

20 – Edie Harmon

To: Jim Minnick, Imperial County Planning Director jimminnick@co.imperial.ca.us

From: Edie Harmon, as an individual desertharmon@gmail.com, Desert Protective Council, Parke Ewing, Ocotillo Discovery Committee

CC: County Counsel, Michael Rood; Katherine Turner; Andy Horne, AndyHorne@co.imperial.ca.us, Supervisor Jack Terrazas, Larry Silver, CELP; Stephen Volker, Volker Law; Lisa Belenky, CBD; Ilene Anderson, Donna Tisdale, BAD, Terry Frewin, Kelly Fuller, POC, Pat Flanagan, Terry Weiner, DPC, Parke Ewing, Luis Olmedo

Re: **Imperial County General Plan Update re Renewable Energy & Transmission Element (IC RETE GPU Project)** (attributed to Jim Minnick, dated Dec. 17, 2014) **and IC RETE Draft PEIR** (prepared by Chambers Group and dated 2015-01) (SCH #2014071062) February 24, 2015

Mapping issues: MAPS and Mapping omissions in the Draft IC RETE PEIR and IC RETE GPU.

1. There are a number of serious errors and omissions related to maps or “Figures” for the IC RETE GPU and IC RETE DPEIR, which must be corrected if the public and decision-makers are to understand the potential cumulative impacts of the RETE GPU. The following maps depicting the locations of the already approved projects or those under consideration as of January 2015 must be included and updated as Figures in the IC RETE GPU and DPEIR documents. Currently, these maps are included only on an IC PDS website which may later be difficult (if not impossible) to locate.
2. The public and decision -makers must be able to find where other already approved and proposed PV projects are located within the body of the DPEIR itself without having to reference other sites. If one is relying on the CD provided by County Planning, one should not then also have to search the County website to find figures with locations of already approved projects. To find that information one is currently forced to go to the County website to see Iris FINAL EIR Fig 4.2-2 at p. 4.2-9 at <ftp://ftp.co.imperial.ca.us/icpds/eir/iris-solar-cluster/final/17ag-resources.pdf>
<http://www.icpds.com/?pid=4284> for the Renewable Energy General Plan Draft PEIR
<http://www.icpds.com/?pid=2934> for Renewable Energy Maps
3. Courts have said that public should not have to search elsewhere for information regarding cumulative impacts. Note that the attached Iris PV map pdf is from a 2015 FEIR, but other solar maps have a date of Oct 28-29, **2013** and are not current as of the IC DPEIR. Nevertheless, the most recent maps depicting the location of already approved and constructed renewable energy projects should be included as figures in the DPEIR itself and identified as such in the Table of Figures as part of the Table of Contents. Additionally, the following are outdated maps as projects are continuing to be considered for approval even in January 2015.
<http://icpds.com/CMS/Media/Solar-Central-County-10-28-13.pdf>
<http://icpds.com/CMS/Media/Solar-Power-Northend-10-29-13.pdf>
<http://icpds.com/CMS/Media/Solar-Power-Southend-10-29-13.pdf>
<http://icpds.com/CMS/Media/Imperial-County-Geothermal-06-10-13.pdf>
<http://icpds.com/CMS/Media/Imperial-County-Wind-Power-10-31-13.pdf>
<http://icpds.com/CMS/Media/All-Renewable-Power-Projects-11-1-13.pdf>

Comment
20-1

Concerns raised by individuals and organizations in response to the Notice of Preparation and other aspects related to the IC RETE and the IC BEIR have not been adequately addressed in the DPEIR

4. The specific concerns raised in various letters have not been adequately addressed or ignored.
5. These letters are found in <ftp://ftp.co.imperial.ca.us/icpds/eir/cec/27appa-nop-is-comments.pdf> the Appendix. It seems that the DPEIR not only fails to include the most of the submitted exhibits, but it ignores the concerns raised in written comments! For example, comments submitted by the Center for

