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VIA ELECTRONIC MAIL

County of San Diego, DPLU
c/o Eric Gibson, Director
5201 Ruffin Road Suite B.
San Diego, CA 92123

Request for Program Environmental Impact Report to Analyze Soitec Project

Dear Mr. Gibson:

Soitec Solar Development LLC (Soitec) requests that the County of San Diego initiate the preparation of a Program Environmental Impact Report (PEIR) to evaluate a project to develop approximately 250 MW of concentrated photovoltaic (CPV) solar energy generating capacity within the Boulevard Subregional Planning Area under the California Environmental Quality Act (CEQA).

Soitec is in the process of seeking County approval to develop CPV solar energy facilities at several different sites within the Boulevard Subregional Planning Area. These facilities are related geographically, are part of Soitec's coordinated effort to develop solar renewable power in San Diego County to satisfy power purchase agreements with San Diego Gas & Electric, and will have generally similar environmental effects that can be mitigated in similar ways. In addition, Soitec has several other sites currently in the early stages of development that would benefit from being analyzed at a programmatic level of detail for development in the near future. Collectively, these projects are ideally suited for an analysis in a PEIR. (*See* 14 Cal. Code Regs. § 15168(a).)

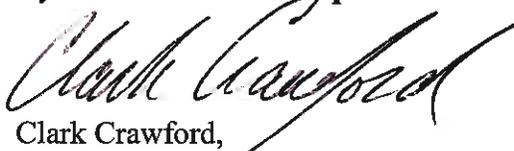
Preparing a PEIR for these projects collectively will provide for a more exhaustive consideration of effects and alternatives than would be practical in an EIR for an individual action, or in multiple EIRs for each Soitec facility. Preparing a PEIR also will ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, avoid duplicative reconsideration of basic policy considerations, and allow the County to consider the broader policy alternatives and program-wide mitigation measures at an early time when the County has greater flexibility to deal with basic problems or cumulative impacts. It will also allow a reduction in paperwork by avoiding duplication of effort. (*See* 14 Cal. Code Regs. § 15168(b).)

**County Program EIR Letter
Soitec Solar Inc.**

By making this request, Soitec recognizes that preparing a PEIR of this magnitude entails costs and some development risk. In particular, the preparation and certification of a PEIR for the project could be delayed by unanticipated issues that affect one facility but not the others. Soitec understands that PEIR preparation and analysis will proceed at the pace of the analysis performed for the slowest facility. Despite this risk, Soitec believes that the benefits of preparing a PEIR outweigh the disadvantages. In addition, the full cost of the processing and resources necessary to carry out the project will be burdened by Soitec and its subsidiary companies. Soitec is also willing to provide any reasonable resources needed or requested by the County to assist in the process. We look forward to working with the County as a team to make this a successful project, so please do not hesitate to contact me if you have any questions about Soitec's request.

Best Regards,

By: Soitec Solar Development LLC



Clark Crawford,
Attorney-in-fact

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