

ELLISON, SCHNEIDER & HARRIS L.L.P.

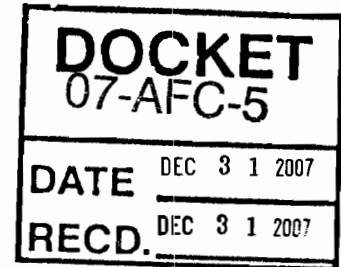
CHRISTOPHER T. ELLISON
ANNE J. SCHNEIDER
JEFFERY D. HARRIS
DOUGLAS K. KERNER
ROBERT E. DONLAN
ANDREW B. BROWN

ATTORNEYS AT LAW
2015 H STREET
SACRAMENTO, CALIFORNIA 95811-3109
TELEPHONE (916) 447-2166 FAX (916) 447-3512

TERESA W. CHAN
JEDEDIAH J. GIBSON
JEREMY D. GOLDBERG
LYNN M. HAUG
PETER J. KIEL
CHRISTOPHER M. SANDERS
WILLIAM W. WESTERFIELD III
GREGGORY L. WHEATLAND

December 31, 2007

Commissioner Jeffrey Byron, Presiding Member
Commissioner James Boyd, Associate Member
Ivanpah Solar Electric Generating System (07-AFC-5)
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814



Re: Applicant's Response to Issues Identification Report
Ivanpah Solar Electric Generating System (07-AFC-5)

Dear Commissioners Byron and Boyd:

Pursuant to the "Notice of Public Site Visit and Informational Hearing and Bureau of Land Management Scoping Hearing" dated December 10, 2007, Solar Partners I, LLC, Solar Partners II, LLC, Solar Partners IV, LLC and Solar Partners VIII, LLC (the "Applicant") hereby file this response to the Issues Identification Report filed by the California Energy Commission ("CEC") staff and the U.S. Bureau of Land Management ("BLM") staff (collectively, "the Staffs") for the Ivanpah Solar Electric Generating System ("Ivanpah SEGS").

Applicant appreciates the Staffs' efforts to date in preparing the Issues Identification Report and looks forward to working proactively to resolve issues and develop a reasonable schedule for this joint proceeding. In terms of the substantive issues set forth in the Issues Identification Report, Applicant believes that it will be more productive to discuss these issues at the Data Request and Issues Workshop. Accordingly, Applicant's comments herein focus on issues related to schedule.

Applicant understands and appreciates the Staff's diligence in addressing the complexities of integrating the CEC's certified regulatory program and the BLM's NEPA process. We look forward to continuing to work with the Committee, the Hearing Officer, the Staffs, and all interested parties to refine the schedule for this proceeding.

Recognizing the efforts to date, Applicant is concerned that the schedule as proposed is not satisfactory. To begin, the Applicant does not believe it is reasonable to ask the Applicant to waive its statutory right to a 12-month decision at the Informational Hearing, and the Applicant has not agreed to waive this important statutory provision at this juncture. While the Staffs' good-faith efforts are characterized as a 13-month schedule, in reality the proposed schedule is at least 13 months if and only if the Committee assumes no time for evidentiary hearings, briefs, and other "TBD" events that must occur. Specifically, as proposed, the Staffs' schedule requires

(a) 315 days to reach the “Final Staff Assessment/FEIS” filing and (b) an additional 60 days for comment on the Federal Record of Decision, for a subtotal of 375 days. However, this 375-day subtotal does not include the considerable time for the events listed as “TBD”:

- Prehearing/Evidentiary hearings start (TBD)
- Energy Commission Committee files proposed decision (TBD)
- Hearing on the proposed decision (TBD)
- Close of public comments on the proposed decision (TBD)
- Addendum/revised proposed decision (TBD)
- Commission Decision (TBD)

Even if some of these events and the 60-day comment period on the Federal Record of Decision can run concurrently, the proposed schedule extends this proceeding beyond 13 months.

In an effort to provide constructive suggestions, Applicant has the following general and specific recommendations. As a general recommendation, Applicant proposes that the revised schedule take advantage of the considerable efforts of the CEC and BLM to date. Specifically, the Memorandum of Understanding (“MOU”) entered into between the CEC and the BLM has as an attachment a model schedule for integrating the CEC and BLM processes (the “CEC-BLM Model Schedule”). The CEC-BLM Model Schedule, found on page 13 of the MOU (attached), is entitled, “BLM and CEC Combined Processing Plan.” Significantly, the CEC-BLM Model Schedule includes all of the major scheduling events set forth in the Staffs’ proposal.¹ Applicant respectfully suggests that the Committee use the CEC-BLM Model Schedule as the basis for a revised schedule for this proceeding.

As to specific recommendations, the Applicant first suggests that the revised schedule to be adopted by the Committee have the Endangered Species Act Section 7 Consultation initiated well before Day 120 as proposed by the Staffs.² The CEC-BLM Model Schedule begins consultation immediately. It is our understanding from BLM that informal Section 7 consultation was begun in September, shortly before the provision of the biological assessment on October 30th. Informal consultation has been on-going, and we have had no indication from the BLM that formal consultation could not commence as scheduled in the MOU. Indeed, we have worked cooperatively with the federal agencies to provide additional funding to staff the Section 7 Consultation so it could be completed within the agreed timeframes of the MOU. Consistent with the CEC-BLM Model Schedule, the Committee’s revised schedule should recommend that the formal Section 7 Consultation begin immediately.

