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09-AFC-7

DATE AUG 24 2010

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August 24, 2010

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

RE: Palen Solar Power Project, Docket No. 09-AFC-7
Palen Solar I, LLC (PSI) Response to CEC Committee's July 29, 2010 Order
Responding to CURE's Petition to Compel Production of Information

Dear Mr. Solomon:

Per the request of the California Energy Commission, PSI is providing the above referenced documents for the Palen Solar Power Project.

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

Sincerely,



Alice Harron
Senior Director, Development

**Palen Solar I, LLC (PSI) Response to CEC Committee's July 29, 2010 Order
Responding to CURE's Petition to Compel Production of Information**

Data Request 22: *Please provide a resume for Andrew Sanders including degrees earned and his peer-reviewed publications on plant taxonomy with specific reference to his formal research on the Coachella Valley Milk vetch.*

Committee Response: GRANTED IN PART. Applicant shall provide CURE with a resume for Andrew Sanders. Relevant peer reviewed publications should be equally available to CURE.

PSI Response: The requested resume (including a list of relevant publications), for Mr. Andrew Sanders is attached to this submittal. Mr. Sanders has been Herbarium Curator at the University of California, Riverside for over 30 years. During this time, his job has exclusively been related to plant taxonomy, especially with respect to the flora of Riverside County. He has not conducted any formal research on the Coachella Valley milkvetch, but has lab experience (e.g., microscopy, specimen entry) with the varieties of *Astragalus lentiginosus* throughout his decades-long career as Herbarium Curator

Data Request 23: *Please explain whether genetic work will be performed to conclusively resolve the question on the taxonomy of the Coachella Valley Milk vetch and any similar species found on-site during surveys.*

Committee Response: GRANTED. The request by its language and intent is clear and straightforward, and seeks only a yes or no answer.

PSI Response: No.

Data Request 26: *Please identify the expert or experts who will make the determination concerning whether collecting voucher specimens will jeopardize the survival of the species. Please explain the criteria such expert(s) will use to make this determination.*

Committee Response: CONDITIONALLY AND PARTIALLY GRANTED. If these experts have been identified, Applicant will provide their names and contact information to CURE. Applicant is not required to conduct analysis or research on behalf of an intervenor.

PSI Response: Experts have not been identified.

Data Request 44: *Please provide supporting descriptions, diagrams and/or photographs demonstrating the Applicant's reference to fragmentation in the Chuckwalla Habitat Unit north of Interstate 10.*

Data Request 45: *Please provide supporting descriptions, diagrams and/or photographs demonstrating the Applicant's reference to high edge to area ratio in the Chuckwalla Habitat Unit north of Interstate 10. 5*

Data Request 46: Please provide supporting descriptions, diagrams and/or photographs demonstrating the Applicant's reference to limited functional connectivity in the Chuckwalla Habitat Unit north of Interstate 10.

Data Request 47: Please provide supporting descriptions, diagrams and/or photographs demonstrating the Applicant's reference to high human disturbance in the Chuckwalla Habitat Unit north of Interstate 10.

Committee Response: PARTIALLY GRANTED. Regarding data requests 44-47, Applicant will provide any documents already in its possession that support its assertion that the Chuckwalla Habitat Unit north of Interstate 10 does not meet four of the principles of a Desert Wildlife Management Area. Applicant is not required to conduct analysis or research on behalf of an intervenor.

PSI Response:

Documents in our possession at this time that support the assertion that the Chuckwalla Habitat Unit north of Interstate 10 does not meet four of the principles of a Desert Wildlife Management Area (DWMA) include: Palen Solar Power Project Biological Resources Technical Report, which was prepared by AECOM and submitted to the CEC in August 2009; the 1994 USFWS Desert Tortoise Draft Recovery Plan; Boarman and Sazaki's 2006 study of road effects on desert tortoise; and the information submitted as part of the PSPP Responses to CEC Information Requests, Reconfigured Alternatives 2 and 3 Biological Resources dated July 21, 2010 and previously served on CURE. The current DWMA boundary does not extend north of Interstate 10 which further indicates these principles are not met, since DWMA boundaries are required to meet the seven principles of conservation biology used in the Draft Recovery Plan (USFWS 1994). The presence of highways, such as Interstate 10, have been documented to significantly reduce DT population within 400 meters of the highway (Boarman and Sazaki 2006), thus leading to habitat fragmentation and limited functional connectivity when highways, such as Interstate 10, are present. If more information becomes available to us, we will serve them upon CURE without additional request.

