do not agree with this. How does URS know if Sunpower will not have cumulative impacts if no current and proper water studies have been done? Ausra will restrict the Carrisa Creek with their creek crossings, thus limiting water to California Valley and Sunpower is located directly in California Valley. Obviously there are cumulative impacts between the 2 plants.

I am concerned that the CESF is even considering implementing their plant that is in an area that has been officially declared in an overdraft situation since 2001(SLO County Master Water Plan Update 2001). I have heard that this overdraft is only referring to the upper aquifer. This is untrue as the Master Water Plan Update refers to the entire Carrizo Basin is in an overdraft.

I am also concerned that URS utilized residential water consumption from Southern California in their Revised Hydrology Report which shows very little water usage for residences. Again this is not accurate according to the SLO County Master Water Plan Rural Water Needs Section "Ranchettes" of 2.5 acres or more utilize 1.8 AFY not .52 AFY for residences as stated by URS on page 1-6 of the Revised Hydrology Report.

According to Section 3.3 of the RETI Environmental Assessment, Solar Thermal Projects should be located within 10 miles of an Urban area with a wastewater treatment plant. The CESF is located over 50 miles from any urban area and much farther from any waste water treatment plants in a remote not easily accessed area. This seems to go against RETI criteria.

Most importantly, the CEC needs to clarify what happens if Ausra starts running local wells dry. Is Ausra Financially responsible? What mitigation is being offered for local wells that are impacted by the CESF? I insist that penalties and mitigation options be included in the Conditions of Certification in regards to local water supplies and local residential wells. Again I am voicing my objection to the use of the Kemnitzer Report and the Betchel Report in representing current water conditions.

Noise Pollution: I firmly believe that the noise pollution will affect my family's well being and our right to enjoy our home and property. This noise pollution generated by the CESF will also affect my neighbors' health and welfare. The Carrisa Plains is not an industrial area and the implementation of the CESF would be a grave injustice to the community as a whole not to mention all future generations who will be deprived of the last natural grasslands in the State of California.

I am requesting that Ausra relocate their power block to the center of their site to ensure that the noise pollution is kept at 39db or less at my home. According to Paul Bollard of Bollard Acoustical Consultants Table 11 of the Noise Mitigation Plan shows an A-weighted Sound power Level (PWL) of 112 db for the ACC unit, with a source height of 21 meters (69ft). Assuming spherical spreading of sound between the source and receiver (6 db doubling of distance from the source), and an additional attenuation rate of 1.5 db per thousand feet for atmospheric absorption and excess ground attenuation, the computed level at the Strobridge Residence from this one source alone would be approximately **47db Leq, or 9db higher than levels predicted for the entire facility within the mitigation plan.** Given the elevated source position, inclusion of excess ground attenuation into the computation may not be justified, so **actual levels could even be higher. The applicant should be very concerned about being required to retrofit the facility to achieve an additional 9 db of noise reduction should their consultants computations turn out to be incorrect.** Moving the power block to the center of the site could potentially avoid legal issues with local residents if noise could be kept to 39 db or less.

Mitigation options for noise seem weak or nonexistent. Additional acoustical insulation at the Strobridge Residence would provide no benefit if windows are open, which is all spring and summer long. Also sound barriers are deemed not practical in section 2.2 1.2 of the mitigation plan, yet if operational noise levels are louder than expected at the Strobridge home these impractical noise barriers are now deemed practical to reduce noise for a mitigation option. This makes no sense and is contradictory.

According to Mr. Bollard relocating the power block to the center of the site has engineering efficiencies associated with the superheated water traveling shorter distances from the reflectors to the power block if it were located in the center of the site. I am insisting that NOISE-4 of the PSA be upheld for the protection of local residents.

Visual impacts: The Carrisa Plains is rolling terrain in which you can see clearly for miles. The CESF has structures that stand roughly 12 stories tall. These structures are the largest of their kind in the entire area and will be seen for miles. Travelers visiting the National Monument will have to pass by this horrific industrial site as Carrisa Plains is the "gateway" to the Carrizo National Monument less than 10 miles away. From my home "Strobridge Residence" the CESF will completely block my families views of the mountains and wildlife to the south and southwest not to mention will be lit up like the San Ardo Oil Fields at night thus destroying the view of the nighttime sky for myself and my neighbors. I would like to see all night time lighting be brought to an absolute minimum.

