

**From:** [Donna Tisdale](#)  
**To:** [FGG-DL, LSDOCS](#); [Smith, Ashley](#)  
**Cc:** [Jacob, Dianne](#); [Wilson, Adam](#)  
**Subject:** BAD - Oct 14 Soitec RPFEIR comments  
**Date:** Monday, October 12, 2015 11:38:34 PM  
**Attachments:** [BAD Soitec RPFEIR 10-12-14.pdf](#)  
[Soitec TDS withdrawal docs 3-2-15.pdf](#)  
[Dave Roberts fundraiser invitation - 9 lobbyists 2-12-15.pdf](#)  
[Rugged Solar Prel Grading Notes 7-24-12.pdf](#)

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Please find the attached timely filed comments on Soitec's RPFEIR from Backcountry Against Dumps, with 3 attachments.

Regards,

Donna Tisdale, President  
619-766-4170

# BACKCOUNTRY AGAINST DUMPS

PO Box 1275, BOULEVARD, CA 91905

October 12, 2015

**TO:** San Diego County Board of Supervisors; cc: Clerk of the Board & PDS via [lsdocs@sdcounty.ca.gov](mailto:lsdocs@sdcounty.ca.gov) and [Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov)

**FROM:** Donna Tisdale, President; 619-766-4170, [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

**RE: Comments on October 14<sup>th</sup> Board Agenda Item 2: Soitec Solar Development RFPFIR:**

Chairman Horn and Supervisors Jacob, Cox, Ron Roberts and Dave Roberts,

Our Board of Directors has formally authorized me to submit comments and to represent them at your October 14<sup>th</sup> Board hearing. We continue to oppose the Soitec Solar Development project and incorporate by reference all of our previous comments and all previous and current comments by the Law Offices of Stephan C. Volker and the Boulevard Planning Group. If necessary, we are fully prepared to return to court to protect our rights, valued resources, public health and safety, and public funds.

***Please reject the Staff Recommendations and deny the significantly reduced and highly speculative Soitec Solar Project in its entirety. The remaining 80 MW Rugged Solar site is slated for the scenic oak studded Rough Acres Ranch in McCain Valley's Tule Creek Floodplain location in the two photos below.***



The Rugged Solar site appears to be controlled by the Hamann Companies, Rough Acres Ranch Foundation, Inc or related entities with John Gibson as a current/former common denominator. See additional information below.

***The Distributed Generation Alternative is alive, totally viable, and should be considered:***

- ***As of 10-9-15, SDG&E reports a total of 454MW of Net Energy Metered (NEM) projects (mostly solar and wind) with a total cap of 617 MW and remaining 163 MW of NEM capacity remaining<sup>1</sup>. Additional DG solar options are available from SDG&E and other entities.***

**Significant new information and changed circumstances for Soitec Solar have drastically altered the Soitec Project Description and rendered the Revised PFEIR, CEQA Findings and**

<sup>1</sup> <http://www.sdge.com/clean-energy/net-energy-metering/overview-nem-cap>

**Statement of Overriding Considerations, and alleged Environmental, and Community Benefit promises significantly reduced and/or totally negated.**

- *With the Alternative 2A removal of LanWest Solar and LanEast Solar and Soitec's March 2, 2015 letter to the County for the March 4<sup>th</sup> Board hearing, with notification of their "official termination" of Tierra Del Sol Solar (attached), the actual Project has been effectively reduced from the original 168MW to the single remaining 80MW 765 acre Rugged Solar.*
- *Soitecs recent sale of their CPV manufacturing plant at 16550 Via Esprillo San Diego, CA 92127, negates alleged overriding benefits. Twenty-one Soitec related companies were listed at the Via Esprillo address.<sup>2</sup>*
- *There is no longer any evidence of need for a Programmatic EIR or the Project.*
- *The Project can and should be rejected outright due to Soitec's changed circumstances, the Project's lack of buyers, lack of viability, and lack of substantial evidence required in the record.*
- **7-15-15:** *Soitec's Q1 press release reconfirms their refocus away from solar and their agreement to sell their solar assets to ConcenSolar<sup>3</sup>*
- **8-5-15:** ***Less than a month later, Soitec announced that negotiations with ConcenSolar had been terminated.**<sup>4</sup>*
- *Alleged Project benefits have now been significantly reduced/voided and fail to support the CEQA Findings and Statement of Overriding Considerations @pages 444-450 of Attachment K<sup>5</sup>*
- **Dec 5<sup>th</sup>, 2014:** *Soitec attorney Jerry Bloom wrote to the CPUC confirming that "the social and economic benefits" of the San Diego Soitec plant were negated by the loss of the Tenaska contract<sup>6</sup>(which included the reassigned Boulevard Project PPAs)*
- **SDG&E issued the following statement published in Greentech Media 12-22-14<sup>7</sup>:** *"Since 2011, SDG&E, along with other regional partners, has worked very hard to bring Soitec to San Diego with a focus on helping them be successful. SDG&E has taken unprecedented action to work with Soitec, amending contracts, extending milestone deadlines and seeking additional CPUC approvals over the years so that we could bring additional renewable resources into the San Diego community, but Soitec has historically not been able to meet the extended deadlines and other milestones in the contracts. Earlier this year, Soitec assigned their contracts to third-party developers. Therefore, we no longer have a direct business relationship with Soitec."*
- **As of December 2014, Soitec's Clark Crawford was quoted as confirming their \$200 million CPV manufacturing facility had only produced 5MW of CPV trackers<sup>8</sup>, negating claims of 200MW per year and 450 jobs! And now that failed factory has been sold.**

<sup>2</sup> <http://www.corporationwiki.com/California/San-Diego/16550-Via-Esprillo-San-Diego-CA-92127-a32095206.aspx>

<sup>3</sup> <http://www.soitec.com/en/news/press-releases/q1-16-electronics-sales-in-line-with-guidance-at-54-1-million-euro-management-confirms-the-strategy-refocusing-on-electronics-business-1761/>

<sup>4</sup> <http://www.soitec.com/en/news/press-releases/soitec-announces-the-end-of-negotiations-with-concensolar-regarding-a-sale-of-solar-assets-and-continues-its-refocus-on-electronics-1772/>

<sup>5</sup> <http://bosagenda.sdcounty.ca.gov/agendadocs/doc?id=0901127e8023b4da>

<sup>6</sup> <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M143/K522/143522462.PDF>

<sup>7</sup> <http://www.greentechmedia.com/articles/read/CPV-Hopeful-Soitec-Latest-Victim-of-the-Economics-of-Silicon-Photovoltaics>

<sup>8</sup> <http://www.greentechmedia.com/articles/read/CPV-Hopeful-Soitec-Latest-Victim-of-the-Economics-of-Silicon-Photovoltaics>

- *The Board of Supervisors and Staff cannot honestly or ethically claim that the Project’s significant unavoidable and cumulatively considerable impacts are outweighed by the alleged considerable benefits that are now significantly reduced or negated, and are not supported by substantial evidence in the record. Even their former partner, SDG&E, has cut ties with Soitec.*

**Alleged Substantial Overriding Benefits are significantly reduced or no longer supported with Soitec’s recent sale of their local CPV manufacturing facility and self-termination of their 60MW Tierra Del Sol Solar project due to lack of buyers:**

1. **Soitec’s March 2<sup>nd</sup> official termination of their 60MW Tierra Del Sol Solar Project reduces alleged GHG benefits by almost 50%.**
2. **Contrary to the claimed benefit, creating utility scale solar in rural San Diego does not always improve reliability in San Diego region:**
  - CAISO stated concerns over simultaneous failure of both the Southwest Powerlink and the Sunrise Powerlink that feed San Diego, in addition to transmission congestion, transmission/thermal overload and voltage concerns on those same lines and interlinked Substations that have been approved or targeted for expensive upgrades that may not be completed before 2017, according to **CAISO’s approved Transmission Plan 2014-2015.**<sup>9</sup>
  - Unless and until those CAISO and SDG&E identified transmission upgrades, including ECO Substation on the Southwest Powerlink and Suncrest Substation on the Sunrise Powerlink, are approved and or completed, new or existing generation connecting to those facilities may be reduced, delayed, or tripped in order to prevent destabilization or cascading failure of the grid.
  - **SDG&E’s 2014 LTTP Track 4 Procurement Plan (Preferred Resources) dated May 1, 2014**<sup>10</sup>, **includes the following information that further negates the alleged reliability benefit:**
    - “A. Quantity and Products to be Solicited SDG&E will solicit bids for up to 200 MW to be delivering in 2021 from new Energy Efficiency (“EE”), Demand Response (“DR”), Energy Storage (“ES”), Renewables, Combined Heat and Power (“CHP”), and Distributed Generation (“DG”) products. SDG&E will target a minimum of 25 MWs of ES, as required by the Track 4 Decision.<sup>6</sup> Specific minimum procurement targets will not be established for any other resource type.
    - ***B. Location / Point of Interconnection Products must provide capacity that will reduce load or add capacity that will count towards SDG&E’s local Resource Adequacy (“RA”) requirements. This means that projects must be located in SDG&E’s local sub-area – i.e., physically located in SDG&E’s service territory and connected to SDG&E-owned transmission or distribution facilities at a point that is (i) at or electrically west of the Miguel or Suncrest substations and (ii) electrically south of the SONGS 230 kV switchyard (projects connecting at the***

<sup>9</sup> <http://www.caiso.com/Documents/Board-Approved2014-2015TransmissionPlan.pdf>

<sup>10</sup> <http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/2014-05-01-Track-4-Preferred-Resources-Plan-FINAL-2.pdf>

*Miguel or Suncrest substations are considered to be local area projects for these purposes). For DR and EE resource types, customers included must be located in San Diego County".(emphasis added)*

3. **This proclaimed benefit is misleading:** The Tierra Del Sol Solar project and its new 138kV line have been terminated by Soitec due to lack of buyers. The sole remaining Rugged Solar project will require a new visually intrusive 138kV line along McCain Valley Road that is the sole access route for the McCain Valley Conservation and Recreation Area, several campgrounds and wilderness areas. Contrary to misleading statements, they have no direct access to either the Sunrise Powerlink or the Southwest Powerlink, without going through the Boulevard Substation and 13 plus miles of visually intrusive 138kV line back to the ECO Substation that connects to the Southwest Powerlink.
4. **Soitec's demo CPV units have reportedly worked very well at their UCSD location which negates the alleged need / benefit for location in a high DNI area.** Soitec has also announced they are exiting the CPV solar business and they have sold their CPV manufacturing facility which further negates the alleged benefits of siting the Project in Boulevard.
5. **The alleged substantial tax benefits, job benefits and broader economic benefits for San Diego County have been reduced by at least \$201 million, almost 50%,** with Soitec's official termination of Tierra Del Solar, Soitec's announced exit from the solar business, sale of their CPV manufacturing facility, and rapidly approaching 2016 deadline for the 30% ITC they are relying on. To date, Soitec has not been able to find any buyers for the remaining 80MW Rugged Solar project, with further negates alleged benefits.
  - a) Anticipated County property tax revenue would be reduced through Soitec's official termination of Tierra Del Sol Solar and Soitec's CPV model failure to thrive or survive.
  - b) Anticipated sales and use taxes for the County would be similarly reduced, as noted above. You can't tax what doesn't ever come to fruition.
  - c) Anticipated ancillary economic benefits would face a similar fate, as noted above. In addition, Imperial County's Coalition of Labor, Agriculture and Business recently made public comments (9-22-15) to the Imperial County Board of Supervisors, on their Renewable Energy / Transmission Element, calling out similarly overstated employment claims made by renewable energy developers and staff for existing projects.
6. **Soitec's official termination of their Tierra Del Sol Solar project reduces the Project from 140 MW to the remaining 80 MW Rugged Solar project which may never get built, or may be significantly reduced in capacity.** Anticipated net GHG reductions must be reduced and account for typically gas-fired backup energy that is required when the sun goes down or SDG&E is forced to shed load due to over generation or voltage issues during peak solar hours.
7. **It is disingenuous to seek enhancement of the County's alleged reputation at the expense and basic sacrifice of the unwilling host community of Boulevard,** and the waste of over \$200 million, including public funds, invested in Soitec's failed CPV factory.
8. **Implementing the political will of the Governor and the Legislature is not a valid benefit.** Their support of Soitec's failed CPV model has resulted in over \$35 million in failed publicly funded investments through DOE grants<sup>11</sup>, Sales and Use Tax Exclusions<sup>12</sup>, Enterprise Zone expansion