Comment
20-2

Comment
20-3

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20-1

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Comment
20-2

Comment
20-3

12. IC BEIR was referred to in the Planning Commission Packet for the informational meeting entitled “Imperial County Renewable energy and Transmission Element Update Community Meetings, June 19, 2014”. P. 2 Meeting Purpose & Agenda overview listed the Environmental Baseline Studies as third on the list to discuss; at p. 9 the first “key task” is to “Develop Baseline Studies”; and p. 10 lists 22 categories to be addressed in the “Baseline Environmental Study.” Comment 20-9
 13. In the references for IC RETE is the following citation for BEIR: “Imperial County Renewable Energy and Transmission Element Update – Baseline Environmental Inventory Report (June 2014, by Chambers Group, Inc).” Comment 20-10
 14. What happened to the “Draft Imperial County Baseline Environmental Inventory Report” that was posted by the Chambers Group according to the June 10, 2014 memo to the RETE TAG group? Why was the document never corrected and considered as a reference for the DPEIR for the RETE GPU? Indeed, it seemed more than woefully inadequate and inaccurate as a resource document, but we doubt that Planning Commissioners and County Supervisors will search the DRECP for detailed information about Imperial County, when experts have stated it is difficult to, and readers are not directed to any specific pages or sections . Comment 20-11
- Purpose and Need**
15. The IC RETE DPEIR states in Sec. 1.1 that “The County of Imperial (County) has updated the existing 2006 Geothermal/Alternative Energy and Transmission Element and associated implementing ordinances. This seventh (7th) element update was initiated by a Grant the County received from the California Energy Commission’s Renewable Energy and Conservation Planning Grant Program.” However, it seems to the concerned public that the funding source and reliance on referencing the DRECP have been instrumental in altering the review of the IC RETE GPU and the RETE DPEIR with a bias toward increasing industrial scale renewable energy projects at remote locations, rather than a concern for what is best for the public and resource values of Imperial County. Comment 20-12
 16. That IC RETE development bias is incompatible with California Public Utilities Code Section 454.5(b)(9)(C), which requires that “the electrical corporation shall first meet its unmet resource needs through all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.” (Emphasis added) A detailed discussion of the CPUC and CEC priorities for electricity procurement are in the January 30 2014 DRECP Alternatives letter from Kevin Emmerich and Laura Cunningham for Basin and Range Watch (to CEC Dockets Office MS-4, Docket No. 09-RENEW EO, “Request for a new Desert Renewable Energy Conservation Plan Alternative”) (See Exhibit 49 for Emmerich-Cunningham letter discussion of the California Energy Efficiency Strategic Plan (CEESP) and loading priorities.) Comment 20-13
 17. Studies done by Bill Powers and others have detailed why there is no need for remote industrial scale renewable energy projects to be converting agricultural lands or disturbing undisturbed desert lands in Imperial County or elsewhere in California’s DRECP area of study. Those reports have been referenced and submitted for comments on the DRECP. Those reports undermine and stand in sharp contrast to the asserted need for the projects to expand industrial scale wind and solar in the desert or as stated in the IC RETE GPU and DPEIR for the “development of expanded renewable energy power production and “exportation to accommodate future growth in California ..” Comment 20-14
 18. Additional detailed concerns about the DRECP, submitted by Desert Protective Council and others are incorporated by reference and included as Exhibit 70. Harmon’s comments on the DRECP are included as Exhibit 72. Comment 20-15
 19. NOA of Draft Programmatic EIR for Renewable Energy and Transmission Element (RETE) Update (or IC RETE) asserts a purpose which is **not** in the best interests of the current and future residents and or economy of Imperial County when it states that: “The proposed project would support the development of expanded renewable energy power production and exportation to accommodate future growth in California and improve overall system reliability.” (NOA Project Description) This text suggests a recommended approval of the RETE with its main purpose as approval of designation of Imperial County Comment 20-16

