URS

DOCKET
07-AFC-3C
DATE JUL 11 2011
RECD. JUL 13 2011

July 11, 2011

Dale Rundquist
Compliance Project Manager
California Energy Commission
Energy Facilities Siting Division
1516 Ninth Street, MS 2000
Sacramento, CA 95814-5504

RE: CPV Sentinel Energy Project (07-AFC-3C)
Additional Construction Parking

Dear Mr. Rundquist:

Please find the attached Construction Parking Area Addition for the CPV Sentinel Energy Project (07-AFC-3C).

We would like to request your comments and/or approval of the proposed Construction Parking Area Addition by **July 15, 2011**.

If you have any questions or concerns, please do not hesitate to call me at 714-648-2759.

Sincerely,

Maggie Fitzgerald
Site Compliance Manager

CC: Mark Turner, CPV Sentinel, LLC
Mark McDaniels, CPV Sentinel, LLC
John Murphy, CPV Sentinel, LLC
Charles Collins, Gemma Power Systems
Karen Timbrell, Gemma Power Systems
Michael Carroll, Latham & Watkins, LLP
Kathy Rushmore, URS
Amanda Johnson, URS

URS Corporation
2020 East First Street, Suite 400
Santa Ana, California 92705
Tel: 7146.835.6886
Fax: 714.433.7701

Construction Parking Area Addition

CPV Sentinel Energy Project
Riverside County, California
07-AFC-3C

July 2011

Prepared for:

CPV
Competitive Power Ventures
SENTINEL
ENERGY PROJECT

Prepared by:

URS

TABLE OF CONTENTS

Page

APPENDIX

TABLE

FIGURES

ACRONYMS

AFC	Application for Certification
CCR	California Code of Regulations
CEC	California Energy Commission
CHU	Critical Habitat Unit
CNDDB	California Natural Diversity Database
CPV	Competitive Power Ventures
CPVS	CPV Sentinel Energy Project
CRS	Cultural Resources Specialist
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
DWMA	Desert Wildlife Management Area
KOP	key observation point
LORS	laws, ordinances, regulations, and standards
PRC	PaleoResource Consultants
PRIA	Paleontological Resource Impact Assessment
project	CPV Sentinel Energy Project
SWPPP	Storm Water Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service

1.0 INTRODUCTION

In June 2007, CPV Sentinel, LLC filed an Application for Certification (AFC) with the California Energy Commission (CEC) seeking approval to construct and operate the CPV Sentinel Energy Project (CPVS or project). In December 2010, the CEC approved the project and issued the Commission Decision (Docket 07-AFC-3C).

CPV Sentinel recently identified a 5-acre parcel adjacent to the CPVS project site to use for construction parking (as shown on Figure 1). This submittal describes the use of the 5-acre parcel for construction parking and analyzes whether this would result in any environmental consequences not previously analyzed. As set forth below, this project modification does not materially change the environmental consequences of the CPVS, and all impacts are expected to remain less than significant.

This document is submitted in accordance with Title 20 California Code of Regulations (CCR), Section 1769, governing post-certification amendments and changes. Section 1769 requires that after the Commission Decision on a project is effective, the applicant must file with the CEC a petition for any modifications it proposes to the project design, operation, or performance requirements. It also specifies that the following information be included in any such petition:

(A) A complete description of the proposed modifications, including new language for any conditions that will be affected.

Section 2.0 below provides a complete description of the project modification. None of the adopted Conditions of Certification are affected by the project modification.

(B) A discussion of the necessity for the proposed modifications.

The proposed 5-acre construction parking area is located adjacent to the project site and this parcel is currently owned by Competitive Power Ventures (CPV). The use of this area for construction parking is necessary to ensure the most effective and efficient construction of the project by reducing the distance between the project site and construction parking.

(C) If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time.

CPV did not own this 5-acre parcel proposed for construction parking at the time of the CEC proceedings.

(D) If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the Commission Decision, an explanation of why the change should be permitted.

As explained in Sections 3.1 through 3.16 below, the project modification does not materially change or undermine the assumptions, rationale, findings, or other bases of the Commission Decision.

(E) An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts.

As explained in Sections 3.1 through 3.16 below, the project modification will not have any adverse impacts on the environment, and no measures in addition to the existing Conditions of Certification are required to address any such impacts.

(F) A discussion of the impact of the modifications on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.

As explained in Sections 3.1 through 3.16 below, the project modification will not affect the project's ability to comply with applicable laws, ordinances, regulations, and standards.

(G) A discussion of how the modification affects the public.

As explained in Sections 3.1 through 3.16 below, the project modification will not have any material effect on the public.

(H) A list of property owners potentially affected by the modification.

As explained in Sections 3.1 through 3.16, the project modification will not materially affect any property owners.

(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.

As explained in Sections 3.1 through 3.16 below, the project modification will not materially affect nearby property owners, the public or the parties to the application proceedings.

Based on the information provided in this submission, we believe that staff can determine that there is no possibility that the new construction parking area would have a significant effect on the environment. The new construction parking area will not necessitate a change or deletion of a condition imposed by the CEC in the Commission Decision, and will not make changes that would cause the project not to comply with any applicable laws, ordinances, regulations, or standards. Therefore, pursuant to 20 CCR Section 1769(a)(2), no Commission approval of the project modification is required.

