



April 16, 2010

Mr. Iain Fisher
CEQA Project Manager
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3296

Re: Tule Wind Project - Response to Data Request No. 2

Dear Mr. Fisher:

Pacific Wind Development, Inc., a wholly owned subsidiary of Iberdrola Renewables, Inc. (IBR) received your Data Request No. 2 regarding the Tule Wind Project. Enclosed is IBR's response.

If you have questions regarding this information, please contact me at 503.796.7781 or Shannon D'Agostino at 703.752.7755 ext. 113.

Sincerely,

Jeffrey Durocher
Wind Permitting Manager

cc (via e-mail): Greg Thomsen, BLM (GThomsen@blm.gov)
Thomas Zale, BLM (Thomas_Zale@blm.gov)
Jeffery Childers, BLM (jchilders@blm.gov)
Rica Nitka, Dudek (rnitka@dudek.com)
Shannon D'Agostino, HDR (Shannon.D'Agostino@hdrinc.com)

Encl.

IBERDROLA RENEWABLES, Inc.
1125 NW Couch St., Suite 700
Portland, OR 97209
Telephone (503) 796-7000
www.iberdrolarenewables.us

Response to Data Request No. 2

PEA Section 3.2 Aesthetics/Visual Resources

1. Text (page 3.2-45) states that as a result of the Tule Wind Project, visual impacts to county lands in the area of Ribbonwood Road north of I-8 would be significant and unmitigable however, no photos from this location are provided to substantiate this statement. Existing and simulated photos from this identified critical viewpoint are not provided in either the PEA Section 3.2 (Aesthetics/Visual Resources) or in the Visual Resources Report. Please provide an existing conditions photo and a visual simulation photo depicting viewable project components from this critical viewpoint in jpeg format.

RESPONSE: The viewpoints selected were identified in consultation with the BLM and County prior to rendering simulations. This particular viewpoint was not selected because, under BLM guidance, it was not considered one of the most critical viewpoint. The dominant visual changes to this viewpoint result from the alternative transmission line constructed adjacent to existing lines. Although this viewpoint was eliminated from the suite of visual simulations, HDR took a photo of existing conditions, which is included with this response. The Tule Wind Project VRA does not conclude that the impact is unmitigable, but that conclusion is required by CEQA.

2. PEA Section 3.2.8, regarding project alternatives, please provide simulations showing differences between the proposed project and Alternatives 2 and 3 for the 138kV line from Ribbonwood Road, Old Highway 80 or I-8, including the O&M/Substation facility co-located on Rough Acres Ranch if visible from a critical viewpoint.

RESPONSE: These vantage points did not meet the County's qualifications for the production of simulations. According to Patrick Brown, recommended simulations were "from views where the public would be likely to see the facility." The County determined that the most relevant viewpoints would be from Boulevard looking toward the project site, from Old Highway 80 toward the transmission line/substation interconnection point, and from I-8 looking north on McCain Valley Road. These locations are presented on pages 20 - 22 of the VRA. Enclosed is a photo of existing conditions at Ribbonwood Road, 100 feet north of the I-8 exit,¹ and a second photo taken approximately 1.5 miles north of I-8 in the area where the alternate transmission line starts heading east.²

Please confirm that Alternatives 2 and 3 will be carried forward (pursuant to the recent agency consultation regarding alternatives). Upon confirmation, and if additional simulations are determined by the lead agencies to be necessary, a visual simulation will

¹ See location 110 on the enclosed Google reference map.

² See location 112 on the enclosed Google reference map.

be rendered from one or more of these vantage points showing the proposed and alternative alignments.

Visual Resources Report

3. Please provide the following information: Table of Contents, including List of Figures, List of References, List of Agencies and Persons Consulted, and date of report. Also, was the BLM consulted during selection of KOPs/critical viewpoints?

RESPONSE: HDR consulted the BLM and County in October and December 2009. HDR will provide the requested information in the Visual Report.

4. Text (page 13) states that the BLM's Visual Contrast Rating System was used to determine the potential visual impacts of the proposed facilities on the existing environment and that the analysis for the Visual Resources Study was documented using visual contrast rating worksheets. Please provide the referenced Visual Contrast Rating Worksheets.

RESPONSE: Visual Contrast Rating Worksheets are included in the project record and HDR will include them as an Appendix to the Visual Report.

5. For each KOP, describe specifically: a) where the KOP is located; b) which agency plans/policies apply; c) what project features will be seen (e.g. number of turbines, miles of access roads, collector system, etc.); d) what distance zone each of the project features will be viewed from; e) the visual sensitivity of the seen landscape given view exposure and viewing distances and angles. Also, please make sure reference to KOPs in the text and in photo descriptions are consistent.

RESPONSE: Additional detail regarding the KOPs will be included in the report. The number of turbines, miles of access roads, distances, and collector system will be estimated on screen from the model used for simulations.

6. For each KOP explain whether a given KOP will/will not be consistent with each of the applicable agency plans and policies and the reasons why.

RESPONSE: The KOPs were determined to be critical views in keeping with VRM objectives. The visual contrast rating worksheet includes a "checkbox" for whether or not the proposed action is in keeping with BLM visual guidelines. This is included in the visual contrast rating worksheets. The KOPs are consistent with all applicable agency plans and policies.

