

# DOCKET

09-AFC-7

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August 5, 2010

Alan Solomon  
Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Palen Solar Power Project, Docket No. 09-AFC-7**  
*Responses to CEC Request for Information*

Dear Mr. Solomon:

Attached please find the following responses to the request of information by Susan Sanders to PSI, LLC per the email dated 8/3/2010, *"RE: Minor Project Changes – Clarification Needed From Applicant"*.

If you have any questions on this submittal, please feel free to contact me directly.

Sincerely,



Alice Harron  
Senior Director, Development

## **Responses to Clarification Request by Susan Sanders per email dated 8/3/2010, 10:37AM:**

- 1) In Attachment 2 of the Applicant's May 4<sup>th</sup> comments on the draft SA/EIS regarding minor project changes, the location of the concrete batch plant is not clear. The text describes it as moveable depending on where construction is at that point, but the Temporary Construction Facility exhibit shows the plant located outside of the Project Disturbance Area. Staff will assume that the batch plant would be located within proposed disturbance areas unless the applicant indicates otherwise – please clarify.

The locations of the concrete batch plants will be located exclusively within the Project Disturbance Area throughout all phases of Project construction. The exhibit referenced above is meant to depict the batch plant layout, not an approximation of its location.

- 2) Temporary Construction Power – In the same May 4<sup>th</sup> submittal, two alternative sources for construction power are described in the text, yet Figure Palen Telecom and Power Routing 2, only shows one route. Staff will only analyze the impacts for the temporary construction line that is provide in the Palen Telecom and Power Routing 2 exhibit and is assuming the applicant will not be submitting an alignment for the other alternative route – please confirm.

PSI will not be submitting an alignment for the other alternative route.

- 3) Relocation of the existing SCE 161-kv power line – In the same May 4<sup>th</sup> submittal, the text says the relocation of this power line would impact approximately 20 acres for equipment staging, yet does not indicate if staging would occur in the Project Disturbance Area, and if not, has the additional acreage been included in revised impact calculations. According to the text, relocating the power line would require the install of 18 H-frame structures, 3 three-pole structures, and about 8,000 feet of conductor. Were these additional impacts included in revised impact calculations? Please clarify.

All equipment staging is accounted for within the Project Disturbance Area. All proposed power line relocation areas are built into our revised impact calculations. We calculated impacts for a 100 foot wide corridor to encompass all features that may be associated with the relocated power lines. This linear corridor was accounted for in our impact calculations up to the intersection with First Solar's proposed power line.

- 4) In Table 2 of July 19<sup>th</sup> data response on Reconfigured Alts 2 and 3, staff is not aware of a construction water supply line. Is this supposed to read 'Construction Power Supply'? Please clarify.

The section labeled "Construction Water Supply Line" is correctly labeled. During the Spring 2010 surveys Aecom surveyed this area under the scenario the Project would need such a line. PSI does not foresee the need of such a line, however, since this area was surveyed, PSI is supplying the survey results to Staff. "Construction Water Supply Line" is used for the sole purpose of delineating a particular surveyed area.

Accordingly, the associated disturbance area for "Construction Water Supply Line" in Table 2 (4.65 acres for the Proposed Project and 4.95 acres for the Reconfigured Alternatives) should not be in the final project footprint disturbance area calculation.

- 5) In Table 2 of July 19<sup>th</sup> data response on Reconfigured Alts 2 and 3, how was the Transmission Line Alignment calculated for the Proposed Project Disturbance Area?

The transmission line alignment was calculated using a 200 foot corridor based on the centerline survey completed for gen-tie route. The 200 foot width is more than sufficient for the proposed transmission line.

- 6) Golden Eagle survey results - Page 4 of the Biological Resources Data Package Addendum notes one inactive GOEA nest located just over 10 miles northeast of the site and 4 inactive GOEA nests were located approximately 6 miles southwest of the site. Please provide the mountain ranges these nest locations occur in and how measurements were made.

The above mentioned nests located just over 10 miles northeast of the site are located in the Palen Mountains.