Full references for the USFWS Tortoise Recovery Plan and for the Boarman and Sazaki study are as follows:

- U.S. Fish and Wildlife Service (USFWS). 1994. The Desert Tortoise (Mojave Population) Recovery Plan. U.S. Fish and Wildlife Service, Region 1 – Lead Region, Portland, Oregon. 73 pp. + appendices.
- Boarman, W.I., and M. Sazaki. 2006. A Highway's Road-Effect Zone for Desert Tortoises (*Gopherus agassizii*). Journal of Arid Environments 65: 94–101.

Data Request 53: Please provide the chemical composition of the dust suppression coating.

Data Request 54: Please provide all third-party studies showing the dust suppression coating is harmless to native plant and animal life.

Committee Response: PARTIALLY GRANTED. Applicant will provide identifying information, such as its trade name, for the dust suppression coating. CURE can then use this information to research the chemical composition and third party studies as it sees fit.

PSI Response: There are four different dust suppression coating products that are under consideration for use by the BSPP but no final decisions have been made. The four products under consideration and their associated manufacturers/vendors are:

- Soil-Sement – Midwest Industrial Supply, Inc.-
- EnviroKleen – Midwest Industrial Supply, Inc.
- DuraSoil – Soilworks, LLC
- DustLess – DirtGlue Enterprises

Data Request 80: *Please confirm whether the 8-10-mile transmission line vaguely identified in the SA/DEIS and recently confirmed in Applicant submittals to the Commission was considered as a potential new source of raven perching sites that may impact DT.*

Committee Response: GRANTED. The request by its language and intent is clear and straightforward, and seeks only a yes or no answer.

PSI Response: Yes.

Data Request 95: *Please identify a) the amount and b) the function and value of MFTL habitat that may be indirectly impacted by the following:
PSPP footprint area, and
PSPP associated transmission line and roads.*

Committee Response: PARTIALLY GRANTED. Applicant will provide the amount of MFTL habitat that may be indirectly impacted by the PSPP footprint, transmission line, and roads. With respect to the portion of the data request regarding the function and value of the MFTL habitat, the Applicant is not required to conduct analysis or research on behalf of an intervenor. Furthermore, the subject matter of these data requests has been addressed in the SA/DEIS as well as Applicant filings.

PSI Response: This information was submitted as part of the PSPP Responses to CEC Information Requests, Reconfigured Alternatives 2 and 3 Biological Resources dated July 21, 2010 and previously served on CURE.

Data Request 96: *Please provide quantified evidence of the amount of sand moving through the sand transport corridor (in Zones 1, 2, and 3).*

Data Request 97: *Please provide the predominant and varied direction of winds through the sand transport corridor.*

Committee Response: CONDITIONALLY GRANTED. If Applicant knows of a study regarding the requested information, Applicant will provide a copy to CURE. However, Applicant is not required to conduct analysis or research on behalf of an intervenor.

PSI Response: There are two items regarding sand movement and wind direction in our possession at this time: 1) the report entitled, Draft Sand Dune Ecosystem Impacts, Mitigation and Maintenance Data Requests, provided in response to CEC Staff Data Requests DR-BIO -60, 61, and-62, and which was docketed in February 2010, and 2) geomorphic wind vector data collected in the field on December 29, 2009 by Dr. Miles Kenney (Principal Investigator and Author of the Draft Sand Dune Report); the geomorphic wind vector data is attached to this Data Request response document.

Data Request 102: *Please explain the Applicant's proposed mitigation measures for impacts to MFTL, including the proposals to maintain habitat through the sand replenishment program and provide replacement habitat within the Chuckwalla Valley.*

Committee Response: CONDITIONALLY GRANTED. To the extent that the information sought is readily available and has not already been provided the Applicant is directed to provide the information to CURE. However, the Applicant is not required to conduct analysis or research on behalf of intervenors.

PSI Response: MFTL mitigation was summarized in the Preliminary Habitat Mitigation and Management Plan which was prepared by AECOM and docketed with the CEC on January 6, 2010, and in the Applicant's comments on the Palen Solar Power Project SA/DEIS which were docketed on May 4, 2010. Mitigation will be achieved through compensatory mitigation (i.e., land acquisition or the NFWF in lieu fund) that includes mitigation for impacts to MFTL habitat with sand dune habitat at a ratio of 3:1 and for other habitat at 1:1. Because of the newly proposed Reconfiguration Alternatives 2 and 3 that greatly reduce sand transport impacts, no sand replenishment program is needed and none is planned.