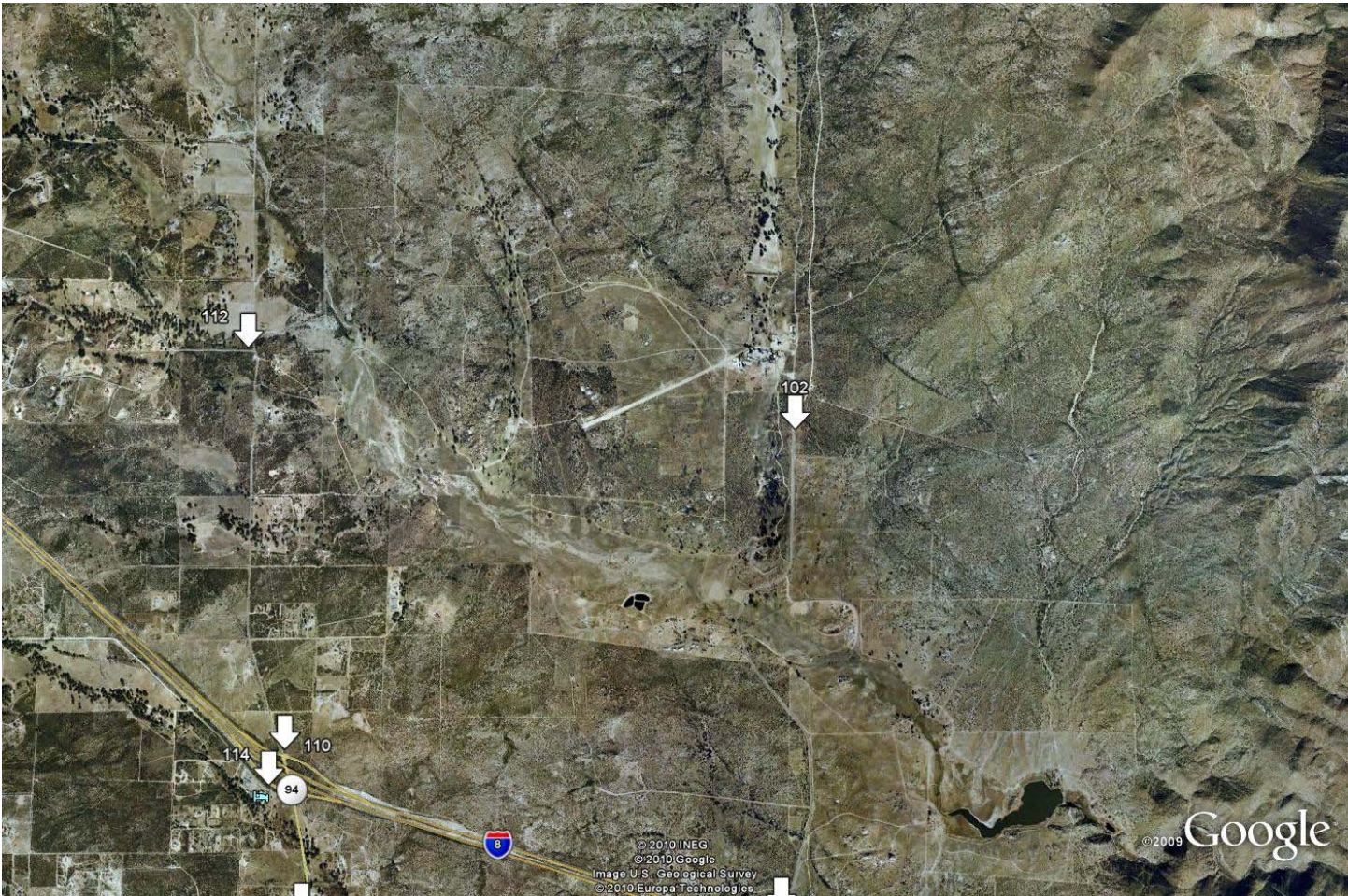
Project Graphics/Photos in Support of PEA Section 3.2 Aesthetics and Visual Resources and in support of the Visual Resources Study

7. Please provide all maps/graphics referenced in PEA Section 3.2 and included in Visual Resources Study in jpeg format. Jpegs of some photo simulations have been provided, but the existing conditions photos are missing. Please reference the existing photographs and simulations by KOP name/number and name the jpeg files accordingly. In their current state, the jpegs are titled differently than the Visual Report KOP map titles, and none have figure numbers.

In addition to existing photos and simulated photos from Ribbonwood Road north of I-8 (item 1 above), please provide the following existing conditions photos in jpeg format:

- I-8 at McCain Valley Road (page 19 of Visual Resource Study)
- Boulevard Substation Tie-In (page 20 of Visual Resources Study)
- McCain Valley Road (page 21 of the Visual Resources Study)
- McCain Valley Road at Rough Acres Ranch (page 22 of the Visual Resources Study)
- McCain Valley Road at Lark Canyon OHV Area and Campground (page 23 of the Visual Resources Study)
- McCain Valley Road at Carrizo Gorge (page 24 of the Visual Resources Study)
- Visual Impact Map (page 25 of the Visual Resources Study).

RESPONSE: The jpeg files will be provided by separate transmission for all of the above requested figures. The correct figure numbers will also be updated.







**PRIVATE
PROPERTY**
NO TRESPASSING