

**DOCKET**  
**09-AFC-9**

DATE FEB 19 2010

RECD. FEB 23 2010

February 19, 2010

Eric Solorio  
Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: Ridgecrest Solar Power Project (RSPP), Docket No. 09-AFC-9, Responses to CEC Data Requests for Biological Resources (DR 61) and Land Use/Recreation/Wilderness (DR 257-261)

Dear Mr. Solorio:

As requested, attached please find Ridgecrest Solar I, LLC's responses to CEC Data Requests BIO-61 and LURW-251 through LURW-261.

If you have any questions on these data responses to the Staff's Data Requests, please feel free to contact me at 510-809-4662 (office) or 949-433-4049 (cell).

Sincerely,



Billy Owens  
Director, Project Development

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBER 61**

**Technical Area: Biological Resources**

**Response Date: February 19 , 2010**

**DR-BIO-61**

**Information Required:**

Please provide a copy of written communication from the USACE that states there are no jurisdictional waters of the United States that will be disturbed for the RSPP project.

**Response:**

A copy of the final Jurisdictional Determination for the Ridgecrest Solar Power Project is provided at the end of this section. The USACE has determined that the RSPP footprint does not support jurisdictional waters of the U.S. The USEPA has also concurred and has declined to elevate this decision for federal waters.



**DEPARTMENT OF THE ARMY**  
LOS ANGELES DISTRICT, CORPS OF ENGINEERS  
VENTURA FIELD OFFICE  
2151 ALESSANDRO DRIVE, SUITE 110  
VENTURA, CALIFORNIA 93001

February 10, 2010

REPLY TO  
ATTENTION OF

Regulatory Division

Joshua Zinn, Ecologist  
EDAW, Inc.  
1420 Kettner Boulevard, Suite 500  
San Diego, California 92101

Dear Mr. Zinn:

This letter concerns your request (File No. SPL-2009-00950-TS) dated October 23, 2009, for a Department of the Army jurisdictional determination for the Ridgecrest Solar Power Project located in the China Lake area of Kern County, California. As part of the permit evaluation process, we have made the jurisdictional determination below.

Based on the information furnished in your request, and the jurisdictional delineation report for the Ridgecrest Solar Power Project (September 2009, revised October 2009), we have determined that the 11,680 acre project area does not support waters of the United States that are tributary to China Lake. Consistent with prior jurisdictional determinations in the China Lake watershed, the Corps determined potential jurisdictional waters of the United States on the 1,760 acre Ridgecrest Solar Power Project site to be isolated<sup>1</sup> and therefore not subject to the permit requirements of Section 404 of the Clean Water Act.

This letter contains an approved jurisdictional determination for the Ridgecrest Solar Power Project. If you object to this decision, you may request an administrative appeal under Corps regulations at 33 CFR Part 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet (Appendix A) and Request for Appeal (RFA) form. If you request to appeal this decision you must submit a completed RFA form to the Corps South Pacific Division Office at the following address:

Tom Cavanaugh  
Administrative Appeal Review Officer,  
U.S. Army Corps of Engineers  
South Pacific Division, CESPDPDS-O, 2042B  
1455 Market Street, San Francisco, California 94103-1399

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 C.F.R. Part 331.5, and that it has been received by the Division Office within 60 days of the date on the NAP. Should you decide to

---

<sup>1</sup> Solid Waste Agency of Northern Cook County (SWANCC) v. United States Army Corps of Engineers (531 U.S. 159, 121 S Ct 675 [2001]).

submit an RFA form, it must be received at the above address by **April 12, 2010**. It is not necessary to submit an RFA form to the Division office if you do not object to the decision in this letter.

This verification is valid for five years from the date of this letter, unless new information warrants revision of the determination before the expiration date. If you wish to submit new information regarding the approved jurisdictional determination for this site, please submit this information to Theresa Stevens at the letterhead address by **April 12, 2010**. The Corps will consider any new information so submitted and respond within 60 days by either revising the prior determination, if appropriate, or reissuing the prior determination. A revised or reissued jurisdictional determination can be appealed as described above.

If you have any questions, please contact Theresa Stevens of my staff at 805-585-2146 or via e-mail at [theresa.stevens@usace.army.mil](mailto:theresa.stevens@usace.army.mil).

Please be advised that you can now comment on your experience with Regulatory Division by accessing the Corps web-based customer survey form at:  
<http://per2.nwp.usace.army.mil/survey.html>.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron O. Allen". The signature is written in a cursive style with a large, sweeping flourish over the top of the name.

Aaron O. Allen, Ph.D.  
Chief, North Coast Branch  
Regulatory Division

Enclosure

**NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND  
REQUEST FOR APPEAL**

Applicant: Joshua Zinn, EDAW, Inc.		File Number: SPL-2009-00950-TS	Date: February 10, 2010
Attached is:			See Section below
	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)		A
	PROFFERED PERMIT (Standard Permit or Letter of permission)		B
	PERMIT DENIAL		C
X	APPROVED JURISDICTIONAL DETERMINATION		D
	PRELIMINARY JURISDICTIONAL DETERMINATION		E

**SECTION I** - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at <http://usace.army.mil/inet/functions/cw/cecwo/reg> or Corps regulations at 33 CFR Part 331.

**A: INITIAL PROFFERED PERMIT:** You may accept or object to the permit.

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **OBJECT:** If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

**B: PROFFERED PERMIT:** You may accept or appeal the permit.

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **APPEAL:** If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**C: PERMIT DENIAL:** You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**D: APPROVED JURISDICTIONAL DETERMINATION:** You may accept or appeal the approved JD or provide new information.

- **ACCEPT:** You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- **APPEAL:** If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**E: PRELIMINARY JURISDICTIONAL DETERMINATION:** You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

**SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT**

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

**POINT OF CONTACT FOR QUESTIONS OR INFORMATION:**

If you have questions regarding this decision and/or the appeal process you may contact:

DISTRICT ENGINEER  
Los Angeles District, Corps of Engineers  
ATTN: Chief, Regulatory Division  
P.O. Box 532711  
Los Angeles, CA 90053-2325  
Tel. (213) 452-3425

If you only have questions regarding the appeal process you may also contact:

DIVISION ENGINEER  
South Pacific Division, Corps of Engineers  
ATTN: Tom Cavanaugh  
Administrative Appeal Review Officer,  
South Pacific Division, CESPDPDS-O, 2042B  
1455 Market Street, San Francisco, California 94103-1399  
Tel. (415) 503-6574  
Email: thomas.j.cavanaugh@usace.army.mil

