

STATE OF CALIFORNIA
California Energy Commission

California Energy Commission

DOCKETED
11-AFC-2

TN # 69553

FEB 15 2013

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE HIDDEN HILLS SOLAR
ENERGY GENERATION SYSTEM

Docket No. 11-AFC-02

OLD SPANISH TRAIL ASSOCIATION

**SUPPLEMENTAL TESTIMONY, DECLARATION OF JACK PRICHETT,
SUPPLEMENTAL EXHIBIT LIST AND ATTACHED COPIES OF EXHIBITS,
REQUEST FOR JUDICIAL NOTICE AND PROOF OF SERVICE**

February 15, 2013

Jack Prichett
President, Tecopa Chapter
Old Spanish Trail Association (OSTA)
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SUPPLEMENTAL TESTIMONY

Intervenor Old Spanish Trail Association (OSTA) herein submits its Supplemental Testimony, Declaration of Jack Prichett, Supplemental Exhibit List, Supplemental Exhibits and Request for Judicial Notice (collectively Supplemental Documents) regarding the application for certification of the proposed Hidden Hills Solar Energy Generating System (HHSEGS).

All of the Supplemental Documents presented herein were prepared, compiled and submitted by Jack Prichett, the person testifying in his attached Declaration.

The Supplemental Testimony consists of the 3 documents set forth in the Supplemental Exhibit List and the attached Exhibits 623 and 624. The new Testimony and Exhibits support OSTA's position that segments of the OSNHT/MR NC **do** fall within the HHSEGS site. In particular, Exhibit 623 provides supplementary information regarding the Trail corridor. Exhibit 623 is the Federal Standard governing National Historic Trails. It clarifies the definition of the National Historic Trail Corridor Concept and explicitly states that the location of NHT² resources may fall outside the congressionally designated route. Exhibit 624 provides a visual demonstration that LIDAR, a remote-sensing technique would provide far superior data recovery than visible light satellite imagery proposed in mitigation measure CUL-9, as written in the FSA.

OSTA reserves the right to supplement and/or revise this testimony at any time up to and including the close of the evidentiary hearings. Moreover, many of the factual issues discussed in the Supplemental Testimony and Documents involve both legal and factual questions while others are predominately legal issues. Therefore, OSTA respectfully reserves the right to address all disputed issues identified at the hearings through testimony, rebuttal, cross-examination, or at later stages of this process including in briefing following the evidentiary hearing.

Pursuant to the discussion at the Prehearing Conference on February 26, 2013, OSTA may also file additional Opening Testimony on the topic of Visual Resources.

OSTA also requests that the Commission take official notice of documents cited in testimony which are published by the California Energy Commission and are available on the Commission website. Some of those documents are included in the Exhibit List, with the URL link cited.

Dated: February 15, 2013

By:



Jack Prichett

**SUPPLEMENTAL EXHIBIT LIST
FOR TESTIMONY OF JACK PRICHETT**

Exhibit 623	Federal Trail Data Standards, Appendix B, 2011. Approved and issued November 2011 by the Federal Trails Data Standards Team of the Federal Geographic Data Committee. See pp. 47-48 of Appendix B. http://www.fgdc.gov/standards/projects/FGDC-standards-projects/trail-data-standard/trail-data-standards
Exhibit 624	Sample LIDAR image of a 19 th Century California archaeological site, showing features of 19 th century activity not visible in aerial or visible light satellite imagery. Imagery provided by ECORP Consulting, Inc., Rocklin CA.

Respectfully submitted,

February 15, 2013



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Declaration of Jack Prichett

Re: Supplemental Testimony on Cultural Resources Relative to the Application for Certification for the Hidden Hills Solar Energy Generating System

Docket No. 11-AFC-02

I, Jack Prichett, declare as follows:

1. I am currently a cultural resources and communications consultant and have held this position for more than nine years.
2. My relevant professional qualifications and experience are set forth in my previously submitted resume and in the testimony presented above, which are incorporated herein by reference.
3. I prepared the supplementary testimony attached hereto and incorporated herein by reference, relating to (1) significance of the Old Spanish National Historic Trail as a cultural resource and (2) needed reformulation of CUL-9 in the CEC's Final Staff Assessment.
4. It is my professional opinion that the testimony above is true and accurate with respect to the issues that are addressed.
5. I am personally familiar with the facts and conclusions described within the testimony above and if called as a witness I could testify competently thereto.

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

Dated: February 15, 2013

Signed:



At: Venice, CA

REQUEST FOR JUDICIAL NOTICE

OSTA hereby requests that the California Energy Commission take judicial notice of Federal Trail Data Standards, Appendix B, 2011. Approved and issued November 2011 by the Federal Trails Data Standards Team of the Federal Geographic Data Committee.

<http://www.fgdc.gov/standards/projects/FGDC-standards-projects/trail-data-standard/trail-data-standards>

This document is included as Exhibit 623 of the Supplementary Testimony.

Dated: February 15, 2013

By:

A handwritten signature in blue ink, appearing to read "Joel Prichett", is written over a light blue rectangular background.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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1516 NINTH STREET, SACRAMENTO, CA 95814
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**APPLICATION FOR CERTIFICATION FOR THE
HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM**

Docket No. 11-AFC-02

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(Revised 2/14/13)**

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Adviser to Presiding Member

Jennifer Nelson
Adviser to Presiding Member

TBD
Adviser to Associate Member

Eileen Allen
Commissioners' Technical
Adviser for Facility Siting

DECLARATION OF SERVICE

I, Jack Prichett, declare that on February 15, 2013, I served and filed copies of the attached Supplementary Testimony, dated February 15, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: <http://www.energy.ca.gov/sitingcases/hiddenhills/>.

The document has been sent to the other persons on the Service List above in the following manner:

(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **OR**

Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: Feb. 15, 2013


