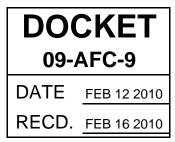
February 12, 2010

Eric Solorio Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814



RE: Ridgecrest Solar Power Project (RSPP), Docket No. 09-AFC-9, Responses to CEC Data Requests for Alternatives (DR-39 and DR-41) and Cultural Resources (DR-113)

Dear Mr. Solorio:

As requested, attached please find Ridgecrest Solar I, LLC's supplemental responses to CEC Data Requests ALT-39, ALT-41 and CULT-113. Information Center searches (Class I Reports) for the RSPP alternative sites are submitted to the CEC under confidential cover.

If you have any questions on these data responses to the Staff's Data Requests, please feel free to contact Billy Owens directly at 510-809-4662 (office) or 949-433-4049 (cell).

Sincerely,

Alice Harron

Senior Director, Development

Technical Area: Alternatives (AFC Section 4.0) Response Date: February 12, 2010

DR-ALT-39

Information Required:

Please fill in Table 1 on the last page of this Data Request, using available data, to compare the alternative sites with the proposed project using the criteria developed by the environmental community.

Response:

Table DR-ALT-39-1 below provides the requested comparison of alternative sites. All of the information except for that associated with cultural resources was provided to the CEC on January 25, 2010. Table DR-ALT-39-1 is now complete.

Technical Area: Alternatives (AFC Section 4.0)

Response Date: February 12, 2010

Table DR-ALT-39-1

Environmental Criteria	Proposed Project Site	Alabama Hills	Boron	South of California City
Is site mechanically disturbed?	A paved road (Brown Road) runs through the site and several unpaved roads traverse the site. Overhead transmission lines are located on the western portion of the site. Site is commonly used by Off Highway Vehicles (OHVs).	Unpaved roadways. Stream traverses the southwest corner of the site.	Paved roads, unpaved roads. Borax Mine. Mojave Cogeneration Co. listed as electric services/steam and air-conditioning supply. US Borax Inc listed on environmental databases including Corrective Action Site) and listed as pesticide producer. Formerly Used Military Sites - Pac Coast Borax Plant and Landing Field Boron.	Unpaved roads. Disturbed area in northwest corner of the site.
Is site located adjacent to degraded and impacted private lands?	Disturbed areas are shown adjacent to the northwestern portion of the site	None found.	Residences are located to the south of the site.	Residences are located to the east of the southeast quadrant of the site.
Is site a Brownfield?	No	No	No	No
Is site located adjacent to urbanized areas (indicate distance)?	~ 4 miles southwest of center of Ridgecrest, ~3.5 miles south of China Lake Acres, and ~ 5 miles southeast of center of Inyokern	~ 5 miles south of Lone Pine	~ 1 mile north of Boron; ~ 0.5 miles east of North Edwards	Adjacent to unincorporated North Edwards; ~8.5 miles southeast of center of California City; and ~10 miles west of Boron.
Does site require the building of new roads (indicate length)?	No. Three Flags Highway (State Highway 395) and Brown Road traverse the site.	Yes. Highway 395 is ~0.7 miles east of site and Horseshoe Meadows Road is ~0.4 miles west of site.	No. Highway 58 runs through site.	Yes. Site is surrounded by unpaved roads. Highway 58 is located ~0.25 miles south of site.
Could site be served by existing substations (indicate name and distance)?	Yes. The SCE Inyokern Substation is situated ~5 miles to the north of the site. However, the Applicant proposes to construct a new substation/switchyard onsite, interconnecting through an existing SCE 115kv/230kV transmission line (Inyokern/Kramer Junction) which runs alongside the site to the west.	No. Site would require construction of new transmission line(s) and designation of new transmission corridor(s), as it is ~5 miles from a 230kV transmission line	No. Site would require construction of new transmission line(s) and designation of new transmission corridor(s), as it is and a ~16.2 miles from a SCE 230kV transmission line	No. Site would require construction of new transmission line(s) and designation of new transmission corridor(s), as it is ~ 12.3 miles from a LA DWP 230kV transmission line; ~15.9 miles from a LA DPW 230kV transmission line; and ~20.1 miles from a SCE 230kV transmission line
Is site located proximate to sources of municipal wastewater (indicate name and distance)?	~6 miles west of the Ridgecrest Wastewater Treatment Plant	~ 5 miles south of the Lone Pine treatment ponds	~ 3.2 miles north of the Boron treatment ponds	~ 8 miles west of the Boron treatment ponds