Data Request 105: *Please provide detailed information regarding the sand replenishment program, including the following:*

anticipated number of truck trips per year,
the equipment that will be used to collect, transport and deposit sand,
the manner in which sand will be deposited, and
the precautions that will be taken to minimize impacts to plants and animals within the areas where sand will be taken and deposited.

Committee Response: CONDITIONALLY GRANTED. To the extent that the information sought is readily available and has not already been provided the Applicant is directed to provide the information to CURE. However, the Applicant is not required to conduct analysis or research on behalf of intervenors.

PSI Response: Because of the recently proposed Reconfigured Alternatives 2 and 3 (See responses to DRs96 and 97 above), a sand replenishment program is not being proposed as part of mitigation for the PSPP. Mitigation will be achieved through compensatory mitigation (i.e., land acquisition or the NFWF in lieu fund) that includes mitigation for impacts to MFTL habitat with sand dune habitat at 3:1 and other habitat at 1:1

Data Request 106: *In order to verify the effectiveness of the Applicant's proposed mitigation, please provide copies of mitigation monitoring reports prepared by the Applicant's consultant that document the results of other sand replenishment programs.*

Committee Response: CONDITIONALLY GRANTED. If the Applicant has the requested information readily available and the mitigation monitoring reports have already been prepared by the Applicant's consultant, then the Applicant is directed to provide the information to CURE. However, the Applicant is not required to conduct analysis or research on behalf of intervenors.

PSI Response: No mitigation monitoring reports have been prepared.

Data Request 108: *Please provide specific performance standards for the sand replenishment program.*

Committee Response: CONDITIONALLY GRANTED. If these standards have been set, Applicant is directed to inform CURE of them, or to provide them when they become available.

PSI Response: As discussed in response to several Data Requests above, because of newly proposed PSPP alternative configurations, there is no need or plan for a sand replenishment program.

Data Request 119: *Please explain whether the proposed [WBO] conservation area will be at least 100 meters from Project features after Project construction.*

Committee Response: GRANTED. The request by its language and intent is clear and straightforward, and seeks only a yes or no answer.

PSI Response: Yes. The proposed WBO conservation area will be located greater than 500 feet from Project features after Project construction.

Data Request 120: *Please discuss the actions that will be taken for the long-term management and monitoring of the proposed conservation area, including:*

a. whether the Applicant plans to provide funding for the management and monitoring of the proposed conservation area and

PSI Response: Yes.

b. whether a conservation easement will be established for private lands acquired for compensation purposes.

PSI Response: Yes.

Data Request 121: *If a conservation easement will be established, please state whether such lands will be preserved in perpetuity.*

PSI Response: Yes, lands on which a conservation easement is established will be preserved in perpetuity.

Committee Response: **GRANTED IN PART.** These requests are granted to the extent they seek only yes or no answers.

PSI Response: See responses above to individual elements of the Data Requests.

Data Request 123: *Please provide copies of mitigation monitoring reports prepared by the Applicant's consultant that document the results of other WBO active translocation projects.*

Committee Response: **CONDITIONALLY GRANTED.** If the Applicant has the requested information readily available and the mitigation monitoring reports have already been prepared, then the Applicant is directed to provide the information to CURE. However, the Applicant is not required to conduct analysis or research on behalf of CURE.

PSI Response: WBO will not be actively translocated as part of the PSPP. WBO will be passively relocated only, as required by the CDFG. Therefore, active translocation monitoring reports are not relevant.

Data Request 135: *Please state whether the Applicant intends to conduct any additional surveys to identify what wildlife species may be using the washes and the Project area as a movement corridor.*

Committee Response: **GRANTED.** The request by its language and intent is clear and straightforward, and seeks only a yes or no answer.

PSI Response: No.

Date: May 14, 2010

From: Miles Kenney, PhD, PG
Encinitas, CA 92024
Miles.kenney@yahoo.com

To: AECOM

Project: Palen I Solar, Chuckwalla Valley, California. (Docket 09-AFC-7)

Subject: Geomorphic wind vector data collected by Miles Kenney in the field on December 29, 2009.