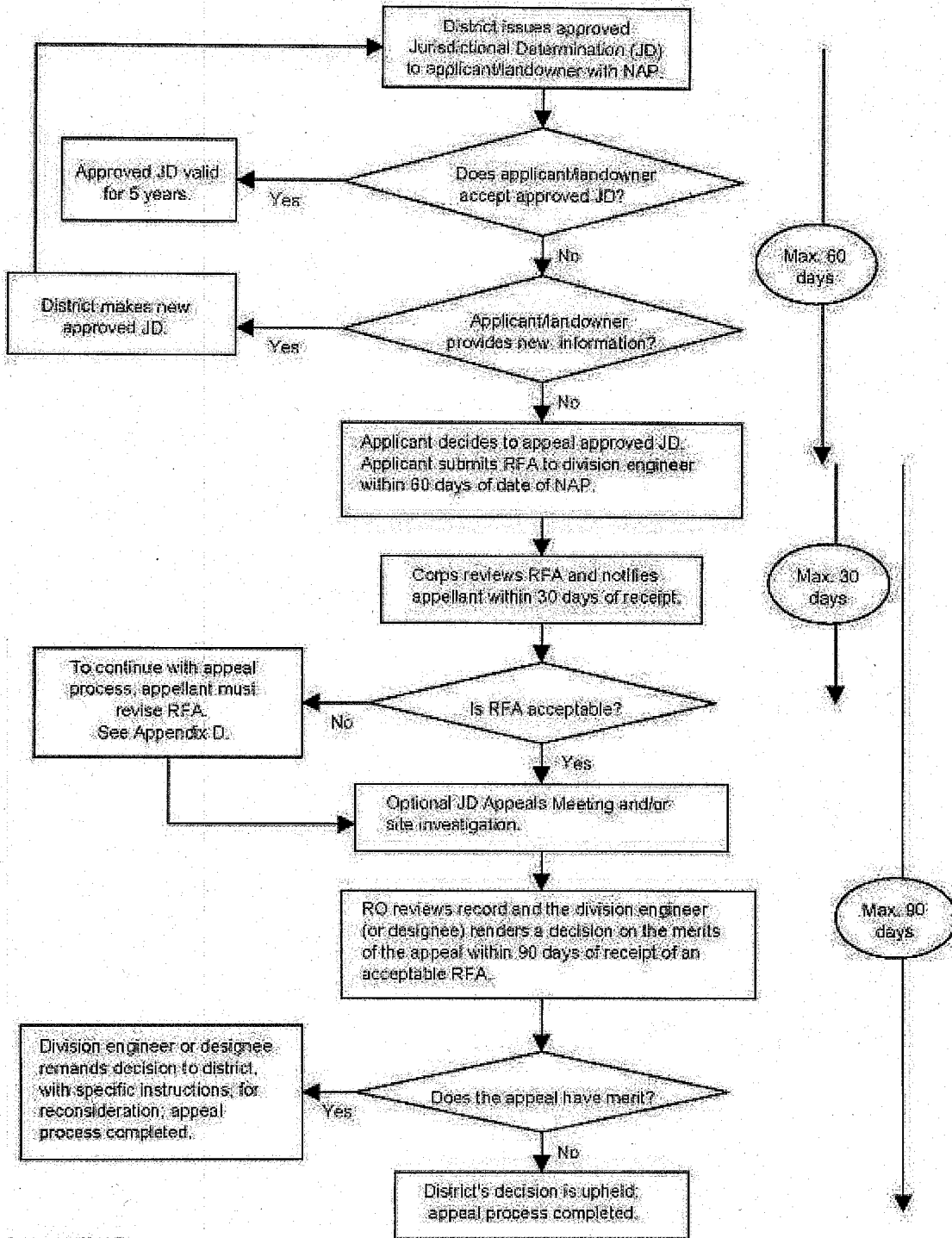
RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

\_\_\_\_\_  
Signature of appellant or agent.

Date:

Telephone number:

## Administrative Appeal Process for Approved Jurisdictional Determinations



**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)  
CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

**DR-LURW-257**

**Information Required:**

Please provide a discussion of existing trails into and through the proposed Bureau of Land Management (BLM) right-of-way (ROW) area and proposed Project site, supported by on-site surveys. Identify potential impacts to existing recreational opportunities and established sites.

**Response:**

In response to data requests DR-LURW-257 through DR-LURW-261, an AECOM Off-Highway Vehicle (OHV) recreation planner (Drew Stoll) conducted, during the week of February 8, 2010, an on-site survey of the vicinity of the proposed Project site to make field observations of existing and designated OHV routes. In addition, Mr. Stoll reviewed BLM planning documentation and other relevant information in order to develop each response.

According to the BLM West Mojave (WEMO) Plan Final Environmental Impact Statement/Environmental Impact Report (FEIS/EIR) (BLM 2005), there are seven open designated routes that traverse the Project ROW. Four of these routes intersect the Project footprint (EP0222, EP0223, EP0234, EP0235) and three of these routes intersect the Project ROW but not the Project footprint (EP0221, EP0236, EP02265). According to the WEMO Plan, the Project ROW is located in a BLM public use area designated as a "limited use area," allowing travel only on designated and signed routes (BLM 2005). The public is prohibited from traveling on any undesignated routes and from riding cross-country.

Figure DR-LURW-257-1 WEMO-Designated Routes depicts designated OHV routes in the vicinity of the Project site. As described in the Section 5.7 Land Use of the Application for Certification (AFC), those routes are from 1985-1987 designations, and will be updated by the El Paso Collaborative Access Planning Area (El Paso CAPA). During the January 5-6, 2010 Energy Commission/BLM Workshops, Scoping, and Information Meetings, the BLM indicated that these designated routes have not been field-verified. Thus, the Applicant has delineated routes based on aerial imagery and field verification. Locations of existing open designated routes within the vicinity of the Project site and the findings are presented below.

The designated OHV routes shown in maps that are sold and distributed to the public vary from the routes shown in the BLM WEMO Plan FEIS/EIR. In particular, the "Friends of Jawbone OHV Riding Areas & Trails – East Kern County & Adjacent High Desert Areas" map (hereafter "Friends of Jawbone Map") (Friends of Jawbone 2008) is distributed by the BLM Ridgecrest Field Office and is also posted within BLM trailhead signs in the vicinity of the Project site (see Figure DR-LURW-257-2 Friends of Jawbone Map). As observed in the field by AECOM's OHV recreation planner, in several instances, the Friends of Jawbone Map more accurately reflects the actual locations of existing routes than the WEMO Plan-designated route maps. Thus, the Applicant considers open designated routes to be those routes that are depicted in the Friends of Jawbone map, that have been verified in the field, and that have signage in the field. The Applicant has provided an updated map of the current designated OHV routes in Figure DR-LURW-257-3. These routes were digitized using a Geographic Information System (GIS) program, based on high-resolution georectified aerial imagery, and then field-verified with observations and Global Positioning System (GPS) devices. The routes were cross-checked with the Friends of Jawbone Map and WEMO Plan OHV map



**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)  
CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

As described in Section 5.7 - Land Use of the AFC, existing recreational opportunities on the Project site include organized equestrian, OHV group events, mountain biking, horseback riding, hiking, running, camping, rock hounding, target shooting, hunting (upland game including quail, doves, rabbits, and coyotes), and wildflower and wildlife viewing. Recreational uses within the Project site would no longer be available once the proposed Project is constructed. The Project site is located within the Cantil-Common sheep allotment area, and sheep grazing occurred for a few days on the Project site in 2008 and 2009. The Project site constitutes a small portion of the allotment and is not heavily grazed. The area northwest of the intersection of U.S. Highway 395 and Brown Road has natural rock formations that the public uses for general hiking, bouldering/rock climbing, paint ball, and other informal recreation activities. Refer to Response DR-LURW-261 for a discussion of existing sites and roads into and through the Project site that have historically been used for religious purposes by Native American tribal members.

Table DR-LURW-258 provides details regarding the routes that are located within the Project ROW (see Figure DR-LURW-257-3 – Existing OHV Routes). The routes that are described within Table DR-LURW-258 are those that are shown on the Friends of Jawbone Map and were verified during the AECOM field survey. The five WEMO-existing open designated OHV routes that intersect the Project ROW have an approximate total length of 5.1 miles within the Project ROW. WEMO maps show three designated routes north of Brown road (no route numbers assigned) within the Project ROW. While these routes can still be found on the ground, there are no public maps or signs on the routes indicating that these are designated routes. Approximately 1.9 miles of these routes are graded electrical transmission line maintenance roads. The other 3.2 miles are jeep trails (routes). A short section of designated Route EP021 (EP421 on WEMO map) enters the south edge of the Project ROW and would remain as a designated route to provide east-west OHV connectivity. One of the designated routes (EP 0234) leaves the east side of the Project ROW and passes through private property to the east of the Project ROW and then connects to the south side of Brown Road. South Calvert Road is a 1.2-mile road on the western edge of the ROW that provides access to private property just north of Brown Road (Figure DR-LURW-257-1). There are approximately 39.25 miles of other roads within the Project ROW that are not open (i.e. not designated) for OHV use. These other roads provide utility access or are remnants of roads created before OHV routes were designated by BLM. All routes in the Project ROW have a natural sandy to clay road base.

