

DOCKET	
09-AFC-9	
DATE	<u>MAY 13 2010</u>
RECD.	<u>MAY 14 2010</u>

STATE OF CALIFORNIA
**Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION) DOCKET NO. 09-AFC-9
FOR THE RIDGECREST SOLAR)
POWER PROJECT)
_____)

**DATA REQUEST BY
Basin and Range Watch**

May 13th, 2010

Laura Cunningham
Kevin Emmerich
Basin and Range Watch
PO Box 153,
Baker CA, 92309
Phone: 775-553-2806
atomictoadranch@netzero.net

**Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION)
FOR THE RIDGECREST SOLAR)
POWER PROJECT)
_____)

DOCKET NO. 09-AFC-9

Nicole Tenenbaum
Senior Project Manager
1625 Shattuck Avenue, Suite 270
Berkeley, CA 94709-1161

**DATA REQUEST BY
Basin and Range Watch**

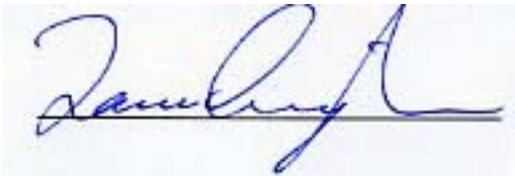
Dear Ms. Tenenbaum,

Basin and Range Watch submits this set of data requests on Soil and Water Resources to the Solar Millennium Ridgecrest Solar Power Project, pursuant to Title 20, section 1716(b), of the California Code of Regulations. The requested information is necessary to: (1) more fully understand the project; (2) assess whether the project will be constructed and operated in compliance with all laws, ordinances, regulations and standards; (3) assess whether the project will result in significant environmental impacts; and (4) assess potential mitigation measures.

Basin and Range Watch reserves the right to submit additional data requests on any topic that requires further information. Pursuant to section 1716(f) of the Energy Commission's regulations, written responses to these requests are due within 30 days.

Please contact us if you have any questions. Thank you for your cooperation with these requests.

Sincerely,



Check box if continuation pages are attached.

1. Regarding the conversion rates for the proposed cash-for-grass water offset program, we request answers to these items:

a. The 625.52 homes needed to convert from turf to xeriscape are 625 per year, correct? This would mean 18,765.6 homes (625.52 x 30) need to convert over the life of the project, correct?

b. In order to know whether this many homes can be converted in a reasonable time frame, we request to know the conversion rate in units of:

homes converted to xeriscape/total number of homes in area/year for the Southern Nevada Water Authority.

c. In Data Response set 1 and 2 ([Data Requests 132-192 Soils and Water](#)), Jan 26 2010, it was stated that there are 6,191 owner occupied homes in Ridgecrest. Is this the current number of homes in the Indian Wells Valley (IWV) water district?

d. What is the growth rate in terms of homes per year of the IWV water district?

2. Were biological soil crusts surveyed for or encountered on the project site?

3. The applicant will be applying herbicides to keep weeds down, and these could potentially wash into the drainages and groundwater. Please specify exact management practices to prevent such occurrences.

4. Has the applicant entered into agreements with the farmers whose land they plan to fallow?

5. During field walks of the project site, we noticed along the western edge of the southern solar field an active wash coming out of the El Paso Mountain foothills to the west, focused through a narrow cement culvert structure in the old railway grade. This wash forms a deep channel with apparent high-energy flows at times through this narrow gap, then turns northwards and meanders in a less constrained channel along the western edge of the project South Field. It appears to flow within the Right of Way, and touch corners of the project footprint.

In the Staff Assessment/Draft Environmental Impact Statement for the Ridgecrest Solar Power Project (March 2010), p. c.9-41, it is said that: *berms will be constructed along the south and west property boundaries to divert flow west and north into existing drainage to the west of the project.*

In Data Response set 1 and 2 ([Data Requests 132-192 Soils and Water](#)) Jan 26 2010, the applicant states:

The upstream area from the south field is a relatively small area compared to the site as a whole and is generally centered in a flat ridge between El Paso Wash and a small un-named wash to the west. As such, the upstream area does not create a large flow of water to either channel, and the slopes, ground cover condition, and rocky crust in this area does not create much opportunity for sediment transport. The construction of the south field will intercept some of the drainage in a minor ephemeral wash that drains to the west, but this drainage will be allowed to meander westerly along the south boundary of the site to its prior point of connection with a drainage depression west of the solar field. This new drainage flow path is longer than the current flow path and thus flow velocities should be reduced compared to the existing small flow upstream of the south field. In addition, using the low impact drainage approach preferred by the BLM (allowing this intercepted water to migrate westerly in an overland flow condition) will not result in any discernible increase in sedimentation or erosion in this area.

Personal observation of the large amount of scour caused by this western ephemeral wash to the railway grade, as well as a plunge pool formed at the outflow side, lead us to request more information on how this wash might impact and erode the southwestern project boundary berms. Will soil cement be applied to the area? Berms may

be eroded away over the 30-year life of the project. Please detail how flows from this meandering western wash will be managed to prevent erosion and disturbance to downstream washes.

**California Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION) DOCKET NO. 09-AFC-9
FOR THE RIDGECREST SOLAR)
POWER PROJECT)
_____)

DECLARATION OF SERVICE

We, Laura Cunningham and Kevin Emmerich, declare that on March 1, 2010, served and filed copies of the attached **data request by Basin and Range Watch**, dated March 1, 2010. 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: [http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest/Ridgecrest_POS.pdf]. The document has been sent to 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:

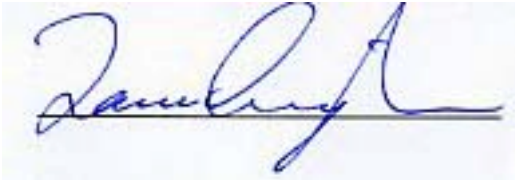
sent electronically to all email addresses on the Proof of Service list;
 by personal delivery or by depositing in the United States mail at with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses NOT marked “email preferred.”
AND

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. 09-AFC-9
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.



Laura Cunningham, Kevin Emmerich



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
For the *RIDGECREST SOLAR*
POWER PROJECT

Docket No. 09-AFC-9

PROOF OF SERVICE
(Revised 4/30/2010)

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DECLARATION OF SERVICE

I, _____, declare that on, _____, I served and filed copies of the attached _____, dated _____. 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: [http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest].

The document has 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;
- by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date 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. 09-AFC-9
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, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.