<sup>11</sup> <http://www.soitec.com/en/news/press-releases/soitec-solar-awarded-25-million-dollars-from-us-department-energy-north-american-solar-manufacturing-facility-in-san-diego-california-1014/>

<sup>12</sup> See # 31 & 32 @ <http://www.treasurer.ca.gov/caeatfa/ste/applicants/considered.pdf>

and incentives<sup>13</sup> and more. Again, Soitec has self-terminated their Tierra Del Sol Solar project which further negates any alleged benefits of the failed AB900 certified projects.

**9. Soitec's recent sale of their local CPV manufacturing facility, to an apparently non-solar entity, W/Via Esprillo VII, LLC, fully negates the alleged benefit of enabling CPV trackers to be produced and installed in San Diego by Soitec Solar Industries LLC.**

**10. Reductions to Project and reliance on Project receiving 30% Investment Tax Credits that expire at the end of 2016<sup>14</sup> = reductions or cancellation of promised one-time and annual community benefits:**

- **Almost 50% benefit reduction, or more, for Mountain Empire Schools Foundation:**
  - The promised \$100,000 annual benefit will be reduced by \$40,000, almost 50%, through Soitec's March 2<sup>nd</sup> termination of Tierra Del Sol Solar. And may be reduced or totally voided if the remaining 80MW Rugged Solar is reduced in capacity, fails to find a buyer, or fails to start operation by the end of 2016 when the 30% ITC currently expires.
- **Almost 50% benefit reduction, or more, for Mountain Health & Community Services:**
  - The promised \$100,000 annual benefit will be reduced by \$40,000, almost 50%, through Soitec's March 2<sup>nd</sup> termination of Tierra Del Sol Solar. And may be reduced or totally voided if the remaining 80MW Rugged Solar is reduced in capacity, fails to find a buyer, or fails to start operation by the end of 2016 when the 30% ITC currently expires.
- **Imperial Valley Desert Museum Fund:**
  - The promised annual benefit of \$7,000 per year will be reduced or negated if the Rugged Solar capacity is reduced, and if the Project fails to qualify for the 30% ITC that expires at the end of 2016.
- **San Diego Astronomy Association (SDAA):**
  - The SDAA has reportedly declined Soitec's one-time \$40,000 offer.
  - If the Project moves forward and survives additional legal challenges, this funding should go to the Real East County Fire Safe Council ([C3666501](#)), a 501c3, or to the San Diego County's groundwater monitoring program for the Boulevard / Jacumba area.
- **50% benefit reduction County of San Diego Groundwater Monitoring Program:**
  - The inadequate one-time \$50,000 donation to the County's groundwater monitoring program for the Boulevard community would be reduced by \$25,000 through Soitec's March 2<sup>nd</sup> termination of Tierra Del Sol Solar. And may be reduced or totally voided if the remaining 80MW Rugged Solar is reduced in capacity, fails to find a buyer, or fails to start operation by the end of 2016 when the 30% ITC currently expires

**Major water use questions and concerns remain:**

- **6-25-15: During the court hearing in Civ. No. 37-2015-00007420-CU-WM-CTL with Judge Wohlfeil, attorney Ryan Waterman (representing Soitec and the County), testified that the entire Rugged Solar site will be clear graded.** Waterman's statement supports the clear grading evident at Soitec's existing small CPV projects located in Borrego and Newberry Springs, as documented in the two photographs below (1.5 MW Newberry Springs site on left and 6.3MW

<sup>13</sup> <http://www.kbkg.com/california/san-diego-enterprise-zone>

<sup>14</sup> <http://energy.gov/savings/business-energy-investment-tax-credit-itc>

Borrego site on right), and as documented in the Rugged Solar Grading and Drainage notes (plans) dated 7-24-12, as discussed, below.

- **However, Mr. Waterman’s apparent Freudian slip contradicts claims made in the EIR that the Boulevard sites will not be clear graded.** We strongly believe that clear grading will take place, along with significantly increased use of drought-stressed groundwater from on-site wells in Boulevard and other sole source groundwater wells located in Pine Valley and Jacumba, based on physical evidence at other existing industrial solar projects, including Soitec’s, and reports from workers at those existing and under-construction projects.



**How much grading and water is really required for Rugged Solar??** A major discrepancy, or some form of information manipulation, exists between the two sets of Rugged Solar’s Preliminary Grading and Drainage Notes stamped as received by DPLU on 7-24-12 and those stamped as received by PDS on 1-2-14:

- **The 2012 version of the preliminary grading notes (attached)<sup>15</sup> includes the following information, mostly from page C-201:**
  - 20,672,229 square feet of disturbed area (total is result of adding figures from several pages: C-202, C-203, C-204, C-205)
  - 776,160 cubic yards of excavation
  - 760,670 cubic yards of fill
  - 15,490 cubic yards of export
  - #17 on page 1 states that, “**THE GRADING FOR THE SITE SHALL INCLUDE THE CLEARING AND GRUBBING OF THE INITIAL 4 INCHES OF TOPSOIL. A PORTION OF THIS MATERIAL SHALL BE USED FOR FILL FOR THE SITE. THE REMAINDER SHALL EXPORTED OFFSITE**”
- **The updated version of Rugged Solar preliminary grading and drainage notes (dated 1-2-14)<sup>16</sup> show the following figures from page C-200:**
  - 29,834 cubic yards cut and fill
  - 0 export
  - Total disturbed area: 20,659,925 square feet (from #17)
  - #17 on page 1 now states that, “**THE GRADING FOR THE SITE SHALL INCLUDE THE CLEARING AND GRUBBING FOR A 20,659,925 SQ.FT. AREA**”
- ***Please note that the total disturbed area in both versions equals approximately 474 acres.***

<sup>15</sup> No digital version was available for the 2012 grading notes

<sup>16</sup> <http://www.sandiegocounty.gov/content/dam/sdc/dplu/ceqa/Soitec-Documents/EIR-FILES/Rugged-Grading-Plan.pdf>

- ***However, in the 2014 version, the cut has inexplicably been reduced by 746,326 cubic yards of soil and the majority of “disturbed area” is now suspiciously identified as “fire clearing”.***
- Our professional source of information on this question, who actually works in the industrial solar construction industry, reviewed the two Rugged Solar grading plans and informed us that *the 2012 plan includes both grading and grubbing while the 2014 grading plan only includes the grub work of clearing vegetation.* In addition, the use of only 2-3% organics is allowed for infill which leaves a massive amount of organics that will need to be dealt with.
- It seems impossible to “clear and grub” an entire 474-acre (20,659,925 square-foot) site down 4 inches without using a grader, and using a grader over this entire site means a huge amount of soil would be graded, dust generated, and water consumed.
- The remaining question is just how much soil will really be moved and how much water will really be consumed in the process??
- Specifically, 4 inches in depth x 20,659,925 square feet in area= 255,060 cubic yards, 8.5 times the quantity claimed in the FPEIR. (using the slightly smaller area of grading from the 2012 work plans; if the slightly larger 2014 disturbed area figure is used, then the quantity be slightly larger.)
- Note also that the original 2012 grading plan admits there would be both filling **and exporting**.
- No matter what you call this (“fire clearing,” etc.), these two specific impacts are admitted. Yet later, the EIR falsely claims that NO exporting would occur. See AR 8115.
- As one example, information available from a contractor’s public website documents that one 50MW solar project on 500 acres (of flat and already cleared converted farmland) included 133,500 cubic yards of grading and 28,000 lf of chain link fencing.<sup>17</sup>

**Tule Wind and Soitec cumulative noise memo and updated schedule is misleading:<sup>18</sup>**

- The update includes a schedule for Tule Wind to start construction in 2016, when they have not yet received the required extension to their Notice To Proceed, from the BLM, that currently expires on December 31, 2015; they have no Eagle Take Permit; and no lease with State Lands Commission.
- With the changes at Soitec, and lack of Power Purchase Agreement, and expiring incentives, both Rugged Solar and Tule Wind could be stalled and end up with overlapping construction schedules at a later date. If it were our choice, neither project would move forward and funds would be found to provide point of use solar or other forms of renewable energy for willing local residents and businesses.

**Additional information on Rugged Solar host Rough Acres Ranch property related entities:**

- **The Hamann Companies have over 100 companies listed at their 1000 Pioneer Way, El Cajon address<sup>19</sup>.**

<sup>17</sup> <http://www.cswcontractors.com/projects.asp?page=Sonora+at+Solar+Gen+2-50+MW>

<sup>18</sup> [http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/RFPEIR/Appendix\\_9.0-9%20MEMORANDUM\\_Soitec\\_Cumulative\\_Noise\\_Sept2015.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/RFPEIR/Appendix_9.0-9%20MEMORANDUM_Soitec_Cumulative_Noise_Sept2015.pdf)

<sup>19</sup> <http://www.bizapedia.com/addresses/1000-PIONEER-WAY-EL-CAJON-CA-92020.html>

- The Rough Acres Foundation / Set Free Rough Acres share a facebook page<sup>20</sup> with the same 2750 McCain Valley Road / Rough Acres Ranch address in Boulevard, despite repeated denials that Set Free is operating there.
- ***Rough Acres Foundation's 990 lists over \$4 million in 2013 revenue<sup>21</sup>. These are not low-income operations.***
- Rough Acres Ranch also hosted a belatedly announced Sunrise Powerlink Construction Yard that was another lucrative proposition<sup>22</sup>.
- The Foundation's stated mission is "to support the purposes of the Christian Community Foundation, Inc, DBA Waterstone".

