

# **Supplemental Information In Response to Imperial County Comments Application for Certification (08-AFC-5) SES Solar Two, LLC**



Submitted to:  
Bureau of Land Management  
1661 S. 4th Street, El Centro, CA 92243



Submitted to:  
California Energy Commission  
1516 9th Street , MS 15, Sacramento, CA 95814-5504



Submitted by:  
SES Solar Two, LLC  
2920 E. Camelback Road, Suite 150, Phoenix, AZ 85016



With Support From:  
URS Corporation

**September 2008**

**SES Solar Two**  
**Response to Comments from the County of Imperial**  
**Public Works Department**  
**08-AFC-5**

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 1:** Provide legal physical access from Dunaway Road and Evan Hewes Highway to project limits along BLM/Private land.

**Response:** The Applicant will incorporate BLM and County access requirements as final engineering design is completed for physical access from Dunaway Road and Evan Hewes Highway. Final engineering design on the roadways will be completed during the compliance phase of the Project.

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**TECHNICAL AREA: WATER RESOURCES**

**Comment 2:** The applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plans. Employment of the appropriate Storm Water Best Management Practices (BMP's) shall be included.

**Response:** The Applicant is aware of the need to submit a Grading and Drainage Plan Study to provide for property grading and drainage control including prevention of sedimentation damage to off-site properties. The Applicant will complete the Study/Plan according to Imperial County criteria and it will be submitted for review and approval to the County Department of Public Works with the application package. This is typically identified as a condition for certification and will be completed during the compliance phase of the Project.

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 3:** An encroachment permit shall be secured from the Department of Public Works for any and all new, altered or existing unauthorized driveway(s) to access the property. (Entrance improvement(s) shall meet the appropriate agency's standards, requirements and/or approval). The encroachment permit may require a County Standard paved commercial driveway entrance to reduce mud tracking onto County roads. An encroachment permit shall be secured for Dunaway Road, Reynolds Road and Strobel Road which will be impacted by the staging and laydown area.

**Response:** When construction and operational work activities affect or are within County right-of-way, the Applicant and its contractors shall secure the required encroachment permits from the Imperial County Department of Public Works for all Project improvements during Project construction and operations. The aforementioned specific requirements will be complied with and provided by the Applicant and its contractors. Should any encroachment permits be necessary, they will likely be a condition of certification and will be completed during the compliance phase of the Project.

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 4:** A Transportation Permit shall be required from the road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater than legal loads on riding surfaces, including bridges.

**Response:** The Applicant and its contractors shall secure the necessary Transportation Permits for the affected jurisdiction's roadways and bridges for all oversize, heavy and extra-legal loads associated with Applicant construction and operational activities. This will likely be a condition of certification and will be completed during the compliance phase of the Project.

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 5:** A Traffic Study shall be prepared to look at all nearby roadway intersections and corridors. Recommendations for road infrastructure improvements must be reviewed and approved by the respective agency impacted by this proposal. Our concerns are traffic safety at all points of ingress/egress as well as nearby road intersections, and the structural integrity of existing roads to handle anticipated truck traffic during construction and plant operations.

**Response:** The traffic study is incorporated in the Traffic Section 5.11 of the AFC and includes analyses of the nearby roadways and intersections. These study locations were identified and approved through a telephonic traffic study scoping discussion with Mr. Neil Jorgenson, Imperial County Traffic Engineer. Reference as cited in the AFC: *Imperial County Public Works Department. 2008. Telephone conversation with Neil Jorgenson re: Approval of Traffic Analysis Scenario and Growth assumptions on 31 January 2008, 760-482-4462.* It is anticipated the current structural integrity of the existing roadways serving the Project site can handle all proposed construction and operational activities at the Project site. Historically, the existing roadways have adequately served the Gypsum plant operations and production trucking activities which have higher or equal loadings than the anticipated Project construction and operational activities.

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 6:** Caltrans should be contacted for their concerns on the project.

**Response:** During the preparation of the AFC Traffic Section, Jacob Armstrong, Chief, Development Review Branch, District 11 Planning Dept., CA Dept. of Transportation, was contacted on January 12, 2008. Moe Bhuyian from the Caltrans South Region Transportation Permits Office was also contacted regarding this Project on January 3-4, 2008. Caltrans staff will continue to be contacted throughout the permitting process as needed to resolve any comments, issues or concerns.

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**TECHNICAL AREA: GENERAL ENVIRONMENTAL RESOURCES**

**Comment 7:** All plan approval and development for the project is to be in compliance with the CEQA and the County's CEQA Guidelines. Development is also to be in compliance with all other local, regional, state, and federal codes or procedures for environmental resource protection that are applicable to the project site or proposed uses.

