



BrightSource

July 23, 2012

Mr. Pierre Martinez
Project Manager, Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Applicant's Supplemental Data Response Number Four, Set 1A (#16 and #26):
"Applicant's Environmental Enhancement Proposal" - Docket 11-AFC-04

Dear Mr. Martinez:

Rio Mesa Solar I, LLC and Rio Mesa Solar II, LLC (collectively the "Applicant") hereby submit the enclosed Supplemental Response Number Four to Energy Commission Staff Data Request Set 1A (# 16 and 26).¹ Data Request 16 relates to Applicant's use of auxiliary boilers, and Data Request 26 asks about "Alternative 3", the 500MW (nominal) on-site alternative. In response to these Data Requests, Applicant submits an "Environmental Enhancement Proposal," which is intended to enable a timely permitting schedule and reduce potentially significant impacts to biological and cultural resources. Applicant proposes to remove RMS 3 (the northern 250 MW (nominal) generating unit) from the Project Description. While RMS 3 enables a faster permitting timeline and has benefits for biological and cultural resources, its removal also represents a significant loss for California's renewable energy and economic recovery goals. It would have represented 250 MW of clean and fast starting renewable energy in Southern California. RMS 3 would have also created 50 permanent jobs in Riverside County and had a larger construction staff than the new Project Description.

The Project Description now consists only of RMS 1 and 2, which were originally presented in the AFC as "On-Site Alternative 3."² The Project will be primarily located on private land, once the proposed site for the Sun Desert Nuclear Power Plant. To detail these changes, Staff has requested that the Applicant provide redline strikethrough changes to each AFC chapter (attached). The primary changes to the Project and its potentially significant impacts include:

1. *Removal of RMS 3*: RMS 1 and RMS 2 are the only solar thermal generating units. The Project will no longer have a 250 MW unit located on BLM managed land.

¹ Applicant's original response to Set 1A was docketed on March 8, 2012, and now includes four supplements. Applicant's responses to Set 1A are available at: <http://energy.ca.gov/sitingcases/riomesa/documents/index.html>

² See AFC, Section 6.3.3.3 (On-Site Alternative 3), starting at p. 6-41, available at: http://energy.ca.gov/sitingcases/riomesa/documents/applicant/afc/Section_6.0_Alternatives.pdf

Mr. Pierre Martinez

Page 2

July 23, 2012

2. *Biological Resources*: many of the impacts will be reduced, including 2,108 acres of reduction in total impacts to vegetation communities, 541 acres in impacts to desert tortoise habitat, and avoidance of 126 kit fox den complexes.
3. *Cultural Resources*: removal of RMS 3 will avoid disturbance to 388 cultural resource sites.
4. *Visual Resources*: removal of RMS 3 reduces the visibility of the Project from I-10 and the nearby population centers of Ripley and Blythe.
5. *Remaining Development on BLM Land*: Portions of the gen-tie line to the Colorado River Substation, the 33 kV construction and emergency backup power line, and upgraded portions of Bradshaw Trail access road will be the only Project facilities located on BLM land and will still require federal permitting. However, with the removal of RMS 3, Bradshaw Trail is no longer situated within the northern portion of the Project.
6. *Common Area/Linear Facility Locations*: the Project switchyard is relocated to the west of the WAPA electric transmission line and North Baja Gas Line. The natural gas tap and meter station will be relocated to the south at the terminus of the "Unit 1, eastern spoke road." The preferred access route would change to an upgraded portion of the Bradshaw Trail access road.
7. *Auxiliary Boiler Usage* will decrease consistent with the Applicant's previously filed Boiler Optimization Proposal.³ (Additional detail is available in Applicant's April 20, 2012 filing).

Per Energy Commission Staff's request, Applicant presents the updated information (including figures and maps) attributable to the removal of RMS 3 in the attached red-line and strike-through changes to the original AFC sections.

Sincerely,



Todd Stewart
Director, Project Development

Enclosure

³ See Applicant's Supplemental Response Number 2 to CEC Staff Data Request Set 1A, available at: [http://energy.ca.gov/sitingcases/riomesa/documents/applicant/2012-04-16 Applicants Supplemental Response 2 to DR Set 1A TN-64814.pdf](http://energy.ca.gov/sitingcases/riomesa/documents/applicant/2012-04-16%20Applicants%20Supplemental%20Response%20to%20DR%20Set%201A%20TN-64814.pdf)