2.0 PROJECT DESCRIPTION CHANGE

The project modification consists of using a 5-acre parcel located directly east of the CPVS project site for construction parking. Figures 1 and 2 show this 5-acre parcel. The area is currently vacant, containing sparse vegetation. CPV currently owns this property. The area would be cleared of vegetation and graded to provide a level surface for parking, and graveled to provide dust control. The area would be used temporarily for construction parking during CPVS construction. After construction is complete, the area would remain graveled, but would not be used during project operations.

3.0 ENVIRONMENTAL CONSEQUENCES

This section discusses potential environmental impacts associated with the temporary use of the new construction parking area.

3.1 AIR QUALITY

The project modification will add a 5-acre parcel for construction parking throughout the duration of project construction, as shown in Figure 1. The additional construction parking area would result in the disturbance of areas not previously evaluated in the Commission Decision. However, the additional construction parking would not result in an increase in the expected construction workforce, the quantity of equipment or equipment type, or a difference in the equipment schedule that was presented in the Commission Decision. Therefore, the construction emissions calculated and modeled in Section 7.1.2.4

of the AFC still conservatively characterize the potential construction-related air quality impacts. The project modification would not change the conclusions in Section V, B of the Commission Decision, and potential air quality impacts during construction are expected to remain less than significant.

The 5-acre construction parking area would require minimal earthwork to clear and grub before covering with gravel for dust mitigation. This additional earthwork would take less than five working days to complete. The analysis presented in the AFC and evaluated in the Commission Decision included four months of soil movement activities, which was sufficiently robust to accommodate minor project refinements. No additional construction personnel or equipment would be required to complete these activities. Total estimated construction emissions for CPVS are expected to be similar to, if not the same as, those presented in the Commission Decision. All construction Conditions of Certification identified in the Commission Decision remain valid and will be implemented during project construction.

The project modification would not change the conclusion that potential air quality impacts during construction and operation are expected to remain less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.2 BIOLOGICAL RESOURCES

The project modification consists of using a 5-acre parcel adjacent to the CPVS project site for construction parking, as shown in Figure 1. The additional construction parking area would result in the disturbance of areas not previously evaluated in the Commission Decision. The area proposed for construction parking would be devegetated, graded, and graveled. There are no plans for restoration or revegetation, and therefore, impacts to this area are presumed to be permanent.

On June 6, 2011, URS biologists Jamie Deutsch and Ken Hashagen conducted a biological survey of the 5-acre area. The survey was conducted by walking north/south transects, with the two surveyors approximately 15 feet apart. Wildlife seen during the survey included black-tailed jack rabbit (*Lepus californicus*), white-tailed antelope squirrel (*Ammospermophilus leucurus*), and several whip-tail (*Aspidoscelis tigris*) and side-blotched (*Uta stansburiana*) lizards. No birds were observed. Several medium to large desert woodrat (*Neotoma lepida*) middens were seen at the base of creosote bushes. No burrows suitable for burrowing owls or desert tortoises were observed.

The proposed new construction parking area is currently disturbed, vacant land and has similar biological resource features as described in the Commission Decision for the 37-acre CPVS project site. Both the CPVS project site and the proposed construction parking area contain the Sonoran creosote bush scrub vegetation community. This community is dominated by creosote (*Larrea tridentata*) shrubs with some white bursage (*Ambrosia dumosa*) and smoke tree (*Psorothamnus schotti*) with annual grasses in the understory and in open areas.

Consistent with the CPVS project site, the proposed construction parking area lacks suitable, natural habitat, which reduces the likelihood of the occurrence of sensitive species. As described in Section 7.2 of the CPVS AFC, the 5-acre proposed construction parking area was included within the previous searches of the California Natural Diversity Database (CNDDB) and the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) conducted for the project. Within the project area and vicinity, records exist for the occurrence of suitable habitat for several special-status plants such as the Coachella valley milk-vetch (*Astragalus lentiginosus var. coachellae*) and triple-ribbed milk-vetch (*Astragalus tricarinatus*), as well as wildlife species such as Coachella Valley fringe-toed lizard, flat-tailed horned lizard (*Phrynosoma mcallii*), desert tortoise (*Gopherus agassizii*), and burrowing owl (*Athene cunicularia*). However, no sensitive resources are identified in either the CNDDB or CVMSHCP within the 5-acre area proposed for construction parking.

Protocol level surveys for desert tortoise, burrowing owl, and rare plants were previously conducted as part of the CPVS project permitting and mitigation measures. The latest round of surveys was conducted in 2011 prior to ground disturbance. The proposed construction parking area was included in these surveys as part of the buffer area associated with the CPVS project site. No tortoise, tortoise burrows, or sign of tortoise, and no rare plants, were found within the project vicinity.

Burrowing owls were found to be nesting in the CPVS project region. Three active nest sites were found in the spring of 2011. One nest site was located along the southern edge of the Dever's Substation, one nest site was south of the Devers Substation by approximately 1,000 feet (about 800 feet south of 16th Avenue), and a third territory was found south of Dillon Road near the proposed gas line. The closest burrowing owl sighting was more than 2,000 feet from the proposed construction parking area. None of the burrowing owls, potential burrowing owl burrows, and breeding territories was found near the proposed construction parking area or would be impacted by the project modification.