**Rough Acres Ranch Foundation, Inc's 2013 - 990 form lists the following<sup>23</sup>:**

- EIN 203124246
- Religion related spiritual development, single organization support
- over \$4 million in contributions, gifts and other similar amounts
- Over \$400,000 in non-interest bearing cash
- \$7.9 million in land
- \$8.3 million in unrestricted assets
- 2 people receiving more than \$100,000 in reportable compensation

Oh what a tangled web developers can weave, using so-called non-profit organizations and dozens of LLCs. At the same time, these developers and their hired guns often begrudge and attempt to besmirch any justified community based / funded self-defense or opposition to their well-funded but ill-suited development projects proposed in unwilling rural neighborhoods. We do have rights to defend ourselves and to receive fair and unbiased hearings. We and are not afraid to exercise those rights

**Request for mandatory recusal of Supervisor Dave Roberts from voting on the Soitec Solar Project based the following reasons:**

1. Based on perceived pattern of unethical and other questionable behavior related to the County's recent \$301,000 settlement with former staffers over allegations of abuse of power.<sup>24</sup>
2. Perceived bias and undue influence related to the fundraiser, held on February 12 2015, to support the re-election of Dave Roberts by Soitec's hired consultants and hosted by 3<sup>rd</sup> party advocate and registered lobbyist James Waring of CleanTech (who helped lure Soitec to San Diego with lucrative incentives<sup>25</sup>), and co-hosted by Soitec's hired consultant and registered lobbyist Jim Whalen, just 8 days after Dave Robert's February 4th vote to support the Soitec Solar Development Project (invitation attached); Based on documentation, Dave Roberts was aware of the fundraiser at the time of the February 4<sup>th</sup> Board vote; in addition, his attendance

<sup>20</sup> <https://www.facebook.com/pages/Rough-Acres-Ranch/236048649918433?rf=154392781265703>

<sup>21</sup> <https://projects.propublica.org/nonprofits/organizations/203124246>

<sup>22</sup> [http://www.cpuc.ca.gov/environment/info/aspensunrise/ntp\\_reqs/ntp\\_req05.pdf](http://www.cpuc.ca.gov/environment/info/aspensunrise/ntp_reqs/ntp_req05.pdf)

<sup>23</sup> <http://www.nonprofitfacts.com/CO/Rough-Acres-Foundation-Inc.html>

<sup>24</sup> <http://www.10news.com/news/county-board-of-supervisors-approves-310k-settlement-for-dave-roberts-accusers-091515>

<sup>25</sup> <http://www.voiceofsandiego.org/share/soitec-workers-still-in-the-dark-about-the-companys-future-in-sd/>

and participation at Soitec events, or with Soitec representatives when their project was in the active review process.

- The February 12<sup>th</sup> invitation for the fundraiser event held “*At the home of Jim and Kathy Waring...*” included the following statements: “\*Contributions payable to Re-elect Supervisor Dave Roberts 2016”; “Contributions from any registered lobbyist with the County of San Diego are prohibited”.
- The Re-elect Dave Roberts for Supervisor 2016 also includes the following disclaimer showing they are aware: “Lobbyists registered with the County of San Diego may not contribute”:

[https://www.complet\\_campaigns.com/public.asp?name=RobertsDave&page=1](https://www.complet_campaigns.com/public.asp?name=RobertsDave&page=1)

3. Roberts spoke in favor and voted to support Soitec Solar projects and approve the Programmatic EIR, Statement of Overriding Considerations and other approvals at the February 4<sup>th</sup> Board of Supervisors hearing<sup>26</sup>.
4. Roberts failed to disclose any campaign contributions related to the Feb 12 fundraiser co-hosted by registered lobbyists James Waring and Jim Whalen, who testified in support of Soitec Solar project at the Feb 4<sup>th</sup> Board hearing.
5. Roberts also failed to disclose the fact that Soitec Solar CPV manufacturing facility is located in his district and that he hosted Soitec Solar’s Clark Crawford as part of a panel.
6. Jim Whalen (J. Whalen & Associates) represents both Soitec Solar and Hamann Companies who are the project /land owners for Soitec Solar’s 765 acre Rugged Solar CPV project that was approved on Feb 4<sup>th</sup> for the rural community of Boulevard.
7. Then Vice-Chair Dave Roberts Agenda Item for the Jan 27, 2015 Board meeting announced a Presentation on the State of the Manufacturing Industry in the San Diego Region which included a presentation from Industry representative Clark Crawford for Soitec, a member of North San Diego Business :

<http://www.supervisordaveroberts.com/legislation/presentationonmanufacturing.012715.pdf>

#### **8. Suspected / potential violations of Open Meeting Laws timeline:**

- May 2012: Soitec’s Rugged Solar Draft Major Use Permit was submitted to San Diego County which triggered restrictions on meetings between elected officials and interested parties.
- November 2012: Dave Roberts was elected to represent District 3 on the County Board of Supervisors<sup>27</sup>
- December 19, 2012: Soitec opened their CPV manufacturing facility in Rancho Bernardo, District 3.<sup>28</sup>
- On July 1, 2014, 6 months after the NOP for Soitec Solar’s Programmatic EIR was announced<sup>29</sup> for their 4 Boulevard CPV projects, Supervisor Dave Roberts participated in welcoming Soitec’s Clark Crawford as one of 6 panelists at the San Diego North Economic Development Corporation’s (SDNEDC) North County Manufacturing Executive

<sup>26</sup> <http://www.sandiegocounty.gov/content/dam/sdc/bos/agenda/sop/020415sop.pdf>

<sup>27</sup> <http://www.sdgIn.com/news/2012/11/07/dave-roberts-elected-san-diego-county-board-supervisors#sthash.aBF2ep7u.dpbs>

<sup>28</sup> [http://www.soitec.com/pdf/soitec\\_sd\\_plant\\_grand\\_opening-dec19th2012-en.pdf](http://www.soitec.com/pdf/soitec_sd_plant_grand_opening-dec19th2012-en.pdf)

<sup>29</sup> [http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/Appendix\\_1.0-1\\_Notice%20of%20Preparation.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/Appendix_1.0-1_Notice%20of%20Preparation.pdf)

Roundtable at the City of Vista Civic Center<sup>30</sup> , which may have violated open meeting laws if Roberts and Crawford engaged in any discussions about Soitec's PEIR projects (on or off the record). Supervisor Roberts is listed as a SDNEDC Investor Stakeholder<sup>31</sup>

- Supervisor Dave Robert's posting for News of the Week for July 12, 2013<sup>32</sup> includes a photograph of the Supervisor apparently taken at Soitec's local reception to celebrate the opening of their Newberry Springs CPV project.

Thank you for consideration of our comments and extensive research.

Any errors or omissions are unintentional.

###

**Attachments:**

Soitec's March 2, 2015 letter terminating Tierra Del Sol Solar Project

Dave Roberts Fundraiser flyer for February 12<sup>th</sup> event at James Waring's home

Preliminary Grading and Drainage Notes for Rugged Solar stamped received by DPLU on 7-24-12

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<sup>30</sup> <http://savingsmanufacturing.com/blog/category/nearsourcing-2/>

<sup>31</sup> <http://sdnedc.org/membership/investor-stakeholders/>

<sup>32</sup> <http://archive.constantcontact.com/fs104/1112142899662/archive/1114084168408.html>

# ATTACHMENT

For Item

#2

Wednesday,  
March 4, 2015

PUBLIC COMMUNICATION RECEIVED BY THE  
CLERK OF THE BOARD

Distributed: 3/2/15

**Panfil, Sarah**

---

**From:** Gungle, Ashley  
**Sent:** Monday, March 02, 2015 2:50 PM  
**To:** FGG-DL, LSDOCS  
**Cc:** Real, Sami  
**Subject:** FW: Request for Denial of Franchise Ordinance  
**Attachments:** Tierra Del Sol Franchise Agreement Ordinance.pdf

Please find attached a letter received on Item #2 on Wednesday's Board agenda.

Thank you,

Ashley

**Ashley Gungle**, Land Use/ Environmental Planner  
COUNTY OF SAN DIEGO | Planning & Development Services  
T. 858.495.5375

---

**From:** Patrick Brown [<mailto:patrick.brown@soitec.com>]  
**Sent:** Monday, March 02, 2015 2:23 PM  
**To:** Gungle, Ashley; Vaughan, Glynnis  
**Cc:** Real, Sami; Kenney, Michael; Chris Brown; Fogg, Mindy; Brison ELLINGHAUS  
**Subject:** Request for Denial of Franchise Ordinance

Hello Ashley and Glynnis,

Please see the attached request for denial of the Soitec Franchise agreement for the Tierra del Sol Solar. Please let me know if you would like to discuss.

**Patrick Brown | Permitting Manager** | Solar Energy Business Unit | Soitec M. +1 619 733 2649  
[Patrick.Brown@Soitec.com](mailto:Patrick.Brown@Soitec.com) | [www.soitec.com](http://www.soitec.com) | **Soitec | 16650 Via Esprillo San Diego, CA 92127 (USA)**

*This message and any of the attachments may contain proprietary material for the sole use of the intended recipient. Any review or distribution by others is strictly prohibited. If you are not the intended recipient please contact the sender and delete all copies.*



Soitec Solar Development LLC.  
16550 Via Esprillo  
San Diego, CA 92127 (USA)  
T. + 1(0)619-733-2649  
Patrick.Brown@soitec.com  
www.soitec.com

March 2, 2015

Clerk of the Board of Supervisors  
Attention: Vice Chairman Roberts  
County Administration Center,  
1600 Pacific Highway, Room 402  
San Diego, CA 92101.

**Request for Denial of the Tierra del Sol Franchise Agreement Ordinance**

Dear Vice Chairman Roberts,

I regretfully request a denial of the Tierra del Sol Solar Project Franchise Ordinance that is before you this Wednesday as item number two. As you may know, Soitec Solar Inc. has decided to exit the solar market and focus on its primary core microelectronics business. Soitec is in the process of selling the solar assets as well as its manufacturing business. As a part of this, I have been tasked with selling the solar land assets in San Diego County. It is unfortunate that we could not find a willing buyer of the Tierra del Sol project that was approved by your Board last month. Because of the lack of interests and expensive carrying costs, we have since canceled the land options and the CAISO interconnection positions Q-794 and Q-895. The result is that the project has been officially terminated. Therefore, I request that you deny the Franchise Ordinance that is before your Board Wednesday because there is no project that would benefit from this ordinance. Once again, I appreciate your support and the Board's support of the project approvals. It should be noted that we are continuing the effort to complete the Rugged Solar project out of the portfolio.

Best Regards,

Patrick Brown, Project Manger  
Soitec Solar Development LLC.

Attachments:

Land Option Termination Notices  
CAISO Correspondence for Q794 and Q895

cc: Ashley Gungle, County of San Diego, 5510 Overland Ave. San Diego, CA 92123  
Mike Kenney, County Traffic Engineer, 5510 Overland Ave. San Diego, CA 92123



Tierra del Sol Solar Farm LLC  
c/o Scitec Solar Development LLC  
16550 Via Esprillo  
San Diego, CA 92127 (USA)  
T. + 1(0)858-746-9019  
M. + 1(0)858-531-2040  
Brison.ellinghaus@soitec.com  
www.soitec.com

February 27, 2015

Mr. Joseph H. Brown and Ms. Norma J. Brown  
Co-Trustees of the Brown Family Trust  
c/o 1116 W. 7<sup>th</sup> Street  
PMB 158  
Columbia, TN 38401

**RE: Buyer's Notice of Termination of Purchase Agreement and Joint Escrow Instructions**

Dear Mr. Brown & Ms. Brown,

As discussed this afternoon, and pursuant to Paragraph 6.2 of that certain Purchase Agreement and Joint Escrow Instructions between Joseph H. Brown and Norma J. Brown in their capacities as co-trustees of the Brown Family Trust ("Seller"), and Tierra del Sol Solar Farm LLC ("Buyer"), dated for reference purposes as of July 14, 2011, as amended (the "Agreement"), I write to submit Buyer's Notice of Termination of the Agreement as of this date. Buyer shall have no further obligations with regard to the Agreement other than those already outstanding.