Maps distributed to the public, combined with the absence of signs in the field, indicate that no OHV routes extend north of Brown Road. U.S. Highway 395 has a fence that parallels it on both sides to keep OHVs and pedestrians from crossing the highway. The only a gap in this fence is at the intersection of U.S. Highway 395 and Brown Road/South China Lake Boulevard. There is one wash with a box culvert that passes under U.S. Highway 395 that is used by OHVs on unauthorized routes connecting private properties on the south side of Ridgecrest to OHV riding areas south of the highway.

There are approximately 1.25 miles of an abandoned railroad bed (with no rails or ties in place) within the Project ROW that appears to be heavily used by OHVs, but it is not a BLM-designated route. Full-size vehicles could travel on the railroad bed but it is too narrow to pass by any other vehicle and there is a risk of falling off the bed where it is raised or where there are bridges. The bed surface is composed of crushed stone that is loose and would be difficult to bicycle on. The abandoned railroad bed would make a good beginner or slow-speed all-terrain vehicle (ATV)/motorcycle trail (a trail open to motorized and non-motorized use that would be open to vehicles 50 inches or less in width).

There are 6.2 miles of designated OHV routes within or adjacent to the Project ROW that would be decommissioned and closed to recreational use, with implementation of the Project (see Table DR-LURW-258 for a list of these routes). Most of the existing designated OHV routes in the Project ROW provide a relatively poor recreation experience due to their straightness and wide width. Wide and straight OHV

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

routes do not provide for mystery or challenge in the riding experience, and lead to higher travel speeds that make the route more dangerous for the person speeding and others on or crossing the route. Higher speeds on straight routes also lead to the development of “woops,” or large undulating bumps that are formed by vehicles traveling at high speeds. Route EP0222 is a graded wide road that provides access for transmission line maintenance and provides the least favorable design for OHV recreation. The almost flat terrain of the study area also makes it less interesting and less challenging for OHV recreation. The Project ROW is located at the north edge of this BLM area with OHV designated routes and does not create a barrier for public access. BLM has designated other camping, trailheads, and OHV routes in areas to the west and east of the Project ROW. The primary impact to recreation would be less area for general recreation access (shooting, hunting, etc.) for the area that would be fenced off and closed to public access. For the most part, OHV recreation within the Project ROW is limited to routes that provide access to the OHV route network to the west, south, and east. This same access is provided by other existing designated routes around the Project ROW. As further described in DR-LURW-260, providing clarification of route access around the Project site would mitigate impacts to OHV users at the Project site.

**References**

U.S. Bureau of Land Management. 2005. West Mojave Proposed Plan – Final Environmental Impact Statement (EIS) and Environmental Impact Report (EIR). January. Available on the Internet at: <http://www.blm.gov/ca/st/en/fo/cdd/wemo.html>

Friends of Jawbone. 2008. Off-Highway Vehicle Riding Areas – East Kern County and Adjacent High Desert Areas – 7<sup>th</sup> Edition. December. Available at [www.jawbone.org](http://www.jawbone.org).

---

**DR-LURW-258**

**Information Required:**

Please provide figure(s)/table(s) depicting the location(s), type, and frequency of use, general route conditions, destination(s), and current BLM designation (if applicable) for existing OHV and other established access trails into and through the proposed Project ROW area and Project site. Site configuration should represent the amended Project boundaries, as presented at the January 5–6 workshops. Include information for Project alternatives, if different from the preferred Project alternative. Mapping of trail routes should reflect GPS ground survey findings and on-site visual observations.

**Response:**

Please see Figures DR-LURW-257-1, DR-LURW-257-2 and DR-LURW-257-3, and Table DR-LURW-258 below. Use levels of designated routes within the Project ROW are based on one day of field observations. Use levels have been ranked from low to high. Use levels were determined by observing the level of soil compaction, soil erosion, surface material (asphalt versus dirt) and condition of the vegetation on and adjacent to the route. The actual number of OHV vehicles using each of the routes is unknown.

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBERS 257 - 261**

Technical Area: Land Use/Recreation/Wilderness

Response Date: February 19, 2010

**Table DR-LURW-258 – Existing Routes in Project Row**

	Miles	Description/ Conditions	Use Level	Recommendations
<b>Designated OHV Routes</b>				
EP0222	1.95	20-foot-wide graded transmission line access road	High	This road, plus 0.37 mile outside the Project ROW, would need to be decommissioned. If the existing transmission line is not relocated, then the road would be kept as an administrative road closed to the public.
EP0223	1.75	10-foot-wide and relatively straight jeep trail/route	Low	This road, plus 0.92 mile outside the Project ROW, would need to be decommissioned.
EP0234	0.74	10-foot-wide and relatively straight jeep trail/route	Low	This road, plus 0.35 mile outside the Project ROW, would need to be decommissioned; another 1-mile section of the road is on private land to the east of the Project ROW. Recommend assisting private land owner with closing their property to public use.
EP0421 on WEMO map data	0.17	10-foot-wide and relatively straight jeep trail/route	Moderate	This road extends in both directions beyond the Project ROW and would remain as a designated route to provide OHV connectivity from east to west south of the Project ROW.
Other without route number	0.46	10-foot-wide and relatively straight jeep trail/route	Low	This segment is close to Brown Road and is a short-cut road to EP0223. This road would be decommissioned.
<b>Designated OHV Routes Subtotal</b>	<b>5.07</b>			
South Calvert Road	0.39	20-foot-wide graded road	Low	This road provides access to private properties north of Brown Road. This road would remain open to licensed vehicles only. The road continues on private land approximately 0.8 miles to the north of the Project ROW on a combination of private and BLM land and then dead-ends.
<b>Other (Non-Designated) Routes Subtotal</b>	<b>38.66</b>	Most are 10 feet wide and vary in condition	Low	These undesignated routes would be decommissioned unless needed for the Project.
<b>Abandoned Railroad Bed Subtotal</b>	<b>1.25</b>	10-foot-wide railroad bed with bridges, hill cuts, and raised areas	High	Would recommend designating as an ATV/motorcycle trail. BLM has designated a portion of this railroad bed a few miles east of the Project area.
<b>Total Routes in Project ROW</b>	<b>45.37</b>			

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

**DR-LURW-259**

**Information Required:**

Please identify and discuss recommended reroutes and/or alternative routes or sites to mitigate loss of access and recreational value. Evaluate alternatives for comparability to existing facilities and availability and consistency with the BLM Route Designation Minimization criteria. Alternative routing should not closely parallel Project boundaries or join existing access trails in a manner that would encourage users to follow existing access trails to the closure point, skirt the Project fence line (resulting in a proliferation of unofficial trails), or rejoin the original route on the other side of the Project.

**Response:**

Existing designated routes in the Project ROW provide access from Brown Road to OHV routes to the south (see Figures DR-LURW-257-1, DR-LURW-257-2, DR-LURW-257-3 and DR-LURW-259, and Table DR-LURW-259). In the vicinity of the Project site, there are no existing open OHV routes north of Brown Road, and, therefore, it would not be feasible to make OHV route connections to the north without designating new routes. OHV routes are needed on the west and east sides of the Project ROW that provide connections from Brown Road to the south. For the most part, this can be accomplished using existing designated routes. One existing road that would provide OHV connectivity is the existing designated Wiknich Road – EP26 (EP0218 on WEMO map). This road is asphalt and thus would require a parallel ATV/motorcycle trail on the east edge of the road ROW. There is private land on both sides of Wiknich Road near Brown Road and there is a shooting range on the west side of the road near Brown Road. Another existing designated route would be EP21 road (EP0219 and EP0421 on WEMO map), which would provide an east/west route south of the Project ROW. EP21 connects to Wiknich Road - EP26 (EP0218 on WEMO map). EP21 road then connects to EP33 (EP0238 on WEMO map) road, which continues east to the Spangler OHV area. A 1-mile-long existing designated OHV route (shown as designated route EP0237 on the WEMO map) would connect Route EP33 (EP0238 on WEMO map) to the intersection of Brown Road, U.S. Highway 395, and South China Boulevard. The existing area south of the intersection of U.S. Highway 395, Brown Road, and South China Boulevard can serve as an access point or parking area for the OHV routes.

