URS

February 14, 2011

Mr. Dale Rundquist
Compliance Project Manager
California Energy Commission (MS-2000)
1516 Ninth Street
Sacramento, CA 95814

Subject: CPV Sentinel Energy Project
Docket No. 07-AFC-3C
Construction Laydown Area Refinement

Dear Mr. Rundquist:

CPV Sentinel, LLC proposes to move the construction laydown area for the CPV Sentinel Energy Project (CPVS) from its currently approved location approximately 50 feet to the west. The new location is necessary to avoid an electric cable now located along the eastern boundary of the area previously proposed in the Application for Certification (AFC).

Please find attached a figure showing the proposed 50-foot shift of the laydown area. As explained further below, this modification does not result in any changes to the environmental consequences of the CPVS. Further, all impacts are expected to remain less than significant with implementation of conditions of certification set forth in the December 2010 Commission Decision.

BIOLOGICAL RESOURCES

The 50-foot-wide area now affected by the construction laydown area was surveyed for biological resources as part of the 1,000 foot buffer from the laydown area previously proposed in the AFC. Attached is AFC Figure 7.2-1 revised to show specifically this 1,000-foot buffer that was previously surveyed. As part of the general habitat, burrowing owl, rare plant, and desert tortoise surveys, the area was surveyed in 2007, 2008, 2009, and 2011 by URS biologists and/or Xeric Specialties Consulting. No threatened or endangered plant or wildlife species have been observed during biological resource field surveys of the construction laydown area or this 50-foot-wide segment. In addition, pre-construction surveys for rare plants and wildlife species (as required by conditions of certification in the Commission Decision) would include surveying this new area. The slight modification to the laydown area would not change the analysis of potential impacts to biological resources as previously described in the AFC Section 7.2, and set forth in the Commission Decision. Impacts to biological resources are expected to be less than significant with implementation of conditions of certification.

CULTURAL RESOURCES

The 50-foot-wide area now affected by construction laydown was previously surveyed for cultural resources, as shown on AFC Figure 7.3-5 (attached for reference). No cultural resources were identified in the 50-foot segment now affected by the construction laydown area (see Section 2.2.7 and Figure 6 of the Confidential Cultural Resources Technical Report).

Therefore, this modification of the construction laydown area would not change the analysis of impacts to cultural resources as described in the AFC Section 7.3 and set forth in the Commission Decision. Impacts to cultural resources are expected to be less than significant with implementation of conditions of certification.

PALEONTOLOGICAL RESOURCES

Construction of supporting facilities, such as temporary construction offices, laydown areas, and parking areas are unlikely to result in adverse impacts on significant paleontological resources, as they will involve only surface ground disturbance. Therefore, this modification of the construction laydown area would not change the analysis of impacts to paleontological resources as described in the AFC Section 7.16 and set forth in the Commission Decision. Impacts to paleontological resources are expected to be less than significant with implementation of conditions of certification.

OTHER RESOURCES

The 50-foot shift of the construction laydown area would not change the analysis for the following remaining disciplines as analyzed in the AFC and set forth in the Commission Decision:

- Air Quality
- Geological Hazards and Resources
- Hazardous Materials Management
- Land Use
- Noise
- Public Health
- Socioeconomics
- Soil and Water Resources
- Traffic and Transportation
- Visual Resources
- Waste Management
- Worker Safety/Fire Protection

Please do not hesitate to contact me at 714-648-2759 or Maggie_fitzgerald@urscorp.com if you have any questions.

Sincerely,

Maggie Fitzgerald
Site Compliance Manager
CPV Sentinel Energy Project

Proposed Transmission Line

Shifted Construction Laydown Area

AFC Construction Laydown Area

CITY OF PALM SPRINGS

RIVERSIDE COUNTY

Proposed Transmission Line

Shifted Construction Laydown Area

AFC Construction Laydown Area

Gas Transmission Corridor (75 feet wide)

Gas Transmission/Potable Water Line/ Access Road Corridor (200 feet wide)

Proposed Project Site

Palm Springs City Limit

N

0 50 100 200

FEET

Source: Imagery, National Agriculture Imagery Project, 2009; Parcels, Riverside County, 2008.