- as a de facto **Sacrifice Area** for the benefit of other more affluent coastal areas of California, or approval of a designation of Imperial County as a **California Sacrifice Area (CSA)** for renewable energy use elsewhere.
20. Surely, this is an Environmental Justice issue where the poorest County in the State asserts that the purpose of this General Plan Update is to export energy for the benefit of growth in other more affluent parts of California! Both Volker August 22, 2014 p.2 (p 501 of 553) and Harmon August 22, 2014 p. 1, 5, 6, 11 (pp.523, 527, 528, 533 of 553) raised concerns about sustainable future development in the face of ongoing drought in other parts of the state in addition to in Imperial County, and concerns about a project whose benefits are located outside Imperial County. See comments and exhibits in Appendix A for the IC RETE DPEIR. (See also recent articles about projections of ever more serious drought. Exhibits 61, 62, and 63. Exhibit 62 <http://advances.sciencemag.org/content/advances/1/1/e1400082.full.pdf> Cook,B.I. et al. 2015 Unprecedented 21st century drought risk in the American southwest and Central Plains. At Sci.Adv. 2015.1e1400082. Feb. 12, 2015 (7pp), is the original publication cited in many articles.) The Bureau of Reclamations 2015 drought projections of impacts on Imperial Valley and irrigation demand are to be found in the Bur Rec 222 page reference and its appendix in these comments reference section.
21. Indeed, the most recent electrical bill from the Imperial Irrigation District (IID) included a “Special Notice to IID Customers” with its “2015 Electric Retail Rate Increase for “an overall average rate increase of 7.4% effective in January 2015” (IID Special Notice cover letter, (Exhibit 50). The IID cover letter goes on to explain that “The revenues generated by the rate increase will help IID “to among other things, “Implement a transmission strategy that facilitates the development of renewable energy resources, and the **export of those resources out of the Imperial Valley and into the greater California region**”. Thus, the IID notice seems to confirm the California Sacrifice Area concept for Imperial County. Imperial County residents get to help fund the export of energy they do not get to use, so that energy can be exported to more affluent communities. Page 2 of 3 of the attached IID Board Action letter states that the rate increase is applicable to all electric customers served by the District. (Exhibit 50)
22. ES.1 “The purpose of this Programmatic EIR is to assess the potential environmental impacts associated with the 2015 *Renewable Energy and Transmission Element* update (proposed Project) and to propose mitigation measures, where required, to reduce significant impacts.” (RETE ES-1)
23. “The proposed Project has been developed to identify new opportunities for renewable energy and assures that the Imperial County General Plan can meet the needs for future development while remaining consistent with identified land use and environmental goals. The proposed Project would support the development of expanded renewable energy power production in the County and exportation to accommodate future growth in California and improve overall system reliability....” (RETE ES-1, emphasis added) (RETE 2.2 Project Objectives p.2-1)
- 1.0 Introduction:**
- 1.1 Background & purpose**
24. “the element update presents a broader focus that takes into account additional forms of renewable energy, including wind, solar, deep solar ponds, biofuel, bio-mass, algae production, concentrated solar-thermal power, and concentrated photovoltaics. Consequently, the new element has been retitled as the *Renewable Energy and Transmission Element* update (proposed Project).” (RETE 1.0 Intro p. 1-1)
25. “Future renewable energy projects developed per the proposed Project would need to be reviewed in the context of this Programmatic EIR to determine if additional environmental documentation would be required. If the subsequent renewable energy project would have environmental effects not addressed in the Programmatic EIR, additional environmental review would be required. If additional impacts are not identified and no new mitigation measures would be required, the subsequent renewable energy project could be approved without additional environmental documentation. If an EIR were required for a subsequent renewable energy project, the EIR should implement the applicable mitigation measures developed in the Programmatic EIR and

Comment
20-16
(continued)

Comment
20-17

Comment
20-18

Comment
20-19

	focus its analysis on specific environmental impacts that were not previously addressed. p. 1-” (RETE 1.0 Intro p.1- 2, emphasized in original)	
Sec. 1.5 Impact terminology worth remembering		
	<u>Cumulatively Considerable:</u> A cumulatively considerable impact would result when effects from the project would contribute a significant physical impact on the environment when added to other approved, proposed, or reasonably foreseeable projects. (RETE 1.0 Intro p. 1- 3)	Comment 20-19 (continued)
	<u>Less than Cumulatively Considerable:</u> A less than cumulatively considerable impact would result when effects of the project would not contribute a significant physical impact on the environment when added to other approved, proposed, or reasonably foreseeable projects.	
	<u>Less than Significant Impact:</u> A less than significant impact is adverse but would cause no substantial change in the environment and would not require mitigation.	
	<u>No Impact:</u> No adverse impact to the environment would occur as a result of the project.	
	<u>Significant Impact:</u> A significant impact exceeds the defined CEQA thresholds of significance. A significant impact would potentially cause a substantial adverse change in the environment and would require mitigation to eliminate the impact or reduce it to less than significant.	
	<u>Significant and Unavoidable:</u> A significant and unavoidable impact cannot be eliminated or reduced to a less than significant level through mitigation incorporation.	
	<u>Standards of Significance:</u> Standards, or “thresholds,” of significance used by Imperial County for the purpose of this Programmatic EIR are based on CEQA Guidelines, scientific data, regulatory performance standards of federal, State, and local agencies, and County goals, objectives, and policies. (RETE 1.0 Intro p. 1- 4)	
26.	But how can the public or decision-makers determine the significance of cumulative impacts of any renewable energy project when the DPEIR fails to disclose the locations of proposed and already approved RE projects and/or already constructed RE projects with their locations, acreage and construction status in an updated figure? See discussion of mapping omissions.	Comment 20-20
2.0 Project Description		
27.	Sec.2.1 Regional setting Imperial County covers 2,942,080 Ac.	Comment 20-21
	Purpose of RETE according to RETE GPU at p1 reveals that DPEIR’s Sec. 2.2 Project objectives are not exactly consistent.	
28.	The following DPEIR text at p. 2-1 does not appear among the project objectives of the RETE identified under Introduction B. “Purpose of the Renewable Energy Transmission Element” at RETE p. 1: “The proposed Project would support the development of expanded renewable energy power production and exportation to accommodate future growth in California ...”	Comment 20-22
29.	Sec. 2.2 Project objectives includes a list of questionable assumed financial benefits related to renewable energy projects and ends with an objective of “Minimization of impacts to local communities, agriculture, and sensitive environmental resources” (RETE p. 2.1)	Comment 20-23
30.	For “development of Electrical Transmission and Joint Use Corridors” the purported benefits (RETE p. 2) the RETE DPEIR (at p.2-2) are inconsistent and seem regional rather than of benefit to residents of impacted communities according to the DPEIR. The DPEIR(at p. 2-2)contains the following statement which is missing from the Plan Element which asserts a purpose to: “Increases regional transmission capacity to support regional energy demand while increasing regional reliability.” (Emphasis added)	Comment 20-24
31.	Sec. 2.3 The IC RETE acknowledges the relation to DRECP with its primary goals which are not the same as the needs of Imperial County residents, nor do they seem particularly local in orientation :	Comment 20-25

