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Paul Kramer
California Energy Commission
Systems Assessment and Facilities Siting Division
1516 9th Street
Sacramento, CA 95814-5504

RE: Errata to Applicant's Visual Resource Testimony
Ivanpah Solar Electric Generating System (07-AFC-5)

Dear Mr. Kramer:

On behalf of Solar Partners I, LLC, Solar Partners II, LLC, Solar Partners IV, LLC, and Solar Partners VIII, LLC, please find attached five copies of the Errata to Applicant's Visual Resources Testimony.

Please call me if you have any questions.

Sincerely,

CH2M HILL

John L. Carrier, J.D.
Program Manager

Enclosure

c: POS List
Project File

Ivanpah Solar Electric Generating System (ISEGS) (07-AFC-5)

Errata to Applicant's Visual Resources Testimony [Exhibit 67]

Submitted to the
California Energy Commission

Submitted by
**Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC;
and Solar Partners VIII, LLC**

December 9, 2009

With Assistance from

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**Errata to the Prepared Direct Visual Resources Testimony of
Wendy Haydon and Thomas Priestley, Ph.D.**

The Prepared Direct Testimony of Wendy Haydon and Thomas Priestley, filed on November 16, 2009, includes by reference Applicant's response to certain data requests. One of the Data Responses included by reference is Data Response 100; Applicant's Data Response Set 1A [Exhibit 4]. That Data Response states, in part,

The 2004 Mojave Visitor Study indicated that 9 percent of visitors to the Mojave National Preserve in October 2003 visited the Clark Mountain area, 7 percent of visitors' first entry point into the Preserve was Clark Mountain, and 10 percent of visitors' departure point from the Preserve was Clark Mountain. The source of this information is:

University of Idaho, Park Studies Unit. 2004. Mojave National Preserve Visitor Study, Fall 2003. Report 151. July. Prepared for the Social Science Program, National Park Service, U.S. Department of the Interior, Visitor Services Project.

Assuming a worst-case scenario of 15,000 vehicles entering the entire Preserve every month of the year², then 180,000 vehicles would enter the entire Preserve annually, and 12,600 to 18,000 vehicles would be within the Clark Mountain area annually. A range of the number of visitors to the Clark Mountain area was estimated using the number of people per vehicle from the Mojave National Preserve Visitor Study, resulting in a worst-case scenario of 28,728 to 41,040 visitors annually to the Clark Mountain area. As a worst-case, all of these visitors would have potential views of the proposed project. (Applicant's Data Response, Set 1A, Response 100, pp. 79-80)

Upon a closer reading of the 2004 Mojave Visitor Study, and review of data from other sources, we need to revise the assessment made in Data Response 100, Set 1A, that an estimated 28,728 to 41,040 people visit the Clark Mountain area annually and, as a worst- case, all of these visitors would have potential views of the proposed Ivanpah SEGS project. To put this into perspective, 41,040 visitors would mean 4.7 visitors each and every hour, 24 hours a day, 7 days a week, 365 days a year.

As the revised information presented below indicates, the numbers of people likely to visit the eastern side of the Clark Mountain unit of the Mojave National Preserve (and to be visiting areas where views toward the proposed project site) would be considerably less.

We need to start by assessing the validity of the 2004 Mojave Visitor Study's findings that 9 percent of visitors to the Mojave National Preserve in October 2003 visited the Clark Mountain area, 7 percent of visitors' first entry point into the Preserve was Clark Mountain, and 10 percent of visitors' departure point from the Preserve was Clark Mountain. First, there appear to be sampling issues that would affect these results. As indicated in the methods description on page 2 of the Visitor Study, visitors were approached at Cima, Essex, Ivanpah, and along Kelbecker/I-40 Road, given questionnaires, and asked to fill them out during their stay at the Preserve. There is no indication in the Visitor Study that that this approach provided

² This is a worst-case scenario because recreation use would likely decline substantially during the summer months due to the heat

