

650 Town Center Drive, 20th Floor
Costa Mesa, California 92626-1925
Tel: +1.714.540.1235 Fax: +1.714.755.8290
www.lw.com

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July 8, 2009

File No. 039610-0003

DOCKET	
08-AFC-9	
DATE	Jul 08 2009
RECD.	Jul 08 2009

VIA FEDEX

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-9
1516 Ninth Street, MS-4
Sacramento, California 95814-5512

Re: City of Palmdale Hybrid Power Plant Project: Docket No. 08-AFC-9

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, Sections 1209, 1209.5, and 1210, enclosed herewith for filing please find Applicant's Response to the California Department of Fish and Game's Comments on the Request for Incidental Take Permit for Mohave Ground Squirrel and Additional Comments Regarding Impacts to Biological Resources.

Please note that the enclosed submittal was filed today via electronic mail to your attention and to all parties on the attached electronic proof of service list.

Very truly yours,



Paul E. Kihm
Senior Paralegal

Enclosure

cc: 08-AFC-9 Proof of Service List (w/encl., via e-mail and U.S. Mail)
Michael J. Carroll, Esq. (w/encl.)

July 7, 2009

California Department of Fish and Game
Edmund J. Pert, Regional Manager
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123

Subject: Response to the June 10, 2009 Comments on the Palmdale Hybrid Power Project's Request for Incidental Take Permit for Mohave Ground Squirrel and Additional Comments Regarding Impacts to Biological Resources, CEC Docket 08-AFC-9

Dear Mr. Pert:

On June 10, 2009, the California Department of Fish and Game (Department) provided to the City of Palmdale and AECOM Environment Comments on the Palmdale Hybrid Power Project's (Project) Request for Incidental Take Permit for Mohave Ground Squirrel and Biological Resources Technical Report. Responses to the Department's comments are provided herein.

Please feel free to contact myself or Mr. Matt Amalong, AMEC Earth & Environmental, Inc. (AMEC), at (949) 233-2134 should you have further questions related to the biological assessment for this Project.

Sincerely,



Sara J. Head
Vice President
Sara.head@aecom.com

cc: Erinn Wilson, CDFG
Matt Amalong, AMEC
Misa Milliron, CEC

Attachment: Response to June 10, 2009 Comments

Palmdale Hybrid Power Project
Attachment -- Responses to Comments
08-AFC-9

Comment 1:

783.2(a)(4): The Section requires "The location where the project or activity is to occur or to be conducted." The Department understands from the Commission, that the transmission line proposed by the applicant has not been approved by Southern California Edison. Therefore, it seems pre-decisional to request take for the transmission line, if the alignment could change. If "take" is authorized for the transmission line, and subsequently changes, it would become necessary to reevaluate the Incidental Take Permit for the project.

Response:

Some adjustments were made to the transmission line route in February 2009 to refine the alignment and to facilitate the avoidance of impacts to washes in some locations. No further changes to the route are anticipated at this time, and the Applicant requests that the agencies move forward with permitting the Project as identified in the request for incidental take.

Comment 2:

783.2(a)(5), 782.2(a)(G): These Sections require "An analysis of whether and to what extent the project or activity for which the permit is sought could result in the taking of species to be covered by the permit" and "an analysis of the impacts of the proposed taking." Identifying the extent and impacts of the take is necessary to identify what constitutes full mitigation.

Page 7 of the application states "... of the total 416.11 acres of disturbance (not clear if this includes all transmission line impacts) "approximately 271.64 acres may include vegetation potentially suitable for Mohave ground squirrel (Table 2)." However, Table 2 and in the text on Page 6, states 321.54 acres are identified as suitable habitat for Mohave ground squirrel (*Spermophilus mohavensis*). The applicant should clarify the discrepancy in acres. A more clear identification of total project impacts might clarify this issue. In addition, the Application should include a habitat assessment and map of suitable habitat for Mohave ground squirrel to allow the Department and Commission to evaluate "take".