Given the holidays, the Staffs’ late filing on December 28th, and the desire to file this response on December 31, 2007 as ordered, Applicant has not included with this response a detailed schedule as a counter-proposal. Moreover, given that we are still very much in the informal stage of this proceeding and that scheduling concerns are among the issues to be

¹ There are only two items on the Staffs’ proposed schedule that do not appear on the CEC-BLM Model Schedule and those appear to be BLM processing dates: (1) “BLM NOA on PSA/DEIS to WO and ASLM (6-8 weeks)” on Day 107 and (2) “NOA of FSA/FEIR in FR” on Day 257.

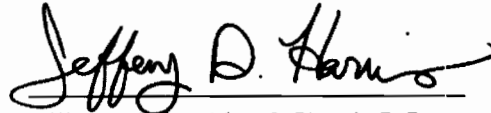
² In addition, Staffs’ schedule assumes consultation will require 155 days, rather than the 135 days required by statute, which would result in a completion date of July 14, 2008.

discussed at the Informational Hearing, filing a detailed, counter-proposal schedule without the benefit of further discussions would not be particularly productive. Accordingly, Applicant will make two further commitments. First, Applicant will bring to the Informational Hearing a draft proposed schedule, consistent with the comments herein. Second, based upon the further discussions at the Informational Hearing, Applicant will either submit its draft schedule at the Informational Hearing or, in the alternative, file a detailed schedule shortly thereafter based on the issues discussed at the hearing.

Applicant appreciates the good-faith efforts of Staff and has, as its objective for the workshop, site visit, and hearings, the complete and satisfactory resolution of all issues.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Jeffery D. Harris". The signature is written in a cursive style with a horizontal line underneath the name.

Ellison, Schneider & Harris L.L.P.
Jeffery D. Harris

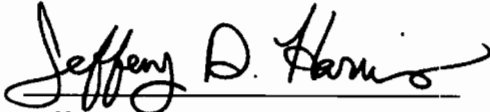
Attorneys for Solar Partners I, LLC; Solar
Partners II, LLC; Solar Partners IV, LLC;
and Solar Partners VIII, LLC

cc: Service List (07-AFC-5)
T. Gulesserian (CURE)

DECLARATION OF SERVICE

I, Jeffery D. Harris, declare that on December 31, 2007, I transmitted via electronic mail a copy of the Applicant's Response to Issues Identification Report, Ivanpah Solar Electric Generating System (07-AFC-5) consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 2010, to all identified on the Proof of Service list below.

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


Jeffery D. Harris

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE *IVANPAH SOLAR ELECTRIC
GENERATING SYSTEM*

Docket No. 07-AFC-5

PROOF OF SERVICE
(Revised 12/7/2007)

CALIFORNIA ENERGY
COMMISSION
Attn: Docket No. 07-AFC-5
1516 Ninth Street, MS-14
Sacramento, CA 95814-5512
docket@energy.state.ca.us

COUNSEL FOR APPLICANT

Jeffery Harris
Ellison, Schneider & Harris L.L.P.
Attorneys at Law
2015 H Street
Sacramento, CA 95814-3109
jdh@eslawfirm.com

APPLICANT

Solar Partners, LLC
John Woolard, Chief Executive Officer
Alicia Torre, Project Manager
1999 Harrison Street, Suite #500
Oakland, CA 94612
ATorre@BrightSourceEnergy.com

INTERESTED AGENCIES

Larry Tobias
Ca. Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
LTobias@caiso.com

Steve De Young
Ivanpah solar Electric Generating System
Project Manager
4155 Arbolado Drive
Walnut Creek, CA 94598
steve4155@astound.net

Electricity Oversight Board
770 L Street, Suite 1250
Sacramento, CA 95814
esaltmarsh@eob.ca.gov

APPLICANT'S CONSULTANTS

John L. Carrier, J. D.
2485 Natomas Park Dr. #600
Sacramento, CA 95833-2937
jcarrier@ch2m.com

* **Tom Hurshman, Project Manager**
Bureau of Land Management
2465 South Townsend Ave.
Montrose, CO 81401
tom_hurshman@blm.gov

* **Sterling White, Field Manager**
Bureau of Land Management
Needles Field Office
1303 South Highway 95
Needles, CA 92363

Sterling_White@blm.gov

INTERVENOR (Proposed)*

Tanya A. Gulesserian
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
Attorneys for the California Unions for
Reliable Energy
tgulesserian@adamsbroadwell.com

ENERGY COMMISSION

JEFFREY D. BYRON
Presiding Member
jbyron@energy.state.ca.us

JAMES D. BOYD
Associate Member
Jboyd@energy.state.ca.us

Paul Kramer
Hearing Officer
pkramer@energy.state.ca.us

Jack Caswell
Project Manager
jaswell@energy.state.ca.us

Dick Ratliff
Staff Counsel
dratliff@energy.state.ca.us

Public Advisor
pao@energy.state.ca.us

* Petition Filed December 21, 2007

**MEMORANDUM OF UNDERSTANDING BETWEEN THE
U.S. DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT
CALIFORNIA DESERT DISTRICT
AND THE CALIFORNIA ENERGY COMMISSION STAFF**