Critical habitat is a term defined by the federal Endangered Species Act that refers to areas designated by the U.S. Fish and Wildlife Service (USFWS) that are essential for the conservation of threatened or endangered species and may require special management and protection. USFWS has designated critical habitat in Riverside County for a number of special status species, including Coachella Valley fringe-toed lizard and desert tortoise. Both species are also included under the CVMSHCP. Although the CPVS project site and the proposed new construction parking area occur within the boundaries of the CVMSHCP, neither fall within any of the 21 Conservation Areas or the 6 Reserve Management Units identified within the plan.

The nearest Critical Habitat Unit (CHU) for the Coachella Valley fringe-toed lizard is located within Garnet Wash, approximately 6,000 feet southeast of the proposed construction parking area. The closest CHU for the desert tortoise is more than 5 miles northeast of the project area within Joshua Tree National Park, designated as a Desert Wildlife Management Area (DWMA) by USFWS in 1994. Due to a lack of suitable habitat, neither the Coachella Valley fringe-toed lizard nor the desert tortoise is likely to occur in the project area or the proposed construction parking area.

The permanent conversion of the approximately 5-acre area of construction parking would comply with applicable laws, ordinances, regulations, and standards (LORS) and would be consistent with the Commission Decision findings. All construction Conditions of Certification identified in the Commission Decision remain valid and will be implemented during project construction.

The project modification would not change the conclusion that potential biological resource impacts during construction and operation are expected to remain less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.3 CULTURAL RESOURCES

The project modification consists of using a 5-acre parcel adjacent to the CPVS project site for construction parking, as shown in Figure 1. The additional construction parking area would result in the disturbance of areas not previously evaluated in the Commission Decision. Impacts to archaeological resources and historic architecture are discussed below.

3.3.1 Archaeological Resources

The results of the records search conducted at the Eastern Information Center on February 16, 2007 (RS #3914) were reviewed. No previously recorded archaeological resources were identified in the area. Specifically, two previously conducted surveys identified in Table 1 below covered the proposed new construction parking area. These surveys were negative for archaeological resources within the proposed new construction parking area.

Table 1
Previously Conducted Cultural Resources Studies within the Proposed New Construction Parking Area

Study Number	Author(s)	Study Name
1083326/RI-2966	Duffield and Broeker, 1990	Interstate 10/Highway 62 and Devers Hill Land Exchange Parcels, Sections 4 and 18, T3S, R4E, SBBM
1085797 /RI-4452	Love 1993	Cultural Resources Reconnaissance, Eagle Mountain Pumped Storage Transmission Corridor, Riverside County, California

On June 21, 2011 and June 23, 2011, the proposed 5-acre construction parking area and a 200-foot buffer were subject to pedestrian archaeological survey (Figure 3). Portions of the western buffer are located within the CPVS project site, and were previously surveyed, with negative results, in May and March of 2007, as discussed in the Cultural Resources Technical Report prepared for the CPVS AFC (URS, 2007b). The 2011 survey was conducted by Patrick Moloney and Robert Lichtenstein, RPA, of Applied Earthworks, under supervision of the Cultural Resources Specialist (CRS) (Maureen Kick, URS) and Alternate CRS (Vanessa Mirro, Applied Earthworks). No archaeological resources were identified within the proposed 5-acre new construction parking area or the 200-foot buffer area.

Based on the record search findings and the results of the pedestrian survey, the project modification would not change the analysis of potential impacts to archaeological resources described in Commission Decision VI, C for construction or operations, and impacts to archaeological resources are expected to remain less than significant with implementation of the Conditions of Certification.

3.3.2 Historic Architecture Resources

The proposed new construction parking area is vacant and does not contain structures. Both the CPVS project site and the proposed new construction parking area were studied for the CPVS AFC and no historic resources were found (JRP, 2007). The remains of two structures are within the 200-foot buffer of the proposed 5-acre parking area. These structures (APN 668-140-001 and APN 668-140-002) date to 1958 and 1959, respectively, and were recorded and found ineligible for the California Register of Historic Resources in 2007 (JRP, 2007).

The project modification would not adversely impact historic structures or architectural resources, either directly or indirectly. The proposed new parking area will not materially alter the physical characteristics of any historic architectural resources in an adverse manner.

3.4 LAND USE AND AGRICULTURE

The project modification does not alter the analysis of potential impacts to land use resources presented in AFC Section 7.4 and set forth in the Commission Decision. These analyses found that the CPVS would not disrupt or divide an established community; would not conflict with the established uses of the area; would be consistent with existing zoning and applicable land use plans, policies, and regulations; and would not affect farmlands. As with the CPVS project site, the 5-acre parcel is zoned by Riverside County as Controlled Development Area (W-2). Under Section 15.1 (e)(2), permitted uses within W-2 include "structures and pertinent facilities necessary and incidental to the development and transmission of electrical power and gas."