Response:

The correct acreage is 321.54 acres. Therefore, page 7 should state, "Of this acreage, approximately 321.54 acres may include vegetation potentially suitable for Mohave ground squirrel (Table 2)." Phil Leitner, PhD., prepared a habitat assessment and map of suitable habitat for MGS. This document was included in Attachment 2 of Appendix H of the Application for Certification (AFC). Maps at a 1:12,000 scale based on Dr. Leitner's report have been produced and are provided at the end of this Attachment.

Comment 3:

783.2(a)(8): This section requires a description of the measures to minimize and fully mitigate the impacts of the proposed taking. The application proposes a mitigation package that includes \$1,300 per acre for a management endowment, \$250 per acre for habitat enhancement for Habitat Management Lands, and \$1,000 per acre for acquisition of Habitat Management Lands. The amount and location of lands proposed for conservation within those

Sections is unspecified. It is not clear how the Applicant came to the dollar amounts that are identified; furthermore, the Applicant does not quantify dollar amounts based on total acres of impacts. It is not clear how the Applicant can guarantee preservation of 365.22 acres of habitat in perpetuity with the funds described. The application should demonstrate how preservation of existing land maintains existing population levels and ecological functions despite the net loss of habitat area and connectivity that would result from project implementation. The selection of the mitigation lands must consider that the Project's permanent footprint, and the other proposed projects in the area, may compromise the mitigation lands' potential to fully mitigate the impacts.

All lands proposed for CESA mitigation would need to be protected in perpetuity for conservation purposes. This often is accomplished by transferring fee title on the mitigation lands to the Department under terms approved by the Department. Alternatively, a Department approved non-profit organization qualified pursuant to California Government Code section 65965 may hold fee title or a conservation easement over the mitigation lands. In the event an approved non-profit holds title, a conservation easement must be recorded in favor of the Department, in a form approved by the Department; in the event an approved non-profit holds a conservation easement over the mitigation lands, the Department must be named third party beneficiary. In addition, in the case of a conservation easement, the Department would need to have periodic access to the mitigation lands to insure that the terms and conditions of the conservation easement are being met.

Funding to manage mitigation lands in perpetuity is accomplished by establishment of a non-wasting endowment to be held by the Department or a Department approved non-profit organization qualified to hold endowment funds. The endowment must be of an amount sufficient to generate annual interest in the amount necessary to meet expected annual maintenance and monitoring costs of the mitigation lands. The amount of the endowment should be determined by using a Property Analysis Record (PAR) or PAR-like analysis once the mitigation lands are identified. If project implementation is anticipated in advance of conveying the mitigation lands and endowment and enhancement funding, security in the form of a pledged savings account or an irrevocable letter of credit would need to be provided prior to ground-disturbing activities.

Response:

The City will provide financial assurances to guarantee that an adequate level of funding is available to implement all compensation measures identified in the Commission License Decision as necessary for compliance with CESA Section 2081. These funds will be used solely for implementation of the biological resources measures associated with the Project.

The City will complete acquisition of the proposed Compensation Lands prior to initiating ground-disturbing Project activities, unless financial assurance is provided to the Department in the form of an irrevocable letter of credit, a pledged savings account or another form of security ("Security") approved by the Commission, to ensure funding for compensation measures identified in the Commission License Conditions as required for compliance with CESA Section 2081.

The amount of the Security will include approximately \$1,000-\$2,000/acre for acquisition of Compensation Lands; \$250/acre for enhancement of Compensation Lands, if necessary; and \$1,350/acre to establish an endowment for long-term management of the Compensation Lands. The City currently anticipates that approximately 321.54 acres of Compensation Lands will be acquired, to compensate for Project impacts to 321.54 acres of potential Mojave Ground Squirrel habitat.