**CONCERNING JOINT ENVIRONMENTAL REVIEW
FOR SOLAR THERMAL POWER PLANT PROJECTS**

I. PURPOSE

This Memorandum of Understanding (MOU) documents the relative roles, responsibilities and procedures to follow in conducting a joint environmental review of solar thermal power plant projects by the Bureau of Land Management and the California Energy Commission staff. The parties to this MOU are: U.S. Department of the Interior, Bureau of Land Management (BLM), and the California Energy Commission (Commission) staff (staff), collectively referred to herein as “the Parties.” A number of large solar thermal power plant projects (Projects) are proposed to be built within the state on land owned by the federal government and managed by BLM. Because applicants would each need a right-of-way from BLM and certification from the Commission, these projects are subject to both BLM and Commission jurisdiction. This MOU shall also apply to any other project that is proposed on federal land managed by BLM and is under the Energy Commission's jurisdiction.

Under federal law, BLM is responsible for processing requests for rights-of-way to authorize the Projects and associated transmission lines and other appurtenant facilities to be constructed and operated on land it manages. In processing the applications, BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. In the case of solar thermal power plant projects, this will be accomplished through preparation of Draft and Final Environmental Impact Statements (EIS) in coordination with CEC and its Preliminary and Final Staff Analyses. Separate consultation requirements and associated documentation are required for Section 106 of the National Historic Preservation Act and Endangered Species Act (ESA) section 7 consultations associated with the Projects. These consultations will be completed by BLM during the process outlined in this MOU. BLM is also responsible for Native American consultation, including Government to Government consultation. The result of this cooperative effort is intended to result in a public participation process and environmental documents that fully meet BLM's requirements.

Under California law, the Commission is responsible for reviewing the applications for certification filed for the Projects, and also has the role of lead agency for the environmental review of the Projects under the California Environmental Quality Act (CEQA). (Pub. Resources Code, section 25500 et seq; Pub. Resources Code, section 21000 et seq.) The Commission conducts this review in accordance with the administrative adjudication provisions of the Administrative Procedure Act (Gov. Code, section 11400 et seq.) and its own regulations governing site certification proceedings (Cal. Code Regs., tit. 20, section 1701 et seq.) These

provisions require the staff to conduct an independent analysis of applications for certification and prepare an independent assessment of a project's potential environmental impacts, feasible mitigation measures, and alternatives as part of this process. The Commission considers the staff assessments, along with those of the applicant, interested local, regional, state, and federal agencies, intervenors, and interested Native American tribes, in developing its decision on an application for certification. The Commission has a certified regulatory program under CEQA that exempts the agency from having to draft an environmental impact report and, instead, requires a final staff assessment, evidentiary hearings, and a decision based on the hearing record, which includes the staff's and other parties' assessments.

It is in the interest of the Parties to share in the preparation of an environmental analysis of each of the Projects in a public process in California to avoid duplication of staff efforts, to share staff expertise and information, to promote intergovernmental coordination at the local, state, and federal levels, and to facilitate public review by providing a joint document and a more efficient environmental review process.

II. BACKGROUND

BLM has received right-of-way requests encompassing more than 300,000 acres for the development of approximately 34 large solar thermal power plants totaling approximately 24,000 megawatts. This large number of projects has not yet reached the stage of an Application for Certification (AFC) with the California Energy Commission. Attachment A to this MOU describes the Projects currently known to BLM. The Parties have conducted pre-application meetings jointly and separately with the project developers. Attachment B consists of a flow chart describing how the integrated CEC/BLM process is expected to function. This flow chart may be modified by agreement of the Parties without amending the MOU, as we continue to work with the process.

III. ROLES AND RESPONSIBILITIES

The Commission's siting process is divided into several phases, as is the NEPA process. The Parties agree to cooperate in their respective reviews of the project and to discuss the project and exchange information about the project on a regular basis. All information exchanged during the project review shall be provided electronically, unless there is a specific need for a paper copy of a document. The Parties will identify a primary point of contact for each Project who will coordinate the communications and exchange of information between the Parties. The Parties have developed a flow chart to demonstrate how the integrated process to produce joint environmental documents will function. This flow chart can be shared with Applicants at the pre-application stage so that they are fully informed of how the process will work and of the information they will need to provide at each stage in the process.

The Parties agree to coordinate in the following specific ways during each joint environmental review process: 1. Pre-application. The Parties shall encourage all potential applicants to attend pre-application meetings, and shall coordinate such meetings to the fullest extent possible, so that representatives of all interested Parties may attend. Pre-application meetings will provide the Parties the opportunity to discuss and comment on a project developer's site selection process

as well as provide the appropriate survey protocols for biological and cultural resources. A primary objective of this process for the Parties is to ensure that Applicants are fully informed of the data and information needs of both the Energy Commission and the BLM at the time an Application for Certification (AFC) is filed with the Energy Commission. It is critical, and in the interest of the Applicants, that the AFC meet the Parties' data and information needs for the Parties' integrated process to function effectively.