Therefore, the project modification would not change the analysis of potential impacts to land use described in AFC Section 7.4, analyzed by CEC Staff in Section 4.5 of the Final Staff Assessment, and

reviewed and approved by the Commission in Section VII, A of the Commission Decision. Impacts to land use are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.5 NOISE

The character of the noise environment and potential noise-sensitive receivers in the vicinity of the construction parking area location is essentially identical to the noise environment and potential noise-sensitive receivers previously analyzed in the Commission Decision. The area is characterized by wind farms with intermittent residential sites.

The nearest portion of the construction parking area would be located approximately 375 feet west of the nearest noise-sensitive receiver (a residence). Noise levels in the vicinity of nearby noise-sensitive receivers would increase for a short period of time during vegetation clearing and grading construction activities at the construction parking area. Noise levels would also increase after clearing and grading construction activities are completed due to vehicles parking at, and going to and from, the finished construction parking area.

The addition of a construction parking area would not significantly affect the project's construction equipment use, construction hours, or construction traffic, and would not result in significant changes to potential noise emissions during construction that were modeled and presented in Section VII, D of the Commission Decision. Condition of Certification NOISE-6 in the Commission Decision prohibits noisy construction work outside of specific hours, and outlines additional mitigation required to limit construction noise levels at nearby noise-sensitive receivers. Such mitigation may include equipping haul trucks and engine-powered equipment with mufflers that meet all applicable regulations. With implementation of NOISE-6, noise impacts due to construction are expected to be less than significant. Therefore, the project modification would not change the analysis presented in Section VII, D of the Commission Decision for construction, and impacts from noise during construction are expected to remain less than significant with implementation of Conditions of Certification.

The addition of a construction parking area located adjacent to the project site will not affect operations noise evaluated in the Commission Decision, since this area will not be used during plant operations and would not result in changes to the potential noise emissions that were modeled and presented in Section VII, D of the Commission Decision. Therefore, with respect to project operations, the modification would not change the analysis presented in the Commission Decision and impacts from noise during operations are expected to remain less than significant with implementation of Conditions of Certification.

3.6 PUBLIC HEALTH

The additional construction parking area does not alter the expected numbers, durations, or locations of construction equipment operations associated with project construction. Therefore, as described in AFC Section 7.6, the relatively short duration of the CPVS construction is not expected to result in significant, long-term public health effects.

The project modification does not increase operational emissions of toxic air contaminants; thus, the health risk assessment was not revised. Therefore, as set forth in Section V, C of the Commission Decision, it is anticipated that the construction and operation of the CPVS will pose a less than significant health risk to nearby populations with implementation of Conditions of Certification.

3.7 WORKER SAFETY AND HEALTH

The project modification would not change the anticipated workplace hazards or require changes to the safety programs presented in AFC Section 7.7, analyzed by CEC Staff in Section 4.14 of the Final Staff Assessment, and reviewed and approved by the Commission in Section V, D of the Commission Decision. Potential impacts to worker safety and health are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.8 SOCIOECONOMICS

The project modification would not alter the analysis of potential socioeconomic impacts presented in AFC Section 7.8, analyzed by CEC Staff in Section 4.8 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VII, C of the Commission Decision. The analysis concluded the CPVS would not induce substantial growth or concentration of population; induce substantial increases in demand for public service and utilities; displace a large number of people; disrupt or divide an established community; or result in disproportionate adverse effects on minority or low-income populations. Potential socioeconomic impacts are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.9 SOILS

The project modification would include grading a 5-acre parcel to provide a level area for construction parking. Grading activities can result in soil erosion and loss of topsoil. However, the existing Storm Water Pollution Prevention Plan (SWPPP) prepared for the project and approved by the CEC in compliance with Condition SOIL&WATER-1 would be modified to include this area. Best Management Practices outlined in the SWPPP would be implemented to reduce impacts from soil erosion and topsoil loss to less than significant levels. Therefore, the project modification would not alter the analysis of potential impacts to soils described in AFC Section 7.9, analyzed by CEC Staff in Section 4.9 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VI, B of the Commission Decision. The project design measures that will be implemented during construction and operation of the CPVS would reduce soil impacts. Therefore, potential impacts to soil resources are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.10 TRAFFIC AND TRANSPORTATION

The project modification would not alter existing forecast project construction and operations traffic volumes, or routes. Therefore, the project modification would not alter the analysis findings, conclusions and mitigation provided in the traffic and transportation impacts assessment presented in AFC Section 7.10, analyzed by CEC Staff in Section 4.10 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VII, B of the Commission Decision, including roadway and intersection levels of service during project construction and operation, and potential impacts to transportation networks. Potential traffic and transportation impacts therefore are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.11 VISUAL RESOURCES

The project modification would not alter the analysis of potential visual impacts presented in AFC Section 7.11, analyzed by CEC Staff in Section 4.12 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VII, E of the Commission Decision. During construction, indirect and temporary impacts on all key observation points (KOPs) and other sensitive viewers may include those associated with the presence of vehicles and construction equipment. However, as noted in the Commission Decision, since construction activities are temporary and visual quality and sensitivity in

the viewshed are *Low* to *Moderate*, visual impacts due to construction are expected to be less than significant.