Designating the abandoned railroad bed as a slow-speed ATV/motorcycle trail would add additional connectivity for ATVs and motorcycles from Brown Road to the south, east, and west of study area. If the railroad bed was designated as a trail from Road EP26 to Road EP33, approximately 5.4 miles of newly designated ATV trail would be added, which would balance the OHV route loss within the Project ROW. The railroad bed is not wide enough for full-size vehicles to pass each other. The railroad bed would also provide a good overlook of the Project site, with an opportunity to provide information to the public about the proposed Project and solar energy in general. The railroad bed is within the Project ROW but is located on the western edge. Fencing would need to be installed between the railroad bed and the Project facility to limit OHV use to the railroad bed. Fencing may only be needed at locations where OHVs can physically leave the railroad bed (e.g., at-grade areas). While the historic railroad is not currently a designated OHV route, this is the route the public would most likely want to keep open for use. The railroad bed could also be developed as a non-motorized trail, but that would require resurfacing to harden the tread for bicycles and strollers. Unless the railroad bed were paved and connected to the community, it would not likely get much use due to its somewhat remote location. In either case, the railroad bridges' structural integrity would need to be verified for safety and safety railings would need to be installed on the bridges and areas with steep-drop terrain.

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

The existing designated route that extends from the intersection of Brown Road and U.S. Highway 395 to the southwest and into the Project ROW is recommended to be closed to public use. This route traverses private land to the east of the Project ROW. An alternative route can be provided to the south to connect to designated routes there. An existing designated OHV route (EP0237) due south from the intersection of Brown Road and U.S. Highway 395 would provide a better recreation experience and provide good connectivity.

As elaborated in the response to DR-LURW-257, the designated routes in the Project ROW provide a relatively low quality OHV experience. Nonetheless, to mitigate for the closure of designated OHV routes in and around the Project ROW, the Applicant would work with the BLM to provide OHV connectivity around the Project ROW with connections to other OHV routes. The existing and proposed designated routes that would be open for OHV use in the future would not come close to the Project ROW, and thus the public would not have a need to approach the Project fencing. Responses to the next question DR-LURW-260 provide recommendations for methods to decommission routes.

**TABLE DR-LURW-259 – ROUTE CONNECTIVITY OPTIONS**

	<b>Miles</b>	<b>Description</b>	<b>Use Level</b>	<b>Notes/ Recommendations</b>
<b>Designated OHV Routes</b>				
EP021	1.44	10-foot-wide and somewhat curvy jeep trail/route	Moderate	Needs route signs; designated as EP0421 on WEMO maps.
EP0219	1.77	10-foot-wide and somewhat curvy jeep trail/route	Moderate	Needs route signs; some erosion.
EP0237	1.06	10-foot-wide and somewhat curvy jeep trail/route	Low	Needs route signs; shows as undesignated on WEMO maps but as designated on Friends of Jawbone Map.
EP0238	2.19	10-foot-wide and somewhat curvy jeep trail/route	Moderate	Needs route signs; parallel to railroad bed.
EP026	0.58	20-foot-wide asphalt road	High	This is Wiknich Road and EP218 with private land on both sides of road; shooting range on west side of road.
EP0421	0.37	10-foot-wide and somewhat curvy jeep trail/route	Moderate	Needs route signs; parallel to railroad bed.
EP0244	0.21	10-foot-wide and somewhat curvy jeep trail/route	Moderate	Needs route signs; connector route to EP 33.
<b>Designated OHV Routes Subtotal</b>	<b>7.63</b>			
<b>Abandoned Railroad Bed Subtotal</b>	<b>5.36</b>	10-foot-wide railroad bed; has bridges over washes and some steep sections	High	EP26 – EP33
<b>Total Connectivity Routes</b>	<b>12.99</b>			

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)**  
**CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

**DR-LURW-260**

**Information Required:**

Several of the existing routes would dead-end at the Project security fence once the Project is constructed. Please recommend measures to remediate terrain along decommissioned routes from the rerouted portion of the route to fence line, or from the fence line to point of access. Provide justification for any areas where remediation would not occur.

**Response:**

Approximately 6.2 miles of designated OHV routes are located within or adjacent to the Project ROW that would be decommissioned and closed to recreational use. Approximately 30.9 miles of nondesignated routes would be decommissioned including routes within the Project ROW, and designated routes that would dead-end at the Project ROW. Initially, all roads leading to the Project ROW would need to be signed and, if needed, fenced to keep the public from using them. When necessary, decommissioned routes that may be tempting for OHV users (i.e. routes that lead off of highly used designated routes) will be leveled or restored to natural condition to dissuade OHV users from using those routes.

While it can be difficult to reestablish natural vegetation in the desert environment, one important step is to keep the public from using the nondesignated routes or areas. Part of achieving this goal could involve work with the owner of the private property on the east edge of the Project ROW and south of Brown Road to fence and/or sign the property to keep the public from traveling through it and near the Project ROW. This would be a benefit to both the private property owner and the Project proponent.

The key action to limit unauthorized OHV use of undesignated routes in and around the Project ROW is to provide clear signs and natural barriers (e.g. boulders) as appropriate that identify access points and limits and remind users to stay on designated routes. Likewise, undesignated routes need to be clearly marked as closed and eventually restored to a natural condition.

In addition, providing information about the area and its natural resources, the Project, and the balance between OHV and other uses of BLM land may help OHV and other users to respect the property and to limit OHV use to designated trails. Such information could be conveyed through an interpretive exhibit and parking area somewhere on Brown Road. Similarly, if the railroad bed is used as an ATV/motorcycle trail, an interpretive exhibit could be erected on the trail to describe the area and the Project and provide an overlook location.

**RIDGECREST SOLAR POWER PROJECT (09-AFC-9)  
CEC STAFF DATA REQUEST NUMBERS 257 - 261**

**Technical Area: Land Use/Recreation/Wilderness**

**Response Date: February 19, 2010**

**DR-LURW-261**

**Information Required:**

Please provide a discussion of existing sites and trails into and through the proposed Project site and BLM ROW that have historically been used for religious purposes by Native American tribal members, including the type and frequency of use and importance to traditional Native American religious practices. Incorporate recommendations to accommodate continued use or mitigate loss of use.

**Response:**

The desert to the east of the Kawaiisu core area, which includes the general vicinity of the RSPP, was used transitorily for seasonal trips to exploit desert resources prehistorically and likely into the historic period. Trips were made to obtain salt at Saltdale, a dry lake, and to the opposite side of Randsburg for obsidian. A prehistoric trail system emanated from the Kawaiisu core area (Zigmond 1986), though no trails have been identified within or adjacent to the RSPP.

Historic and contemporary use of the RSPP area appears to revolve around relatively informal pedestrian routes and, subsequently, OHV routes. Results of the Class III archaeological survey of the RSPP did not identify any formal trail alignments, and Native American cultural resources identified within the RSPP consist primarily of sparse lithic scatters resulting from lithic reduction as part of the tool-making process and lithic isolates. The Sacred Lands file search provided by the Native American Heritage Commission did not identify any sacred sites within the RSPP. Similarly, correspondence and communication conducted as part of the formal Native American contact program for RSPP did not yield any information on sites and trails of religious significance from the Native American contacts consulted. Ongoing consultation, however, has indicated that the RSPP serves as a meeting point for and conduit to the El Paso Mountains for various tribal groups. To date, no additional information on specific locations and routes has been identified. Documented ethnographic information from Kawaiisu elders suggests that access to ceremonials sites, like upper Last Chance Canyon and sites in the El Paso Mountains, was obtained using "several different routes (along ridge lines) that led to the peaks of Black Mountain and that different tribes used their own routes" (Faull et al. n.d.:8).

