

CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

November 29, 2007

DOCKET 07-AFC-1	
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TO: AGENCY DISTRIBUTION LIST

REQUEST FOR AGENCY COMMENTS ON THE PRELIMINARY STAFF ASSESSMENT FOR THE VICTORVILLE 2 HYBRID POWER PROJECT (07-AFC-1)

The enclosed Preliminary Staff Assessment (PSA) contains the California Energy Commission staff's initial engineering and environmental evaluation of the Victorville 2 Hybrid Power (Victorville 2) project. Staff finds that the Victorville 2 project would comply with all applicable laws, ordinances, regulations and standards. Staff's preliminary conclusions are also that significant adverse direct, indirect or cumulative impacts are not likely to occur, although there are five technical areas in which staff is continuing its analysis, which are summarized as follows:

- **Air Quality** - Staff believes that the project emission impacts can be mitigated to a level of insignificance with the emission reduction and priority reserve credits defined by current rules, subject to the mitigation remaining available to the project as it undergoes legal challenges.
- **Biology** – Staff has tentatively determined that the project will meet all mitigation requirements, but is awaiting additional information that will be provided when the federal Biological Opinion is completed and issued by U.S. Fish and Wildlife Service. This permit will address habitat compensation ratios related to desert tortoise and Mohave ground squirrel, the potential need for tortoise exclusion fencing, and the adequacy of proposed plant relocation areas and programs.
- **Cultural Resources** – The applicant will be providing in early December 2007 additional cultural resource field surveys that have been conducted on a portion of Segment 3 of the transmission line and along the route of the proposed potable/backup process water pipeline. When the survey data is received, staff will be able to complete its review of the project, which based on information provided to date indicates the project would not have a significant impact on known archaeological or ethnographic resources.
- **Soil and Water** – The applicant will be providing additional stormwater plans and calculations that are expected to resolve outstanding stormwater management issues. Staff will continue to explore its tentative conclusion that the project's use of reclaimed water will neither exacerbate the overdraft in the Mojave Groundwater Basin nor compromise the ability of Victor Valley Water Reclamation Authority to meet its obligations under the Memorandum of Understanding with CDFG for maintenance of flows in the Mojave River.
- **Traffic and Transportation** – Staff is further exploring two potential impacts to aviation traffic and safety that could affect operations at the Southern California Logistics Airport (SCLA). The first relates to the potential for glare from the solar collector thermal arrays to distract or cause temporary vision impairment to pilots. The second relates to the potential turbulence effect on U.S. Army helicopters from the project's turbine and cooling tower thermal plumes, if the arrival and departure traffic patterns to the north of the SCLA were to remain unaltered.

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On February 28, 2007, the city of Victorville submitted an Application for Certification (AFC) to construct and operate the Victorville 2 Hybrid Power Project (Victorville 2), a hybrid of natural gas-fired combined cycle generating equipment integrated with solar thermal generating equipment, in the city of Victorville, San Bernardino County. The AFC seeks approval from the California Energy Commission to construct and operate a nominal 563 megawatt (MW) power plant consisting of two natural gas-fired combustion turbine-generators (CTGs) rated at 154 MW each, two heat recovery steam generators with duct firing (HRSGs), one steam turbine-generator (STG) rated at 268 MW, and 250 acres of parabolic solar-thermal collectors with associated heat transfer equipment. The solar-thermal collectors would contribute up to 50 MW of the STG's 268 MW output, and with plant auxiliary loads of about 13 MW, Victorville 2's net output would be 563 MW.

We request that you review the enclosed PSA for the areas for which your agency would normally be responsible but for the Energy Commission's permitting authority. Please provide any written comments to John Kessler, Siting Project Manager by Friday, December 21, 2007. You may also present your comments at a public workshop on the PSA that will be conducted on December 11, 2007 at the Southern California Logistics Airport. The workshop will be separately noticed. Comments received will be used for preparing the Final Staff Assessment which will be staff's testimony in evidentiary hearings.

If you desire information on technical or project schedule issues, or how to participate in the Energy Commission's review of the project, your questions should be directed to John Kessler at (916) 654-4679 or at jkessler@energy.state.ca.us. The status of the project, an electronic copy of the AFC, copies of notices, and other relevant documents are also available on the Energy Commission's web site at <http://www.energy.ca.gov/sitingcases/victorville2>.

Sincerely,



Roger E. Johnson
Siting and Compliance Office Manager

Enclosure