Site	Latitude	Longitude	Vector	Notes
1	33 40.979	115 14.599		Bridge on HWY 10
2	33 42.229	115 12.986	N34W	weak coppice dune tail
3	33 42.482	115 12.338		Qsr, no active coppice
4	33 42.891	115 12.031	N30W	small coppice dune tail
5	33 42.916	115 11.966	N42W	strong coppice dune tail
6	33 42.453	115 12.450		Qsr – stabilized, dormant
7	33 42.253	115 12.853		washes in dormant dunes
8	33 42.124	115 13.223		Qal-S0, no active coppice
9				Qal-S2, no active coppice
10	33 41.279	115 13.565		Qsr-strongly degraded
11	33 41.126	115 13.257		Qw, no active coppice
12	33 40.858	115 12.808		Qal-S3a, no active coppice
13	33 41.245	115 12.514		Not a dune area, degraded
14	33 41.112	115 12.283		suspicious mound
15	33 40.580	115 11.276		Qoaf-S4 in Zone III
16	33 40.914	115 11.057		Near Zone II/III contact
17	33 41.152	115 10.977	N20W	Coppice tail, loose sand sheets, Zone II
18	33 41.394	115 10.899	N24W	Coppice tail, relic crescent dunes, Strongly vegetated-stabilized, active sand sheets
19	33 41.794	115 10.975		Qw within Zone II
20	33 41.846	115 11.086		Qoaf-S4/S5
21	33 41.908	115 11.117		Qoaf surface
22	33 42.117	115 11.337	N38W	Active coppice tail
23	33 42.257	115 11.368		Qoaf surface
24	33 42.349	115 11.432		Ablation of Qsr deposits, Qoaf, 428'
25	33 42.428	115 11.394		Ql deposits – 425'

26	33	42.771	115	11.488	N33W	Active coppice tail, salt crusts in Q1
27	33	43.068	115	11.315	N34W	Barchans in Zone I, wind vector toward Southern Coxcomb mtns. ~N34W
28	33	43.207	115	12.340		Q1/Qoaf contact 427'
29	33	43.216	115	12.434		Qoaf, 2' above Q1-old shoreline
30		south from site 29				Dunes migrate over Qoaf surface, Indicates that dunes are younger, and likely Just post date age of Qoaf.
31	33	42.920	115	12.794		Qsr – depression within dormant dunes
32	33	42.902	115	13.235		Qoaf

Date: May 14, 2010

From: Miles Kenney, PhD, PG
Encinitas, CA 92024
Miles.kenney@yahoo.com

To: AECOM

Project: Palen I Solar, Chuckwalla Valley, California. (Docket 09-AFC-7)

Subject: Geomorphic wind vector data collected by Miles Kenney in the field on December 29, 2009. This is the data that was utilized to provide the February Preliminary Geomorphic Aeolian Report that was submitted to the CEC.

Site	Latitude	Longitude	Vector	Notes
2	33 42.229	115 12.986	N34W	weak coppice dune tail
4	33 42.891	115 12.031	N30W	small coppice dune tail
5	33 42.916	115 11.966	N42W	strong coppice dune tail
17	33 41.152	115 10.977	N20W	Coppice tail, loose sand sheets, Zone II
18	33 41.394	115 10.899	N24W	Coppice tail, relic crescent dunes, Strongly vegetated-stabilized, active sand sheets
22	33 42.117	115 11.337	N38W	Active coppice tail
26	33 42.771	115 11.488	N33W	Active coppice tail, salt crusts in Q1
27	33 43.068	115 11.315	N34W	Barchans in Zone I, wind vector toward

BIOGRAPHICAL SKETCH

ANDREW C. SANDERS

Andrew C. Sanders
Herbarium Curator, University of California, Riverside

Department of Botany and Plant Sciences
University of California, Riverside
Riverside, CA 92521-0124
(951) 827-3601
andrew.sanders@ucr.edu

Education

B.S. in Biology, specializing in Botany; University of California, Riverside, June 1975

Employment Experience

Current Position

Curator of the University of California (UC), Riverside Herbarium, 1979 to present. Andrew Sanders is Museum Scientist and Curator of the UC Riverside Herbarium. Since he began work there, he has helped to increase the size of the collection by 175,000 specimens, making it now the 5th largest in California. He developed (with assistance of Ed Plummer) the UC Riverside database structure, which is now widely used and that permitted UC Riverside to become the first large herbarium in California to completely database its holdings and make the label data available online. Mr. Sanders also worked intensively on georeferencing so that UC Riverside now has one of the highest percentages of its specimens georeferenced with latitude and longitude (80%) as any herbarium in the U.S.

