

From: [Slovick, Mark](#)
To: [Patrick BROWN](#)
Cc: [Boparai, Poonam](#)
Subject: FW: Soitec solar
Date: Thursday, January 31, 2013 7:46:24 AM
Attachments: [Soitec Solar Energy Project comments.docx](#)

Here are the comments from ARB. Can you have your consultants address and work with Poonam directly?

Thanks, Mark

From: Mehl, Dave@ARB [mailto:dmehl@arb.ca.gov]
Sent: Wednesday, January 30, 2013 8:13 AM
To: Slovic, Mark
Subject: Soitec solar

Attached are my comments on the Soitec Solar project. After you and your consultant have an opportunity to review, I would like to have a conference call to discuss.

Thanks, Dave

Soitec Solar Energy Project

Need to bolster methodology descriptions—including clearly identifying assumptions and basis of assumptions

Application does not address hydrofluorocarbons (HFCs) or perfluorocarbons (PFCs)

Generation appears to assume to displace electricity from SDG&E, but didn't identify if Project has contract with SDG&E. Nor, if the project is to replace future growth or displace current resources.

The table below identifies differences/deficiencies in each of the sub-projects evaluations.

Rugged	Tierra
CO2 only, no other pollutants appear to have been evaluated except for in water usage. App states the CH4 and N2O small compare to CO2	Evaluated CO2, CH4, and N2O for all combustion sources
Energy – using projected SDG&E 2020 forecast factor based on 2009 data, which skews emissions low	Based on SDG&E 2010 data for 33% renewables
Includes emissions from wastewater treatment	Didn't address
Didn't address	Claims no GIS. What tech being used? What kV?
Using default worker trip distance of 20 mi one-way, yet remote location, in some models. The listing all workers as coming from Alpine in others.	Some places show construction worker trips from Alpine (35 mi one-way), but only pop of 14,000. Basis that can support this workforce? Other places uses 16.8 mi one-way with an 85%reduction due to carpooling. No basis for carpool reduction given.
Didn't address	Helicopter emissions for line work.
Didn't address	Emergency generators.
Project location listed as in SCAQMD, what other inputs weren't updated?	N/A
Building construction has no worker trip emissions, yet the coating of it does	N/A

Used SMAQMD model, yet soils in the two places may not be similar (no basis given that they are) and may need different amount of work, thereby causing different emissions.	N/A
Didn't address	Concrete trucks coming from Alpine—can Alpine support projects concrete needs?
Full model outputs	Only summary of model outputs