

DOCKETED

Docket Number:	09-AFC-07C
Project Title:	Palen Solar Power Project - Compliance
TN #:	200807
Document Title:	Energy Commission Staff's Testimony and Errata to the Final Staff Assessment Part A
Description:	Errata to the FSA Part A
Filer:	Alicia Campos
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/9/2013 4:34:18 PM
Docketed Date:	10/9/2013

Memorandum

Date: October 9, 2013
Telephone: (916) 654-4745
File: 09-AFC-7C

To: **Commissioner Karen Douglas**, Presiding Member
Commissioner David Hochschild, Associate Member
Ken Celli, Hearing Officer

From: **California Energy Commission** - **Christine Stora**, Compliance Project Manager
1516 Ninth Street Siting, Transmission and Environmental Protection Division
Sacramento, CA 95814-5512

Subject: **Palen Solar Electric Generating System Amendment (09-AFC-7C)**
ENERGY COMMISSION STAFF'S TESTIMONY AND ERRATA TO THE FINAL
STAFF ASSESSMENT PART A

The Final Staff Assessment, Parts A and B, with the attached Errata, are Staff's Testimony.

Energy Commission staff is providing an errata to the Final Staff Assessment Part A. Staff is modifying the FSA Part A for the following technical areas: Executive Summary, Public Health, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, and Alternatives. Each section states where new analysis is provided. Edits to the FSA Part A are included where new text is **bold and underlined** and removed text is shown as ~~strike through~~.

Staff anticipates filing a supplement to its testimony on or before October 16. The purpose of that supplement is to provide an analysis, as required by CalTrans, of the I-10 Corridor for the installation of desert tortoise fencing within the CalTrans Right of Way.

cc: Docket (09-AFC-7C)
Proof of Service List

ERRATA TO THE FINAL STAFF ASSESSMENT PART A

EXECUTIVE SUMMARY

1. Page 1-5, under first heading, staff makes the following changes:

**Executive Summary - Table 1
Environmental and Engineering Assessment**

	PSPP Decision	PSPP Decision	PSEGS Amendment	PSEGS Amendment
Technical Area	Complies with LORS	Impacts Mitigated	Complies with LORS	Impacts Mitigated
Air Quality/Greenhouse gases	Yes	Yes	To be provided in Part C	To be provided in Part C
Biological Resources	Yes	Yes	Yes	Uncertain
Cultural Resources	Yes	No	To be provided in Part B	To be provided in Part B
Hazardous Materials	Yes	Yes	Yes	Yes
Land Use	No	No	Yes	Yes
Noise and Vibration	Yes	Yes	Yes	Yes
Public Health	Yes	Yes	Yes	Yes
Socioeconomics	Yes	N/A	Yes	Yes
Soil and Water Resources	Yes	Yes	Yes	Yes
Traffic & Transportation	Yes	Yes	Yes	Yes
Transmission Line Safety/Nuisance	Yes	Yes	Yes	Yes
Visual Resources	Yes	No	Yes No	No
Waste Management	Yes	Yes	Yes	Yes
Worker Safety and Fire Protection	Yes	Yes	Yes	Yes
Facility Design	Yes	Yes	Yes	Yes
Geology & Paleontology	Yes	Yes	Yes	Yes
Power Plant Efficiency	N/A	N/A	N/A	N/A
Power Plant Reliability	N/A	N/A	N/A	N/A
Transmission System Engineering	Yes	Yes	Yes	Yes
Alternatives	N/A	N/A	N/A	N/A

PUBLIC HEALTH

2. Page 4.7-15, last paragraph, first sentence, staff makes the following changes:

“Construction could disturb a certain percentage of approximately 5,200 **3,794** acres (Palen 2013d, ~~Section 4.1.1.1~~**Palen 2013d, Section 4.1.1.1**) of top soil that could harbor the *Coccidioides* spores.....”

SOIL AND WATER RESOURCES

3. Page 4.9-100, first number “3e”, staff makes the following changes:

3. Earthwork and temporary construction related activities shall be conducted such that off-site resources are protected from impacts due to redirection of flood flows around and through the site. Construction activities shall proceed in a manner so as to minimize exposure of facilities to construction period flooding. Temporary diversion channels, **if employed**, shall be adequately designed for flood conveyance capable of protecting the construction site while not contributing to onsite or offsite erosion.

TRAFFIC AND TRANSPORTATION

4. Page 4.10-37, under TRANS-7, #8 is being added, below is staffs addition:

8. **The HPP shall include a communication protocol for Riverside County with specific contact information whereby Riverside County can speak to a representative at the PSEGS site 24 hours a day/seven days a week to respond to any Riverside County PSEC Project requests to investigate interference with operation of the PSEC microwave tower.**

TRANSMISSION LINE SAFETY AND NUISANCE

5. Page 4.11-6, first paragraph, staff makes the following changes:

When generated, such noise manifests itself as perceivable interference with ~~radio or television signal reception or interference with other forms of radio communication~~ **where the signal is amplitude modulated (AM). Frequency modulated signals such as used for cellular telephone and microwave communication are normally unaffected.**

6. Page 4.11-12, under “RESPONSE TO COMMENTS”, staff makes the following additions:

Comments: Riverside County expressed some concern about the potential for the power-frequency fields from the proposed lines to interfere with the operation of the county’s microwave-frequency equipment.

Staff’s Response: As staff noted in discussing the potential for radio-frequency interference, the microwave equipment of concern operates at frequencies not subject to interference by the power-frequency fields from the proposed and similar lines. Staff does not recommend any related condition of certification.