Mr. Sanders' current position involves extensive work with the flora of the southwestern U.S. and adjacent areas. He has identified tens of thousands of plant specimens, and, as a result of his 31 years of experience at the herbarium and on projects with various governmental agencies, environmental firms, and non-government organizations, he is extremely familiar with the flora of Southern California and can identify the overwhelming majority of plant species from this area on sight.

Mr. Sanders has personally created more than 37,000 plant collections, mostly in California, and is very familiar with the geography and flora of the southern half of the state. As a result, he can quickly and accurately locate collection localities, including old and obscure locations, because he has worked with most of them at one time or another and has often been to the area in person. He has done extensive field work in all regions of Southern California.

Previous Positions

University of California, Riverside, Department of Biology, Staff Research Associate and Resident Biologist at the James Reserve in the San Jacinto Mountains of Riverside County, California, April 1978 to September 1979.

U.S. Department of the Interior, Bureau of Land Management (Riverside and Bakersfield Districts and California Desert Plan Staff); held positions as a Wildlife Biologist, Natural Resource Technician, and Range Conservationist; August 1975 to April 1978.

Other Experience

Outside of California, Mr. Sanders has done extensive field work and made numerous plant collections throughout the southwestern U.S., but particularly in Nevada and Arizona. He has also worked extensively in Mexico.

In addition, Mr. Sanders regularly makes plant identifications (including fossils) for professional biological consultants. He also leads natural history field trips for the California Native Plant Society, Southern California Botanists, the Audubon Society, The Nature Conservancy, and other organizations.

Select Publications

In press. Elvin, Mark A., Andrew C. Sanders, and Mark S. Brunell. *Monardella* in *The Jepson Manual: Higher Plants of California, 2nd Edition*.

In press. Van Devender, T.R., A.C. Sanders, R.K. Wilson, and S.A. Meyer. Vegetation, Flora, and Seasons of the Rio Cuchujaqui, A Tropical Deciduous Forest near Alamos, Sonora, Mexico, in *The Tropical Deciduous Forest of the Alamos, Sonora, Region: Ecology and Conservation of a Threatened Ecosystem*, ed. by R.H. Robichaux.

2009. Elvin, Mark A., and Andrew C. Sanders. Nomenclatural Changes for *Monardella* (Lamiaceae) in California. *Novon* 19 (3).

2009. Provance, Mitchell C., and Andrew C. Sanders. An overview of the *Diospyros campechiana* complex (Ebenaceae) and description of three new species. *J. Bot. Res. Inst. Texas* 3 (1): 85-1123(1): 85–12.

2008. Dean, Ellen, Fred Hrusa, Gordon Leppig, Andrew Sanders, and Barbara Ertter. Catalogue of Non-native Vascular Plants Occurring Spontaneously in California Beyond those Addressed in the Jepson Manual – Part II. *Madroño* 55(2): 93–112.

2008. Provance, Mitchell C., Ignacio García Ruiz, and Andrew C. Sanders. The *Diospyros salicifolia* complex (Ebenaceae) in Mesoamerica. *J. Bot. Res. Inst. Texas* 2(2): 1,009–1,100.