- DRECP goals as identified by IC RETE:
1. Contribute to the conservation (recovery) of Covered Species, habitats, and natural communities, as well as to the physical, visual, cultural, and social resources in the Plan Area
 2. Streamline future permitting efforts for the development of renewable energy in the Plan Area to help meet California's Renewables Portfolio Standard (RPS), California's greenhouse gas emission reduction targets, and other State and federal renewable energy and transmission goals (RETE p. 2-2)
32. IC RETE states that DRECP located "future development areas for renewable energy as "Development Focus Areas" (DFAs) using the following criteria:
- "...Generation should be developed either on already-disturbed land or in areas of lower biological value, and conflict with both biological and non-biological resources should be minimized.
- "Areas identified for generation should have high-quality solar, wind, and/or geothermal renewable energy resources.
- "Generation should be sited close to existing transmission and in areas where transmission could be expected as a reasonable extension of the existing transmission system and planned system upgrades, as identified by the Renewable Energy Transmission Initiative, or other transmission plans.
- "Generation should, to the maximum extent possible, be aggregated to avoid transmission sprawl, reduce cost, and reduce disturbance across the Plan Area. Again, this principle aims to minimize disturbance to biologically, culturally, recreation, and visual valuable areas.
- "The Plan should provide sufficient areas for development flexibility to ensure the Plan does not constrain competition within the market or unnecessarily result in distorted or environmentally incompatible incentives when implemented (i.e., where feasible, the Plan should remain market neutral between different technologies or different project configurations)...(DRECP EIR/EIS, I.337)." (IC RETE p. 2-3)
33. DRECP DFA for Imperial County appears to include the central irrigated portion of the County in addition to additional lands along the Salton Sea and in East Mesa geothermal areas. But the County RETE also considered agricultural resources and reduced the footprint of the DRECP DFAs and to introduce a 0.5 mile buffer around all urban areas. (IC RETE p. 2-3) See Renewable Energy Overlay Zone Map Fig. 2.4-1. (IC RETE p. 2-35) However, recent approvals by the County Board of Supervisors for the conversion of even more agricultural lands for industrial scale solar projects is not encouraging if one is concerned about the future of agriculture and agricultural related businesses in Imperial County.
- 2.4 Project Components**
34. Includes the Renewable Energy and Transmission Element Overlay Zone Map in Fig. 2.4-1, (RETE p. 2-5), Renewable Energy and Transmission Element Goals and Objectives, and the RETE Implementation Ordinance.(IC RETE p. 2-4)
- 2.4.2 RETE Overlay Zone Map (Fig. 2.4-1 at IC RETE p.2-5)**
35. "The County team developed a draft Renewable Energy (RE) Overlay Zone Map as described above in Section 2.3, which identifies locations within the County authorized for development and operation of renewable energy projects with an approved Renewable Energy Conditional Use Permit (RECUP) (Figure 2.4-1). The RE Overlay Zone is concentrated in areas that were determined to be the most suitable for the development of renewable energy facilities, while minimizing the impact to other established uses. The RE Overlay Zone covers approximately 61,627.10 acres of land and surface water within the Salton Sea. Renewable Energy Conditional Use Permit application(s) proposed for specific renewable energy projects not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone." (RETE p. 2-4)
36. This may be nice sounding language, however, it ignores the past pre-approval objections and continuing adverse consequences of the approvals related to the troubled Ocotillo Wind Energy Project on public lands in SW Imperial County. In fact, that wind project has become the poster child for how not to do a wind energy project, with problems attracting both national and international attention. And, it ignores