If Security is provided, the City, the Department, or a third-party entity approved by the Department and Commission, shall complete the proposed Compensation Lands acquisition within 18 months of the start of Project ground-disturbing activities. A minimum of three (3) months prior to acquisition of the 321.54 acres of Compensation Lands, the City or a third-party entity approved by the Department and Commission, shall submit to the Department for approval a formal acquisition proposal identifying specific properties comprising the acres that will be purchased. The Department and Commission would approve all of the parcels comprising the 321.54 acres in advance of purchase. The Compensation Lands are expected to be acquired in the western Mojave Desert and are expected to promote conservation of both the MGS and Joshua tree woodlands and will be subject to the conditions listed below.

In conjunction with the City's funding obligations related to the Compensation Lands and following the Department's approval of the proposed 321.54 acres to be purchased, the City, the Department, or a third-party entity approved by the Department, and Commission shall comply with the following conditions:

a) Preliminary Report: Provide a recent preliminary title report, initial hazardous materials survey report, biological analysis, and other necessary documents for the proposed 321.54 acres (or conservation easement). All documents conveying or conserving Compensation Lands and all conditions of title/easement are subject to the approval of the Department, the California Department of General Services and, if applicable, the Fish and Game Commission.

b) Title/Conveyance: Transfer fee title to the 321.54 acres of Compensation Lands to the Department or an organization approved by the Department under terms approved by the Department. Convey a conservation easement on the 321.54 acres of Compensation Lands to the Department or an organization approved by the Department under terms approved by the Department and the City.

c) Enhancement Fund (as necessary): Fund the initial protection and enhancement of the 321.54 acres by providing to the Department, or a third-party entity approved by the Department and Commission, an appropriate amount as determined by the Department field review of the land as discussed above.

d) Endowment Fund: Prior to ground-disturbing expansion Project activities, provide to the Department, or a third-party entity approved by the Department and Commission, a permanent capital endowment in the amount determined through the Property Analysis Record (PAR) or PAR-like analysis that will be conducted for the 321.54 acres of Compensation Lands. Interest from this amount shall be available for reinvestment into the principal and for the long-term operation, management, and protection of the Compensation

Lands, including reasonable administrative overhead, biological monitoring, improvements to carrying capacity, law enforcement measures, and any other action designed to protect or improve the habitat values of the Compensation Lands. The endowment principal shall not be drawn upon unless such withdrawal is deemed necessary by the Department, or a third-party entity approved by the Department and Commission, to ensure the continued viability of the species on the 321.54 acres. Monies received by the Department pursuant to this provision shall be deposited in a special deposit account established pursuant to Government Code §16370. The Department may pool the endowment with other endowments for the operation, management, and protection of the 321.54 acres for local populations of the Covered Species.

e) Security Deposit: The City may proceed with ground-disturbing Project activities before fully performing its duties and obligations as set forth above only if the City secures its performance by providing to the Department funding, or the Department approves administrative proof of funding, necessary to cover land acquisition and easement costs, fencing/cleanup costs and, as necessary, initial protection and enhancement of the acquired 321.54 acres. If the Security is provided to allow the commencement of Project disturbance prior to completion of compensation actions, the City, the Department, or a third-party entity approved by the Department and Commission, must complete the required actions no later than 18 months after the start of the ground disturbing activities. The Security will provide that the Department, or a third-party entity approved by the Department and Commission, may draw on the principal sum if it is determined that the City has failed to comply with the Commission Conditions of Certification pertaining to CESA § 2081 compliance. The Security will be returned to the City upon completion of the legal transfer of the Compensation Lands to the Department, or upon completion of an implementation agreement with a third-party mitigation banking entity, acceptable to the Department and Commission to acquire and/or manage the Compensation Lands.

f) Reimbursement Fund: Provide reimbursement to the Department for reasonable expenses incurred during title, easement, and documentation review; expenses incurred from other state agency reviews; and overhead related to providing Compensation Lands to the Department.

