

DOCKETED

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TN #:	202615
Document Title:	Declaration of Clint Helton in Support of Applicant's Opening Testimony
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Declaration of
CLINT HELTON
Huntington Beach Energy Project
(12-AFC-02)

I, Clint Helton, declare as follows:

1. I am presently employed by CH2M Hill, Inc. under contract with AES Southland Development, LLC to provide environmental consulting services for the Huntington Beach Energy Project (“HBEP”).
2. A copy of my professional qualifications and experience is attached hereto as Exhibit A and incorporated by reference herein.
3. I caused to be prepared or prepared information related to **Cultural Resources** in support of the Application for Certification (“AFC”) for HBEP. Such information was either provided by me to consultants for incorporation of such data into documents or based on my independent analysis of data from reliable documents and sources, as well as my professional experience and knowledge. Specifically, I prepared or caused to be prepared the following:
 - a. Application for Certification, Section 5.3 and related Appendices, dated and docketed June 27, 2012 (TN #66003);
 - b. Application for Designation of Confidential Record re Cultural Resources Records, dated and docketed June 27, 2012 (TN #66057);
 - c. Applicant’s Data Adequacy Supplement, Section 5.3, dated and docketed August 6, 2012 (TN #66490);
 - d. Repeated Application for Confidential Designation (related data) – Cultural Resources, dated and docketed August 6, 2012 (TN #66493);
 - e. Responses to Staff’s Data Requests, Set 1A (#35-36), docketed November 2, 2012 (TN #68366);
 - f. Supplemental Responses to Staff’s Data Request #36 (Cultural Resources), dated and docketed December 11, 2012 (TN #68847)
 - g. Applicant’s Comments on PSA, Part A (specific to Biological Resources) dated and docketed November 7, 2013 (TN #201142)
 - h. Applicant’s Follow-Up to PSA Part A Workshop (Cultural Resources section) dated and docketed December 13, 2013 (TN #201437);
 - i. Applicant’s Comments on Staff’s PSA Part A Supplemental Focused Analysis (Cultural Resources section), dated and docketed January 21, 2014 (TN #201582); and,
 - j. Opening Testimony in Support of Cultural Resources (docketed with Applicant’s Opening Testimony on June 30, 2014 (TN # TBD)).

4. In addition to those documents prepared by me or prepared at my direction, my testimony in this proceeding relies on the following document, which has been docketed in this proceeding.
 - a. Historical photographs of the Huntington Beach Generating Station under construction (circa. 1959) docketed TBD (TN #202535).
5. It is my professional opinion that the information provided to the California Energy Commission related to the HBEP AFC proceeding is valid and accurate with respect to the issues addressed herein.
6. I am personally familiar with the facts and conclusions related in the testimony with respect to the issues addressed herein.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

6/25/14
Date



Clint Helton

EXHIBIT A



Clinton Helton, RPA

Cultural Resources Specialist

Education

M.A., Anthropology

B.A., Spanish Language and Literature

Professional Registrations

Registered Professional Archaeologist (1999, No. 11280)

Principal Investigator and/or Permit Administrator, U.S. Federal Antiquities Permits in AZ, CA, CO, OR, WA, UT, NV

Distinguishing Qualifications

- 18 years of experience conducting environmental impact evaluations, with particular expertise in conducting cultural resources studies in California, Arizona, Nevada, and Utah
- Extensive experience in regulatory compliance, cultural resources, National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) compliance activities
- Highly experienced managing cultural resources studies for large linear utility, energy, mining, and transportation projects

Relevant Experience

Mr. Helton has more than 18 years of environmental management experience with an expertise in archaeology and cultural resources/cultural heritage management. He has a strong background in environmental impact evaluations, having directed technical studies; negotiated with lead agencies, responsible agencies and clients; and has written, edited, and produced a substantial number of environmental review and technical documents. Mr. Helton frequently acts as a senior technical advisor and senior reviewer for projects and clients throughout the United States and internationally, with particular expertise in Arizona, California, Nevada, and Utah.

His knowledge of regulatory compliance and cultural and paleontological resources enables him to manage NEPA and NHPA compliance activities and document preparation. Mr. Helton is a particularly skilled practitioner of federal regulations governing treatment of cultural resources, especially Section 106 of NHPA (36CFR800) and the Native American Graves Protection and Repatriation Act (43CFR10). Mr. Helton has significant expertise conducting consultation with state and federal agencies, as well as facilitating formal government-to-government consultation with Native American groups and tribes throughout the western U.S. Mr. Helton has authored numerous environmental technical reports, cultural resources management plans, cultural resources studies, Programmatic Agreements, Memorandums of Understanding, and contributed to many NEPA documents for a variety of private and public sector clients.

