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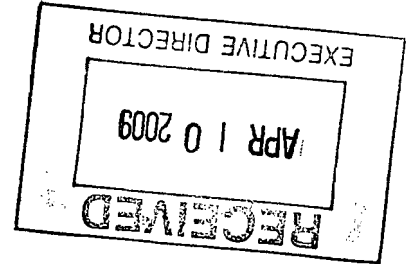
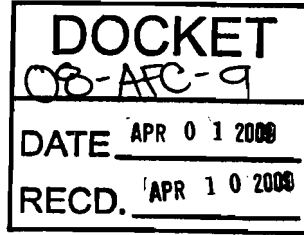


Consultants in Archaeology and Historic Preservation

www.williamsself.com

April 1, 2009

Ms. Melissa Jones
Executive Director
California Energy Commission
Dockets Office, 4th floor
1516 Ninth Street
Sacramento, CA 95814



Subject: Submittal of Confidential Information that is Substantially Similar to Information Previously Deemed Confidential;

Response to DR 20: Archaeological Survey of Two Realignments of the Electrical Transmission Line, Twenty-Two Pull Areas, and Three Laydown Areas, within the Palmdale Hybrid Power Project Area

Docket Number: 08-AFC-9

Dear Ms. Jones,

The City of Palmdale (City), Los Angeles County, California is proposing to construct and operate the Palmdale Hybrid Power Project (PHPP). As part of the City's consultant team preparing the Application for Certification (AFC), William Self Associates, Inc. (WSA) undertook a cultural resources assessment for the PHPP. This work was performed under subcontract to ENSR Corporation (now AECOM), who prepared the AFC under contract to Inland Energy, Inc. who submitted the AFC on behalf of the City. On September 8, 2008, the City of Palmdale filed an Application for Confidentiality on behalf of the Palmdale Hybrid Power Project for portions of the cultural resources technical report that supported the AFC. Specifically, the City requested that the following information in the technical report be designated as confidential:

- Locational information for archaeological sites provided in the Survey Results section and in Table 15.
- All of Figure 7 (Maps 1 and 2).
- Attachment 4 (Photos).
- Attachment 5 (State of California DPR 523 Forms)
- Attachment 7 (Cultural Resource Maps)
- Attachment 8 (Records Search Maps).
- Attachment 9 (DPR Forms of Previously Recorded Sites).
- Attachment 10 (Cultural Resource Reports from Previous Studies of the PHPP Area)

William Self Associates, Inc.

E-mail: jallan@williamsself.com

CORPORATE OFFICE: San Francisco Bay Area

PO Box 2192, 61 Avenida de Orinda

Orinda CA 94563

Phone: 925-253-9070/ 925-254-3553 fax

On September 30, 2008, the CEC granted the application for confidentiality in its entirety. On December 10, 2009, the California Energy Commission (CEC) provided a set of data requests, eight of which pertained to the Cultural Resources discussed in the AFC. WSA has responded to several of these Data Requests in previous submittals. Data Request 20 asked the PHPP to “submit a new confidential [sic] Attachment 7 which adds the tower locations and the pull site locations for the proposed transmission line to the plotted locations of known and newly identified cultural resources.” Attachment 7, comprising 10 individual maps depicting this information, was submitted to the CEC in response to Data Request (DR) 20 on February 25, 2009.

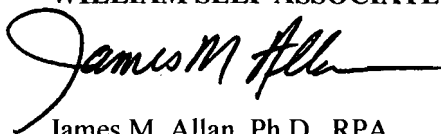
In preparing the response to DR 20, the applicant determined that there were two realigned portions of the proposed transmission line (Area A and Area B), 22 pull areas and three laydown areas that were either partly or wholly outside of the previous archaeological survey corridor. As part of the response to DR 20, these previously unsurveyed portions of the PHPP area were subject to an intensive pedestrian survey. During the survey, new archaeological sites were identified and assessed. A report entitled “Response to DR 20: Archaeological Survey of Two Realignments of the Electrical Transmission Line, Twenty-Two Pull Areas, and Three Laydown Areas, within the Palmdale Hybrid Power Project Area” is being submitted, which includes locational information for the newly identified archaeological sites.

Since the enclosed report contains archaeological site information substantially similar to site information that was previously granted confidentiality by the CEC, the City requests that the attached response be designated confidential pursuant to Title 20, California Code of Regulations, Section 2505(a) (4)). In conformance with this regulation, the City certifies that the archaeological site information submitted in the report is substantially similar to previously submitted information and that all the facts and circumstances remain unchanged.

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct and complete to the best of my knowledge and that I am authorized to make the application and certification.

Sincerely,

WILLIAM SELF ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "James M. Allan", with a long horizontal flourish extending to the right.

James M. Allan, Ph.D., RPA
Principal