Buyer will provide a quitclaim deed to Seller in accordance with the Agreement. Escrow Holder is hereby authorized to release any and all funds held in escrow to Seller.

Best regards,  
Tierra del Sol Solar Farm LLC

A handwritten signature in black ink, appearing to read "Brison R. Ellinghaus".

Brison R. Ellinghaus  
Project Development Manager

Cc: First American Title Company



Tierra del Sol Solar Farm LLC  
c/o Soitec Solar Development LLC  
16550 Via Esprillo  
San Diego, CA 92127 (USA)  
T. + 1(0)858-746-9019  
M. +1(0)858-531-2040  
Brison.ellinghaus@soitec.com  
www.soitec.com

February 27, 2015

Mr. Joseph H. Brown  
c/o 1116 W. 7<sup>th</sup> Street  
PMB 158  
Columbia, TN 38401

**RE: Buyer's Notice of Termination of Purchase Agreement and Joint Escrow Instructions**

Dear Mr. Brown,

As discussed this afternoon, and pursuant to Paragraph 6.2 of that certain Purchase Agreement and Joint Escrow Instructions between Joseph H. Brown in his capacity as Trustee for the Brown and Reynolds Trust ("Seller"), and Tierra del Sol Solar Farm LLC ("Buyer"), dated for reference purposes as of July 14, 2011, as amended (the "Agreement"), I write to submit Buyer's Notice of Termination of the Agreement as of this date. Buyer shall have no further obligations with regard to the Agreement other than those already outstanding.

Buyer will provide a quitclaim deed to Seller in accordance with the Agreement. Escrow Holder is hereby authorized to release any and all funds held in escrow to Seller.

Best regards,  
Tierra del Sol Solar Farm LLC

  
Brison R. Ellinghaus  
Project Development Manager

Cc: First American Title Company



Brison ELLINGHAUS <brison.ellinghaus@soitec.com>

**Project Withdrawn - Tierra del Sol Solar Farm (Queue #794)**

1 message

no-reply@caiso.com <no-reply@caiso.com>

Mon, Feb 23, 2015 at 12:25 PM

To: brison.ellinghaus@soitec.com, lwright@caiso.com, lkravchuk@caiso.com, mmishler@semprautilities.com, giengineers@semprautilities.com, csibley@caiso.com

This notification confirms that the Tierra del Sol Solar Farm (Q#794) has been withdrawn from the queue as of 02/19/2015.

\*\*\*\*\*

The foregoing electronic message, together with any attachments thereto, is confidential and may be legally privileged against disclosure other than to the intended recipient. It is intended solely for the addressee(s) and access to the message by anyone else is unauthorized. If you are not the intended recipient of this electronic message, you are hereby notified that any dissemination, distribution, or any action taken or omitted to be taken in reliance on it is strictly prohibited and may be unlawful. If you have received this electronic message in error, please delete and immediately notify the sender of this error.

\*\*\*\*\*

5 of 6



Brison ELLINGHAUS <brison.ellinghaus@soitec.com>

**Project Withdrawn - Tierra Del Sol II (Queue #895)**

1 message

no-reply@caiso.com <no-reply@caiso.com>

Mon, Feb 23, 2015 at 1:30 PM

To: dwain.boettcher@soitec.com, brison.ellinghaus@soitec.com, lwright@caiso.com, lkravchuk@caiso.com, mmishler@semprautilities.com, giengineers@semprautilities.com, csibley@caiso.com

This notification confirms that the Tierra Del Sol II (Q#895) has been withdrawn from the queue as of 02/19/2015.

\*\*\*\*\*

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\*\*\*\*\*

6 of 6

SPC23.101

C



9 REB'S FUND

**Please Join Hosts**

951 **Jim & Kathy Waring**

**With Co-Hosts**

#507

Rich Ahrendt ~ Rob Appel ~ Sam Attisha ~ Richard Barrera ~ **Craig Benedetto**  
 Mary Jane & Roger Boyd ~ Carolyn Cohen ~ Dr. Kathleen Davis ~ Hon. Wadie Deddeh  
 Chris Duggan ~ Michael Gelfand ~ Keith Jones ~ Stath Karras ~ Linda & Mel Katz  
 863 Maddy Kilkenny ~ Richard Ledford ~ Rich Leib ~ Tana Lorah ~ Dave Malcolm  
 Blair McNeill ~ Vince Mudd ~ Bob Nelson ~ Melinda Newsom ~ Jack Raymond  
 Kimmy Roberts ~ Stephanie Saathoff ~ Kim Santini, Esq. ~ Zachary Schlagel  
 Rose Ann & Ira Sharp ~ Hon. Pam Slater-Price & Hershell Price ~ Matthew Strauss  
 Tom Sudberry ~ Frank Urtasun ~ Shawn VanDiver ~ Janet Vohariwatt ~ **Chris Wahl**  
 John Wainio ~ Jim Whalen ~ Tom Wornham ~ Alan Ziegus

867

**For a Reception to Support**

815

866

**Dave Roberts**

**Vice-Chair, County Board of Supervisors**

**Thursday, February 12<sup>th</sup>, 2015**

**5:30p.m.-7:30p.m.**

**At the home of Jim and Kathy Waring**  
**7965 La Jolla Scenic Drive N.**  
**La Jolla, CA 92037**

**Suggested Minimum Contribution ~ \$150**

**Maximum Contribution ~ \$750**

*\*Contributions payable to Re-elect Supervisor Dave Roberts 2016  
 PO Box 7955, San Diego, CA 92167 or online at <http://daverobertsforsupervisor.com>*

**RSVP to Kelli or Sydnie at (619) 239-1721 or [rsvp@kmstrategies.net](mailto:rsvp@kmstrategies.net)**

Political contributions are not tax deductible. County law permits only personal contributions and limits contributions to \$750 per individual, \$1500 per couple, per election. Spouses may write separate checks or one check signed by both spouses if the check exceeds \$750. Contributions from any registered lobbyist with the County of San Diego are prohibited. State law prohibits reimbursing donors for their contributions.

**Paid for by Re-elect Supervisor Dave Roberts 2016 ID#1359646**  
 PO Box 1490, Solana Beach, CA 92075

# PRELIMINARY GRADING AND DRAINAGE NOTES

## GRADING NOTES

- ALL GRADING SHALL CONFORM TO THE REQUIREMENTS OF THE GRADING ORDINANCE SECTIONS 87.101 THROUGH 87.804 OF THE SAN DIEGO COUNTY CODE OF REGULATORY ORDINANCES.
- A REGISTERED CIVIL ENGINEER IS REQUIRED TO SUPERVISE INSTALLATION OF THE FILL KEYWAY AND ALL FILL BENCHING AND COMPACTION. A SOILS REPORT WITH COMPACTION TESTS IS REQUIRED FOR ALL FILL THAT IS OVER 12" IN DEPTH. DPLU FORM #73, MINOR GRADING CERTIFICATION, AND THREE (3) COPIES OF THE COMPACTION REPORT COMPLETED BY A SOILS ENGINEER SHALL BE SUBMITTED PRIOR TO ROUGH GRADE APPROVAL.
- ALL FILL MATERIAL SHALL BE COMPACTED AS NOTED.
- NATURAL DRAINAGE SHALL NOT BE DIVERTED OR CONCENTRATED ONTO ADJACENT PROPERTY.
- MAINTAIN 1% (MINIMUM) SLOPE AWAY FROM ALL BUILDINGS FOR AT LEAST 5'.
- ALL GRADING DETAILS SHALL BE IN CONFORMANCE WITH THE FOLLOWING SAN DIEGO COUNTY DESIGN STANDARDS OR REGIONAL STANDARD DRAWINGS:
  - DS-8 LOT GRADING
  - DS-10 GRADING OF SLOPES
  - DS-11 REQUIRED SETBACKS
  - D-40 RIP RAP ENERGY DISSIPATER
  - D-82 DEBRIS FENCE
  - DS-09 FENCING CUT BANKS
- BERMS SHALL BE REQUIRED AT THE TOP OF ALL FILL SLOPES AND SWALES OR BROW DITCHES SHALL BE REQUIRED AT THE TOP OF ALL CUT SLOPES. ALL BERMS, SWALES, OR BROW DITCHES SHALL CONFORM TO THE DESIGN STANDARDS OR REGIONAL STANDARD DRAWINGS LISTED ABOVE.
- REGARDLESS OF WHICH BMP'S ARE IMPLEMENTED THE FACE OF ALL CUT AND FILL SLOPES IN EXCESS OF 3' VERTICAL HEIGHT SHALL BE PLANTED AND MAINTAINED WITH A GROUND COVER OR OTHER PLANTING TO PROTECT THE SLOPES AGAINST EROSION AND INSTABILITY. PLANTING SHALL COMMENCE AS SOON AS SLOPES ARE COMPLETED. ALL PLANTING MUST HAVE A PERMANENTLY INSTALLED IRRIGATION SYSTEM.
- REQUIRED SLOPE RATIOS ARE AS FOLLOWS:
  - CUTS - 1.5:1 FOR MINOR SLOPES (UP TO 15' VERTICAL HEIGHT)
  - CUTS - 2:1 FOR MAJOR SLOPES (OVER 15' VERTICAL HEIGHT)
  - FILLS - 2:1 (MAXIMUM) FOR ALL FILL SLOPES
- NOTWITHSTANDING THE MINIMUM STANDARDS SET FORTH IN THE GRADING ORDINANCE AND NOTWITHSTANDING THE APPROVAL OF THESE GRADING PLANS, THE OWNER AND PERMITEE ARE RESPONSIBLE FOR THE PREVENTION OF DAMAGE TO ADJACENT PROPERTIES. NO PERSON SHALL EXCAVATE SO CLOSE TO THE PROPERTY LINE AS TO ENDANGER ANY ADJOINING PUBLIC STREET OR SIDEWALK, OR THE FUNCTION OF ANY SEWAGE DISPOSAL SYSTEM OR ANY OTHER PUBLIC OR PRIVATE PROPERTY.
- THE DIRECTOR OF PLANNING AND LAND USE MAY IMPOSE CONDITIONS THAT ARE REASONABLY NECESSARY TO PREVENT THE CREATION OF A NUISANCE OR HAZARD TO PERSONS OR TO PUBLIC OR PRIVATE PROPERTY. THE DIRECTOR MAY ALSO MODIFY OR ADD CONDITIONS TO ANY VALID GRADING PERMIT WHEN SUCH MODIFICATIONS OR ADDITIONS ARE REASONABLY NECESSARY TO PREVENT THE CREATION OF A NUISANCE OR HAZARD TO PERSONS OR TO PUBLIC OR PRIVATE PROPERTY. SUCH CONDITIONS MAY INCLUDE BUT ARE NOT LIMITED TO THE FOLLOWING:
  - IMPROVEMENT OF EXISTING GRADING TO CONFORM WITH THE GRADING ORDINANCE. AND;
  - REQUIREMENTS FOR FENCING OF EXCAVATIONS OR FILLS THAT WOULD OTHERWISE BE HAZARDOUS, AND;
  - ADEQUATE DUST CONTROL MEASURES.
- ALL OPERATIONS CONDUCTED ON THE PREMISES, INCLUDING THE WARMING UP, REPAIR, ARRIVAL, DEPARTURE OR RUNNING OF TRUCKS, EARTH MOVING EQUIPMENT, CONSTRUCTION EQUIPMENT OR ANY OTHER ASSOCIATED GRADING EQUIPMENT SHALL BE LIMITED TO THE PERIOD BETWEEN 7:00AM AND 6:00PM MONDAY THROUGH SATURDAY. NO EARTH MOVING OR GRADING SHALL BE CONDUCTED ON SUNDAYS OR HOLIDAYS.
- THE CONTRACTOR SHALL VERIFY THE EXISTENCE AND LOCATION OF ALL UTILITIES BEFORE COMMENCING WORK. NOTICE OF THE PROPOSED WORK SHALL BE PROVIDED TO THE FOLLOWING AGENCIES:
  - SAN DIEGO GAS AND ELECTRIC (800) 422-4133
  - PACIFIC BELL (800) 422-4133
  - CATV (800) 422-4133
  - WATER UTILITY (800) 422-4133
  - SEWER UTILITY (800) 422-4133
- APPROVAL OF THESE PLANS BY THE DIRECTOR OF PLANNING AND LAND USE DOES NOT AUTHORIZE ANY WORK OR GRADING TO BE PERFORMED UNTIL THE PROPERTY OWNER'S PERMISSION IS OBTAINED, RIGHT TO ENTRY FORM COMPLETED AND VALID GRADING PERMIT ISSUED.
- THE ISSUANCE OF A GRADING PERMIT SHALL CONSTITUTE AN AUTHORIZATION TO PERFORM ONLY THAT WORK WHICH IS DESCRIBED OR SHOWN ON THE GRADING PERMIT APPLICATION AND APPROVED GRADING PLANS. ALL WORK SHALL BE PERFORMED IN ACCORDANCE WITH ANY CONDITIONS IMPOSED BY THE DIRECTOR OF PLANNING AND LAND USE AND IN ACCORDANCE WITH THE GRADING ORDINANCE.
- ROADS ARE CLASSIFIED ON THE DRAWING AS THE FOLLOWING:
  - PRIMARY ACCESS ROAD - 24FT WIDE GRADED ROAD IMPROVED TO CARRYING A 50,000LBS VEHICLE.
  - SECONDARY ACCESS ROAD - 30FT WIDE GRADED ROAD WITH AN 18FT LANE CAPABLE OF CARRYING A 15,000LBS VEHICLE AND A 12FT LANE CAPABLE TO CARRYING A 50,000LBS VEHICLE.
  - SERVICE ROAD - 30FT WIDE GRADED ROAD CAPABLE TO CARRYING A 15,000LBS VEHICLE.
- THE GRADING FOR THE SITE SHALL INCLUDE THE CLEARING AND GRUBBING OF THE INITIAL 4 INCHES OF TOPSOIL. A PORTION OF THIS MATERIAL SHALL BE USED AS FILL FOR THE SITE. THE REMAINDER SHALL EXPORTED OFFSITE.
- THE BASIS OF EXISTING CONTOURS WAS PROVIDED IN A DIGITAL TERRAIN MODEL (DTM) TIED TO THE CCS83 GRID. THE DTM WAS CREATED IN CONJUNCTION WITH AN AERIAL TOPOGRAPHICAL SURVEY AT 20-SCALE WITH 0.5 FOOT CONTOUR INTERVALS PREFORMED JANUARY 2012.
- EARTHWORK QUANTITIES:
 