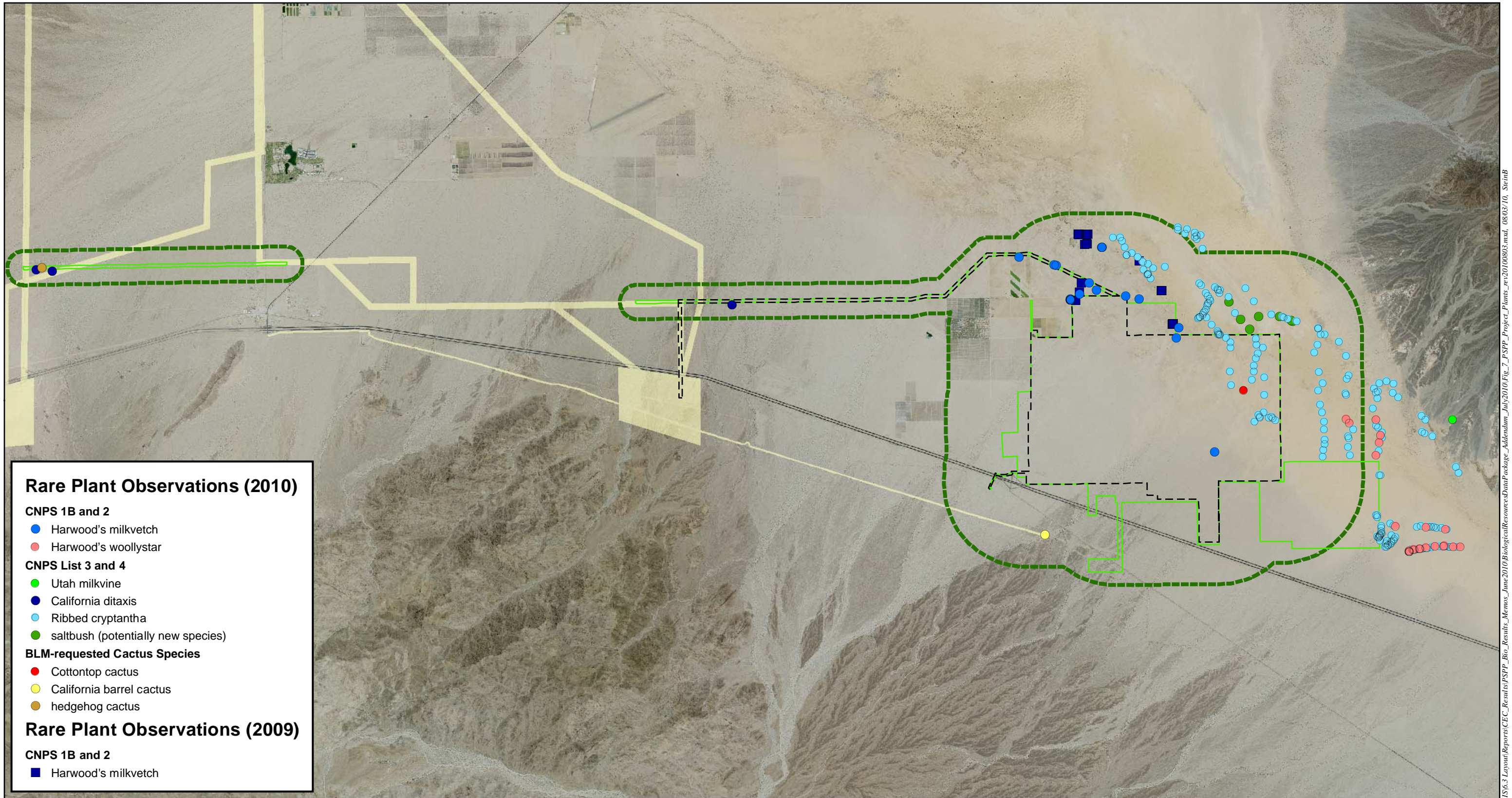
The nests located approximately 6 miles southwest of the site are in the Chuckwalla Mountains.

Measurements were made by measuring their distance from the project disturbance area in GIS and then used an approximate number to characterize nest locations occurring within the same general area.

- 7) California ditaxis – Table 3 of the Biological Resources Data Package Addendum indicates that California ditaxis was found during spring 2010 surveys yet Figure 7 does not show their locations. Please confirm that this species was found and their locations.

See the revised Figure 7 attached which clarifies the locations of the California ditaxis.





**Rare Plant Observations (2010)**

**CNPS 1B and 2**

- Harwood's milkvetch
- Harwood's woollystar

**CNPS List 3 and 4**

- Utah milkvine
- California ditaxis
- Ribbed cryptantha
- saltbush (potentially new species)

**BLM-requested Cactus Species**

- Cottontop cactus
- California barrel cactus
- hedgehog cactus

**Rare Plant Observations (2009)**

**CNPS 1B and 2**

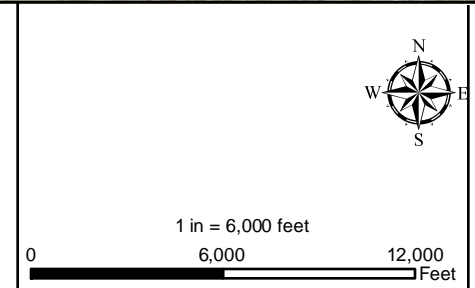
- Harwood's milkvetch



**Legend**

- Focused Survey Area
- Project Disturbance Area
- Project BRSA
- First Solar Study Area

Source: NAIP 2009; AECOM 2010



**Palen Solar Power Project  
Data Package Addendum**

**Figure 7  
Proposed Project Special  
Status Plant Species**

Date: August 2010



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA**

***In the Matter of:***  
**APPLICATION FOR CERTIFICATION**  
**for the *PALEN SOLAR POWER PROJECT***

**Docket No. 09-AFC-7**  
**PROOF OF SERVICE**  
**(Revised 7/2/10)**

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\*indicates change

**DECLARATION OF SERVICE**

I, Carl Lindner, declare that on, August 5, 2010, I served and filed copies of the Responses to CEC Request for Information. 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:

[\[http://www.energy.ca.gov/sitingcases/solar\\_millennium\\_palen\]](http://www.energy.ca.gov/sitingcases/solar_millennium_palen).

The document has been sent to 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

by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on the date to those addresses **NOT** marked "email preferred."

**AND**

**For filing with the Energy Commission:**

sending an original paper copy and one electronic copy, mailed respectively, to the address below (**preferred method**);

**OR**

depositing in the mail an original and 12 paper copies, along with 13 CDs, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 09-AFC-7

1516 Ninth Street, MS-4

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

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the country where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

  
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