While no detailed information on trail routes used by Native Americans has been obtained to date, should ridgeline routes in fact be used to access the El Paso Mountains, these routes will continue to be open to use. In addition, the untracked grade of the former Southern Pacific railway to the west of the RSPP ROW currently provides pedestrian access along the base of the El Paso Mountains and could potentially serve as an access point to the canyons and ridges of the range.

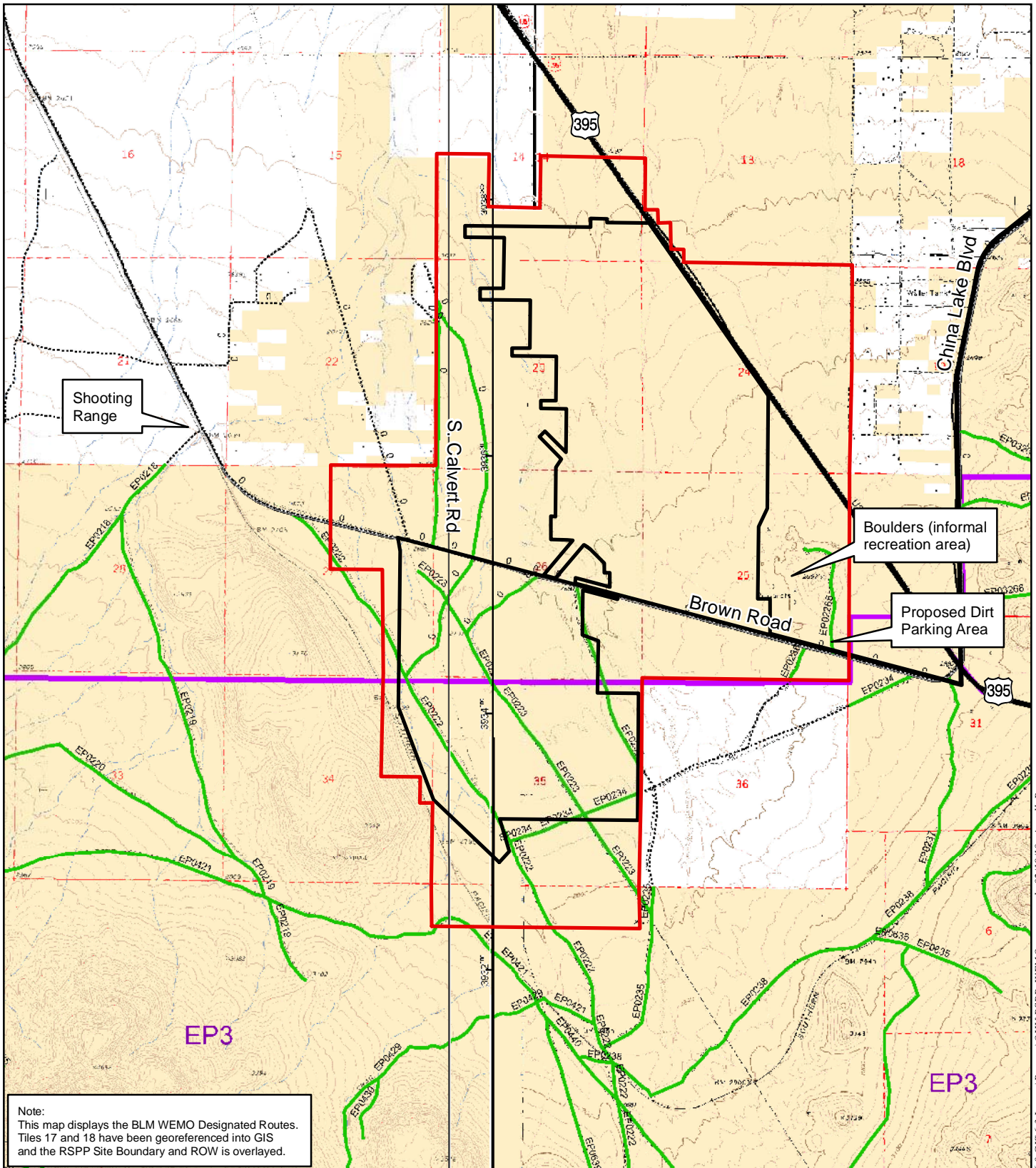
In order to obtain additional information, the Applicant has contacted tribal representatives, including those who have indicated knowledge of use of the general vicinity of the RSPP, to obtain information regarding the location and use of site and trails within the RSPP and the potential for acceptable alternative sites and routes outside the RSPP. Copies of communication with these representatives is attached as Attachment DR-LURW-261. Responses and any additional communication will be documented and copies submitted to the CEC upon receipt.

**Reference**

Faull, Mark, Alan Garfinkel, Andy Gree, and Albert Knight. n.d. The El Paso Mountains: Sacred Landscape of the Kawaiisu. Draft Manuscript on file at the Bureau of Land Management Ridgecrest Field Office.

## **Land Use, Recreation and Wilderness Figures**





Note:  
 This map displays the BLM WEMO Designated Routes.  
 Tiles 17 and 18 have been georeferenced into GIS  
 and the RSP Site Boundary and ROW is overlaid.



**Legend**

- Project ROW
- Project Disturbance Area
- WEMO-designated routes
- MAZ Boundaries