EXCAVATION: 777,750 CUBIC YARDS

FILL: 763,100 CUBIC YARDS

IMPORT: \_\_\_\_\_ CUBIC YARDS

EXPORT: 14,650 CUBIC YARDS

## PRELIMINARY GRADING PLAN NOTE

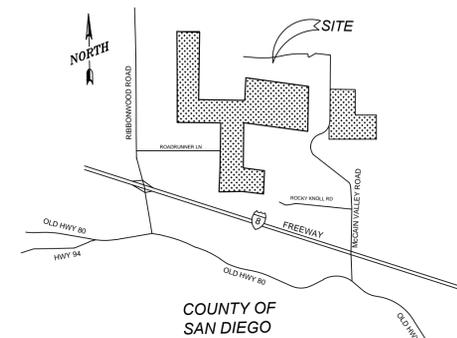
THIS PLAN IS PROVIDED TO ALLOW FOR FULL AND ADEQUATE DISCRETIONARY REVIEW OF A PROPOSED DEVELOPMENT PROJECT. THE PROPERTY OWNER ACKNOWLEDGES THAT ACCEPTANCE OR APPROVAL OF THIS PLAN DOES NOT CONSTITUTE AN APPROVAL TO PERFORM ANY GRADING SHOWN HEREON, AND AGREES TO OBTAIN VALID GRADING PERMISSION BEFORE COMMENCING SUCH ACTIVITY.

## STORMWATER MANAGEMENT NOTES

- DURING THE RAINY SEASON FROM OCTOBER 1ST TO APRIL 30TH THE AMOUNT OF EXPOSED SOIL ALLOWED AT ONE TIME SHALL NOT EXCEED THAT WHICH CAN BE ADEQUATELY PROTECTED WITHIN 48 HOURS OF A PREDICTED RAIN.
- 125% OF ALL NEEDED BMP MATERIALS SHALL BE STORED ONSITE YEAR-ROUND TO ALLOW FULL DEPLOYMENT AND INSTALLATION WITHIN 48 HOURS OF A PREDICTED RAIN.
- THE PROPERTY OWNER SHALL COMPLY WITH ALL APPLICABLE STORMWATER REGULATIONS AT ALL TIMES. THE BMPs THAT HAVE BEEN INCORPORATED INTO THIS PLAN SHALL BE IMPLEMENTED AND MAINTAINED TO PREVENT ONSITE EROSION AND TO PREVENT DISCHARGES OF POLLUTANTS FROM LEAVING THE SITE. MAINTENANCE OF BMPs IS THE RESPONSIBILITY OF THE PROPERTY OWNER AND FAILURE TO PROPERLY INSTALL OR MAINTAIN THE BMPs MAY RESULT IN ENFORCEMENT ACTION BY THE COUNTY OF SAN DIEGO OR OTHERS. IF INSTALLED BMPs FAIL, THEY MUST BE REPAIRED OR REPLACED WITH AN ACCEPTABLE ALTERNATE AS SOON AS IT IS SAFE TO DO SO.
- PERIMETER SEDIMENT CONTROL BMPs SHALL BE INSTALLED IMMEDIATELY AFTER THE AREA TO BE GRADED IS BRUSHED OR CLEARED, BUT PRIOR TO THE START OF GRADING OPERATIONS.
- EROSION CONTROL BMPs USED FOR SLOPE STABILIZATION SHALL BE INSTALLED AS SOON AS THE FINISHED SLOPES ARE COMPLETE.
- A PERIMETER BMP INSPECTION IS REQUIRED ON THE FIRST DAY OF GRADING
- WHERE AN EXISTING STORMWATER CONVEYANCE CROSSES OVER A PLANNED SECONDARY SERVICE ROAD, THE ROAD SHALL BE GRADED AND MAINTAINED AS A FORD.
- RIP RAP SHALL BE PLACED AT ALL LOCATIONS WHERE ONE DRAINAGE FEATURE (SUCH AS A DITCH OR A SWALE) DRAINS INTO A LARGER DRAINAGE FEATURE.
- DIP SECTIONS SHALL BE COMPOSED OF 6" OF REINFORCED STRUCTURAL CONCRETE SLABS, WHICH SHALL BE DESIGNED TO WITHSTAND AND CONVEY HUNDRED (100) YEAR FREQUENCY STORM.
- ALL SURFACES THAT ARE NOT IMPROVED ROADS SHOULD BE SEEDED AND REVEGETATED WITH DROUGHT TOLERANT PLANTS.

PROPERTY OWNER INFORMATION				
NAME:	Waterstone Support Foundation Inc. John Gibson	Frankie Thibodeau	Vista Oaks Business Park John Gibson	Harmony Grove Partners John Gibson
ADDRESS:	2925 Professional Pl #200	39990 Roadrunner Ln	1000 Pioneer Way	1000 Pioneer Way
CITY:	Colorado Springs	Boulevard	El Cajon	El Cajon
STATE:	CO	CA	CA	CA
ZIP:	80904	91905	92020	92020
PHONE:	(619) 440-7424	(619) 766-9105	(619) 440-7424	(619) 440-7424
APN's and (Acreage)	611-110-01 (123.8)	611-091-07 (42.53), 612-030-19 (43.46), 612-030-01 (40.22)	611-090-04 (84), 611-091-03 (42.46), 611-090-02 (82), 611-060-04 (79).	611-100-07 (228.22)

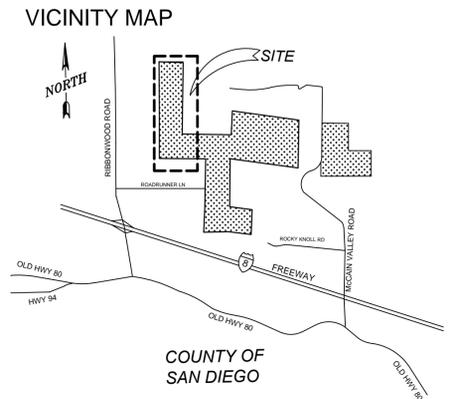
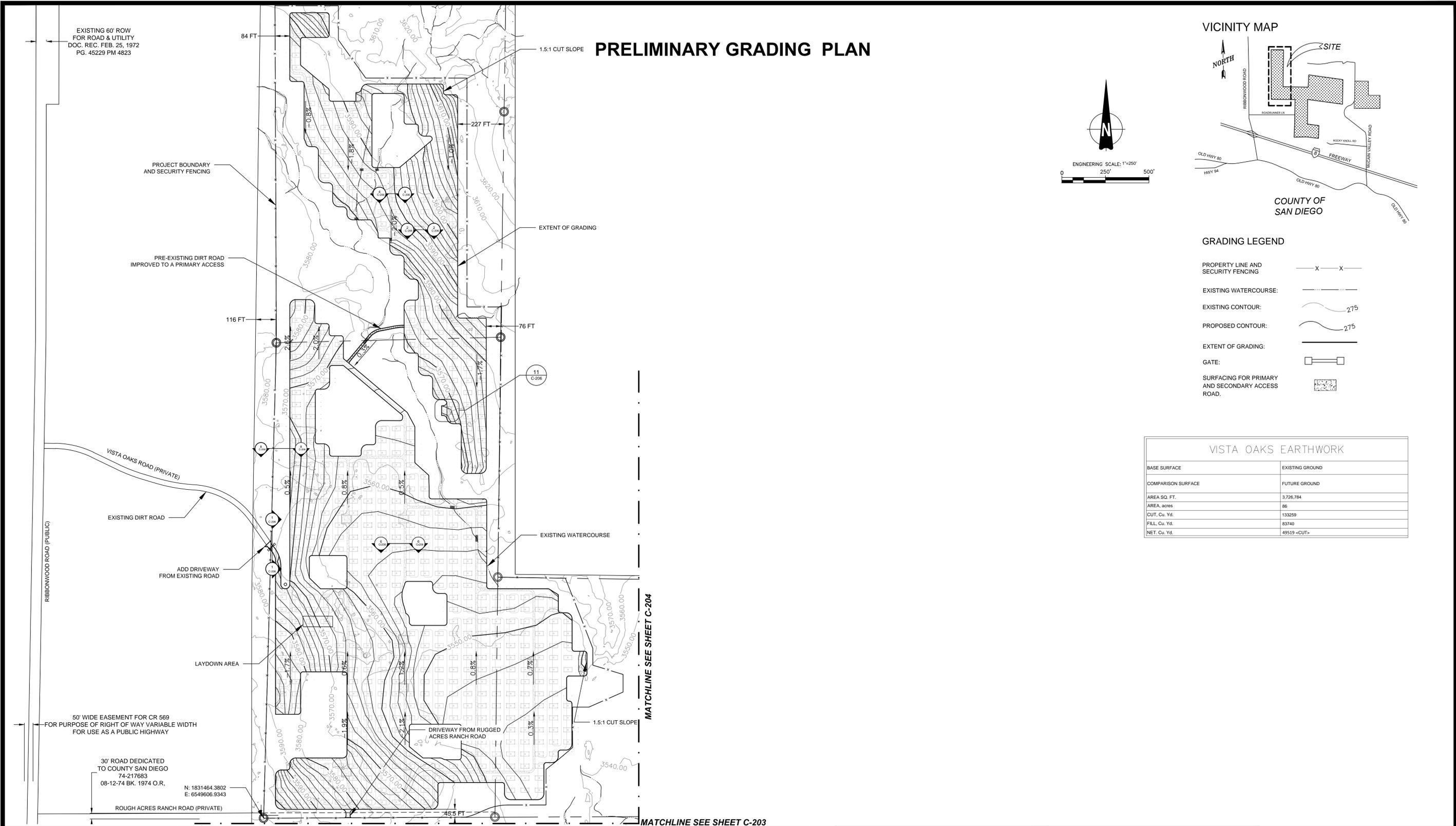
## VICINITY MAP