2. Data Adequacy. The Energy Commission staff reviews AFC applications to determine whether they meet the informational requirements of the Energy Commission's regulations and, if so, to recommend to the Energy Commission that the application be accepted as complete. During this period of up to 30 days, the Energy Commission staff will confer with the staff of the BLM regarding the sufficiency of information provided in the AFC. To the extent feasible, BLM staff will provide detailed and specific requests for the information needed to complete the Environmental Impact Statement (EIS). If any such requests go beyond the scope of informational requirements in the Energy Commission's regulations, the Energy Commission staff will send such requests to the applicant immediately following acceptance of the AFC as complete pursuant to the Energy Commission's regulations. If the Commission determines the AFC to be complete, the AFC will be accepted for purposes of beginning the Commission's statutory timeline of 12 months for a final decision. (Pub. Resources Code, section 25522.) Some applications may result in the need for BLM to amend existing land use plans. BLM's planning regulations and NEPA regulations require that this be identified at the beginning of the process. The potential need for a plan amendment may be associated with a need to upgrade the utility system infrastructure farther down line in the transmission system, a factor that is typically determined in a System Impact Study (SIS). Typically, this study is initiated at the AFC stage in the Energy Commission's process. However, since BLM must identify this need as part of the proposed action and alternatives, the SIS will need to be provided much earlier in the process than indicated by the Energy Commission's data adequacy regulations.

3. Discovery. After the AFC for a project is determined by the Commission to be complete, the Parties agree to cooperate in developing the scope of issues to be addressed in the NEPA/CEQA joint document, and in making decisions regarding public meetings, mailing lists, agency website information, and the preparation and distribution of fact sheets, news releases, announcements, and public notices during the NEPA/CEQA joint process. Energy Commission staff and BLM shall coordinate and hold a publicly noticed scoping meeting to assist in determining the appropriate scope of project review. BLM shall make a representative available for the scoping meeting. Dates for public workshops will be coordinated among the Parties to the fullest extent possible and, to the extent that it has sufficient resources, BLM shall endeavor to have a staff representative available at each publicly noticed staff workshop at which project alternatives, biological resources, and cultural resources will be discussed. These public workshops satisfy the Energy Commission's requirements for public workshops and BLM's need for public meetings.

Each Party agrees to promptly provide the other Party with any information it possesses or receives that is relevant to the responsibilities of the other party in its review of the projects. Each Party agrees to inform the other Party of any outstanding information it needs that is in possession of the other Party. Energy Commission staff shall coordinate and formally file any

information requests of the applicant. Within 21 days of the date the Commission deems the application for certification complete, BLM agrees to provide Commission staff a list of the information it needs to complete the environmental analysis to meet BLM's needs and to conform with the requirements of NEPA. Energy Commission staff shall incorporate BLM's information needs in its data requests and shall require the applicant to provide the data within 30 days of the receipt of the request, unless the applicant provides notification to the Energy Commission pursuant to subdivision (f) of Section 1716 of the Commission's siting regulations. (Cal. Code Regs., tit. 20, section 1701 et seq.).

Both the Energy Commission and BLM will determine whether the Applicant's responses are adequate. If the applicant's responses are not sufficient, or a new issue arises resulting in a need for BLM to obtain more data, BLM shall notify the Energy Commission staff of the need for the additional data as soon as possible. Energy Commission staff shall require the applicant to provide the additional data within 30 days, unless the applicant provides notification to the Commission as identified in the previous paragraph.

4. Analysis. The Parties agree that BLM will prepare an analysis addressing NEPA project alternatives and the Purpose of and Need for the action, as required by NEPA. In addition, BLM will be responsible for completing Native American consultation that is required by federal law. Energy Commission staff will prepare an assessment addressing impacts on air quality, biological resources, cultural resources, water resources, geological resources and hazards, hazardous materials handling, land use, noise, paleontological resources, public health, socioeconomics, soils, traffic and transportation, visual resources, waste management and worker safety and fire protection, as well as facility design engineering, efficiency, reliability, transmission system engineering and transmission line safety and nuisance. Energy Commission staff's assessment will also identify mitigation measures that may be considered to reduce any potential significant impacts. The assessments provided by the Parties must be sufficient to meet all federal and state requirements for NEPA and CEQA and shall be included as part of the joint Preliminary Staff Assessment/Draft Environmental Impact Statement and the joint Final Staff Assessment/Final Environmental Impact Statement. BLM and the Energy Commission recognize that BLM's requirements under NEPA to "select the contractor" will be satisfied through the process described in this section of the MOU only when BLM determines that the analyses prepared by Energy Commission staff sufficiently incorporate BLM's concerns into the analyses.

Draft preliminary analyses prepared by each Party shall be shared with the other Party at least 21 days prior to publication, and draft final analyses prepared by each Party shall be shared with the other Party at least 21 days prior to publication. The Parties agree to identify all concerns and recommended changes within 10 days of receipt of the draft analyses, and to work together to resolve any issues concerning the analyses or timing of review.

5. Hearings. The Parties agree that, for the Energy Commission's evidentiary hearings on each project, each will provide witnesses capable of sponsoring the analysis of each subject area for which the Party has responsibility pursuant to Section 4 above. The Energy Commission staff will consult with BLM and take the lead preparing any post-evidentiary-hearing briefs if the

Energy Commission's committee overseeing the case calls for briefs from the parties in the Energy Commission's proceeding.