1 inch = 3,500 feet

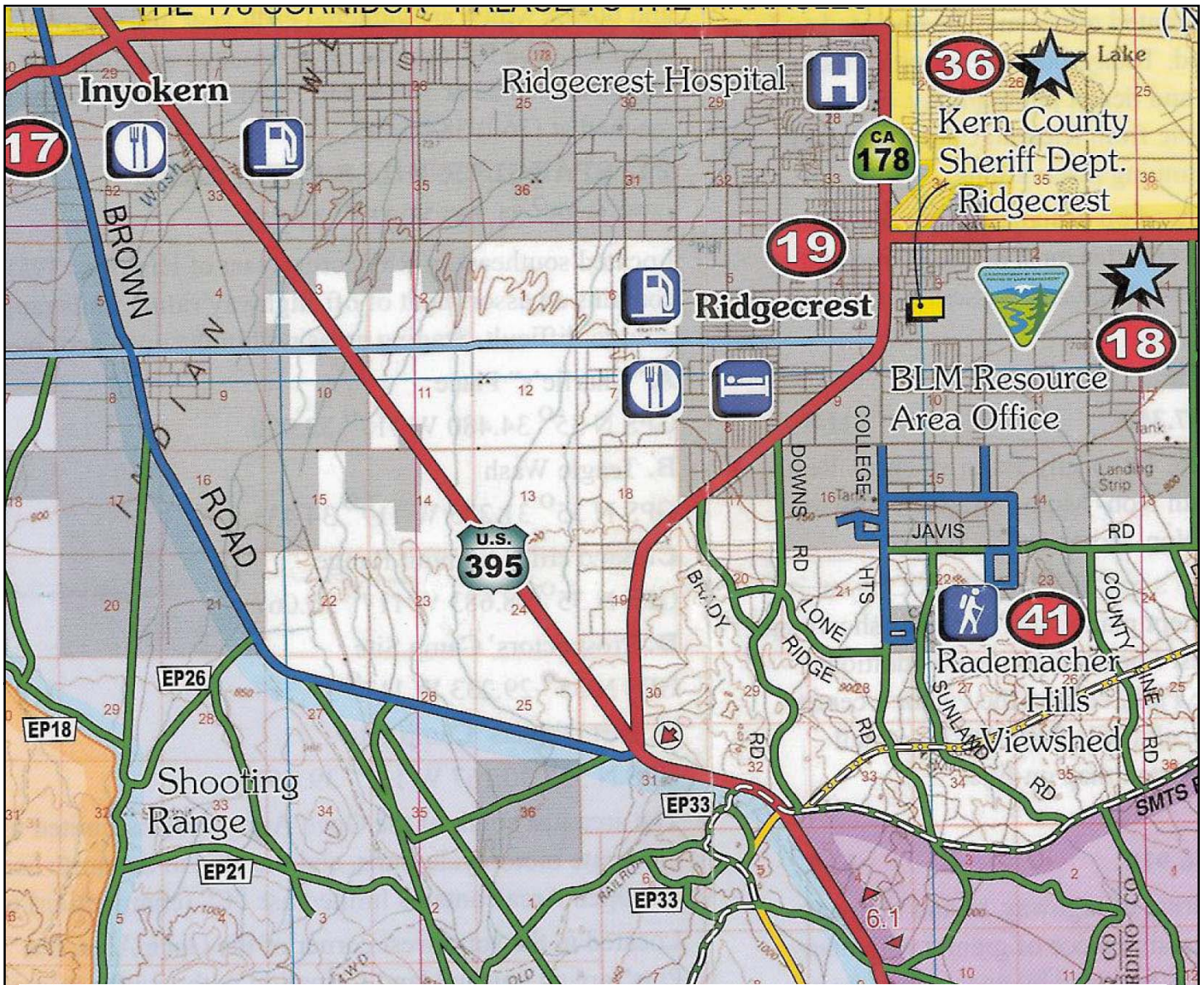
0      3,500      7,000  
 Feet

**Ridgecrest  
 Solar Power Project**

**Figure DR-LURW-257-1  
 WEMO Designated Routes**

Source: AECOM 2010; BLM 2004

Date: February 2010



	U.S. FEDERAL HIGHWAY		PACIFIC CREST SCENIC TRAIL HIKING AND EQUESTRIAN ONLY		CALIFORNIA FISH & GAME AREA (FENCED)		10,000 - METER UNIVERSAL TRANSVERSE MERCATOR GRID, ZONE 11 1927 NORTH AMERICAN DATUM
	STATE HIGHWAY		MILEAGE BETWEEN MARKERS		MILITARY LAND		LATITUDE AND LONGITUDE MARKING
	TWO LANE PAVED ROAD		PRIVATE GATES (LOCKED)		BLM LIMITED USE AREA (MUST STAY ON DESIGNATED ROUTES) ENCOURAGED ROUTES ARE MARKED ON THE MAP AND ON THE TRAILS		POSSIBLE CELLULAR RECEPTION
	DIRT ROAD STREET LEGAL ONLY		STATE PARK		BLM PUBLIC LAND		MUSEUM
	FOUR WHEEL DRIVE ROADS		BLM - TRAVEL ON MARKED TRAILS ONLY		BLM - WILDERNESS, ETC. CLOSED TO ALL MOTORIZED VEHICLES HIKERS AND HORSES ONLY		NOTE: IRC = INTER REGIONAL CONNECTOR TRAIL
	RECOMMEND - MOTORCYCLES & ATVS ONLY (SEQUOIA NATIONAL FOREST NO ATVS)		BLM - OPEN RIDING AREAS		PRIVATE PROPERTY		DEGREE OF DIFFICULTY FOR U.S. FOREST
	DIRT ROAD ( CAL CITY)		PRIVATE HOMES STAY 1/4 MILE AWAY		GAS		EASIEST
	SMTS (STATE MOTORIZED TRAIL SYSTEM)				FOOD		MORE DIFFICULT
	SMTS ALTERNATE				LODGING		MOST DIFFICULT
	NON-MOTORIZED HIKING TRAIL				PAY PHONE		
					HOSPITAL		
					RANGER STATION		
					RESTROOM		
					HIKING		
					CAMPING		

This map is not intended to provide land ownership status, however, large blocks of land denoting private property have been highlighted. See the BLM Desert Access Guides for additional information on surface management status. While every effort has been made to ensure the accuracy of this map, neither the publishers nor distributors, Friends of Jawbone, Kern County or any agencies listed on this map will accept any liability for any loss or damage resulting from the use of this map.

Source: Friends of Jawbone 2008

**LEGEND**

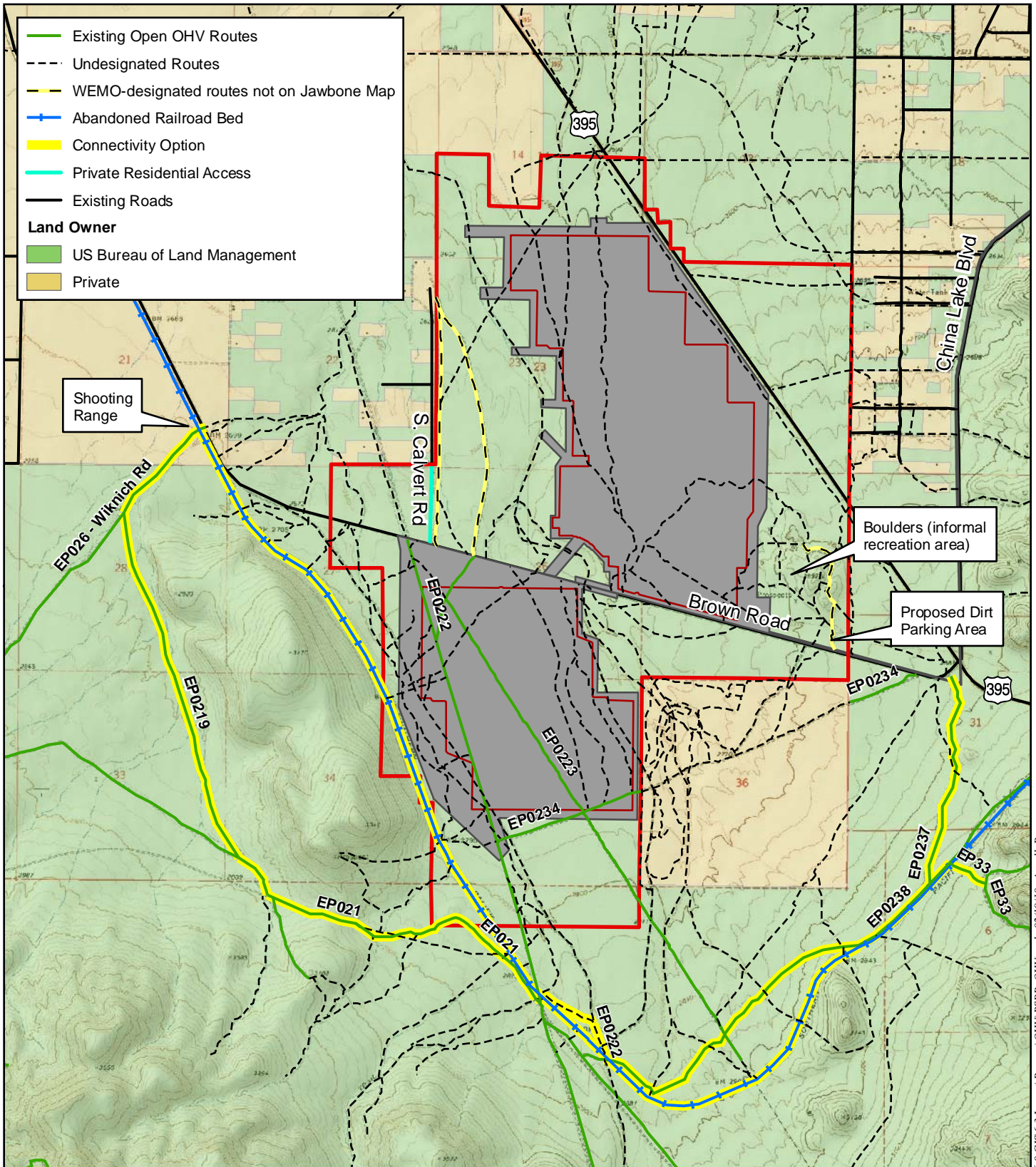


**Figure DR-LURW-257-2  
Friends of Jaw Bone Map**

Solar Millennium

AECOM

Date: February 2010



- Existing Open OHV Routes
  - - - Undesignated Routes
  - WEMO-designated routes not on Jawbone Map
  - Abandoned Railroad Bed
  - Connectivity Option
  - Private Residential Access
  - Existing Roads
- Land Owner**
- US Bureau of Land Management
  - Private

