

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512**DOCKET****08-AFC-9**

DATE FEB 09 2010

REC'D FEB 09 2010

February 9, 2010



TO: AGENCY DISTRIBUTION LIST

**REQUEST FOR AGENCY COMMENTS ON THE PRELIMINARY STAFF ASSESSMENT FOR THE PROPOSED PALMDALE HYBRID POWER PROJECT (08-AFC-9)**

The enclosed Preliminary Staff Assessment (PSA) contains the California Energy Commission staff's initial engineering and environmental evaluation of the Palmdale Hybrid Power Project (PHPP).

In summary, this PSA finds that:

- Air Quality – The applicant will rely on Emissions Reduction Credits (ERCs) from the San Joaquin Valley Air Pollution Control District (SJVAPCD), but has not identified any specific ERCs, nor has the SJVAPCD confirmed in writing that the transfers could occur.
- Biological Resources – Development of the power block and linear facilities would result in direct and indirect impacts to native vegetation and wildlife caused by the permanent loss of over 416 acres of land. Some additional details regarding the mitigation package need to be developed.
- Cultural Resources – Potential impacts to cultural resources may exist, but staff is unable to conclude its analysis without additional information.
- Land Use - Segment 1 of the transmission line requires a right-of-way study and appropriate zoning in order for staff to complete its' analysis.
- Soil and Water Resources – Staff has concluded that resolution of outstanding stormwater management issues, final soil berm details, construction-related wastewater issues and an executed agreement for tertiary treated water is required in order to complete its analysis.
- Transmission System Engineering – The transmission outlet and terminations require more definition and further study in order to determine feasibility.
- Traffic and Transportation – Staff has identified project induced impacts to the region's transportation system at several intersections. In addition, there are several unresolved issues associated with vertical velocity plumes and visible water vapor plumes and their potential impact on flight paths and patterns.
- Visible – Staff has determined that additional KOPs would be necessary to determine if the project is in compliance with applicable LORs. Additional information and analysis is required in order to determine whether the visible plumes generated by the cooling towers will result in a visual impact.

On August 4, 2008, the City of Palmdale filed an Application for Certification with the California Energy Commission to construct and operate the Palmdale Hybrid Power Project; a hybrid of natural gas-fired combined generating equipment integrated with solar thermal generating equipment. The plant will have a net electrical output of 617 megawatts (MW). The proposed project site is located approximately 60 miles north of downtown Los Angeles and in the northernmost portion of the city of Palmdale. The site address is 950 East Avenue M, bounded on the west by vacant land and then Sierra Highway, on the north by East Avenue M, on the east by East 15<sup>th</sup> Street and on the south by Avenue M-12.

We request that you review the enclosed PSA for the areas for which your agency would normally be responsible except for the Energy Commission's permitting authority. Please provide any written comments to Felicia Miller, Siting Project Manager by **March 8, 2010**. You may also present your comments at the public workshop on the PSA that will be conducted on February 11-12, 2010 in Sacramento. The workshop was separately noticed. Comments received will be used by staff to prepare its Final Staff Assessment which will be staff's testimony in evidentiary hearings.

If you desire information on technical or project schedule issues, or how to participate in the Energy Commission's review of the project, your questions should be directed to Felicia Miller at (916) 654-4640 or at [fmiller@energy.state.ca.us](mailto:fmiller@energy.state.ca.us). The status of the project, an electronic copy of the AFC, copies of notices, and other relevant documents are also available on the Energy Commission's web site at <http://www.energy.ca.gov/sitingcases/palmdale>.

Sincerely,

**Original signed by:** \_\_\_\_\_

Eileen Allen  
Siting Office Manager

Enclosure



**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](http://WWW.ENERGY.CA.GOV)**

**APPLICATION FOR CERTIFICATION  
For the *PALMDALE HYBRID  
POWER PROJECT***

**Docket No. 08-AFC-9**

**PROOF OF SERVICE**

*(Revised 2/4/2010)*

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**DECLARATION OF SERVICE**

I, April Albright, declare that on, February 9, 2010, I served and filed copies of the attached Document Handling Letter and the Request for Agency Comments on the Preliminary Staff Assessment for the Palmdale Hybrid Power Project (08-AFC-9). 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/palmdale/index.html>]**. 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 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. 08-AFC-9  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

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

Original signed by: \_\_\_\_\_  
**April Albright**