Comment
20-25
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Comment
20-26

- repeated County approvals necessary for the conversion of agricultural lands to industrial scale solar projects in Imperial County, even in the face of well reasoned, substantive concerns and opposition.
37. Elsewhere in the RE Overlay zone is included Geothermal, Renewable Energy for any renewable energy other than geothermal in SE Imperial County south of I-8, and Renewable Energy/Geothermal for any form of RE. This Overlay zone also includes much land within the DRECP preferred Alternative and then adds additional land but excludes a 0.5 mile buffer around urban areas. (IC RETE 2-4,6)
38. Omitting portions of the geothermal overlay zones is either confusing text or definitely inconsistent from Objective 1.1 under Goals and Objectives at RETE GPU (p. 24) and RETE DPEIR Sec. 2.4.2 Objective 1 (at p. 2-8), both of which state: “*Objective 1.1: The County of Imperial supports the goals and objectives of the Desert Renewable Energy Conservation Plan to plan for, encourage, and facilitate the **full development of all renewable energy resources within its jurisdiction.***” (Emphasis added)
39. Transmission system Fig. 2.4-2 (IC RETE DPEIR p. 2-7) and IC RETE Fig 4(at p.11) shows existing and proposed IID & SDG&E transmission corridors. IID primary owner and sole distributor of elect service in Imperial County. Then the text describes the transmission lines in place now.
40. Sec. 2.4.2 Renewable Energy and Transmission Element’s Goals and Objectives
Objective 1.1: The County of Imperial supports the goals and objectives of the Desert Renewable Energy Conservation Plan to plan for, encourage, and facilitate the full development of all renewable energy resources within its jurisdiction. (Emphasis added IC RETE p. 2-8)
41. Harmon believes that at the most recent TAG meeting it was asked and agreed that the words “full development of ALL” be removed. Both Donna Tisdale and Edie Harmon recall that the change was requested and then approved by Andy Horne at the TAG meeting. Unless deleted, this text suggests a desire for Imperial County to become the approved Sacrifice Area for both the State and other states!!! If Objective 1.1 is approved with the word “all” for development of all renewable energy resources then no agricultural, natural or cultural resources will survive without significant adverse impacts, if they survive at all. In fact, if Objective 1.1 is not altered, no other objectives have any real significance or meaning at all. So, it appears that the CEC which provided funding for the RETE General Plan Update gets what it paid for, a recommendation for approval of Imperial County as a willing sacrifice area.
42. Objective 1.5 related to requiring mitigation and monitoring activities has been very weak and ineffective related to the OWEF project. Are the mitigation and monitoring requirements ignored with respect to other RE projects, or are such mitigation activities effective or enforced?
43. Objective 1.6 is extremely weak when it only encourages rather than mandates efficient use of water resources. As written, it appears that a project might choose to ignore this objective if it is deemed inconvenient or more costly to the project applicant. Regardless of what a project applicant may want, California Water Code Section 106 still identifies domestic use as the highest priority, followed by irrigation.
44. There needs to be an Objective 1.8 which would require funds be set aside for additional air quality monitoring stations and monitoring itself. This is also related to Objective 3.4 to “Assure that revenues projected from proposed renewable energy facility developments are sufficient to offset operational costs to the County from that particular development.” (DPEIR at p. 2-8 and RETE GPU at p.25.)
45. Goal 3 and its objective to lower energy rates in Imperial County is questionable given that IID just announced the increase in electrical rates in 2015.
- What is meant by” Utility-scale distributed energy production” ?**
46. Goal 5 Objective 5.2 Based on discussion at the TAG meeting, no one seemed to know what is meant by “Utility scale distributed energy projects” (RETE GPU p. 26, and DPEIR at 2-10) This term must be defined or changed to the commonly understood “distributed generation” meaning rooftop PV or other truly distributed generation sites for installations as noted by Hernandez et al 2014. (Exhibit 51)