**Response:** As stated in Section 1.2 of the AFC, this Project has been designed and will be developed in accordance with the current California Energy Commission (CEC) power plant siting regulations. This approach is designed to facilitate review by CEC staff in accordance with the California Environmental Quality Act (CEQA). It is important to note that the majority of the Project is located on public land administered by the Bureau of Land Management (BLM). Therefore, the Project will also be reviewed by the BLM in order to receive the necessary right-of-way grant. This dual submission is consistent with the National Environmental Policy Act of 1969 (NEPA) and CEQA. This environmental review process was developed through a Memorandum of Understanding (MOU) between the CEC and the BLM (presented in the AFC as Appendix A, Memorandum of Understanding). The MOU sets out the relative roles, responsibilities, and procedures CEC and BLM staff will follow when conducting their respective environmental reviews of the Project. The Applicant will conduct the construction and operation of the Project in accordance with all applicable laws, ordinances, regulations, and standards (LORS).

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**TECHNICAL AREA: SOCIOECONOMICS**

**Comment 8:** Emergency access shall be reviewed and approved by the Office of Emergency Services (OES)/Fire Department.

**Response:** The Applicant has contacted John Romero of the Office of Emergency Services Fire Prevention Department on August 19, 2008 for review and approval of emergency access and is awaiting response. Discussions with Fire Chief Chris Petree of the City of El Centro Fire Department on May 14, 2008, and Ryan Kelly of Imperial County Public Health and Emergency Medical Services on May 22, 2008, as referenced in the AFC, have indicated adequate capacity of local Emergency Services to accommodate the development of this Project as the permitting process continues.

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**TECHNICAL AREA: TRAFFIC AND TRANSPORTATION**

**Comment 9:** All on-site traffic area shall be hard surfaced to provide all weather access for fire protection vehicles. The surfacing shall meet the Department of Public Works and Fire/OES Standards as well as those of Air Pollution Control District (APCD).

**Response:** Access for fire protection vehicles will comply with these requirements during construction and development. All Project development will meet Department of Public Works, Fire/OES and APCD standards.

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**TECHNICAL AREA: HAZARDOUS MATERIALS**

**Comment 10:** All solid and hazardous waste shall be disposed of in an approved solid waste disposal site in accordance with existing County, State and Federal regulations.

**Response:** All solid and hazardous waste will be disposed of in accordance with existing federal, state and local laws, regulations, ordinances and standards (LORS) as discussed in Section 5.14.5 of the Project AFC.

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**TECHNICAL AREA: AIR QUALITY**

**Comment 11:** The project construction must take appropriate dust control measures and mitigate PM10 levels for any unpaved roads as well as onsite access concerns.

**Response:** Every CEC license includes a number of Conditions of Certification that pertain specifically to control of dust and equipment exhaust emissions during construction. Page 5.2-38 of the AFC details methods used to control dust and PM-10 emissions during construction. These include, but are not limited to, using the application of either water, chemical dust suppressant or other suppression technique on unpaved surfaces and parking areas, limiting traffic speeds on all unpaved site areas to 5 miles per hour, and using vacuum-sweep and/or water-flush paved surfaces to control dust emissions from travel on the paved access road and paved parking areas.

Compliance with Imperial County Air Pollution Control District Regulation VIII will require additional dust control mitigation throughout the construction phase of the Project of the type suggested in this comment.

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**TECHNICAL AREA: GENERAL ENVIRONMENTAL RESOURCES**

**Comment 12:** Imperial County Public Works reserves the right to make additional comments as projects develops.

**Response:** The Applicant is aware that Imperial County Public Works reserves the right to make additional comments as this Project develops and will be prepared to respond in a timely manner.



1615 Murray Canyon Road, Suite 1000  
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**LETTER OF TRANSMITTAL**

**TO:**

Christopher Meyer  
California Energy Commission  
1516 Ninth Street MS-15  
Sacramento, CA 95814

<b>DOCKET</b> 08-AFC-5	
<b>DATE</b>	SEP 0 3 2008
<b>RECD.</b>	SEP 0 4 2008

**CC:**

Lynda Kastoll  
BLM – El Centro Field Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243

**DATE:** September 3, 2008

**SUBJECT:** Solar Two Responses to Imperial County Comments

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**Enclosed/Attached please find the following:**

- Solar Two Responses to Imperial County Comments, SES Solar Two, LLC (08-AFC-5)

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**For:**  Review and Approval

As Requested

Signature and Return

For Your Information

Appropriate Action

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**Remarks:**

Provided is the Solar Two Responses to Imperial County Comments including 2 hard copies. A digital copy was emailed to you as well. If you have any questions or need any further information, please feel free to call. Thank you.

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Kindly,

Angela Leiba  
Project Manager