I am confused as to why Ausra is not offering local residences landscaping such as trees on the property lines facing the CESF. Ausra initially stated that trees would be provided and when local residents tried to negotiate this offer of trees Ausra stated that we were mistaken and trees were never offered. I am tired of being lied to. I would have to insist as part of Conditions of Certification that trees be provided for all local residents within a 3 mile radius who request them and that these trees be at least 8-10ft in height to expedite screening for local residents. These trees must be provided with irrigation as most local residents cannot afford to provide irrigation themselves due to the fact that everything has to be hard lined in to avoid damage caused by squirrels.

Traffic impacts: The traffic proposed by URS/Ausra in the Traffic Mitigation Plan seems highly underestimated. Ausra should be held to 10 trucks per day from the 101 and 10 trucks per day from Hwy. 5. There should be no exceptions for time critical trucks. All trucks are time critical and this is a misleading statement. The applicant has not stated how many concrete trucks, fuel trucks, hazmat trucks, sanitation trucks, dump trucks; water trucks will be used and no information has been supplied on these trucks delivery routes.

Construction workers are not going to ride the bus. How are these construction workers going to get there tools and equipment on the bus? Welders cannot fit their welding equipment on a bus. The individual vehicles are going to be much higher than proposed by URS. URS has not accounted for cumulative impacts from Optisolar and Sunpower. The 3 plants combined will generate a tremendous amount of traffic. Cumulative impacts need to be addressed.

In Conclusion I firmly believe that the Water, Noise and Traffic issues are far from being resolved. If URS/Ausra would complete proper well tests, relocate the power block in regards to noise, and present accurate traffic studies that do not exclude the bulk of traffic by classifying it as "Time Critical" they would potentially save themselves time and money. URS/Ausra's lack of cooperation has created their own time delays by trying to bully their way through the process.

Sincerely,

Michael Strobridge
Carrisa Plains Resident



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
FOR THE *CARRIZO ENERGY*
SOLAR FARM PROJECT

Docket No. 07-AFC-8

PROOF OF SERVICE
(Revised 2/18/2009)

APPLICANT

Perry H. Fontana, QEP
Vice President-Projects
Ausra, Inc.
2585 East Bayshore Road
Palo Alto, California 94303
perry@ausra.com

California ISO
e-recipient@caiso.com

JEFFREY D. BYRON
Commissioner and Associate Member
jbyron@energy.state.ca.us

INTERVENORS

*Mr. John A. Ruskovich
13084 Soda Lake Road
Santa Margarita, California 93453
agarnett@tcsn.com

Gary Fay
Hearing Officer
Gfay@energy.state.ca.us

APPLICANT CONSULTANT

Angela Leiba, GISP
Senior Project Manager
GIS Manager/Visual Resource
Specialist
URS Corporation
1615 Murray Canyon Road, Suite
1000
San Diego, CA 92108
angela_leiba@urscorp.com

*Mr. Michael Strobbridge
9450 Pronghorn Plains Road
Santa Margarita, California 93453
mike_76@live.com

John Kessler
Project Manager
jkessler@energy.state.ca.us

Caryn Holmes
Staff Counsel
cholmes@energy.state.ca.us

Kristen E. Walker, J.D.
URS Corporation
1615 Murray Canyon Road, Suite
1000
San Diego, California 92108
kristen_e_walker@urscorp.com

California Unions for Reliable Energy
(CURE)
c/o Tanya Gulesserian
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
tgulesserian@adamsbroadwell.com

Michael Doughton
Staff Counsel
mdoughto@energy.state.ca.us

Elena Miller
Public Adviser
publicadviser@energy.state.ca.us

COUNSEL FOR APPLICANT

Jane E. Luckhardt
DOWNEY BRAND
621 Capitol Mall, 18th Floor
Sacramento, CA 95814
jluckhardt@downeybrand.com

John Burch
Traditional Council Lead
Salinan Tribe
8315 Morro Road, #202
Atascadero, California 93422
salinantribe@aol.com

*Environmental Center of
San Luis Obispo (ECOSLO)
c/o Babak Naficy
P.O. Box 13728
San Luis Obispo, California 93406
babaknaficy@sbcglobal.net
ENERGY COMMISSION

INTERESTED AGENCIES

*indicates change

DECLARATION OF SERVICE

I, ^{Michael} Strobridge, declare that on 3/29/09, I served and filed copies of the attached Carrisa Rains Resident Letter. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[<http://www.energy.ca.gov/sitingcases/carrizo/index.html>]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (**preferred method**);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-8
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

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