Technical Area: Alternatives (AFC Section 4.0)

Response Date: February 12, 2010

Environmental Criteria	Proposed Project Site	Alabama Hills	Boron	South of California City
Is site located proximate to load centers (indicate name and distance?)	Los Angeles ~100 miles south- southwest of site; Las Vegas ~140 miles west-northwest of site.	Los Angeles ~ 160 miles south of site; Las Vegas ~ 160 miles west-southwest of site.	Los Angeles ~ 70 miles south- southwest of the site; Las Vegas ~ 155 miles northwest of site.	Los Angeles ~ 70 miles south- southwest of the site; Las Vegas ~ 160 miles northwest of site.
Is site located adjacent to federally designated corridors with existing transmission lines?	Yes	Yes	None identified	None identified
Does site support sensitive biological resources, including federally designated and proposed critical habitat; significant populations of federal or state threatened and endangered species, significant populations of sensitive, rare and special status species and rare or unique plant communities?	The southern portion of the site is located in a Mohave ground squirrel conservation area. Desert tortoises have been observed on the site, but the site is not located within designated Desert Tortoise critical habitat.	While there are no records of sensitive species occurring on the site as identified by the CNDDB, several special-status species have been documented within 5 miles of the site.	The site is located within designated Desert Tortoise critical habitat. Mohave ground squirrel and several sensitive plant species have also been identified in the vicinity of the site by CNDDB.	The site is located within designated Desert Tortoise critical habitat. Mohave ground squirrel and several sensitive plant species have also been identified in the vicinity of the site by CNDDB.
Is site within an Area of Critical Environmental Concern, Wildlife Habitat Management Area, proposed HCP and NCCP Conservation Reserves?	None identified	None identified	None identified	None identified
Does site contain land purchased for conservation including those conveyed to BLM?	None identified	None identified	None identified	None identified
Does site contain landscape-level biological linkage areas required for the continued functioning of biological and ecological processes?	Site contains desert washes that facilitate animal movement in the desert. Project has potential to impact such wildlife movement corridors, but these would not be considered by themselves as required for the continued functioning of biological and ecological processes in the immediate area.	Site contains channels descending from foothills of the Eastern Sierras towards Owens Lake. These ephemeral washes may facilitate animal movement in this area, though there is little to no change in vegetation type or density from the surrounding upland areas. Project has potential to impact these washes; however, they would not be considered by themselves as required for the continued functioning of biological and ecological processes in the immediate area.	Site contains desert washes that facilitate animal movement in the desert. Project has potential to impact such wildlife movement corridors, but these would not be considered by themselves as required for the continued functioning of biological and ecological processes in the immediate area.	None identified

Technical Area: Alternatives (AFC Section 4.0)

