



CH2M HILL  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA 95833  
Tel 916.286.0224  
Fax 916.614.3424

March 30, 2012

427930.DI.DR

Mike Monasmith  
Senior Project Manager  
Systems Assessment & Facility Siting Division  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

Subject: Data Response, Set 1D-5  
Hidden Hills Solar Electric Generating System (11-AFC-2)

Dear Mr. Monasmith:

On behalf of Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC, please find attached electronic copies of Data Response, Set 1D-5.

Hard copies will be sent out on Monday. Please call me if you have any questions.

Sincerely,

CH2M HILL

A handwritten signature in blue ink, reading "John L. Carrier".

John L. Carrier, J.D.  
Program Manager

Encl.

c: POS List  
Project file

**DOCKET**  
**11-AFC-2**

DATE MAR 30 2012

RECD. MAR 30 2012

**Data Response Set 1D-5**

# **Hidden Hills**

## **Solar Electric Generating System**

(11-AFC-2)



**Application for Certification**  
**Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC**

**March 2012**

With Technical Assistance from



---

# **Hidden Hills Solar Electric Generating System (HHSEGS)**

**(11-AFC-2)**

**Data Response, Set 1D-5  
(Response to Data Request 125)**

Submitted to the  
**California Energy Commission**

Submitted by  
**Hidden Hills Solar I, LLC; and  
Hidden Hills Solar II, LLC**

March 30, 2012

With Assistance from  
**CH2MHILL**  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA 95833

# Contents

---

Section	Page
Introduction .....	1
Cultural Resources (125) .....	2
 <b>Attachments</b>	
DR125-1      Historic Trails and Roads Technical Study (Confidential)	

# Introduction

---

Attached is Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC (collectively, “Applicant”) supplemental response to the California Energy Commission (CEC) Staff’s Data Request 125 for the Hidden Hills Solar Electric Generating System (HHSEGS) Project (11-AFC-2). The CEC Staff served Data Request Set 1D on December 6, 2011. The Attachment submitted in response to this data request is numbered to match the data request.

# Cultural Resources (125)

---

## BACKGROUND

The Old Spanish Trail/Mormon Road was a well-travelled trade route through the area and portions of it have been listed on the National Register of Historic Places. The Tecopa Chapter of the Old Spanish Trail Association has identified and recorded portions of the trail still extant in the Mojave Desert, including in the project vicinity. While the segment adjacent to the project area is not listed as a contributing element to the National Register-listed Old Spanish Trail/Mormon Road Historic District, this segment and other extant segments in the project area of analysis may have significance at the local or state level and may then be considered historical resources for the purposes of CEQA. If impacted by the project, mitigation may be required.

The technical report and Supplement B also acknowledge the presence of a number of other roads and trails potentially located within the project area of analysis, such as the wagon road connecting Hidden Hills Ranch with Trout Canyon. It does not appear that these resources have been evaluated and, if within the project area of analysis, need to be surveyed, recorded and evaluated for their significance as historical resources pursuant to CEQA.

## DATA REQUESTS

125. Present a complete history of the Old Spanish Trail. Describe, to the extent possible, how the trail was used in prehistoric times. The Paiute referred to the trail as the Indian Trail during the August 2, 2011 meeting. Please describe any cultural significance the trail plays in the history of the Paiute or other Native American groups in the area. Additionally, the history of the trail in the AFC stops at year 1863. Please complete and provide a description of the history of the trail. If any additional trail segments are present within the project area of analysis, provide a completed DPR 523 form for each resource, prepared by the appropriate resource specialist, and ensure that each form contains a discussion of the significance of the segment, both individually and as part of a potential district, under CEQA Section 15064.5(a)(3), (A)(B)(C) & (D). For those segments evaluated as eligible, please have the appropriate specialist provide an evaluation of whether the integrity of setting will be significantly impacted by construction of the HHSEGS such that the significance of the resource will be materially impaired.

**Response:** In Applicant's December 27, 2011 letter, Applicant objected to this data request because sufficient information on this topic has already been provided, the data request is burdensome, and the information requested is not reasonably necessary for the Commission decision in this proceeding. Without waiving this objection, Applicant has performed additional research on this topic and is providing to staff an Historic Trails and Roads Technical Study as Confidential Attachment DR125-1.

**Confidential Attachment DR125-1**  
**Historic Trails and Roads Technical Study**

---

Attachment DR125-1 has been submitted under a repeated request for confidential designation.





**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 *HIDDEN HILLS SOLAR ELECTRIC  
GENERATING SYSTEM***

DOCKET NO. 11-AFC-2

PROOF OF SERVICE  
(Revised 3/22/2012)

**APPLICANT**

BrightSource Energy  
Stephen Wiley  
1999 Harrison Street, Suite 2150  
Oakland, CA 94612-3500  
[swiley@brightsourceenergy.com](mailto:swiley@brightsourceenergy.com)

BrightSource Energy  
Andrew Miller  
Michelle L. Farley  
1999 Harrison Street, Suite 2150  
Oakland, CA 94612-3500  
[amiller@brightsourceenergy.com](mailto:amiller@brightsourceenergy.com)  
[mfarley@brightsourceenergy.com](mailto:mfarley@brightsourceenergy.com)

BrightSource Energy  
Clay Jensen  
Gary Kazio  
410 South Rampart Blvd., Suite 390  
Las Vegas, Nevada 89145  
[cjensen@brightsourceenergy.com](mailto:cjensen@brightsourceenergy.com)  
[gkazio@brightsourceenergy.com](mailto:gkazio@brightsourceenergy.com)