If all actions for Compensation Lands described above are not completed within 18 months of initial ground-disturbing activity, the City shall consult with the Department and possibly develop alternate compensation land proposals subject to the above requirements. The City is responsible for all Compensation Lands acquisition/easement costs, including but not limited to title and document review costs, as well as expenses incurred from other state agency reviews and overhead related to providing Compensation Lands to the Department; escrow fees or costs; toxic waste clearance; and other site cleanup measures.

Comment 4:

783.2(A)(10): This Section requires a description of the funding source and the level of funding available for implementation of the minimization *and* mitigation measures. For this project, that would include the cost of acquisition, enhancement, and endowment. The security amount would need to be sufficient to purchase acreage equal to the amount to be set aside for mitigation, and would also need to take into account current land values and inflation. In addition to covering land costs, the security would need to include endowment and

enhancement costs determined for the mitigation acreage. The Department will conservatively estimate the required endowment amount if specific mitigation lands and a PAR or PAR-like analysis has not yet been conducted at the time that permitting details must be specified by the Department.

The Department has determined, based on both the Project description, as well as our familiarity with the biological resources present on the Project site and that the Project may result in "take" of State-listed species, that it is appropriate to obtain a State incidental take authorization for this Project prior to commencing any ground-disturbing activities. Thus, any "take" that occurs prior to the issuance of a permit is not authorized.

Response:

Please see response to comment 3.

Burrowing Owl:

The Biological Resources Technical Report indicates evidence of burrowing owl (*Athene cunicularia*) within the project site and survey results indicate owls do occur within the project area. Since the Project site could support owls, the Department requires that a qualified biologist conduct a survey no more than 30 days before the onset of any ground-disturbing activities. The Department recommends four separate site visits each conducted on separate days to maximize detection of burrowing owls within appropriate habitat during preconstruction surveys. If burrowing owls occupy the site during the non-breeding season, a passive relocation effort may be instituted. Otherwise, the Department recommends that projects avoid occupied burrows with a minimum 250-foot no-construction buffer zone unless a Department-approved biologist verifies through non-invasive methods that either: 1) the birds have not begun egg-laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival. Failure to implement this buffer zone could cause adult burrowing owls to abandon the nest, cause eggs or young to be directly impacted (crushed), and/or result in reproductive failure. Impacts of this nature violate Fish and Game Code Sections 3503, 3503.5, 3513, and the International Migratory Bird Treaty Act.

Response:

The four-visit survey mentioned by CDFG is part of the Phase III survey in the *Survey Protocol and Mitigation Guidelines for Burrowing Owls*, developed by the California Burrowing Owl Consortium (CBOC) (1993) and adopted by the Department (1995). This Phase III survey identifies burrowing owl presence and use of the Project site. The nesting season portion of this survey was conducted in 2008 and the winter resident portion was conducted in 2009, following the Phase II burrow survey (AMEC 2008 and 2009a). The BRTR also identified that a pre-construction survey would be conducted within 30 days of construction to determine burrowing owl presence at the time of construction (AMEC 2008: Page 78). The Department and CBOC guidelines do not recommend four visits for this pre-construction survey.

The BRTR identified that any nesting burrowing owls would be avoided by a 250-foot buffer and that passive relocation techniques would be used, as necessary, to remove non-nesting burrowing owls (AMEC 2008: Page 79).

Desert Tortoise:

The proposed project is located within suitable desert tortoise (*Gopherus agassazii*) habitat. Desert tortoise surveys were conducted at the power plant site by AMEC in 2006, 2008, and 2009. The transmission lines were surveyed in 2006, with additional surveys along re-alignment sections in 2009. Based on these survey results, and confirmed in a conference call on May 26th, the Department has determined additional desert tortoise protocol surveys would not be required for the project. However, for areas that supported suitable tortoise habitat, construction surveys, restrictive fencing and monitoring would still be required. In addition, any changes in the transmission line alignment would require subsequent protocol level surveys. The applicant agreed to provide the Department with detailed alignment maps delineating all suitable desert tortoise habitat.