Response Date: February 12, 2010

Environmental Criteria	Proposed Project Site	Alabama Hills	Boron	South of California City
Is the site within Proposed Wilderness Area, proposed National Monuments, and Citizens' Wilderness Inventory Areas	None identified	None identified	None identified	None identified
Does the site contain wetlands and riparian areas, including the upland habitat and groundwater resources required to protect the integrity of seeps, springs, streams or wetlands?	Site contains no wetlands or riparian areas but ephemeral washes on site likely qualify as jurisdictional waters of the state.	Site contains no wetlands or riparian areas but ephemeral washes on site likely qualify as jurisdictional waters of the state.	Site contains no wetlands or riparian areas but ephemeral washes on site likely qualify as jurisdictional waters of the state.	Site contains no wetlands or riparian areas and few, if any ephemeral desert washes. If present, such washes would likely qualify as jurisdictional waters of the state.
Is the site a National Historic Register eligible site and does it contain other known cultural resources?	There are 42 historic resources and seven prehistoric cultural resource located with the proposed RSPP site. There are no known NRHP eligible sites at present.	Maps of previously conducted studies and cultural resources recorded within a one-mile area around the Alabaman Hills Alternative were obtained from the EIC at University of California Riverside by AECOM on January 25, 2010. The results of the records search indicate that no resources have been previously recorded within the Alabaman Hills Alternative.	Information regarding previously conducted studies and site records was obtained for a one-mile area around the Boron Alternative. The results of the records search indicate that no resources have been previously recorded within the Boron Alternative	Information regarding previously conducted studies and site records was obtained for a one-mile area around the South of California City Alternative was obtained from the SSJVIC at California State University, Bakersfield by AECOM on January 26, 2010. The results of the records search indicate that no resources have been previously recorded within the South of California City Alternative.
Is the site located directly adjacent to National or State Park units?	None identified	None identified	None identified	None identified

Technical Area: Alternatives (AFC Section 4.0) Response Date: February 12, 2010

DR-ALT-41

Information Required:

Please provide an Information Center search (Class I) for recorded sites identified within the Boron Alternative and the Garlock Road alternative.

Response:

An Information Center search (Class I) for recorded sites identified within the Boron and Garlock Road alternatives is provided to the CEC under confidential cover.

Technical Area: Cultural Resources (AFC Section 5.4) Response Date: February 12, 2010

DR-CULT-113

Information Required:

For any alternative site locations not on BLM lands (to be identified at a later date by staff), please provide to staff, under confidential cover, the following:

- a) Copies of county records of any mines located on the alternative site locations;
- b) Copies of DPR 523 site forms for all previously known cultural resources from California Historical Resources Information System (CHRIS) record searches, for the alternative locations, out to 1.0 mile beyond the sites' and associated linear facility corridors' boundaries;
- c) Copies of CHRIS reports of previous archaeological excavations and architectural surveys conducted within the boundaries of the alternative sites and their linear facility corridors;
- d) A copy of the results of the Native American Heritage Commission's (NAHC) sacred lands database search for each alternative location:
- e) Copies of all letters sent to and received from Native Americans identified by the NAHC as interested in development at each alternative location;
- f) A consultation with local historical societies and museums to establish the background history of the alternative project site locations;
- g) An examination of historic maps to identify former and extant buildings and structures, including trails, roads, and other infrastructure, aged 45 years or older, for each alternative location:
- h) A map at a scale of 1:24,000 depicting the locations of all previously known and mapidentified cultural resources for each alternative location; and
- i) A discussion of the comparative advantages and disadvantages of the proposed project and each alternative location, with respect to cultural resources.

Response:

Class I Reports for the alternative site locations not on BLM lands (Alabama Hills, Boron, and Garlock Road alternatives) covering the requested information above are provided to the CEC under confidential cover.



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

1516 NINTH STREET, SACRAMENTO, CA 95814 1-800-822-6228 - www.energy.ca.gov

APPLICATION FOR CERTIFICATION For the RIDGECREST SOLAR POWER PROJECT

Docket No. 09-AFC-9

PROOF OF SERVICE (Revised 2/4/2010)

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DECLARATION OF SERVICE

I, <u>Elizabeth Copley</u>, declare that on <u>February 12, 2010</u>, I served and filed copies of the attached <u>Ridgecrest Solar Power Project (Docket No. 09-AFC-9) Supplemental Data Response Information: for Alternatives, DR-ALT-39 and 41; and for Cultural Resources, DR-CULT-113. 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:</u>

[http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest].

The document has been sent to both 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:

- X sent electronically to all email addresses on the Proof of Service list;
- <u>X</u> by personal delivery or by overnight delivery service or depositing in the United States mail at Oakland, California with postage or fees thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

<u>X</u> sending an original paper copy and one electronic copy, mailed and emailed Respectively, to the address below (preferred method);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-9 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512 docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

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ECCORY