Because the project site and the immediate vicinity are of a low scenic integrity that is reflective of the prominent industrial character of the energy-related facilities, potential visual impacts are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.12 HAZARDOUS MATERIALS

The project modification would not result in changes to the hazardous materials that would be used during construction or operation of the CPVS. Therefore, as described in AFC Section 7.12, analyzed by CEC Staff in Section 4.4 of the Final Staff Assessment, and reviewed and approved by the Commission in Section V, E of the Commission Decision, potential hazardous materials handling impacts are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.13 WASTE MANAGEMENT

The project modification would not increase nonhazardous or hazardous wastes associated with construction or operation of the CPVS. AFC Section 7.13, CEC Staff Final Staff Assessment Section 4.13, and Section V, F of the Commission Decision include best management practices that will be implemented during construction and operation of the CPVS to manage and minimize the amount of waste generated. Therefore, potential waste management impacts are expected to be less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

3.14 WATER RESOURCES

The project modification would not result in changes to the analysis of water resources, water quality, or flood hazards described in AFC Section 7.14, analyzed by CEC Staff in Section 4.9 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VI, B of the Commission Decision. The site is not located within a designated flood hazard zone. A small ephemeral drainage transects the site, flowing southeast. Gravel would be placed on the surface of this area; therefore there would be no increase in the amount of impervious surface area or increase in runoff. Drainage patterns would be essentially the same as existing conditions. The existing Storm Water Pollution Prevention Plan (SWPPP) prepared for the project and approved by the CEC in compliance with Condition SOIL&WATER-1 would be modified to include this area. Best Management Practices outlined in the SWPPP would be implemented to control runoff volume and rate, as well as to minimize the discharge of pollutants. Impacts to water resources are expected to be less than significant with implementation of the Conditions of Certification outlined in the Commission Decision.

3.15 GEOLOGIC HAZARDS AND RESOURCES

The project modification would not result in changes to the analysis of geologic hazards or result in significant adverse impacts to the geologic environment. Therefore, as described in AFC Section 7.15, analyzed by CEC Staff in Section 5.2 of the Final Staff Assessment, and reviewed and approved by the Commission in Section VI, D of the Commission Decision, impacts to geologic hazards and resources are expected to be less than significant with implementation of the Conditions of Certification outlined in the Commission Decision.

3.16 PALEONTOLOGICAL RESOURCES

The project modification consists of using a 5-acre parcel adjacent to the CPVS project site for construction parking, as shown in Figure 1. The additional construction parking area would result in the disturbance of areas not previously evaluated in the Commission Decision.

The data and conclusions of this analysis are based on the findings of the Paleontological Resource Impact Assessment (PRIA) (Fisk, 2007) prepared for the project by PaleoResource Consultants (PRC) and summarized in the Commission Decision. These findings were supplemented by field surveys of the project area and its vicinity conducted in 2007 and of the proposed 5-acre area proposed for construction parking in 2011, as discussed further below.

The project PRIA (Fisk, 2007), based on a review of the available geological and paleontological literature and museum records searches, concluded that while no known paleontological resources had been previously reported from the project site or its immediate vicinity, there was still the potential for project activities to adversely impact significant paleontological resources. The Pleistocene alluvial fan deposits of the "Ocotillo Conglomerate" are present at or near the surface within the project area. These deposits have previously produced abundant, significant fossil vertebrate remains from locations elsewhere in the region and could potentially produce additional, important fossils during project excavation. The fossiliferous Pliocene Imperial Formation is not present at the surface in the project area, but could be impacted during some of the deeper project excavations. A field survey of the project area conducted in 2007 confirmed the conclusions established by the literature and museum searches. These findings formed the basis for part of the CEC's Conditions of Certification for the project.

The conclusions of the project PRIA (outlined above) also apply to the area proposed to be used for construction parking. The proposed parking area is immediately adjacent to the project area and occupies an area that was considered by the literature and museum searches for the project PRIA (Fisk, 2007). A field survey was conducted on June 21, 2011 by PRC and found no paleontological resources (see Appendix A). This survey confirmed that the geology of the proposed construction parking area was the same as that of the CPVS project site. Because the geology and paleontological sensitivity of the proposed parking area is identical to that of the project area, the same Conditions of Certification that were applied to the CPV Sentinel Energy Project to mitigate adverse impacts on paleontological resources can be applied to the proposed project modification as well. There are no known fossil localities previously reported from the proposed parking area; however, potentially fossiliferous sediments are present at or near the surface. These sediments have the potential to produce the remains of Pleistocene fossil vertebrates. Since the planned earth disturbance activities will be relatively shallow, it is unlikely that they will impact the Imperial Formation. There will be no additional impacts on paleontological resources resulting from not removing the gravel on the parking area following project completion. Therefore, impacts to paleontological resources are expected to remain less than significant with implementation of Conditions of Certification outlined in the Commission Decision.

4.0 REFERENCES

Fisk, L.H., 2007. Paleontological Resource Statement of the Ocotillo Power Plant: unpublished report prepared for URS Corporation by PaleoResource Consultants, Auburn, CA, 46 pp.

JRP Historical, LLC, 2007. Historical Resources Inventory and Evaluation Report, CPV Sentinel Project.

URS (URS Corporation), 2007a. Application for Certification, CPV Sentinel Energy Project, Riverside County, California. June.