FILE NAME: C:\USERS\ORCZOC\DESKTOP\GRADING AND DRAINAGE\GRADING AND DRAINAGE\DRAWINGS\FINAL DRAWINGS\FINAL DRAWINGS\C-201\_NOTES\_RUGGED.DWG PLOT DATE: 7/17/2012 2:23:04 PM LAST SAVED BY: ORCZOC

<b>CLIENT</b>  Soitec Solar Development, LLC 4250 Executive Square, Suite 770 San Diego, CA 92037-9178	 <b>AECOM</b> AECOM TECHNICAL SERVICES, INC 440 Stevens Avenue, Suite 250 Solana Beach, CA 98075 858.947.7144 tel 858.947.7145 fax www.aecom.com	<b>CONTACT INFORMATION</b> NAME: <u>PAT BROWN</u> ADDRESS: <u>4250 Executive Square, Suite 770</u> <u>La Jolla, CA</u> TELEPHONE NUMBER: <u>(858) 652-4423</u> (24 HOUR CONTACT NUMBER) SITE A.P.N. NUMBER: <u>SEE DRAWINGS C-202 THROUGH C-205</u> ADJACENT A.P.N NUMBERS <u>SEE DRAWINGS C-202 THROUGH C-205</u>	<b>GRADING ON ADJACENT PARCELS</b> LIST ANY ADJACENT PARCELS UNDER THE SAME OWNERSHIP AS THIS PARCEL FOR WHICH A GRADING PLAN HAS BEEN SUBMITTED OR A GRADING PERMIT ISSUED: APN(s): _____ <hr/> <b>PROPERTY OWNER CERTIFICATION</b> I CERTIFY THAT I HAVE READ AND UNDERSTAND THE STORMWATER MANAGEMENT NOTES AND THE GRADING NOTES: OWNER'S SIGNATURE (REQUIRED): _____ DATE: _____	<b>DISTURBED AREA CALCS</b> PAD + SLOPES: _____ SF DRIVEWAY: _____ SF PRIMARY SEPTIC: _____ SF FIRE CLEARING: _____ SF TOTAL: _____ SF IF ≥ 1 AC, PROVIDE WDDID#: _____	<b>PLAN CHECK/PERMITS</b> BUILDING PERMIT PLAN CHECK NUMBER: _____ PARCEL MAP NUMBER: _____ <hr/> <b>ENGINEER OF WORK</b> I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT AND THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT. NAME: <u>Robert William Alexander Salom</u> DATE: <u>07/16/10</u> RCE NO: <u>C 76419</u> EXPIRES: <u>12/31/12</u>	<b>PRIVATE CONTRACT</b> COUNTY OF SAN DIEGO DEPARTMENT OF PLANNING AND LAND USE PRELIMINARY GRADING PLAN FOR: <b>80 MW SOLAR SYSTEM</b> <b>RUGGED SOLAR LLC</b> SHEET NUMBER <u>C-201</u> REV. <u>0</u> SHEET: <u>1</u> OF SHEETS: <u>6</u> APPROVED DIRECTOR OF PLANNING AND LAND USE: _____ GRADING PERMIT NUMBER: _____ BY: _____ DATE: _____
		<p style="text-align: right;"><b>PRELIMINARY</b></p>				

FILE NAME: C:\USERS\OROZCOG\DESKTOP\GRADING AND DRAINAGE\WORKING GRADING FOLDER\C-202\_C\_202\_GRADING.DWG LAST SAVED BY: OROZCOG PLOT DATE: 7/17/2012 2:30:12 PM



**GRADING LEGEND**

PROPERTY LINE AND SECURITY FENCING	— X — X —
EXISTING WATERCOURSE:	— — — — —
EXISTING CONTOUR:	— 2.75 —
PROPOSED CONTOUR:	— 2.75 —
EXTENT OF GRADING:	— — — — —
GATE:	— [ ] —
SURFACING FOR PRIMARY AND SECONDARY ACCESS ROAD.	[ ]

**VISTA OAKS EARTHWORK**

BASE SURFACE	EXISTING GROUND
COMPARISON SURFACE	FUTURE GROUND
AREA SQ. FT.	3,726,784
AREA, acres	86
CUT, Cu. Yd.	133259
FILL, Cu. Yd.	83740
NET, Cu. Yd.	49519 <CUT>

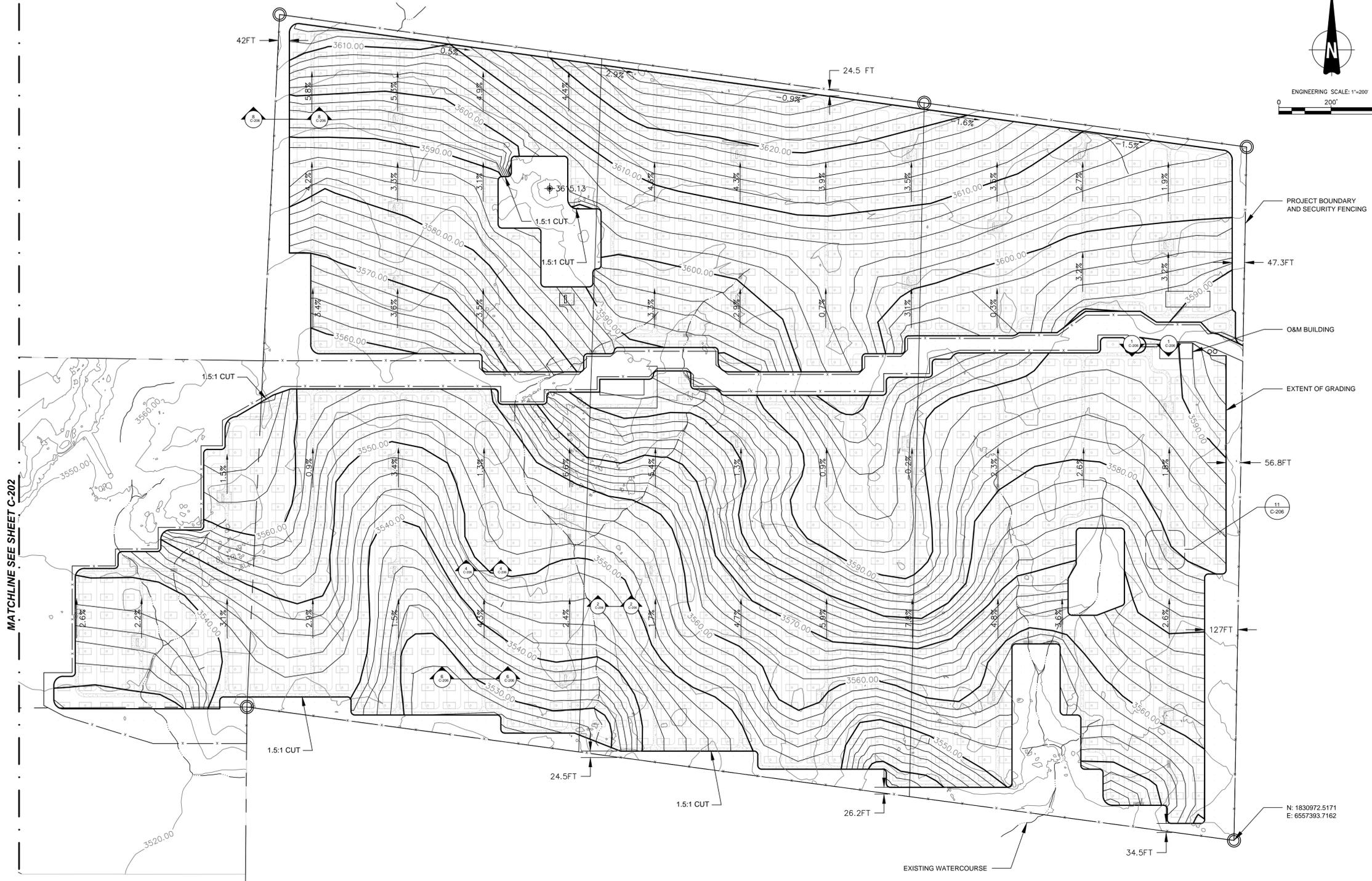
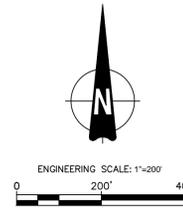
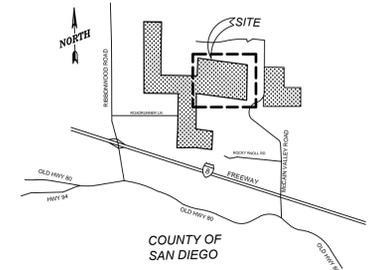
<p><b>CLIENT</b></p> <p><b>Soitec</b></p> <p>Soitec Solar Development, LLC 4250 Executive Square, Suite 770 San Diego, CA 92037-9178</p>	<p><b>AECOM</b></p> <p>AECOM TECHNICAL SERVICES, INC 440 Stevens Avenue, Suite 250 Solana Beach, CA 90875 858.947.7144 tel 858.947.7145 fax www.aecom.com</p>	<p><b>PROPERTY OWNER INFORMATION</b></p> <p>NAME: Vista Oaks Business Park, John Gibson ADDRESS: 1000 Pioneer Way El Cajon, CA 92020 TELEPHONE NUMBER: (619) 440-7424 (24 HOUR CONTACT NUMBER) SITE A.P.N. NUMBER: 611-090-04, 611-091-03, 611-090-02, 611-060-04, 611-090-04, 611-090-18, 611-060-07, 611-090-14, 611-090-115, 611-091-17 ADJACENT A.P.N. NUMBERS: 611-060-03, 611-060-04, 611-060-05, 611-090-19, 611-090-20, 611-090-20</p>	<p><b>GRADING ON ADJACENT PARCELS</b></p> <p>LIST ANY ADJACENT PARCELS UNDER THE SAME OWNERSHIP AS THIS PARCEL FOR WHICH A GRADING PLAN HAS BEEN SUBMITTED OR A GRADING PERMIT ISSUED:</p> <p>APN(s):</p>	<p><b>DISTURBED AREA CALCS</b></p> <p>PAD + SLOPES: 3,719,684 SF DRIVEWAY: 7,100 SF PRIMARY SEPTIC: SF FIRE CLEARING: SF TOTAL: 3,726,784 SF IF ≥ 1 AC, PROVIDE WDDID#:</p>	<p><b>PLAN CHECK/PERMITS</b></p> <p>BUILDING PERMIT PLAN CHECK NUMBER: PARCEL MAP NUMBER:</p>	<p><b>PRIVATE CONTRACT</b></p> <p>COUNTY OF SAN DIEGO DEPARTMENT OF PLANNING AND LAND USE</p> <p>PRELIMINARY GRADING PLAN FOR: <b>80 MW SOLAR SYSTEM</b> RUGGED SOLAR LLC</p> <p>SHEET NUMBER: C-202 REV: 0 SHEET: 2 OF SHEETS: 6</p> <p>APPROVED DIRECTOR OF PLANNING AND LAND USE: GRADING PERMIT NUMBER: BY: DATE:</p>
		<p><b>PROPERTY OWNER CERTIFICATION</b></p> <p>I CERTIFY THAT I HAVE READ AND UNDERSTAND THE STORMWATER MANAGEMENT NOTES AND THE GRADING NOTES:</p> <p>OWNER'S SIGNATURE (REQUIRED): DATE:</p>		<p><b>ENGINEER OF WORK</b></p> <p>I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT AND THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT.</p> <p>NAME: Robert William Alexander Salom DATE: 07/16/10 RCE NO: C 76419 EXPIRES: 12/31/12</p>		