**APPLICANTS' CONSULTANTS**

Strachan Consulting, LLC  
Susan Strachan  
P.O. Box 1049  
Davis, CA 95617  
[susan@strachanconsult.com](mailto:susan@strachanconsult.com)

CH2MHill  
John Carrier  
2485 Natomas Park Drive, Suite 600  
Sacramento, CA 95833-2987  
[jcarrier@ch2m.com](mailto:jcarrier@ch2m.com)

**COUNSEL FOR APPLICANT**

Ellison, Schneider and Harris, LLP  
Chris Ellison  
Jeff Harris  
Samantha Pottenger  
2600 Capitol Avenue, Suite 400  
Sacramento, CA 95816-5905  
[cte@eslawfirm.com](mailto:cte@eslawfirm.com)  
[jdh@eslawfirm.com](mailto:jdh@eslawfirm.com)  
[sgp@eslawfirm.com](mailto:sgp@eslawfirm.com)

**INTERVENORS**

Jon William Zellhoefer  
P.O. Box 34  
Tecopa, CA 92389  
[jon@zellhoefer.info](mailto:jon@zellhoefer.info)

Center for Biological Diversity  
Lisa T. Belenky, Sr. Attorney  
351 California Street, Ste. 600  
San Francisco, CA 94104  
*e-mail service preferred*  
[lbelenky@biologicaldiversity.org](mailto:lbelenky@biologicaldiversity.org)

Center for Biological Diversity  
Ileene Anderson, Public Lands  
Desert Director  
PMB 447  
8033 Sunset Boulevard  
Los Angeles, CA 90046  
*e-mail service preferred*  
[ianderson@biologicaldiversity.org](mailto:ianderson@biologicaldiversity.org)

Old Spanish Trail Association  
Jack Prichett  
857 Nowita Place  
Venice, CA 90291  
[jackprichett@ca.rr.com](mailto:jackprichett@ca.rr.com)

**INTERESTED AGENCIES**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

Great Basin Unified APCD  
Duane Ono  
Deputy Air Pollution Control Officer  
157 Short Street  
Bishop, CA 93514  
[dono@gbuapcd.org](mailto:dono@gbuapcd.org)

County of Inyo  
Dana Crom, Deputy County Counsel  
P.O. Box M  
Independence, CA 93526  
[dcrom@inyocounty.us](mailto:dcrom@inyocounty.us)

Nye County  
Lorinda A. Wichman, Chairman  
Board of County Supervisors  
P.O. Box 153  
Tonopah, NV 89049  
[lawichman@gmail.com](mailto:lawichman@gmail.com)

\*Nye County Water District  
L. Darrel Lacy  
Interim General Manager  
2101 E. Calvada Boulevard,  
Suite 100  
Pahrump, NV 89048  
[llacy@co.nye.nv.us](mailto:llacy@co.nye.nv.us)

\*National Park Service  
Michael L. Elliott  
Cultural Resources Specialist  
National Trails Intermountain  
Region  
P.O. Box 728  
Santa Fe, NM 87504-0728  
[Michael\\_Elliott@nps.gov](mailto:Michael_Elliott@nps.gov)

\*indicates change

**ENERGY COMMISSION –  
DECISIONMAKERS**

KAREN DOUGLAS  
Commissioner and Presiding Member  
*e-mail service preferred*  
[kldougla@energy.ca.gov](mailto:kldougla@energy.ca.gov)

CARLA PETERMAN  
Commissioner and Associate Member  
[cpeterma@energy.ca.gov](mailto:cpeterma@energy.ca.gov)

Ken Celli  
Hearing Adviser  
[kcelli@energy.ca.gov](mailto:kcelli@energy.ca.gov)

Galen Lemei  
*e-mail service preferred*  
Advisor to Presiding Member  
[glemei@energy.ca.gov](mailto:glemei@energy.ca.gov)

Jim Bartridge  
Advisor to Associate Member  
[jbartrid@energy.ca.gov](mailto:jbartrid@energy.ca.gov)

**ENERGY COMMISSION -  
STAFF**

Mike Monasmith  
Senior Project Manager  
[mmonasmi@energy.ca.gov](mailto:mmonasmi@energy.ca.gov)

Richard Ratliff  
Staff Counsel IV  
[dratliff@energy.ca.gov](mailto:dratliff@energy.ca.gov)

**ENERGY COMMISSION –  
PUBLIC ADVISER**

Jennifer Jennings  
Public Adviser's Office  
*e-mail service preferred*  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)

### DECLARATION OF SERVICE

I, Mary Finn, declare that on March 30, 2012, I served and filed copies of the attached Hidden Hills SEGS Data Response, Set 1D-5, dated March 30, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/hiddenhills/index.html](http://www.energy.ca.gov/sitingcases/hiddenhills/index.html).

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 or Chief Counsel, as appropriate, in the following manner:

*(Check all that Apply)*

**For service to all other parties:**

- ☒ Served electronically to all e-mail addresses on the Proof of Service list;
- ☐ Served by delivering on this date, either personally, or for mailing with the U.S. 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 that date to those addresses **NOT** marked "e-mail preferred."

**AND**

**For filing with the Docket Unit at the Energy Commission:**

- ☒ by sending an electronic copy to the e-mail address below (preferred method); **OR**
- ☐ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

**CALIFORNIA ENERGY COMMISSION – DOCKET UNIT**

Attn: Docket No. 11-AFC-2  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

***OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:***

- ☐ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission  
Michael J. Levy, Chief Counsel  
1516 Ninth Street MS-14  
Sacramento, CA 95814  
[mlevy@energy.state.ca.us](mailto:mlevy@energy.state.ca.us)

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



---

Mary Finn  
CH2M Hill