URS (URS Corporation), 2007b. Cultural Resources Technical Report, Confidential Appendix K. June.

FIGURES

Diablo Rd

Wind Farm

Newly Proposed Construction Parking Area

Powerline Road North
Powerline Road South

16th Ave

Construction Laydown Area

Wind Farm

RIVERSIDE COUNTY

CITY OF PALM SPRINGS

Dillon Rd (existing paved road)

Diablo Rd

Wind Farm

18th Ave

Karen Dr

Karen Ave

19th Ave

(Energy Facility)

Transmission Line

Construction Laydown Area

Newly Proposed Construction Parking Area

Project Site

Gas Transmission Corridor (75 feet wide)

Gas Transmission/Access Road Corridor (200 feet wide)

Palm Springs City Limit

N

0 250 500 1,000 FEET

Source: Imagery, Kern County Mosaic, National Agriculture Imagery Project (NAIP), USDA, June 2009.

U:\GIS\Ocotillo_28067168\Projects\2011\newly_propsd_constructionpkng_area.mxd 6/20/2011 3:10:58 PM

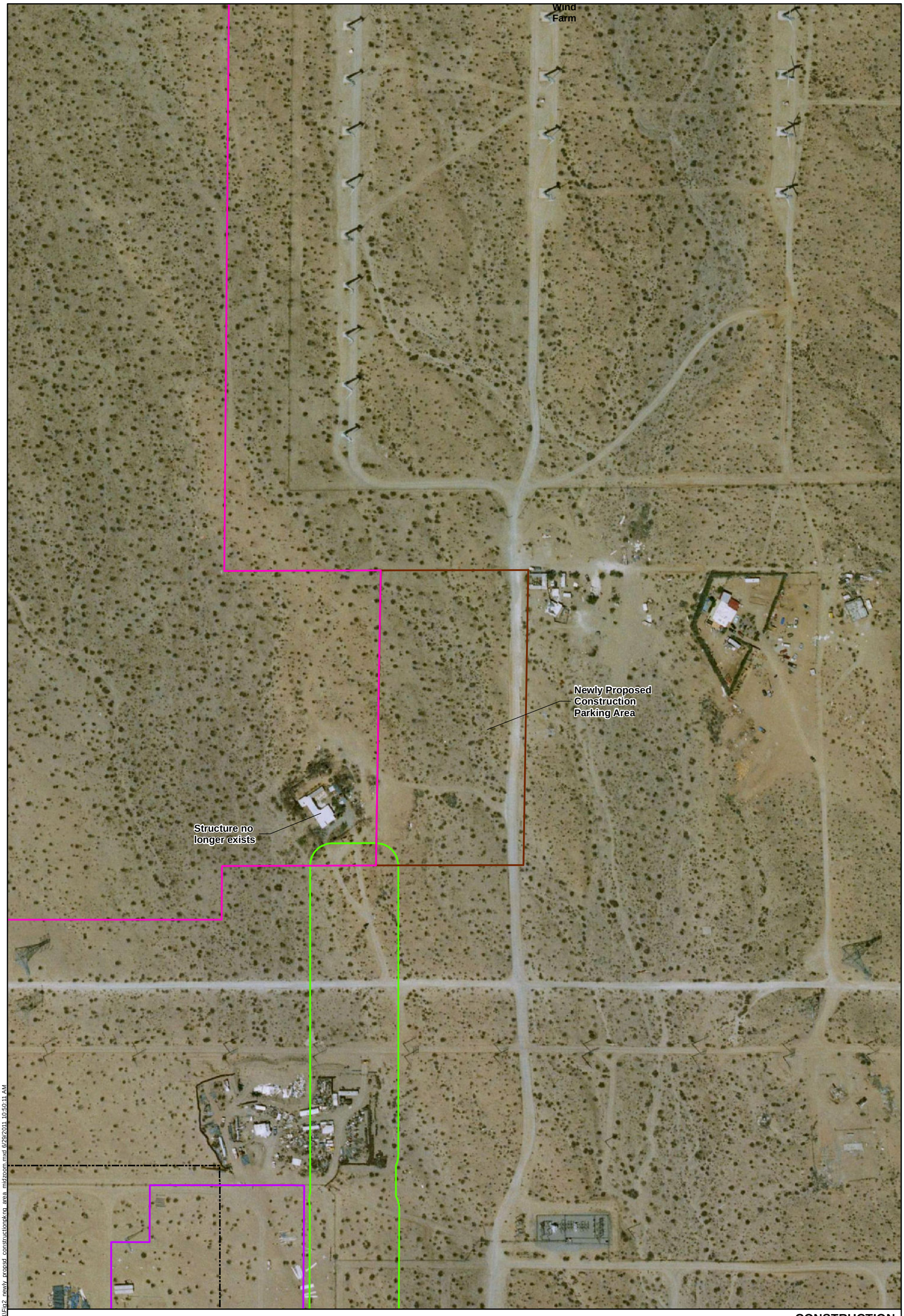
CONSTRUCTION PARKING AREA ADDITION

CPV Sentinel Energy Project
CPV Sentinel, LLC
Riverside County, CA

July 2011
28067907

URS

FIGURE 1



Transmission Line

Construction Laydown Area

Newly Proposed Construction Parking Area

Project Site

Source: Imagery, 2007.