U:\GIS\Ocotillo_28067168\Projects\2011\Fig_1_Mod_Laydown.mxd 2/8/2011 11:21:13 AM

MODIFIED CONSTRUCTION LAYDOWN AREA

CPV Sentinel Energy Project
February 2011 — CPV Sentinel, LLC
28067907 — Riverside County, CA

URS

FIGURE 1

LEGEND

- Palm Springs City Limits
- Proposed Project Site
- Gas Transmission Corridor (75-feet wide)
- Gas Transmission/ Potable Water Line/ Access Road Corridor (200-feet wide)
- 1,000-Foot Buffer Around Former Laydown Area
- Construction Laydown Area
- Proposed Transmission Line
- 100% Coverage by Biological Survey
- Wash

Note:
Buried Pipe Depth: 7' to top of 24' Pipe

Source: project boundaries and proposed transmission line, referenced from graphics and digitized by URS, December 2006;; orthophoto, USDA FSA aerial photography field office: county image mosaic for Riverside, CA (2005); city imits, Riverside County, 2001-2006

Diablo Rd

Wind Farm

Proposed Transmission Line

Powerline Road North
Powerline Road South

16th Ave

1,000-foot Buffer Around Former Laydown Area

Construction Laydown Area

Wind Farm

Wind Farm

Dillon Rd (existing paved road)

RIVERSIDE COUNTY
CITY OF PALM SPRINGS

Diablo Rd

Karen Ave

(existing unpaved road)

Wind Farm

18th Ave

19th Ave

Indigo Power Plant

N

0 250 500 1,000
FEET

U:\GIS\Ocotillo_28067168\Projects\2011\figure7.2-1_bioresources.mxd 2/10/2011 4:47:02 PM

BIOLOGICAL RESOURCES STUDY AREA COVERAGE AND WATERS OF THE U.S. (Revised to Show Surveyed 1,000-Foot Buffer Around Former Laydown Area)

February 2011
28067907

CPV Sentinel Energy Project
CPV Sentinel, LLC
Riverside County, CA

URS

AFC FIGURE 7.2-1

LEGEND

- Palm Springs City Limits
- Proposed Project Site

Note:
Buried Pipe Depth: 7' to top of 24' Pipe

- Gas Transmission Corridor (75-feet wide)
- Gas Transmission/ Potable Water Line/ Access Road Corridor (200-feet wide)
- Construction Laydown Area
- Transmission Line
- Areas Surveyed
- Areas Not Surveyed Due to Inaccessibility

Source: project boundaries and proposed transmission line, referenced from graphics and digitized by URS, December 2006; orthophoto, USDA FSA aerial photography field office; county image mosiac for Riverside, CA (2005); city limits, Riverside County, 2001-2006.

Diablo Rd

Wind Farm

Proposed Transmission Line

16th Ave

Powerline Road North

Powerline Road South

Wind Farm

Construction Laydown Area

Wind Farm

Dillon Rd (existing paved road)

RIVERSIDE COUNTY

CITY OF PALM SPRINGS

Diablo Rd

Karen Ave

(existing unpaved road)

Wind Farm

18th Ave

19th Ave

Indigo Energy Facility

N

0 250 500 1,000

FEET

Map Document: (T:\GIS\Ocotillo_28067168\Projects\figure7.3-1_arcaeologicalRes.mxd) 6/18/2007 -- 6:45:11 PM MTorchia

6/21/07 vsa ..T:\CPV Sentinel (Ocotillo)\7.03 Cultural\7.3-1_surveyed area.ai

AREA SUREVEYED FOR ARCHAEOLOGICAL RESOURCES

June 2007
28067168

CPV Sentinel Energy Project
CPV Sentinel, LLC
Riverside County, California

URS

FIGURE 7.3-5