October 19, 2007
File No. 04.02.15.02

Mr. Jack Caswell
California Energy Commission
Systems Assessment and Facilities Siting Division
1516 9th Street, MS 15
Sacramento, CA 95814-5504

RE: Data Adequacy, Supplement B
Ivanpah Solar Electric Generating System (07-AFC-5)

Dear Mr. Caswell:

On behalf of Bright Source Energy, please find attached one original, 25 hard copies and 75 CD-ROMs of the Data Adequacy Supplement B, which addresses Staff’s remaining data adequacy recommendation dated September 28, 2007. The CD-ROMs include the AFC, Supplement A and this Supplement B.

Please call me if you have any questions.

Sincerely,

CH2M HILL

[Signature]
John L. Carrier, J.D.
Program Manager

c: Project File
Supplement B

In Response to Data Adequacy Review
of the
Application for Certification
for the
Ivanpah Solar Electric Generating System
(Ivanpah SEGS)
(07-AFC-05)

Submitted to the
California Energy Commission

Submitted by
Solar Partners I, LLC;
Solar Partners II, LLC;
Solar Partners IV, LLC;
and Solar Partners VIII, LLC

October 19, 2007

CH2M HILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833
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### Attachments

- CR-1c  CHRIS Reports (Confidential)
Introduction

This supplement to the Ivanpah Solar Electric Generating System (Ivanpah SEGS) Application for Certification (AFC) (07-AFC-5) responds to comments the California Energy Commission (CEC) Staff have made as a result of their data adequacy review of the AFC. On October 5, 2007, Applicant filed Data Adequacy Supplement A with the CEC. Additional information was requested for two additional areas: Cultural Resources and Traffic & Transportation. This Data Adequacy Supplement B addresses those remaining inadequacies.

Each subsection contains the data adequacy questions or information requests, with numbers and summary titles and, in brackets, the citation from Appendix B, Title 22, California Code of Regulations (Regulations Pertaining to the Rules of Practice and Procedure and Power Plant Site Certification) indicating a particular information requirement for the AFC. Each item follows with the CEC Staff comment on data adequacy for this item, under the heading “Information required for the AFC to conform with regulations” followed by the Applicant’s response to the information requested.
5.3 Cultural Resources

1. Literature Search Results [Appendix B(g)(2)(B)]

The results of a literature search to identify cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources listed pursuant to ordinance by a city or county, or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior’s Professional Standards for the technical area addressed.

Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5' quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying numbers shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within .25 mile of the area surveyed for the project under Section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.

Information required for the AFC to conform to the regulations:

1c. Staff cannot determine whether all the required reports have been submitted until a usable map, as described above, has been received. CHRIS reports numbered 106-1219, 106-1602, and 106-2218 need to be submitted. Staff also needs a report for unnumbered survey shown as scarlet N-S linear in T16N R14E, sections 2, 11.

Response — The Applicant did not receive the three missing reports from the information center because they could not find them. However, they continued to look and have since found them. Unfortunately, Report 106-2218 is on microfiche and the information center does not have a way to copy it. Five copies of the other two reports are provided to the CEC, under a request for confidentiality, as Attachment CR-1c. The N-S linear in T16N R14E, Sections 2 and 11 is an alternative survey route for report #1061734, which was submitted with the AFC as Confidential Attachment 5.3C.
Attachment CR-1c, CHRIS Reports, was submitted separately under a request for confidentiality.
2. Traffic Counts [Appendix B(g)(5)(C)(ii)]

Current daily average and peak traffic counts;

Information required for the AFC to conform to the regulations:

Please provide current daily average traffic counts (I-15).

Response — The AFC used the 2005 traffic data; however, Caltrans has just released the 2006 data. Both are provided for your convenience.

In 2005, the traffic counts on I-15 at Yates Wells Road were:

Annual Average Daily Traffic (AADT) South of the interchange (I/C) (i.e., Back AADT) = 40,000
AADT North of the I/C (Ahead AADT): 40,500
Back Peak: 5,300
Ahead Peak: 5,400

According to Caltrans, 2006 traffic counts on I-15 at Yates Wells Road were:

AADT = 40,000 vehicles
Peak Hour: 5,300 vehicles

[Reference: http://traffic-counts.dot.ca.gov/2006all/r012-15i.htm]