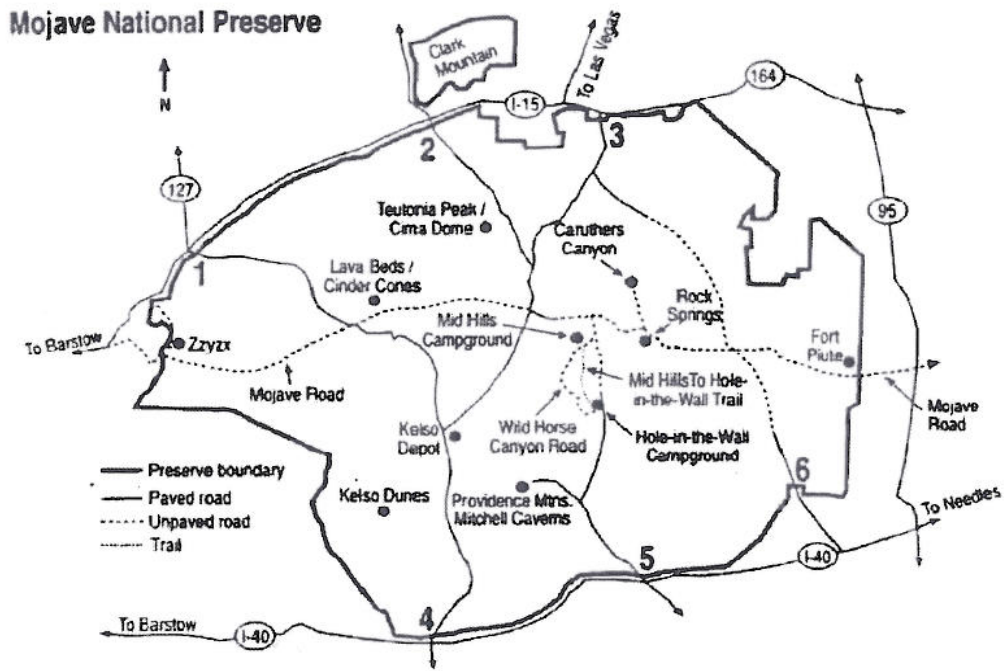
a sample that was accurately representative of the spatial distribution of visitors in the Preserve. The fact that survey instruments were distributed only at four locations including “Ivanpah” could mean that visitors in the vicinity of the Clark Mountain unit of the Preserve were over-sampled (since sampling occurred only at those four locations rather than throughout the Preserve), creating an inflated estimate of the percentages and numbers of visitors who visit this portion of the Preserve, or who enter or leave the Preserve from this area.

In addition, there appear to be serious issues with the way these survey questions were constructed that could produce misleading results. More specifically, on page 29 of the Visitor Survey, it is indicated that when these questions were asked, visitors were shown a copy of Map 2 (attached), which is reproduced on page 29 of the survey report. As you will notice on this map, Clark Mountain is written in large letters in a rectangle that appears just north of I-15 along Cima Road, which is one of the primary access roads into the Preserve. Given the way the question was asked and the use of this map as an aid in presenting the question, it would be very easy for visitors to say that they had entered or left the Preserve by way of Clark Mountain, or even that they had “visited” Clark Mountain by virtue of the fact that they had driven by this area on I-15 on their way into or out of the Preserve on Cima Road. In sum, the survey’s suggestion that 7 to 10 percent of the Preserve’s visitors “visit” the Clark Mountain unit or enter or leave the Preserve through this unit is suspect, and the extrapolation from these percentages that there would be 28,728 to 41,040 visitors in the Clark Mountain unit is unlikely to be valid.

These large estimates of visitors to the Clark Mountain unit are particularly suspect in light of the fact that although the western edge of the Clark Mountain unit is bordered by the Excelsior Mine Road, which is paved, the interior and eastern portions of the unit are accessible only by rough, unpaved roads. In addition, the Clark Mountain unit of the Preserve does not include any developed campgrounds, picnic areas, visitor centers or other facilities that would attract visitors and support visitor use of this area.

To provide a double-check of these visitation estimates for the Clark Mountain unit, particularly those for the eastern portions of the unit from which there might be some potential to see the project site, the staff of the Preserve were consulted to obtain estimates of the traffic levels on the roads providing access to into the area. In a conversation that took place on December 7, 2009 between Maly-Ann Bory, CH2M HILL transportation planner, and Tim Duncan, NPS Ranger assigned to the Mojave National Preserve, Mr. Duncan indicated that the primary access into the eastern portion of the Clark Mountain area is by way of the Colosseum/Green’s Well Road. He characterized this road as being very rough and difficult to traverse, and indicated that during most of the year the typical traffic consists of 1 to 2 vehicles per day. He also indicated that during the spring and fall seasons, traffic levels can be higher, ranging up to 20 to 30 vehicles per day. Extrapolating from this data, assuming a 3-month spring season and a 3-month fall season, and assuming an average of 20 vehicles per day for every day of the spring and fall seasons, 4,106 vehicles would access the eastern portion of the Clark Mountain area. Assuming a conservative average of three visitors per vehicle, the total number of people visiting the area would be 60 visitors per day during the spring and fall months and 6 visitors per day during the rest of the year. On an annual basis, these estimates indicate that a total of 12,318 people would visit this area over the course of the year. These estimates are likely conservative (i.e., over-estimating the number of visitors) because the assumption of 20 vehicles per day for every day of the 3-month spring and fall seasons may well overestimate the overall

levels of visitation during those months. In any case, even if this number is a bit high, it provides a more realistic general indication of the levels of visitor use in the eastern portions of the Clark Mountain area than the extrapolated estimates of 28,728 to 41,040 visitors presented in the Data Response.





**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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APPLICATION FOR CERTIFICATION
FOR THE *IVANPAH SOLAR ELECTRIC
GENERATING SYSTEM*

DOCKET No. 07-AFC-5
PROOF OF SERVICE
(Revised 11/23/09)

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DECLARATION OF SERVICE

I, John L. Carrier, declare that on December 9, 2009, I served and filed copies of the attached, Errata to Applicant's Visual Resource Testimony dated December 9, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/ivanpah].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at Sacramento** with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses NOT marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-5
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.



John L. Carrier, J.D.

**or by other delivery service, e.g., Fed Ex, UPS, courier, etc.