BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE BEACON SOLAR ENERGY PROJECT

DOCKET NO. 08-AFC-2

DOCKET 08-AFC-2		
DATE		
RECD.	Jul 20 2009	

RESPONSE TO REQUEST REGARDING BSEP SUBSURFACE INVESTIGATIONS

From: Apple, Rebecca

Sent: Friday, July 17, 2009 10:36 AM

To: Eric Solorio

Cc: Stein, Kenneth; Busa, Scott; Michael McGuirt; Russell, Meg; Head, Sara; Guigliano,

Jennifer; Luckhardt, Jane

Subject: Response to request regarding BSEP subsurface investigations

Eric -

At the July 1 PSA Workshop, CEC Staff (Mike McGuirt) requested that Beacon provide a cost estimate for implementing the ground penetrating radar as proposed for the Beacon Solar Energy Project. Beacon's consultant (AECOM) requested quotes to implement the requested activity and was consistently informed that magnetometer is the preferred method for the task (both for the type of project proposed and cost). There are limited firms that conduct this work. Two ballpark estimates were obtained; one quoted \$25,000 per acre for this investigation and the other firm quoted approximately \$10,000 an acre.

The recommended general approach for the activity is summarized below.

It is proposed that the geophysical inventory be conducted in two phases. The first phase will be to conduct a geophysical survey over known archaeological sites specifically to develop a set of expectations concerning the magnetic characteristics for known local site types. This will include areas previously identified including examples of Fire Affected Rock (FAR). For this phase, geophysical data will be collected along transects. Specifically, the data will be collected along parallel transects. This limited work will provide an important basis for generating geophysical predictions of cultural treated rock (FAR) and soils compared to the natural magnetism of local rocks and soils. The second phase will be a systematic geomagnetic survey of the selected acreage.

Selection of units will be stratified and based upon the results of the first phase investigation and additional statistical modeling of the expected prehistoric features located within the study area. After the field survey is completed, data will be downloaded to a processing computer for statistical assessment visual processing (high-resolution monitors) using sophisticated third party software. It should be emphasized that the analytical process included not just the field work, but the time-consuming computer processing of data and visual data analysis.

Beacon has proposed to conduct this work on 5% of 550 acres, or 27 acres as opposed to the 20% proposed by the CEC Staff which translates to 110 acres.

Even applying the lower potential bid to 27 acres equates to \$270,000 for this task alone. At the higher rate, the cost would be \$675,000. To do 20%, as requested by the CEC Staff, the cost would be \$1.1 million at the <u>lower rate</u> for this task alone. Beacon believes that geophysical survey costs over \$270,000 would be unreasonable, and hence that the requirement should be based on 5% coverage or less, with a \$270,000 cap on this survey work.

Thank you, Rebecca

Rebecca Apple

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PROOF OF SERVICE

(Revised 4/28/09)

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Declaration of Service

I, Shawn Prentiss, declare that on July 20, 2009, I served and filed copies of the following:

- 1. Responses to Select Cure Comments at CEC's Request
- 2. Responses to Air Quality Questions from Workshop
- 3. Response to Request Regarding BSEP Subsurface Investigations
- 4. Response to Request for Predictive Sensitivity Groundwater Analysis
- 5. Response to Rerouted Wash Information Request from Workshop.

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:

<u>www.energy.ca.gov/sitingcases/beacon</u>. 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:

For Service to All Other Parties

(check all that apply)

X sent electronically to all email addresses on the Proof of Service list; X by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service List above. For Filing with the Energy Commission X sending an original paper copy mailed, to the address below; OR depositing in the mail an original and 12 paper copies as follow: California Energy Commission Attn: Docket No. 08-AFC-2 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.