PRELIMINARY



# PRELIMINARY GRADING PLAN

## VICINITY MAP



### GRADING LEGEND

- PROPERTY LINE AND SECURITY FENCING: — X — X —
- EXISTING WATERCOURSE: ————
- EXISTING CONTOUR: ———— 2.75
- PROPOSED CONTOUR: ———— 2.75
- EXTENT OF GRADING: ————
- GATE: ————
- SURFACING FOR PRIMARY AND SECONDARY ACCESS ROADS: [Pattern]

HARMONY GROVE EARTHWORK	
BASE SURFACE	EXISTING GROUND
COMPARISON SURFACE	FUTURE GROUND
AREA SQ. FT.	9,238,176
AREA, acres	212
CUT, Cu. Yd.	380,554
FILL, Cu. Yd.	358,705
NET, Cu. Yd.	21,849 <CUT>

FILE NAME: C:\USERS\OROCZCOG\DESKTOP\RUGGED\GRADING AND DRAINAGE\WORKING GRADING FOLDER\C-204\_C-204\_GRADING\_REV2.DWG PLOT DATE: 7/17/2012 2:35:55 PM LAST SAVED BY: OROZCOG

MATCHLINE SEE SHEET C-202

MATCHLINE SEE SHEET C-205

**CLIENT**

**Soitec**

Soitec Solar Development, LLC  
4250 Executive Square, Suite 770  
San Diego, CA 92037-9178

**AECOM**

AECOM TECHNICAL SERVICES, INC  
440 Stevens Avenue, Suite 250  
Solana Beach, CA 98075  
858.947.7144 tel 858.947.7145 fax  
www.aecom.com

**PROPERTY OWNER INFORMATION**

NAME: Harmony Grove Partners John Gibson  
ADDRESS: 1000 Pioneer Way  
El Cajon, CA 92020  
TELEPHONE NUMBER: (619) 440-7424  
SITE A.P.N. NUMBER: 611-100-07  
ADJACENT A.P.N. NUMBERS: 611-100-06, 611-091-03, 611-070-03  
611-070-01, 611-060-03, 611-090-03, 611-090-04

**GRADING ON ADJACENT PARCELS**

LIST ANY ADJACENT PARCELS UNDER THE SAME OWNERSHIP AS THIS PARCEL FOR WHICH A GRADING PLAN HAS BEEN SUBMITTED OR A GRADING PERMIT ISSUED:

APN(s):

**PROPERTY OWNER CERTIFICATION**

I CERTIFY THAT I HAVE READ AND UNDERSTAND THE STORMWATER MANAGEMENT NOTES AND THE GRADING NOTES:

OWNER'S SIGNATURE (REQUIRED): DATE:

**DISTURBED AREA CALCS**

PAD + SLOPES: 9,233,394 SF  
DRIVEWAY: 4,780 SF  
PRIMARY SEPTIC: SF  
FIRE CLEARING: SF  
TOTAL: 9,238,176 SF  
IF ≥ 1 AC, PROVIDE WDDI#:

**PLAN CHECK/PERMITS**

BUILDING PERMIT PLAN CHECK NUMBER:  
PARCEL MAP NUMBER:

**ENGINEER OF WORK**

I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT AND THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT.

NAME: Robert William Alexander Salom DATE: 07/16/10  
RCE NO: C 76419 EXPIRES: 12/31/12

**PRIVATE CONTRACT**

COUNTY OF SAN DIEGO  
DEPARTMENT OF PLANNING AND LAND USE

PRELIMINARY GRADING PLAN FOR:  
**80 MW SOLAR SYSTEM  
RUGGED SOLAR LLC**

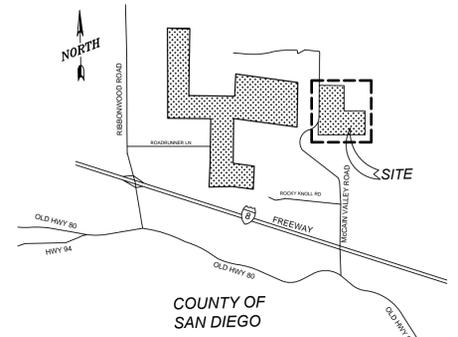
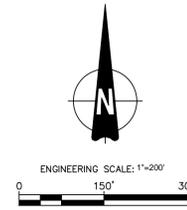
SHEET NUMBER: C-204 REV: 0 SHEET: 4 OF SHEETS: 6

APPROVED DIRECTOR OF PLANNING AND LAND USE: GRADING PERMIT NUMBER:

PRELIMINARY

# PRELIMINARY GRADING PLAN

## VICINITY MAP



### GRADING LEGEND

- PROPERTY LINE AND SECURITY FENCING: — X — X —
- EXISTING WATERCOURSE: ————
- EXISTING CONTOUR: ———— 2.75
- PROPOSED CONTOUR: ———— 2.75
- EXTENT OF GRADING: ————
- GATE: [Symbol]
- SURFACING FOR PRIMARY AND SECONDARY ACCESS ROADS: [Symbol]

### WATERSTONE EARTHWORK

BASE SURFACE	EXISTING GROUND
COMPARISON SURFACE	FUTURE GROUND
AREA SQ. FT.	2,436,658
AREA, acres	56
CUT, Cu. Yd.	83463
FILL, Cu. Yd.	141413
NET, Cu. Yd.	57949 <FILL>

MATCHLINE SEE SHEET C-204

60' WIDE EASTMENT COUNTY ROAD 658 BK. 464, PG. 93 REC. 12-6-35

EXISTING DRIVEWAY FROM SD&G SUNRISE TRANSMISSION CORRIDOR

100' WIDE POWER LINE EASMENT TINTST. #2010-0235441 REC. 05-11-10 REC 05-03-11 INST.# 2011-0229743

MC CAIN VALLEY ROAD (PUBLIC)

N: 1829483.1431  
E: 6558618.3094

FILE NAME: C:\USERS\OROZCO\DESKTOP\GRADING AND DRAINAGE\DRAWINGS\WORKING GRADING FOLDER\C-205\_GRADING.DWG LAST SAVED BY: OROZCOG PLOT DATE: 7/17/2012 2:25:23 PM

**CLIENT**

**Soitec Solar Development, LLC**  
4250 Executive Square, Suite 770  
San Diego, CA 92037-9178

**AECOM**  
AECOM TECHNICAL SERVICES, INC  
440 Stevens Avenue, Suite 250  
Solana Beach, CA 98075  
858.947.7144 tel 858.947.7145 fax  
www.aecom.com

**PROPERTY OWNER INFORMATION**

NAME: Waterstone Support Foundation Inc. John Gibson  
ADDRESS: 2925 Professional PI #200  
Colorado Springs, CA 80904  
TELEPHONE NUMBER: (619) 440-7424  
(24 HOUR CONTACT NUMBER)  
SITE A.P.N. NUMBER: 611-110-01  
ADJACENT A.P.N NUMBERS 611-110-04,611-100-06,611-110-02

**GRADING ON ADJACENT PARCELS**

LIST ANY ADJACENT PARCELS UNDER THE SAME OWNERSHIP AS THIS PARCEL FOR WHICH A GRADING PLAN HAS BEEN SUBMITTED OR A GRADING PERMIT ISSUED:

APN(s):

---

**PROPERTY OWNER CERTIFICATION**

I CERTIFY THAT I HAVE READ AND UNDERSTAND THE STORMWATER MANAGEMENT NOTES AND THE GRADING NOTES:

OWNER'S SIGNATURE (REQUIRED): \_\_\_\_\_ DATE: \_\_\_\_\_

**DISTURBED AREA CALCS**

PAD + SLOPES: 2,433,123 SF  
DRIVEWAY: 3,535 SF  
PRIMARY SEPTIC: SF  
FIRE CLEARING: SF  
TOTAL: 2,436,658 SF  
IF ≥ 1 AC, PROVIDE WDD#: \_\_\_\_\_

**PLAN CHECK/PERMITS**

BUILDING PERMIT PLAN CHECK NUMBER: \_\_\_\_\_  
PARCEL MAP NUMBER: \_\_\_\_\_

---

**ENGINEER OF WORK**

I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT AND THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT.