Mr. Helton meets the Professional Qualification Standards stated in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

Representative Projects

Task Leader; AES Southland Development, Huntington Beach Energy Project (HBEP), Orange County, California. Provided senior technical leadership in preparation of the cultural resources section for an AFC for a natural gas-fired power plant, including field surveys, report preparation, and conducting Native American consultation.

Task Leader; AES Southland Development, Alamitos Energy Center (AEC), Los Angeles County, California. Provided senior technical leadership in preparation of the cultural resources section for an AFC for a natural gas-fired power plant, including field surveys, report preparation, and conducting Native American consultation.

Clinton Helton, RPA

Task Leader; AES Southland Development, Redondo Beach Energy Project (RBEP), Los Angeles County, California. Provided senior technical leadership in preparation of the cultural resources section for an AFC for a natural gas-fired power plant, including field surveys, report preparation, and conducting Native American consultation.

Construction Compliance, Mojave Solar Project, Abengoa Solar, Harper Lake, California. CH2M HILL is conducting biological and cultural resources compliance monitoring during construction of this 250-MW solar thermal power plant in the Mojave Desert. The California Energy Commission has granted a license to construct the facility and the Bureau of Land Management is acting as the lead federal agency representative to ensure compliance with NEAP conditions. This project uses parabolic trough solar thermal technology to produce electrical power using a steam turbine generator. Because of the large acreage required for this project (over 2,000 acres), potential impacts and mitigation for biological and cultural resources are major issues. Mr. Helton is the Principal Investigator for this project, and CH2M HILL's team includes multiple cultural and biological resources specialists and monitors. Compliance monitoring is expected to occur through July 2014.

Senior Technologist/Task Leader; Hidden Hills Solar Electric Generating System Transmission Line; Bright Source Energy; Clark County, Nevada. Mr. Helton was the senior consultant for the cultural resources impact assessment of a proposed transmission system entailing 54 miles of 500kV line and 28 miles of 230kV line routed through a desert landscape in southwest Nevada.

Senior Technologist/Task Leader; Ivanpah Solar Electric Generating System Project; BrightSource Energy; San Bernardino County, California. CH2M HILL prepared an Application For Certification on behalf of this energy development client for the California Energy Commission in support of a large proposed solar power generation facility covering over 5,000 acres of land managed by Bureau of Land Management in San Bernardino County, California, just south of Las Vegas, Nevada. Our cultural resources team conducted extensive analysis over a 3-year period including Native American consultation, geoarchaeological analysis, and helicopter surveys to identify Traditional Cultural Places. The project is currently being deployed in California's Mojave Desert and is currently the largest solar energy plant under construction in the world.

Task Manager, Edison Mission Energy, Walnut Creek Energy Park Power Plant, California. Assisted with preparation of AFC for CEC in support of this proposed 500-MW power generation facility in Los Angeles County, California. Responsible for preparation of cultural resources component of project, including field surveys, report preparation, and conducting Native American consultation.

Task Manager, Edison Mission Energy, Sun Valley Energy Center Power Plant, California. Assisted with preparation of AFC for CEC in support of this proposed 500-MW power generation facility in San Bernardino County, California. Responsible for preparation of cultural resources component of project, including field surveys, report preparation, and conducting Native American consultation.

Task Manager, Chula Vista Energy Upgrade Project, MMC Energy, San Diego County, California. Task Lead and overall management of cultural resources studies for this 100-MW power plant upgrade project in San Diego County, California. Responsible for preparation of cultural resources component of project, including field surveys, report preparation, and conducting Native American consultation.

AFCs for Walnut Creek Energy Park and Sun Valley Energy Project, Edison Mission Energy, City of Industry/Romoland, California. Provided support for two Applications for Certification before the California Energy Commission for similarly designed 500-MW natural gas-fired peaking power plants using the GE LMS100 advanced gas turbine technology. These applications were prepared in parallel and were filed at the Energy Commission within one week of one another. The AFCs were filed in December of 2005 and the projects are scheduled to begin construction in 2007.