Gas Transmission Corridor (75 feet wide)

Gas Transmission/Access
Road Corridor (200 feet wide)

Palm Springs City Limit

N

0 50 100 200
FEET

CONSTRUCTION
PARKING AREA ADDITION - DETAILED

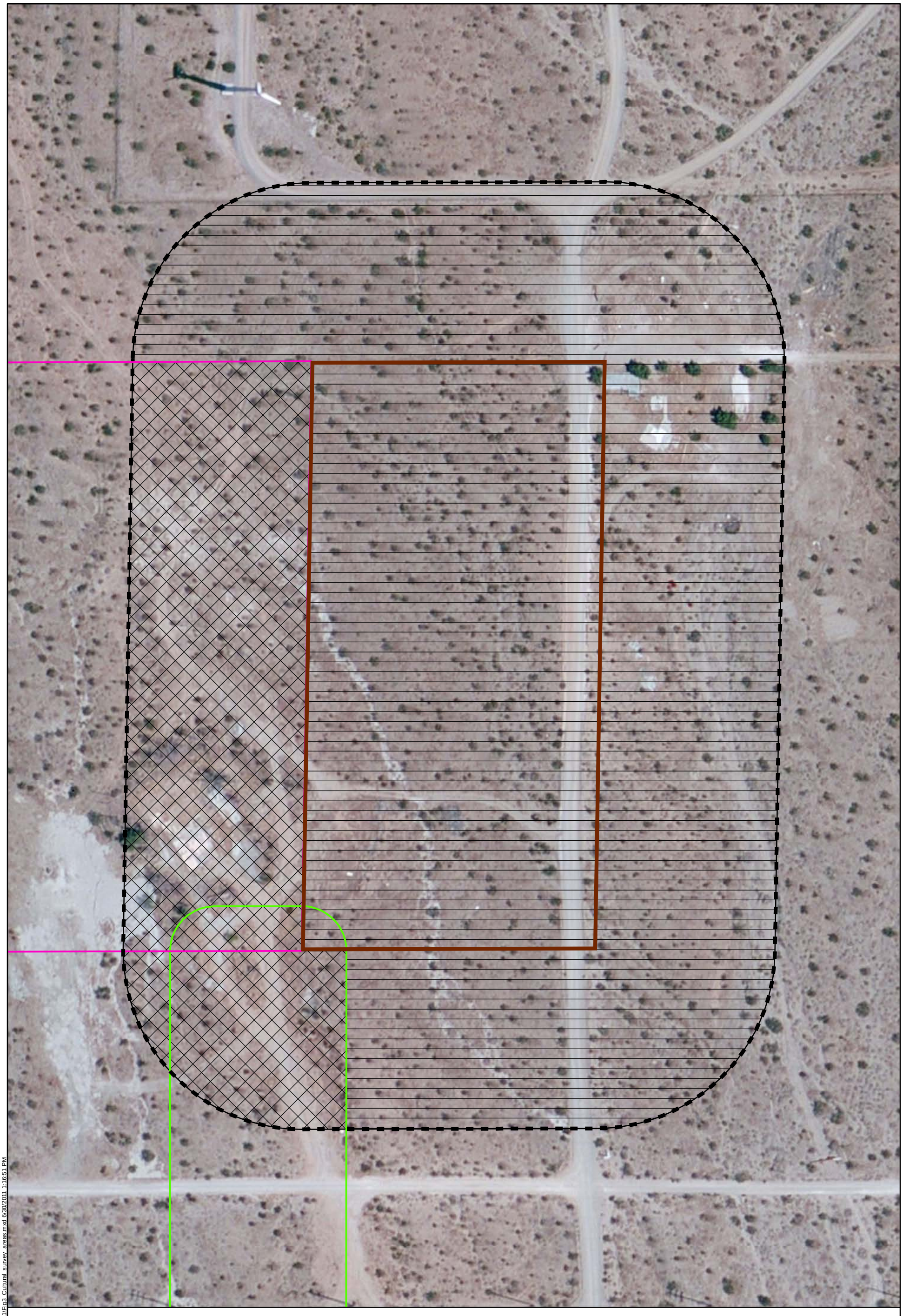
July 2011
28067907

CPV Sentinel Energy Project
CPV Sentinel, LLC
Riverside County, CA

URS

FIGURE 2

U:\GIS\Ocotillo_28067168\Projects\2011\Fig2_newly_propsd_constructionpkng_area_midzoom.mxd 6/29/2011 10:50:11 AM



AREA SURVEYED - CULTURAL RESOURCES

CPV Sentinel Energy Project
CPV Sentinel, LLC
Riverside County, CA

July 2011
28067907

URS

FIGURE 3

U:\GIS\Ocotillo_28067168\Projects\2011\Fig3_Cultural_survey_areas.mxd 6/30/2011 1:16:51 PM

APPENDIX A

PALEONTOLOGICAL IMPACT ASSESSMENT

CPV SENTINEL ENERGY PROJECT
PROJECT MODIFICATION
PALEONTOLOGICAL RESOURCE IMPACT ASSESSMENT

Prepared for:

CPV Sentinel, LLC
50 Braintree Hill Office Park, Suite 300
Braintree, MA 02184

URS Corporation
Post Montgomery Center
One Montgomery Street, Suite 900
San Francisco, CA 94104-4538

and

California Energy Commission
1516 Ninth Street, MS 2000
Sacramento, CA 95814-5504

Prepared by:

Dr. Lanny H. Fisk, PhD, PG
Dr. David M. Haasl, PhD
PaleoResource Consultants
F & F GeoResource Associates, Inc.
550 High Street, Suite 108
Auburn, CA 95603

Contact:

Dr. Lanny H. Fisk, PhD, PG
916-947-9594
Lanny@PaleoResource.com

29 June 2011

PaleoResource Consultants
F & F GeoResource Associates, Inc.
550 High Street, Suite 108, Auburn, California 95603
Office Phone: 530-885-9696; Mobile Phone: 916-947-9594

29 June 2011

Kathy Rushmore
URS Corporation
Post Montgomery Center
One Montgomery Street, Suite 900
San Francisco, CA 94104-4538

Dear Ms. Rushmore:

In accordance with your request, we have completed a paleontological resource impact assessment for the proposed CPV Sentinel Energy Project modification (i.e., the preparation of a 5 acre parcel adjacent to the Project site) for use as a laydown area. The following brief report reviews the existing Project Conditions of Certification, the paleontological impact assessment prepared for the Project, and a field survey conducted by a project Paleontological Resource Monitor. It is our professional opinion that the sediments exposed at the surface are identical to those present within the Project site and therefore, have the same paleontological sensitivity. Therefore, the same Conditions of Certification in the original Sentinel Commission Decision should apply to the proposed Project modification.

We appreciate the opportunity to perform this study. If you have any questions, or if we can be of further service, please contact us at your convenience.

Respectfully,

PaleoResource Consultants

Lanny H. Fisk, PhD

PROFESSIONAL GEOLOGIST
LANNY H. FISK, Ph.D
No. 6985
STATE OF CALIFORNIA

Dr. Lanny H. Fisk, PhD, PG
Principal Paleontologist
PG 6985, Expires 02/28/12

2.16 PALEONTOLOGICAL RESOURCES

The purpose of this report is to fulfill the requirements of the California Energy Commission (CEC) for an analysis of the potential impacts on paleontological resources (fossils) resulting from the preparation of a five (5) acre parcel located adjacent to CPV Sentinel Energy Project (Project) site for use as a construction parking area in support of Project construction. This area was not part of the original agreement with the California Energy Commission (CEC) and is therefore a modification to the original project. Ground disturbance activities resulting from the parking area include removal of vegetation and grading of the proposed parking area to provide a level surface for parking. This area would then be covered in gravel which would not subsequently be removed following Project completion. The data and conclusions of this report are based on the findings of the Paleontological Resource Impact Assessment (PRIA) (Fisk 2007) prepared for the Project by PaleoResource Consultants and summarized in the Project Commission Decision. These findings were supplemented by field surveys of the Project area and its vicinity conducted in 2007 and of the Project modification site in particular in 2011.

The Project PRIA (Fisk 2007), based upon a review of the available geological and paleontological literature and museum records searches, concluded that while no known paleontological resources had been previously reported from the Project site or its immediate vicinity, there was still the potential for Project activities to adversely impact significant paleontological resources. The Pleistocene alluvial fan deposits of the "Ocotillo Conglomerate" are present at or near the surface within the Project area. These deposits have previously produced abundant, significant fossil vertebrate remains from locations elsewhere in the region and could potentially produce additional, important fossils during Project excavation. The fossiliferous Pliocene Imperial Formation is not present at the surface in the Project area, but could be impacted during some of the deeper Project excavations. A field survey of the Project area conducted in 2007 confirmed the conclusions established by the literature and museum searches. These findings formed the basis for part of the CEC's Conditions of Certification for the Project.

The conclusions of the Project PRIA (outlined above) also apply to the area encompassed by the proposed Project modification. The proposed parking area is immediately adjacent to the Project area and occupies an area that was considered by the literature and museum searches for the Project PRIA (Fisk 2007). A field survey, conducted on 21 June 2011, found no paleontological resources and confirmed that the geology of the parking area was the same as that of the Project site.

Because the geology and paleontological sensitivity of the proposed parking area is identical to that of the Project area, the same Conditions of Certification that were applied to the CPV Sentinel Energy Project to mitigation adverse impacts on paleontological resources can be applied to the proposed Project modification as well. There are no known fossil localities previously reported from the proposed parking area; however, potentially fossiliferous sediments are present at or near the surface. These sediments have the potential to produce the remains of Pleistocene fossil vertebrates. Since the planned earth disturbance activities will be relatively shallow, it is unlikely that they will impact the Imperial Formation. There will be no additional impacts on paleontological resources resulting from not removing the gravel on the parking area following Project completion.

References

Fisk, L. H., 2007, Paleontological Resource Statement of the Ocotillo Power Plant: unpublished report prepared for URS Corporation by PaleoResource Consultants, Auburn, CA, 46 p.