Response:

Maps at a 1:12,000 scale showing desert tortoise habitat in the surveyed areas have been produced and are provided at the end of this Attachment. Further alignment changes are not anticipated, but should they occur, additional surveys will be conducted in those areas.

Rare Plants:

The Department provided written response to the Commission (Department, 2009) on the Biological Resources Technical Report. The Department provided detailed comments within the report on the deficiencies of the plant surveys for the proposed project. To properly substantiate the lack of sensitive plant species within the project site, plant surveys need to occur throughout the entire alignment and should be completed within the appropriate time of year for each flowering plant. In addition, plant surveys should not be conducted at the same time as other focused surveys (see Attachment 1).

Response:

Focused special-status plant surveys were conducted by experienced biologists throughout the Project's entire alignment during the appropriate time to sample for all species with potential to occur on the Project in April 2008 and with an addendum to cover adjustments to the transmission line route in April 2009 (AMEC 2008: Pages 14 and 26; AMEC 2009b: Pages 1 and 2). According to National Oceanic and Atmospheric Association (NOAA) data, mean rainfall totals for the winter season (*i.e.* December, January, February) in Palmdale from 1971 through 2000 equal 4.34 inches. A total of 4.31 inches was recorded during the 2007-2008 winter season, and a total of 3.90 inches was recorded during the 2008-2009 winter season. Notwithstanding that the timing of precipitation is a critical factor influencing the germination and growth of plants, the 2007-2008 and 2008-2009 winter precipitation for Palmdale suggests that plant productivity was adequate in Spring 2008 and 2009 for conducting plant surveys.

Surveys involved transects spaced no more than 30 feet apart covering 100 percent of all Project site areas involving proposed ground disturbance (power plant site, construction laydown area, and linear rights-of-way [ROWs]). All plant species detected were recorded in field notes or collected as voucher specimens. Plants were identified from keys, descriptions and drawings in Hickman (ed. 1993) and Munz (1974). Some specimens were identified or confirmed by Andrew C. Sanders (Botanist and Collection's Manager for the Herbarium at the University of California, Riverside).

The seven species of plants with California Natural Diversity Database (CNDDDB) records in the region blooming later than April are not anticipated to be present (or are not of concern) based on the following aspects:

- Brown fox sedge (*Carex vulpinoidea*) – lack of appropriate habitat (marshes and swamps, riparian woodland).
- Mt. Gleason paintbrush (*Castilleja gleasonii*) - lack of appropriate habitat (occurs on open flats or slopes in granitic soil in chaparral, pinyon and juniper woodland, and lower montane coniferous forest. Restricted to the San Gabriel Mountains).
- Kern Canyon clarkia (*Clarkia xantiana* ssp. *Parviflora*) – California Native Plant Society (CNPS) List 4.2 (Watch list, not rare or threatened in CA).
- Lemon lily (*Lilium parryi*) – lack of appropriate habitat (wet, mountainous terrain, generally in forested areas. On shady edges of streams, in open boggy meadows & seeps, lower montane coniferous forest, riparian forest, upper montane coniferous forest).
- California muhly (*Muhlenbergia californica*) – CNPS List 4.3 (Watch list, not rare or threatened in CA).
- Rock Creek broomrape (*Orobanche valida* ssp. *Valida*) – surveys would have noted this species even if not blooming.
- Greata's aster (*Symphyotrichum greatae*) – lack of appropriate habitat (mesic canyons in broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest, and riparian woodland).

The Response to the CEC's Set 2 Data Request #134 addresses information on the botanical survey methodology (AECOM Environment 2009a). Because of the large project size, the intensity of the desert tortoise surveys and the timing of the desert tortoise surveys, the plant surveys were conducted concurrently with desert tortoise surveys (AMEC 2008: Page 14). This is not contraindicated by the Department (2000) and CNPS (2001) guidelines.

