

From: Alan Solomon
To: Alice Harron; Susan Sanders; Susan Sanders
Date: 6/11/2010 1:56 PM
Subject: Blythe Follow Up Items
Attachments: Blythe - Bio information needed (2010-06-11).doc

DOCKET	
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DATE	<u>JUN 11 2010</u>
RECD.	<u>JUN 17 2010</u>

Hi Alice,

Attached is information that Susan Sanders needs to complete her portion of the Blythe Solar Power Project Supplemental Staff Assessment.

We would appreciate if this information could be submitted by June 18.

Thanks,
Alan

To: Alan Solomon
From: Susan Sanders
Date: June 11, 2010
Re: Additional Biological Resource Impact Information Needed to Complete
Blythe Solar Power Project Supplemental Staff Assessment

Alan, following up on our phone conversation this morning, we need the following information from the Applicant by **Friday, June 18th** to prepare our analysis for the Supplemental Staff Assessment:

Impacts of construction of the 220 kV gen-tie structure and the fiber optic cable. The figure recently submitted by AECOM "*Blythe Solar Power Project Utilities Corridors – Preliminary*" depicts the location of the gen-tie and fiber optic cable, as well as Black Rock Road and the BSPP telecom line. We need information as to how the features shown on this figure will impact biological resources. Specifically, we need a figure and table showing temporary and permanent construction impacts to habitat types, including waters of the state and sand dunes. We also need to know the location of these features to the sensitive biological resources (including many sensitive plant species) that the Applicant found during their Spring 2010 surveys, particularly for the many rare plant occurrences along these linear features. For all impact information we need the Applicant to separate acreage impacts so it is clear which impacts are a result of their Project from construction within the:

- facility footprint
- linears
- substation
- road work/temporary construction work

Clarification on SCE Construction v. Applicant Construction. Staff also needs clarification as to which of the components of the gen-tie and telecommunications lines will be built by SCE and which by the Applicant, and a detailed project description of everything the Applicant will be doing on these project components. The Applicant submitted documents in their "*Responses to Questions from the April 28, 29 and May 7, 2010 CEC Workshops Southern California Edison Colorado River Substation – Project Description Technical Areas: Transmission System Engineering*" describing these constructions of these components, but we are still uncertain as to what the Applicant will be constructing. For example, page 3 states: "*The first structures constructed by the Developer and located just north of Colorado River Substation would be dead end structures; SCE would work with the Developer to integrate final design. SCE would construct, own, operate, and maintain the final spans of the circuits from the substation dead end structure to the tower connection at the first Project structure(s).*" Staff does not currently have any information about proposed construction north of the proposed substation, and if this is something that the Applicant would be implementing then we need all the same information as

described above (i.e., a figure and table showing temporary and permanent construction impacts to habitat types, including waters of the state and sand dunes, and the location of these features to the sensitive biological resources).

Temporary Construction Power Line Corridor/Secondary Fire Access Road.

On page 14 of the Applicant's April 14th Initial Comments on the SA/DEIS they note that the temporary construction power line corridor is outside the area surveyed for biological resources in 2009, and that full protocol-level biological surveys of the alignment are currently underway. I understand based on my conversations with you that this will also be the route for the proposed secondary fire access road. I need confirmation for the proposed route, and as much information as possible on the potential impacts of constructing these features. It sounds like surveys should already be complete, since they were being conducted in April 2010.

We need a detailed figure depicting the location of these proposed project features in relation to habitat types and biological resources, and an impact analysis. Ideally we would have this information on a vegetation map that depicted the location of the proposed project components and two 1,000-foot buffer areas extending outward on either side of this route. At a minimum we need all the same information as described above (i.e., a figure and table showing temporary and permanent construction impacts to habitat types from construction and operation of the project, the location of these features to the sensitive biological resources, and any information available on potential direct and indirect impacts).

Concrete Batch Plant

Since this facility will operate at night, noise and night-lighting impacts may occur to wildlife species. We need the night-time decibel range and hours of operation that the facility will generate and design measures that will be implemented to mitigate the temporary noise and lighting impacts from operating the concrete plant during construction. We also need a more detailed plan of the concrete batch plant than that shown in the Preliminary Site Plan Exhibit. Show the exact dimensions of the proposed batch plant in relation to the entire facility footprint.

Fire Station. I understand that the applicant has been coordinating with Riverside County on the need for a fire access road and a fire station. If a fire station is a likely requirement, then any information that the applicant could provide on this subject would be welcome, particularly some potential locations for the station.

2010 Survey Results: We also would like to have a report describing the results of the golden eagle surveys conducted this spring, as well as the follow up final reports for the preliminary data we received on the Spring 2010 surveys. The Applicant indicated during the May workshop that a Botanical Survey Report for the spring 2010 surveys would be submitted, and prepared according to agency

protocols for botanical assessments. We need the report to clearly distinguish, and quantify, the impacts of the substation from the impacts of the Project. We also need the report to elaborate on the reasons for the earlier misidentification of the Coachella Valley milk-vetch, which appeared on an earlier submittal of preliminary survey results in the vicinity of the substation. We need the report to include GPS data and CNDDDB field survey forms for all occurrences.