2006. Provance, M.C., and A.C. Sanders. More American Black Sapotes: New *Diospyros* (Ebenaceae) for Mexico and Central America. *Sida* 22:277–304.
2005. Provance, M.C., and A.C. Sanders. *Diospyros torresii* (Ebenaceae): A New Black Zapote from Tropical Mexico. *Sida* 21:2,045–2,050.
2004. Roberts, F.M., S.D. White, A.C. Sanders, D.E. Bramlet, and S. Boyd. *The Vascular Plants of Western Riverside County, California: An Annotated Checklist*. F.M. Roberts Publications, San Luis Rey, California.
2003. Elvin, Mark A., and Andrew C. Sanders. A New Species of *Monardella* (Lamiaceae) from Baja California, Mexico, and Southern California, United States. *Novon* 13 (4): 425–432.
2002. Hrusa, Fred, Barbara Ertter, Andrew Sanders, Gordon Leppig, and Ellen Dean. Catalogue of Non-Native Vascular Plants Occurring Spontaneously in California beyond those Addressed in the Jepson Manual – Part 1. *Madrono* 49(2): 61–98.
2001. Costea, M., A.C. Sanders, and J.G. Wainess. Notes on some Little Known *Amaranthus* Taxa (Amaranthaceae) in the United States, *Sida*.
2001. Costea, M., A.C. Sanders, and J.G. Wainess. Preliminary Results toward a Revision of the *Amaranthus Hybridus* Species Complex (Amaranthaceae). *Sida* 19(4): 931–974.
- 2001 [2003]. Costea, M., J.G. Wainess, and A.C. Sanders. Structure of the Pericarp in some *Amaranthus* L. (Amaranthaceae) Species and its Taxonomic Significance. *Aliso* 20(2): 51–60.
2000. Minnich, R.A., and A. C. Sanders. Sahara Mustard (*Brassica tournefortii*), in *California's Wildland Weeds: Identification and Control*, C. Bossard, J. Randall, and M. Hoshovsky, eds.
1999. Boyd, S., and A.C. Sanders. Noteworthy Collections, California – *Dicentra chrysantha*, *Euphorbia anramsiana*, *Holocarpha heermannii*. *Madroño* 46(2): 112.
1999. Sanders, A.C. Invasive Exotics in California: A Perspective from Inland Southern California. In M. Kelly, E. Wagner, and P. Warner (eds.) *Proceedings of the California Exotic Pest Plant Council Symposium*, Vol 4: 1998. Pp. 7–10.
1999. Sanders, A.C., and S. Boyd. Noteworthy Collections, California – *Chloris truncata*, *Galium parisiense*, *Ranunculus testiculatus*. *Madroño* 46(2):113.

1998. Sanders, A.C. Polygonaceae in Martin, P., et al. (revised & ed.). *Gentry's Río Mayo Plants: The Tropical Deciduous Forest and Environs of Northwest Mexico*, University of Arizona Press.
1997. Cudney, D., C. Bell, and A. C. Sanders. Weedy Spurges in California, U.C. Extension Circular.
1997. Sanders, A.C. Noteworthy Collections: *Gaura parviflora*, Onagraceae; *Crepis tectorum*, Asteraceae. *Madroño* 44:306–307.
1997. Sanders, A.C. Noteworthy Collections, California – *Allium vineale*, *Celtis sinensis*, *Cestrum nocturnum*, *Colutea arborescens*, *Crepis nana*, *Crepis tectorum*, *Cynosurus echinatus*, *Desmodium tortuosum*, *Eruca vesicaria* var. *sativa*, *Gilia maculata*, *Gnaphalium purpureum*, *Gypsophila elegans*, *Horkelia cuneata* ssp. *puberula*, *Leonotus nepetifolia*, *Nerium oleander*, *Phaseolus filiformis*, *Pinus attenuata*, *Pinus jeffreyi*, *Rhamnus alaternus*, *Salvia reflexa*, *Ziziphus obtusifolia*, *Madroño* 44.
1997. Sanders, A.C., and D. Koutnik. Noteworthy Collections, California – *Euphorbia dendroides*, *E. esula*, *E. hirta*, *E. nutans*, *E. oblongata*, *E. revoluta*, *E. terracina*. *Madroño* 44(2): 203–210.
1997. Sanders, A.C., D.L. Banks, and S. Boyd. Rediscovery of *Hemizonia mohavensis* Keck (Asteraceae) and Addition of Two New Localities. *Madroño* 44 (2): 203–210.
1997. White, S., and A.C. Sanders. Clarification of Three *Camissonia Boothii* Subspecies' Distributions in California. *Madroño* 44 (1): 106–112.
1996. Friedman, S.L., T.R. Van Devender, V.W. Steinmann, A.C. Sanders, P.D. Jenkins, S.A. Meyer, A.L. Reina Guerrero, D.A. Yetman, R.S. Felger, and R.A. Lopez Estudillo. Noteworthy Collections, Sonora, Mexico – *Brickellia brandegei*, *Cordia globosa*, *Bromelia alsodes*, *Selenicereus vagans*, *Capparis flexuosa*, *Ipomoea imperati*, *Operculina pennatifida*, *Doyera emetocathartica*, *Momordica charantia*, *Bergia texana*, *Caesalpinia sclerocarpa*, *Mimosa asperata*, *Pholisma culiacanum*, *Nesaea longipes*, *Malpighia glabra*, *Bastardia viscosa*, *Okenia hypogea*, *Oenothera drummondii* var. *thalassaphila*, *Ophioglossum nudicaule*, *Luziola gracillima*, *Panicum antidotale*, *Tridens eragrostoides*, *Amyris balsamifera*, *Capraria biflora*, *Solanum azureum*, *Citharexylum scabrum*, *Lippia graveolens*. *Madroño* 43(4):532–538.
1996. Sanders, A.C. Noteworthy Collections, California – *Achrachne racemosa*, *Aegilops cylindrica*, *Atriplex mulleri*, *Baileya multiradiata*, *Bromus secalinus*, *Cenchrus ciliaris*, *Centaurea diffusa*, *Centaurea maculosa*, *Ceratonia siliqua*, *Chloris truncata*, *Cynanchum louiseae*, *Ephedra funerea*, *Eragrostis curvula* var. *conferta*, *Fatoua villosa*, *Linanthus orcuttii*, *Matricaria globifera*, *Melica californica*, *Melissa officinalis*, *Panicum antidotale*, *Panicum maximum*, *Pistacia atlantica*, *Schinus polygamus*, *Schoenus nigricans*, *Scribneria bolanderi*, *Senna obtusifolia*, *Solanum mauritianum*, *Triteleia hyacinthine*. *Madroño* 43(4):524–532.