NAME: Robert William Alexander Salom DATE: 07/16/10  
RCE NO: C 76419 EXPIRES: 12/31/12

**PRIVATE CONTRACT**

COUNTY OF SAN DIEGO  
DEPARTMENT OF PLANNING AND LAND USE

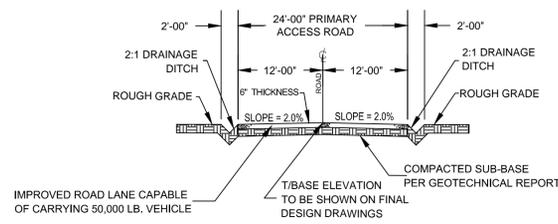
PRELIMINARY GRADING PLAN FOR:  
**80 MW SOLAR SYSTEM  
RUGGED SOLAR LLC**

SHEET NUMBER: C-205 REV: 0 SHEET: 5 OF SHEETS: 6

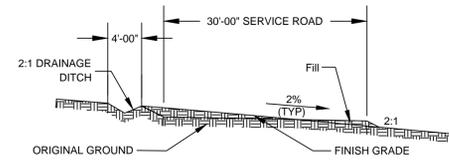
APPROVED: \_\_\_\_\_ DIRECTOR OF PLANNING AND LAND USE  
GRADING PERMIT NUMBER: \_\_\_\_\_  
DATE: \_\_\_\_\_

PRELIMINARY

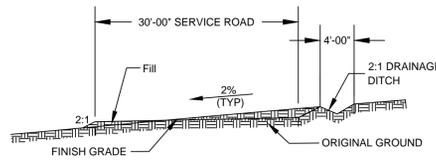
# DETAILS



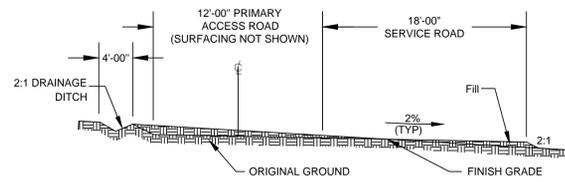
**1 TYPICAL CROSS SECTION**  
PRIMARY ACCESS ROAD NTS



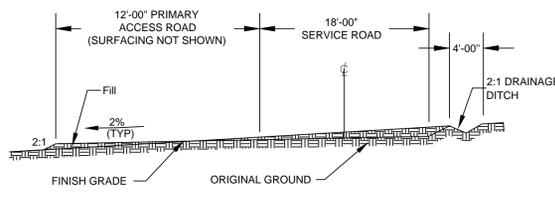
**2 TYPICAL CROSS SECTION**  
SERVICE ROAD NTS



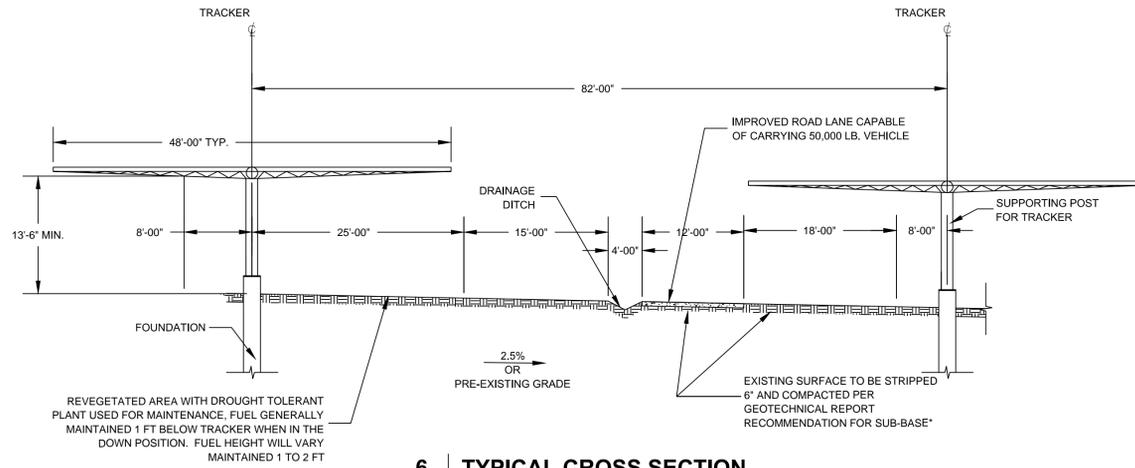
**3 TYPICAL CROSS SECTION**  
SERVICE ROAD NTS



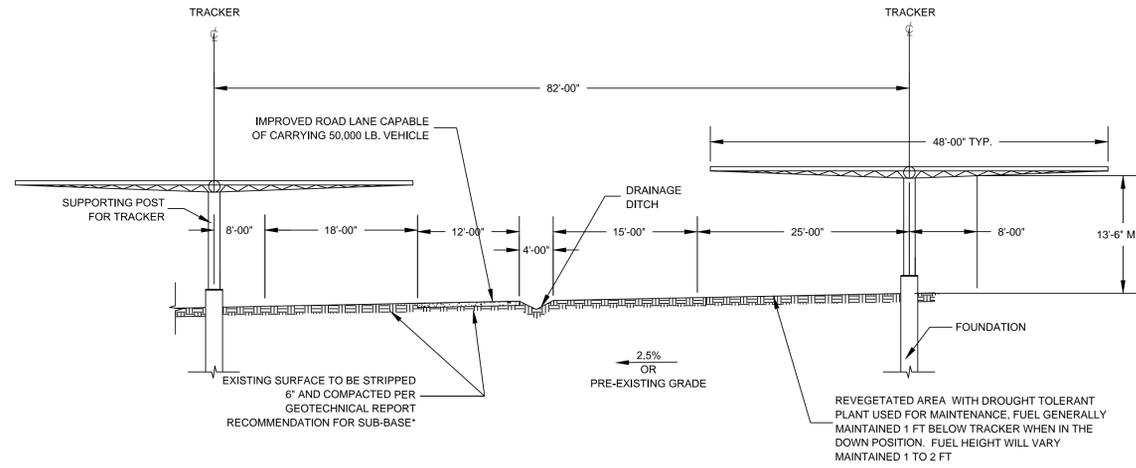
**4 TYPICAL CROSS SECTION**  
SECONDARY ACCESS ROAD NTS



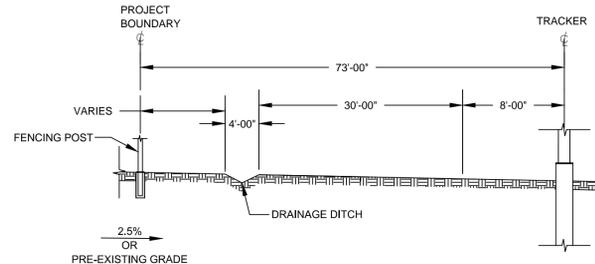
**5 TYPICAL CROSS SECTION**  
SECONDARY ACCESS ROAD NTS



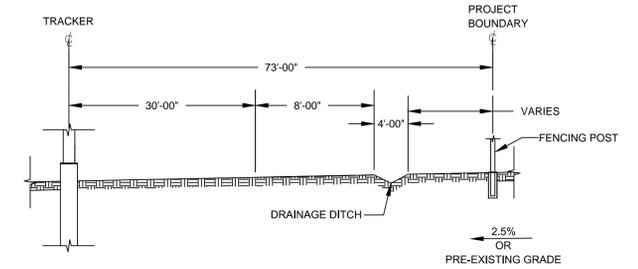
**6 TYPICAL CROSS SECTION**  
EMERGENCY VEHICLE ACCESS NTS



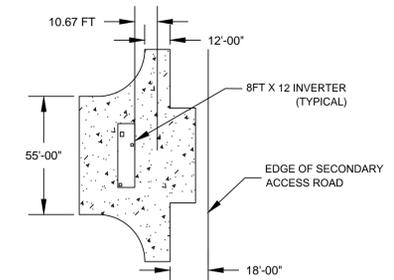
**7 TYPICAL CROSS SECTION**  
EMERGENCY VEHICLE ACCESS NTS



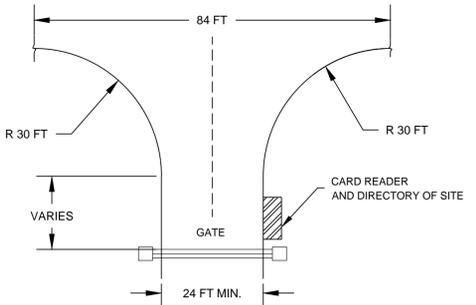
**8 TYPICAL CROSS SECTION**  
TREATMENT AREA NTS



**9 TYPICAL CROSS SECTION**  
TREATMENT AREA NTS



**11 DETAIL - DECOMPOSED GRANITE PAD**  
SEE DETAIL 1 FOR MATERIAL COMPACTION NTS



**13 DETAIL - DRIVEWAY ENTRANCE**  
NTS

**CLIENT**

**Soitec**

Soitec Solar Development, LLC  
4250 Executive Square, Suite 770  
San Diego, CA 92037-9178

**AECOM**

AECOM TECHNICAL SERVICES, INC  
440 Stevens Avenue, Suite 250  
Solana Beach, CA 98075  
858.947.7144 tel 858.947.7145 fax  
www.aecom.com

**PROPERTY OWNER INFORMATION**

NAME: SEE SHEETS C-202 THROUGH C-205

ADDRESS: \_\_\_\_\_

TELEPHONE NUMBER: (619) 440-7424  
(24 HOUR CONTACT NUMBER)

SITE A.P.N. NUMBER: \_\_\_\_\_

SITE ADDRESS: \_\_\_\_\_

**GRADING ON ADJACENT PARCELS**

LIST ANY ADJACENT PARCELS UNDER THE SAME OWNERSHIP AS THIS PARCEL FOR WHICH A GRADING PLAN HAS BEEN SUBMITTED OR A GRADING PERMIT ISSUED:

APN(s): \_\_\_\_\_

**PROPERTY OWNER CERTIFICATION**

I CERTIFY THAT I HAVE READ AND UNDERSTAND THE STORMWATER MANAGEMENT NOTES AND THE GRADING NOTES:

OWNER'S SIGNATURE (REQUIRED): \_\_\_\_\_ DATE: \_\_\_\_\_

**DISTURBED AREA CALCS**

PAD + SLOPES: \_\_\_\_\_ SF

DRIVEWAY: \_\_\_\_\_ SF

PRIMARY SEPTIC: \_\_\_\_\_ SF

FIRE CLEARING: \_\_\_\_\_ SF

TOTAL: \_\_\_\_\_ SF

IF ≥ 1 AC, PROVIDE WDI# : \_\_\_\_\_

**PLAN CHECK/PERMITS**

BUILDING PERMIT PLAN CHECK NUMBER: \_\_\_\_\_

PARCEL MAP NUMBER: \_\_\_\_\_

**ENGINEER OF WORK**

I HEREBY DECLARE THAT I AM THE ENGINEER OF WORK FOR THIS PROJECT AND THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT.

NAME: Robert William Alexander Salom DATE: 07/16/10

RCE NO: C 76419 EXPIRES: 12/31/12

**PRIVATE CONTRACT**

COUNTY OF SAN DIEGO  
DEPARTMENT OF PLANNING AND LAND USE

PRELIMINARY GRADING PLAN FOR:  
**80 MW SOLAR SYSTEM**  
RUGGED SOLAR LLC

SHEET NUMBER: C-206 REV: 0 SHEET: 6 OF SHEETS: 6

APPROVED DIRECTOR OF PLANNING AND LAND USE: \_\_\_\_\_ GRADING PERMIT NUMBER: \_\_\_\_\_

BY: \_\_\_\_\_ DATE: \_\_\_\_\_

FILE NAME: C:\USERS\ORZCOG\DESKTOP\RUGGED\GRADING AND DRAINAGE\DRAWINGS\FINAL DRAWINGS\C-206\_DETAILS\_RUGGED.DWG PLOT DATE: 6/21/2012 1:19:42 PM LAST SAVED BY: ORZCOG

PRELIMINARY