6. Proposed Decision. The Parties agree to confer with each other as needed to comment on the Presiding Member's Proposed Decision (PMPD) in the Energy Commission's proceeding and to identify any findings or conclusions of the PMPD that are contrary to or inconsistent with the testimony of any Party. After completion of the Final EIS and a 30-day period, the BLM will prepare its Record of Decision (ROD), which describes BLM's decision. That decision can be appealed to the Interior Board of Land Appeals (IBLA), in the U.S. Department of the Interior.

IV. IMPLEMENTATION AND AMENDMENT

This MOU becomes effective upon signature by all the Parties, and may be subsequently amended or modified through written agreement of all Parties.

V. RESOLVING DISAGREEMENTS

If there are disagreements between the Energy Commission staff and BLM staff regarding the provisions of this agreement, representatives of each staff will meet to discuss the issues in dispute and shall work towards resolution. If agreement is not reached within 21 days of this initial meeting, the signatories of this MOU or his/her representative shall confer to attempt to resolve the disagreement.

V. TERMINATION

This MOU will remain in effect until all terms set forth herein are carried out to the satisfaction of the Parties. This MOU may be formally terminated in writing by any Party upon providing 30 days written notice to the other Party of an intention to terminate.

VI. SIGNATURES

The Parties hereto have executed this MOU on the dates shown below.


Mike Pool, State Director
Bureau of Land Management California

Date: 7/23/07


B.B. Blevins, Executive Director
California Energy Commission

Date: 8/8/07

July 30, 2007

The current EA addresses route proliferation on the allotment.

California Desert District - Solar Energy Applications July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Barstow	CACA 47702	SES Stirling Energy Systems, Inc. Solar One LLC	11/15/2006	6,462.	MUC: Limited & Moderate	850 Mw	Stirling engines 34,000 full phase	Near Pisgah North of I-40	EIS pending with California Energy Commission (CEC) as California Environmental Quality Act (CEQA) lead. received completed amended application
	CACA 48563	SES pilot site	11/15/2006	15	MUC: Limited & Moderate	1 Mw	Stirling engine 40 dishes	near Pisgah	Application complete EA in progress (5102)
	CACA 48741			6,400	MUC: Limited & Unclassified	800 Mw	Photovoltaic (PV)	near Baker	Application complete POD received. EIS required 5101 pending
	CACA 48742	Solar Investments LLC (G-S)	01/18/2007	9,600	MUC: Moderate	1,000 Mw	Photovoltaic (PV)	Silurian Valley	Application complete POD received. EIS required 5101 pending
	CACA 48743			10,000	MUC: Moderate	1,200 Mw	Photovoltaic (PV)	near Salt Hills	Application complete POD received. EIS required 5101 pending
	Pending			8,000	MUC: Moderate & Limited	1,000 Mw	Solar thermal	near Ludlow	Application forwarded to Needles Field Office
	CACA 48875	DPT Broadwell Lake LLC	01/24/2007	5,128	MUC: Limited & Moderate Military: Red	500 Mw solar thermal farm	Power tower 400-600 ft. high	Broadwell Dry Lake	Application complete POD received. EIS required 5101 pending
	CACA 48819	Optisolar Inc.	02/26/2007	13,440	MUC: Moderate, Limited, Intensive & Unclassified	1,000 Mw	Photovoltaic	Desert Ruby	Application complete POD complete. EIS required 5101 pending
	CACA 48818			14,440	MUC: Moderate	1205 Mw	Photovoltaic	Desert Opai	Application complete POD complete. EIS required 5101 pending

July 30, 2007

California Desert District - Solar Energy Applications
July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Barstow	CACA 48941		05/04/2007	4,500	MUC: Moderate, Adjacent to Harper ACEC (exclusion)	585 Mw	Photovoltaic	Desert Onyx	Application complete. POD complete. EIS required 5101 pending
	CACA 49051	FPL Energy, Inc.	04/24/2007	7,680	MUC: Moderate Cultural Heritage landscape concerns	750 Mw	Solar trough	Salt Creek; south of Siturian Dry lake, east of Fort Irwin	Application complete. Adjustments to project boundary in process. POD pending. 5101 pending. EIS required.
	CACA 49179	FPL Energy, Inc.	07/23/2007	6,400	MUC: Moderate & Limited	1,000 Mw	Solar trough	Black Butte: N. of Pisgah & I-40 T9N, R5E T8N, R6E	Application complete & on hold. Draft POD revision pending. 2 nd in line after Sterling Energy
El Centro	CACA 47740	Stirling Energy Systems, Inc. Solar Two LLC	01/16/2006	6000 -7000	Flat-tailed horned lizard habitat (FTHL) outside Management Area (defined in Range-wide Plan); Class L Military: Red Zone	Proposed 900 Mw generation (in 3 phases) .	Stirling Engine	Imperial County: T16S/R10E SBM Imperial County; T16S/R11E SBM	5101 funds received. Anticipate joint EIS/EIR with CEC as CEQA lead. Pending Application for Certification to CEC (anticipated Nov.- Dec.. 2007.
	CACA 48273	BIO Renewable Projects, LLC	07/31/2006	640	Unclassified lands; on western boundary of Chocolate Mountain Gunnery Range. Military: Red Zone	20 Mw.	Photovoltaic (PV) system	Imperial County: T11S/15E SBM	No contact for several months. Need to follow up as to ident. No cost recovery
	CACA 49150	BCL & Associates	07/18/2007	16,000 to use 7,500 for use 500 acres for solar collectors & 5,740 for greenbelt	Portion in Flat-tailed horned lizard (FTHL) management area. Cap on disturbance & 5:1 compensation. MOU with Navy.. solar project proposed on private land to the South	500 Mw	Photovoltaic (PV) system	Imperial County: T13S, R12E - Sec. 5-10, 15, 17-22, 26-35; T13S, R12E: Sec. 1-5, 11 & 12 SE of San Sebastian Marsh, W. of Hwy 86, NE of Navy ranges.	ECFO will work with applicant to identify issues and adjust acreage to correspond with proposed project needs and reduce acreage within FTHL management area.