1996. Sanders, A.C., and S. Boyd. Noteworthy Collections, California – *Brassica fruticulosa*. *Madroño* 43(4):523–524.
1996. White, S., A.C. Sanders, and M. Wilcox. Noteworthy Collections, California – *Androstegium breviflorum*, *Claytonia lanceolata*, *Nicotiana acuminata*, *Ranunculus scleratus*. *Madroño* 43 (2): 334–335.
1995. Skinner, M.W., D.P. Tibor, R.L. Bittman, B. Ertter, T.S. Ross, S. Boyd, A.C. Sanders, J.R. Shevock, and D.W. Taylor. Research Needs for Conserving California's Rare Plants. *Madroño* 42(2): 211–241.
1995. Van Devender, T.R., A.C. Sanders, V.W. Steinmann, R.K. Van Devender, S.A. Meyer, S.L. Friedman, J.F. Wiens, D.A. Yetman, P.D. Jenkins, E. Lopez-Saavedra, R.A. Lopez-Estudillo, and J.D. Freeh. Noteworthy Collections, Sonora, Mexico – *Blechnum pyramidatum*, *Begonia palmeri*, *Acmella oppositifolia*, *Blumea viscosa*, *Elephantopus spicatus*, *Eupatorium odoratum*, *Pectis uniaristata*, *Cuscuta boldinghii*, *C. potosina*, *Ipomoea meyeri*, *Merremia quinquefolia*, *Cyperus difformis*, *Euphorbia ocymoidea*, *Bothriochloa pertusa*, *Bouteloua alamosana*, *Desmodium scopulorum*, *D. scorpiurus*, *Mimosa diplotricha*, *Phaseolus lunatus*, *Polypremum procumbens*, *Passiflora suberosa*, *Piper jaliscanum*, *Crusea coronata*, *C. psyllioides*, *Diodia sarmentosa*, *Hedyotis vegrandis*, *Anemia affinis*, *Nicotiana plumbaginifolia*, *Phylla strigulosa*, *Madroño* 42(3): 411–418.
1991. Sanders, A.C., and D. Cudney. Key to the Families of Weeds of the West, in *Weeds of the West*, T.D. Whitson, ed., Western Society of Weed Science.
1983. Vasek, F.C., and A. C. Sanders. Distribution of *Polygala acanthoclada*. *Madroño* 30(3): 193–194.
1979. Jones, C.E., A.C. Sanders, et al. Noteworthy Collections, California – *Physalis lobata*. *Madroño* 29(2): 101.

**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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DECLARATION OF SERVICE

I, Carl Lindner, declare that on, August 24, 2010, I served and filed copies of the **Palen Solar I, LLC (PSI) Response to CEC Committee's July 29, 2010 Order Responding to CURE's Petition to Compel Production of 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:

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CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-7
1516 Ninth Street, MS-4
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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.