Shooting Range

Boulders (informal recreation area)

Proposed Dirt Parking Area



**Legend**

- Project ROW
- Facility Footprint
- Project Disturbance Area

1 inch = 3,500 feet

0      3,500      7,000  
Feet

**Ridgecrest  
Solar Power Project**

**Figure DR-LURW-257-3  
Existing OHV Routes  
and Connectivity Options**

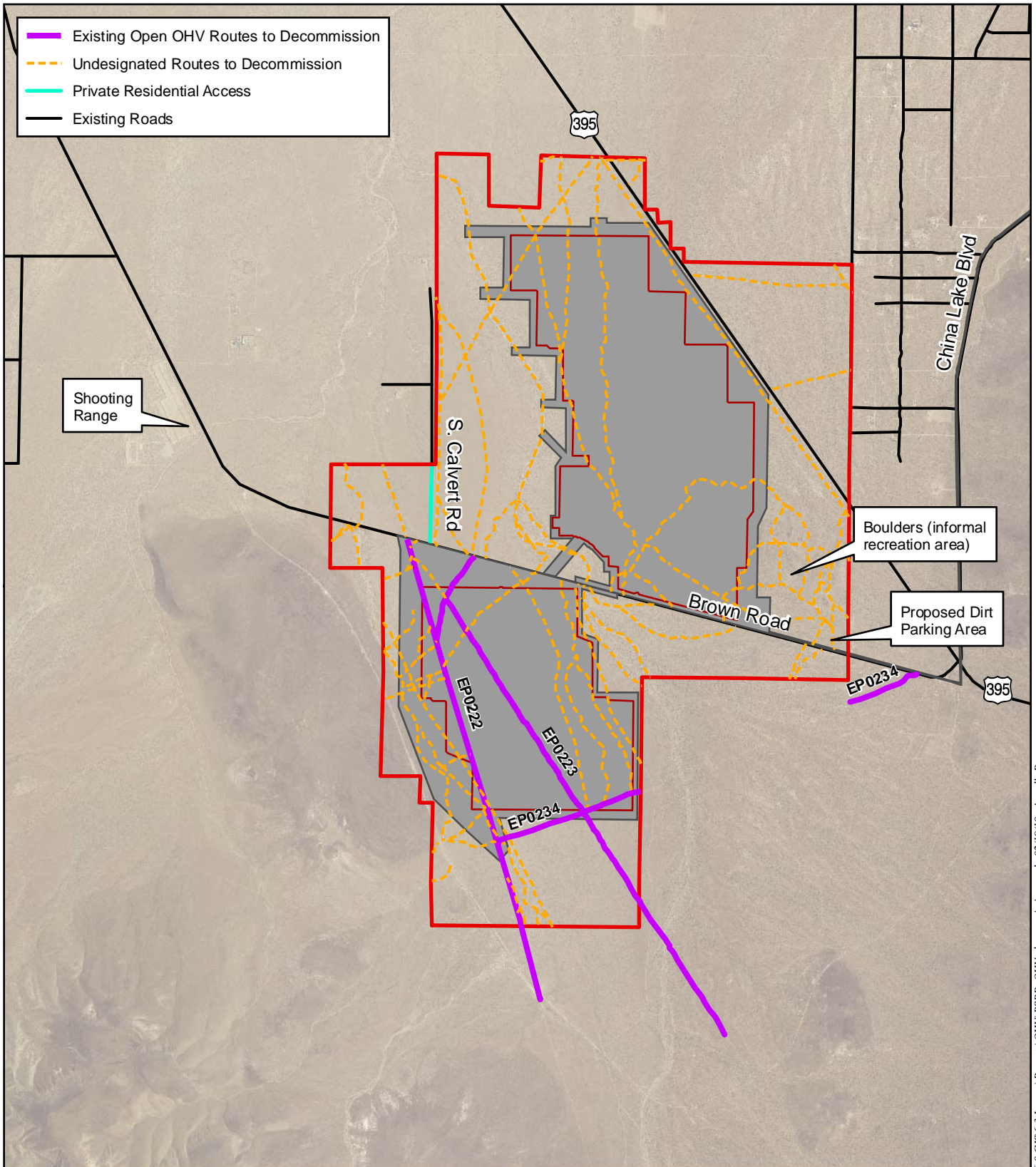
Source: AECOM 2010; BLM 2010;  
Kern County 2009; USGS

---



---

Date: February 2010



- Existing Open OHV Routes to Decommission
- - - Undesignated Routes to Decommission
- Private Residential Access
- Existing Roads

Shooting Range

S. Calvert Rd

China Lake Blvd

Boulders (informal recreation area)

Proposed Dirt Parking Area

Brown Road

EP0222

EP0233

EP0234

EP0234

395

395



**Legend**

- Project ROW
- Facility Footprint
- Project Disturbance Area

1 inch = 3,500 feet

0 3,500 7,000 Feet

**Ridgecrest  
Solar Power Project**

**Figure DR-LURW-259  
Route Decommissioning**

Source: AECOM 2010; NAIP 2009;  
Kern County 2009;

Date: February 2010

**Attachment DR-LURW-261**

**Native American Consultation Letters Regarding Existing Sites and Trails**



AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Mr. Neil Peyron, Chairperson  
Tule River Indian Tribe  
P.O. Box 589  
Porterville, CA 93258

Dear Mr. Peyron:

**Subject: Proposed Ridgecrest Solar Project**

Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope



AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Mr. Ron Wermuth  
P.O. Box 168  
Kernville, CA 93238

Dear Mr. Wermuth:

**Subject: Proposed Ridgecrest Solar Project**

Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope



AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Ms. Kathy Morgan, Chairperson  
Tejon Indian Tribe  
2234 4<sup>th</sup> Street  
Wasco, CA 93280

Dear Ms. Morgan:

**Subject: Proposed Ridgecrest Solar Project**

Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope





AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Mr. Harold Williams, Chairperson  
Kern Valley Indian Council  
15775 Setimo Creek Road  
Caliente, CA 93518

Dear Mr. Williams:

**Subject: Proposed Ridgecrest Solar Project**

Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope



AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Mr. Robert Robinson, Historic Preservation Officer  
Kern Valley Indian Council  
P.O. Box 401  
Weldon, CA 93283

Dear Mr. Robinson:

**Subject: Proposed Ridgecrest Solar Project**

Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope



AECOM  
1420 Kettner Boulevard  
Suite 500  
San Diego, CA 92101  
www.aecom.com

619.233.1454 tel  
619.233.0952 fax

February 5, 2010

Ms. Donna Begay, Chairperson  
Tubatulabals of Kern Valley  
P.O. Box 226  
Lake Isabella, CA 93240

Dear Mr. Begay:

**Subject: Proposed Ridgecrest Solar Project**

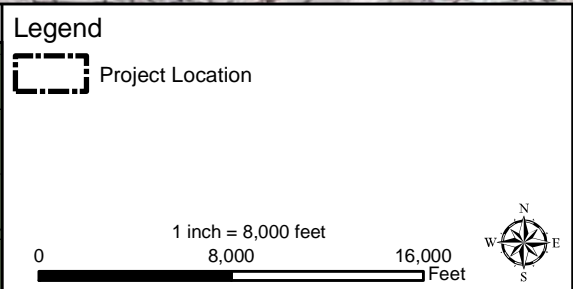
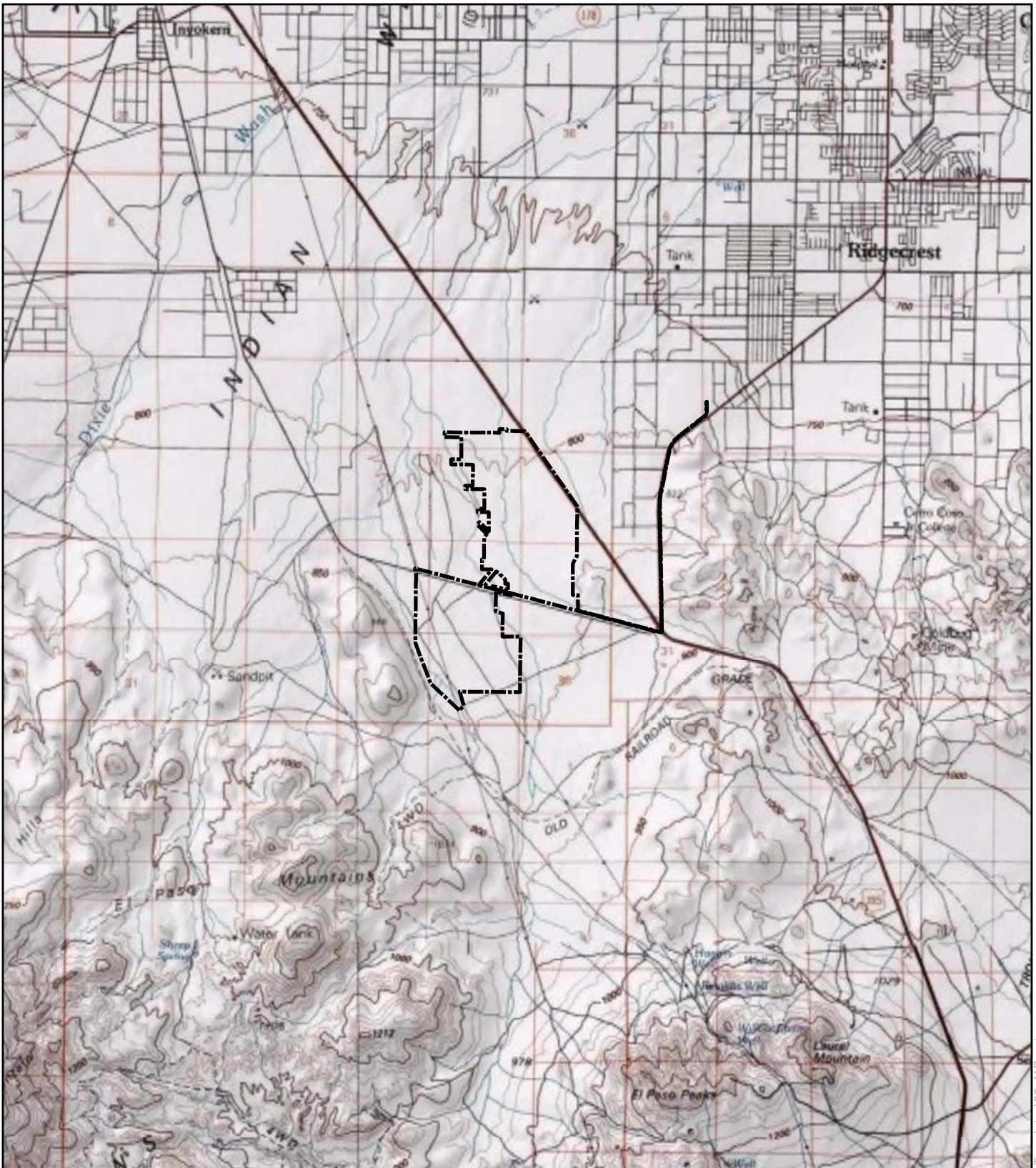
Ridgecrest Solar I, LLC is proposing to build a 242 mega-watt solar plant southwest of Ridgecrest, California. The proposed project would generally include the following components: 242 mega-watt solar plant, appurtenant facilities, transmission line connection, and waterline connections. The land is currently undeveloped and is managed by the Bureau of Land Management (BLM), who will serve as federal lead for the project. The California Energy Commission (CEC) will serve as state lead.

You were previously contacted regarding this project to solicit your general questions, comments, or concerns as well as knowledge of Native American resources in the area. At this time, we would sincerely appreciate any additional information you may have regarding sites and trails into and through the proposed project site and surrounding areas that have historically been used for religious purposes by tribal members, as well as any information you would like to share on the location, types of uses, and frequency of uses of these sites or trails. A project map, a reply form, and a self-addressed stamped envelope have been included for your convenience. Providing comments now does not limit your ability to comment at a later time. Please write or call at your earliest convenience so that we may include your information in our analysis of the project.

Sincerely,

Stev Weidlich  
Ethnographer

Enclosure: Map  
Response form  
Stamped reply envelope



**Proposed  
 Ridgecrest Solar  
 Power Project**

February 2010



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)

**APPLICATION FOR CERTIFICATION**  
**For the *RIDGECREST SOLAR***  
***POWER PROJECT***

**Docket No. 09-AFC-9**

**PROOF OF SERVICE**  
**(Revised 2/4/2010)**

**APPLICANT**

Nicole Tenenbaum  
Senior Project Manager  
1625 Shattuck Avenue, Suite 270  
Berkeley, CA 94709-1161  
[tenenbaum@solarmillennium.com](mailto:tenenbaum@solarmillennium.com)

Elizabeth Copley  
AECOM Project Manager  
2101 Webster Street, Suite 1900  
Oakland, CA 94612  
[elizabeth.copley@aecom.com](mailto:elizabeth.copley@aecom.com)

Scott Galati  
Galati/Blek, LLP  
455 Capitol Mall, Suite 350  
Sacramento, CA 95814  
[sgalati@gb-llp.com](mailto:sgalati@gb-llp.com)

Peter Weiner  
Matthew Sanders  
Paul, Hastings, Janofsky & Walker LLP  
55 2<sup>nd</sup> Street, Suite 2400-3441  
San Francisco, CA 94105  
[peterweiner@paulhastings.com](mailto:peterweiner@paulhastings.com)  
[matthewsanders@paulhastings.com](mailto:matthewsanders@paulhastings.com)

**INTERVENORS**

California Unions for Reliable Energy (CURE)  
Tanya A. Gulesserian,  
Marc D. Joseph  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)

\*Desert Tortoise Council  
Sidney Silliman  
1225 Adriana Way  
Upland, CA 91784  
[gssilliman@csupomona.edu](mailto:gssilliman@csupomona.edu)

**INTERESTED AGENCIES**

\*Janet Eubanks, Project Manager,  
U.S. Department of the Interior  
Bureau of Land Management  
California Desert District  
22835 Calle San Juan de los Lagos  
Moreno Valley, California 92553  
[Janet\\_Eubanks@ca.blm.gov](mailto:Janet_Eubanks@ca.blm.gov).

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

**ENERGY COMMISSION**

JAMES D. BOYD  
Vice Chair and Presiding Member  
[jboyd@energy.state.ca.us](mailto:jboyd@energy.state.ca.us)

\*ANTHONY EGGERT  
Commissioner and Associate Member  
[aeggert@energy.state.ca.us](mailto:aeggert@energy.state.ca.us)

\*Kourtney Vaccaro  
Hearing Officer  
[kvaccaro@energy.state.ca.us](mailto:kvaccaro@energy.state.ca.us)

Eric Solorio  
Project Manager  
[esolorio@energy.state.ca.us](mailto:esolorio@energy.state.ca.us)

Jared Babula  
Staff Counsel  
[jbabula@energy.state.ca.us](mailto:jbabula@energy.state.ca.us)

Public Adviser  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)

**DECLARATION OF SERVICE**

I, Elizabeth Copley, declare that on February 19, 2010, I served and filed copies of the attached Ridgecrest Solar Power Project (Docket No. 09-AFC-9) Supplemental Data Response Information: for Biological Resources, DR-BIO-61 and for Land Use/Recreation/Wilderness (DR 257-261). The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[\[http://www.energy.ca.gov/sitingcases/solar\\_millennium\\_ridgecrest\]](http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest).

The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**For service to all other parties:**

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery or by overnight delivery service or depositing in the United States mail at Oakland, California with postage or fees thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

**For filing with the Energy Commission:**

- sending an original paper copy and one electronic copy, mailed and emailed Respectively, to the address below (preferred method);

**OR**

- depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 09-AFC-9  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_