July 30, 2007

California Desert District - Solar Energy Applications July 2007									
Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Needles	CACA 48668	DPT Ivanpah LLC	11/17/2006 (original) 12/14/2006 (modified) 1/22/2007 (modified)	480 2,400 6,270	Class L Groundwater issue	300 - 400 Mw (To be built in 100 - 200 Mw phases)	Power Tower	Ivanpah, south of the California/Nevada line T16N/R14E T17N/R14E	Modified application twice to increase acreage ¼ cost recovery received (\$42,280) Project Code assigned \$ transferred into 5101 account.
	CACA 48669	GEN 3 Solar, Inc.	12/14/2006	4,160	DWMA Class L	300 Mw	Photovoltaic	Ivanpah, south of Calif./Nevada line T17N/R14E	¼ cost recovery received (\$40,767) Project Code assigned \$ transferred into 5101 account.
	CACA 48758	Solar Investments VIII LLC	1/18/2007	5,520	Class M Possible groundwater issue	1,000 Mw	Solar Trough (solar thermal)	Mesquite Hills T10N/R8E T11N/R8E	Cost recovery paperwork sent 3/23/07
	CACA 48759	Solar Investments XIII LLC	1/18/2007	8,960	Class L Possible groundwater issue	1,000 Mw	Solar Trough (solar thermal)	New York Mountains T13N/R17E T14N/17E	Cost recovery paperwork sent 3/23/07
Needles	CACA 48760	Solar Investments I LLC	12/20/2006	10,880	Class L Possible groundwater issue Possible concerns with landscape issues along Historic Route 66	1,000 Mw	Solar Trough (solar thermal)	Amboy T6N/R11E T7N/R11E	Cost recovery paperwork sent 3/23/07
	CACA 48761	Solar Investments XII LLC	1/18/2007	12,640	DWMA Critical habitat (desert tortoise)	1,000 Mw	Solar Trough (solar thermal)	Nipton T16N/R15E T16N/R16E	Application rejected 3/23/2007

July 30, 2007

California Desert District - Solar Energy Applications
July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Needles	CACA 48776	Solar Investments I LLC	12/20/2006	30,720	DWMA Critical habitat (desert tortoise)	1,000 Mw	Solar Trough (solar thermal)	Plute Valley T11N/R19E T12N/R19E T13N/R19E T11N/R20E T12N/R20E	Application rejected 3/23/07
	CACA 48778	Solar Investments I LLC	12/20/2006	5,440	Class M and L Partial DWMA Partial Critical habitat (desert tortoise)	1,000 Mw	Solar Trough (solar thermal)	Arrowhead Junction T9N/R20E T9N/R21E T10N/R21E	Application accepted/rejected, in part, 3/23/2007 cost recovery paperwork sent
	CACA 48779	Solar Investments I LLC	1/18/2007	15,040	DWMA Critical habitat (desert tortoise)	1,000 Mw	Solar Trough (solar thermal)	Camino T9N/R19E T10N/R19E	Application rejected 3/23/2007
	CACA 48781	Solar Investments I LLC	12/20/2006	10,165	DWMA Critical habitat (desert tortoise)	1,000 Mw	Solar Trough (solar thermal)	Mountain Springs Road T9N/R18E T10N/R18E	Application rejected 3/23/2007
	Not yet serialized	IDIT, Inc.	03/16/07	6,680	Class M Military base border Possible ground water issue	500 Mw	Solar Trough (solar thermal)	Stedman T6N/R9E, T6N/R10E	Pending CDD Energy Strike Team Review
	Not yet serialized	IDIT, Inc.	03/16/2007	6,080	Class M Military base border Possible groundwater issue	500 Mw	Solar trough	Amboy T6N/R10E T6N/R11E	Pending CDD Energy Strike Team Review
	Not yet serialized	Leopold Companies, Inc.	04/02/2007	37,760	Multiple Use Class M	4,100 Mw (100 Mw per 900 acres)	Concentrated solar power (ENTECH's technology) – no groundwater usage		Pending CDD Energy Strike Team Review