VISUAL RESOURCES

7. Page 4.12-46, under VIS-3, letter G, staff makes the following changes:

G. Lighting plan shall demonstrate that plant operational lighting (**excluding FAA and emergency lighting**) will, **to the extent practical**, not be **directly** reflected upward or off-site by heliostats in nighttime stow position. Control measures for eliminating such reflections shall be incorporated in the HMPP specified in Condition of Certification TRANS-7.

ALTERNATIVES

8. Page 6.1-31, Alternatives Table 1, staff makes the following changes:

**Alternatives Table 1
Summary Comparison of Impacts of the Proposed PSEGS
to the No-Project Alternative**

Environmental Effect	Proposed PSEGS	No-Project Alternative
		Reconfigured Alternative #2 or #3
Cultural Resources		
Potential impacts on a significant built-environment cultural resources (Desert Center) beyond the site	<u>SULS</u>	Much less than <u>Similar to</u> PSEGS (LS)

9. Page 6.1-37, third paragraph, staff makes the following text changes:

~~The potential impacts on built-environment resources from construction and operation of the proposed PSEGS vary greatly, for impacts on and off the facility site, and differ significantly from the potential impacts of Reconfigured Alternative #2 or #3. The potential impacts on built-environment resources on the facility site were determined to be less than significant in the Commission Decision for the PSPP. Staff concludes that the potential impacts of the proposed PSEGS on built-environment resources on the site would also be less than significant, and these impacts would be similar to PSEGS. Potential impacts on built-environment resources beyond the facility site were found to be less than significant under the original PSPP due to the parabolic trough project's relatively low vertical profile. As one consequence of~~ **Even with** the much higher vertical profile of the proposed PSEGS, ~~which staff concludes it would not result in significant and immitigable impacts on off-site built-environment resources.~~ **Construction and operation of Reconfigured Alternative #2 or #3 would cause impacts on built-environment resources that would be much less than similar to PSEGS.**

10. Page 6.1-38, second paragraph, staff makes the following text changes:

The potential cumulative impact of Reconfigured Alternative #2 or #3 on the archaeological and ethnographic full complement of cultural resources *beyond* the facility site, ~~archaeological, built environment, and ethnographic resources,~~ would be **much less than PSEGS. The potential cumulative impact of Reconfigured Alternative #2 or #3 on the built environment resources *beyond* the facility site would be similar to PSEGS.**

11. Page 6.1-58, Alternatives Table 4, fourth box under Cultural Resources, staff makes the following changes:

**Alternatives Table 4
Summary Comparison of Impacts of the Proposed PSEGS to the Solar Photovoltaic Alternative with Single-Axis Tracking Technology**

Environmental Effect	Proposed PSEGS	Solar PV Alternative
Cultural Resources		
Potential impacts on a-significant built-environment cultural resources (Desert Center) <i>beyond</i> the site	<u>SULS</u>	Much less than Similar to PSEGS (SMLS)

12. Page 6.1-78, Alternatives Table 5, fifth box under Cultural Resources, staff makes the following changes:

**Alternatives Table 5
Summary Comparison of Impacts of the Proposed PSEGS to the Reduced Acreage Alternative with SPT Technology**

Environmental Effect	Proposed PSEGS	Reduced Acreage Alternative with SPT Technology
Cultural Resources		
Potential impacts on a-significant built-environment cultural resources (Desert Center) <i>beyond</i> the site	<u>SULS</u>	Similar to PSEGS (SULS)

13. Page 6.1-93, third bullet under “No-Project Alternative”, staff makes the following text changes:

- **Cultural Resources** – Potential impacts on a-significant built-environment cultural resources ~~(Desert Center)~~ *beyond* the site.

14. Page 6.1-95, second paragraph, staff makes the following text changes:

As one consequence of **Even with** the much higher vertical profile of the proposed PSEGS, which staff concludes would result in significant and immitigable **less-than-significant** impacts on off-site built-environment resources, staff concludes that construction and operation of Reconfigured Alternative #2 or #3 would cause impacts on built-environment resources *beyond* the site that would be “much less than **similar to** PSEGS.”

15. Page 6.1-97, third bullet under “Solar PV Alternative with Single-Axis Tracking Technology, staff makes the following text changes:

- **Cultural Resources** – Potential impacts on a significant built-environment cultural resources (Desert Center) *beyond* the site.

16. Page 6.1-98, last paragraph, last sentence, staff makes the following text changes:

Staff concludes that the Solar PV Alternative would cause impacts on built-environment resources *beyond* the site that would be “~~much less than~~ similar to PSEGS.” These direct and cumulative impacts could be reduced to less than significant with implementation of appropriate mitigation measures.

17. Page 6.1-109, Alternatives Appendix 2, page 3, staff makes the following changes:

**Alternatives Appendix-2
Summary Comparison of Impacts of the Project Alternatives to the
Proposed Modified Project**

Environmental Effect	Proposed PSEGS	No-Project Alternative	Solar PV Alternative with Single-Axis Tracking Technology	Reduced Acreage Alternative with SPT Technology
		Reconfigured Alternative #2 or #3		
Cultural Resources				
Potential impacts on significant built-environment cultural resources (Desert Center, Eagle Mountain Mine) <i>beyond</i> the site	<u>SULS</u>	Much less than <u>Similar to</u> PSEGS (LS)	Much less than <u>Similar to</u> PSEGS (<u>SMLS</u>)	Similar to PSEGS (<u>SULS</u>)