July 30, 2007

California Desert District - Solar Energy Applications
July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
	Not yet serialized	IDIT, Inc.	04/24/2007	7,000	Class m and L	500 Mw	Solar trough		2 nd in time for most of site location. Pending CDD Energy Strike Team Review
	CACA 48649	Optisolar (was GEN 3 Solar Inc.)	11/09/2006	14,784	Multiple Use Class L	1,000 Mw	Photovoltaic	Desert Center Area – added additional lands 2/2007. Application is in portions of T.4 & 5 S., R.22 E	Received 5101 funds
	CACA 48878	Leopold Inc.	03/08/2007	22,913	Multiple use class L	1,000 Mw	Solar trough Photovoltaic	Blythe area	Sent 5101 letter
	CACA 48810	Chevron Energy 2	02/22/2007	5,540	Conflicts with utility corridor and other ROW's – north of I-10.	500 Mw	Solar trough	Desert Center / Chuckwalla area – portion of T. 5 S., R. 17 E.	Sent 5101 letter
Palm Springs South Coast	CACA 48808	Chuckwalla Solar 1	09-14-2006	4098	Multiple Use Class L	49 Mw	Photovoltaic & trough	Desert Center area	Received 5101 funds
	CACA 48811	Chevron Energy - 1	02/15/2007	1,950	Conflicts with utility corridor and other ROW's – south of I-10.	500 Mw	Solar trough	Chuckwalla area – portion of T.6 S., R.18 E.	Received 5101 funds
	CACA 49098	Altera Renewable Energy Ventures		8,742	Multiple use class L			Black Hills (Blythe) – portions of T.4 & 5 S., R. 22 E. north of I-10	Sent app. Rec'd & case #
	CACA 49097	Altera Renewable Energy Ventures		6,630	Multiple Use class L			Mule Mountains	Sent app. Rec'd & case #
	CACA 48880	Boulevard Associates	01/31/2007	16,094	Multiple Use class L	1,000 Mw	Solar trough	Desert Center 2	Received 5101 funds
	CACA 48728	Boulevard Associates	01/31/2007	20,652	Multiple Use class L	1,000	Solar trough	McCoy	Received 5101 funds

July 30, 2007

California Desert District - Solar Energy Applications

July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Ridgecrest	CACA 48872	Solar Millennium LLC	3/14/2007	14,000		279 Mw	Photo-voltaic	Robbers Roost - Freeman Gulch	
	CACA 48820	Opti-Solar "Sapphire Project"	2/13/2007	6,000	Multiple Use Class L	745 Mw	Photo-voltaic	Between Aqueduct and Highway 14 near Mojave, CA	Reviewed POD on file Conflicts w/ CACA 49015. This was filed first
	CACA 49017	Opti-Solar "Garnet Project"	04/03/2007	7,200	Multiple Use Class L	500 Mw	Photo-voltaic	Highway 395 Kramer Junction	Awaiting Review/ POD submitted
	CACA 49018	Opti-Solar "Turquoise Project"	04/06/2007	11,800	Multiple Use Class L	400 Mw	Photo-voltaic	Freeman Junction Little Dixie Wash Area Highway 14	Awaiting Review. Conflicts with 4 other companies. Deficiency letter to go out. Status checks 30 days from receipt
	CACA 48872	Solar Millennium	3/14/2007	11,200	Multiple Use Class L	1000 Mw	Parabolic trough	Freeman Junction Little Dixie Wash Area Highway 14	Reviewed Conflicts with 4 other companies. Deficiency letter to go out. Status checks 30 days from receipt
	CACA 49016	Solar Millennium Ridgecrest	3/23/2007	11,000	Multiple Use Class L	500 Mw	Parabolic trough	Jacks Ranch Road	Reviewed. Deficiency letter to go out. Status check 30 days from receipt
	CACA 49015	Solar Millennium	4/20/2007	5000	Multiple Use Class L	300 Mw	Parabolic trough	Highway 395/Cuddeback Road	Reviewed. Conflicts with opti-solar CACA 49017. this application was filed second
	CACA 49012	IDIT, INC Randsburg	3/23/2007	8000	DMWA Multiple Use Class L	500 Mw	Parabolic trough	Randsburg	Reviewed. Totally within DWMA. Will be rejected
	CACA 49013	IDIT, INC Redrock	3/23/2007	8000	Multiple Use Class L	1,000 Mw	Parabolic trough	Redrock Area	Awaiting Review/ POD

July 30, 2007

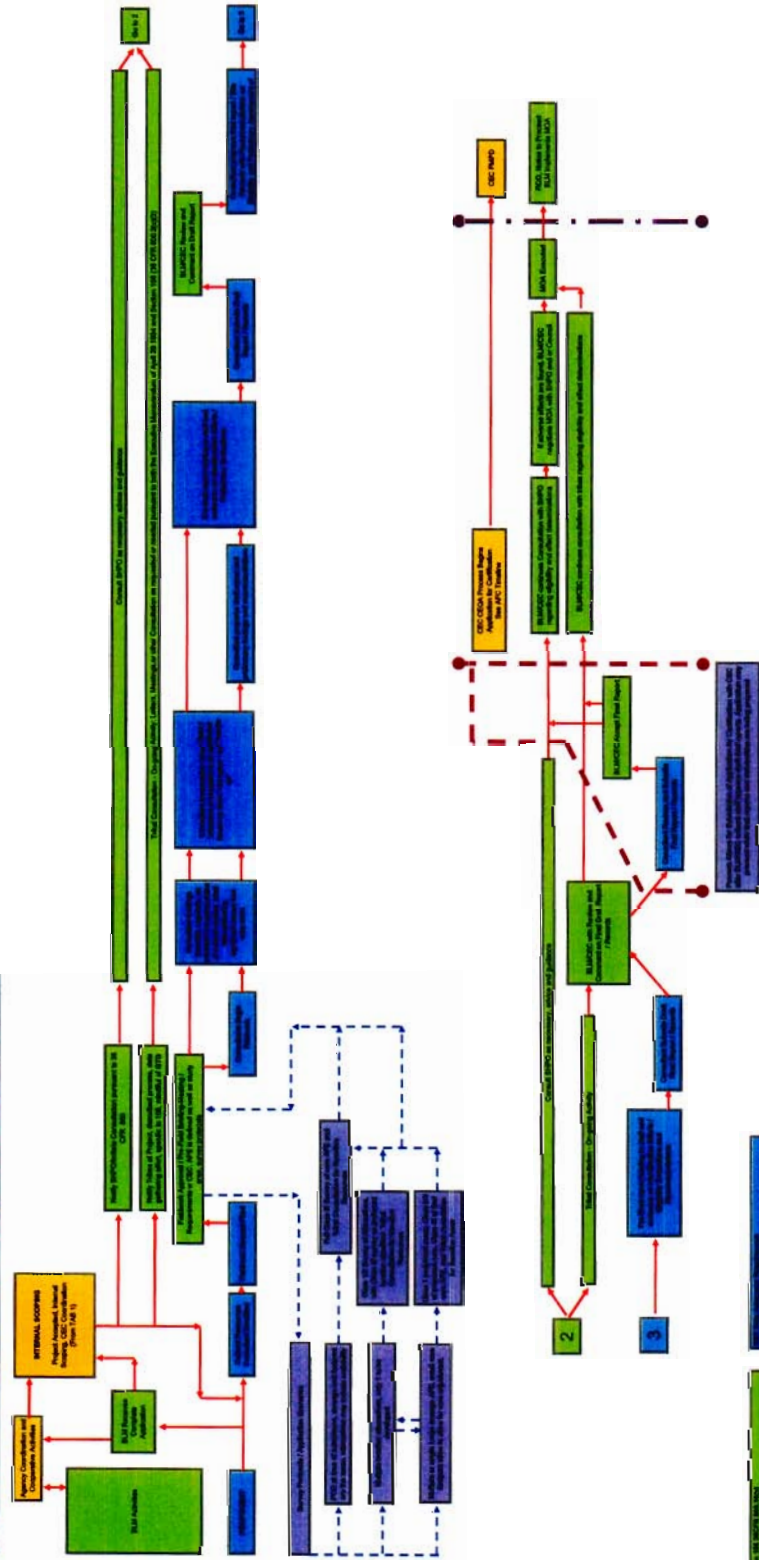
California Desert District - Solar Energy Applications
July 2007

Field Office	Serial Number	Applicant	Date Application Received	Acreage	DWMA, Critical Habitat, ACEC, MUC Class	Megawatts (Mw)	Planned Technology	Geographic Area	Status of Application
Ridgecrest	CACA 49014	AES/SEAWEST "Sage Canyon"	3/19/2007	4,000	Multiple Use Class L	Not stated	Parabolic trough/ Met towers	Freeman Junction Little Dixie Wash Area Highway 14	Awaiting Review
	CACA 49019	Boulevard Assoc. Wildrose Solar	05/09/2007	17,200	Multiple Use Class L	250 Mw	Parabolic trough	Panamint Valley	Not reviewed at this time

Column

Acreage: Describe the total acreage in the application, any phases, and the area to be developed at this time. Also the area not proposed for immediate development.
DWMA, etc: Include any concern that may point toward return of the application, as well as concerns that are cautions to the applicant in proceeding with the application.
Megawatts: Describe the total Mw in the project area, Mw proposed to be developed now. It would help to describe Mw per acreage, e.g., "X" Mw per 800 acres, if that's what an applicant uses.
Planned technology: Photovoltaic (PV), Concentrating Solar power technology (CSP): parabolic trough, dish-engine system (e.g., Stirling engine), power tower system.
Geographic area: Include notation of full or partial Township and Range. Do not get down to the Section level of detail. Familiar descriptions of the area are helpful, as some already contain.
Status of application: Include synopsis of discussions with applicant. Also include whether a cost recovery account has been established. Has payment been received; how much. Relationships with cooperators or contacts between applicant and other regulators

CULTURAL RESOURCE REVIEW PROCESS / BUM-DEC JOINT PROJECTS (SOLAR)



DEC/BLM Review Process

The DEC/BLM review process involves a joint review of the project application and the cultural resource assessment. The review is conducted by the DEC/BLM Cultural Resource Review Committee (CRCRC). The CRCRC is composed of representatives from the DEC, BLM, and other relevant agencies. The CRCRC reviews the project application and the cultural resource assessment and makes recommendations to the DEC/BLM Permitting and Licensing Division (PLD). The PLD then issues a permit if the project meets all requirements.

Public Involvement

Public involvement is a key component of the cultural resource review process. The DEC/BLM provides opportunities for the public to provide input on the project. This includes public hearings, public comment periods, and public meetings. The DEC/BLM also provides information on the project and the review process to the public. The public's input is used to inform the DEC/BLM's decision-making process.