Joshua Tree Woodlands:

The project will impact approximately 189.28 acres of Joshua tree woodland. The continual loss of Joshua tree woodland in the Antelope Valley is a concern to the Department as these communities support a high biological diversity. The Department considers Joshua tree woodlands as a threatened vegetative community. Any impacts to Joshua tree woodlands are considered significant. The loss of Joshua tree woodlands as the result of the proposed project should be mitigated below a significant level.

If avoidance of Joshua tree woodland is not feasible, efforts should be made to acquire and protect habitat of equal or superior value and/or acquire and protect areas to be enhanced and/or restored, which will result in fully functional Joshua tree woodland habitat. Mitigation for Joshua tree woodland should be mitigated at a ratio of no less than 1:1 for low quality habitat. Higher mitigation ratios would be required for higher quality habitat. The Department does not acknowledge salvaging and transplanting Joshua trees as a viable mitigation option as there have been no scientifically documented successful cases of transplantation for this species. To adequately mitigate for the loss of Joshua tree woodlands, the Department requires compensatory mitigation in the form of land acquisition. If funding for acquisition of mitigation property is proposed, a property value analysis should be undertaken to quantify acquisition

costs sufficient to secure the required acreage of Joshua tree woodland, as well as ensure funding for fencing, maintenance, and monitoring of this property in perpetuity. The applicant should document specific areas where mitigation monies will be spent to mitigate for loss of Joshua tree woodland.

Response:

A total of 185.35 acres of Joshua tree woodland will be affected by the Project (AMEC 2009c). The Applicant recognizes that transplantation is only one type of mitigation measure that is used to preserve Joshua tree woodland. The City of Palmdale (City) also proposes the establishment of a Joshua tree preserve near the southwest corner of the solar arrays, on City-owned property, for permanent preservation of Joshua tree woodland (see the Conceptual Landscape Plan, AECOM Environment 2009). Currently the acreage of this preserve is undetermined. In addition, Compensation Lands will be acquired to compensate for impacts to Mohave ground squirrel, as discussed above. Because the Applicant intends to seek Compensation Lands located in the same area as the MGS population affected by the Project, it is anticipated that the Compensation Lands also will host Joshua trees. If Joshua trees are not present on the Compensation Lands proposed for the Project, other preservation strategies will be discussed with the Department and the Commission.

Arroyo Toad:

Arroyo toad (*Bufo californicus*) is known to occur within Little Rock Wash. Although it is more likely they will occur above the dam, the Department is concerned toad may be present within the transmission line corridor. At Little Rock Wash, the transmission line access road runs perpendicular across the creek. Two towers are identified on either side of the wash. Because of the potential for toad to occur within the wash and in upland habitat adjacent to the wash, the Department recommends U.S. Fish and Wildlife Service protocol surveys for arroyo toad occur prior to commencement of construction activities. In addition, a biological monitor knowledgeable in arroyo toad should be present during all ground disturbing activities within 500 feet of the wash.

Response:

Six arroyo toad protocol surveys were conducted between April 21 and June 25, 2009. No sign of arroyo toad were observed during the surveys. Based on the intermittent flow at this location (drying out by early summer; dry throughout some years), marginal habitat (lack of suitable stream and burrowing substrate), and the absence of arroyo toads during 2009 focused surveys, it is highly unlikely arroyo toads utilize this section of Little Rock Creek and the Project therefore will have no effect on the arroyo toad. A survey report will be prepared and submitted to the U.S. Fish and Wildlife Service, the Department, and the Commission. A preconstruction survey will be conducted to verify arroyo toads are not present in this section of Little Rock Creek. Additionally, a qualified Project biologist knowledgeable about arroyo toads will be present during all construction-related ground-disturbing activities within 500 feet of the wash.

References:

AECOM Environment 2009a. Palmdale Hybrid Power Project Responses to CEC Data Request Set 2 (91-162). (submitted on May 1, 2009).

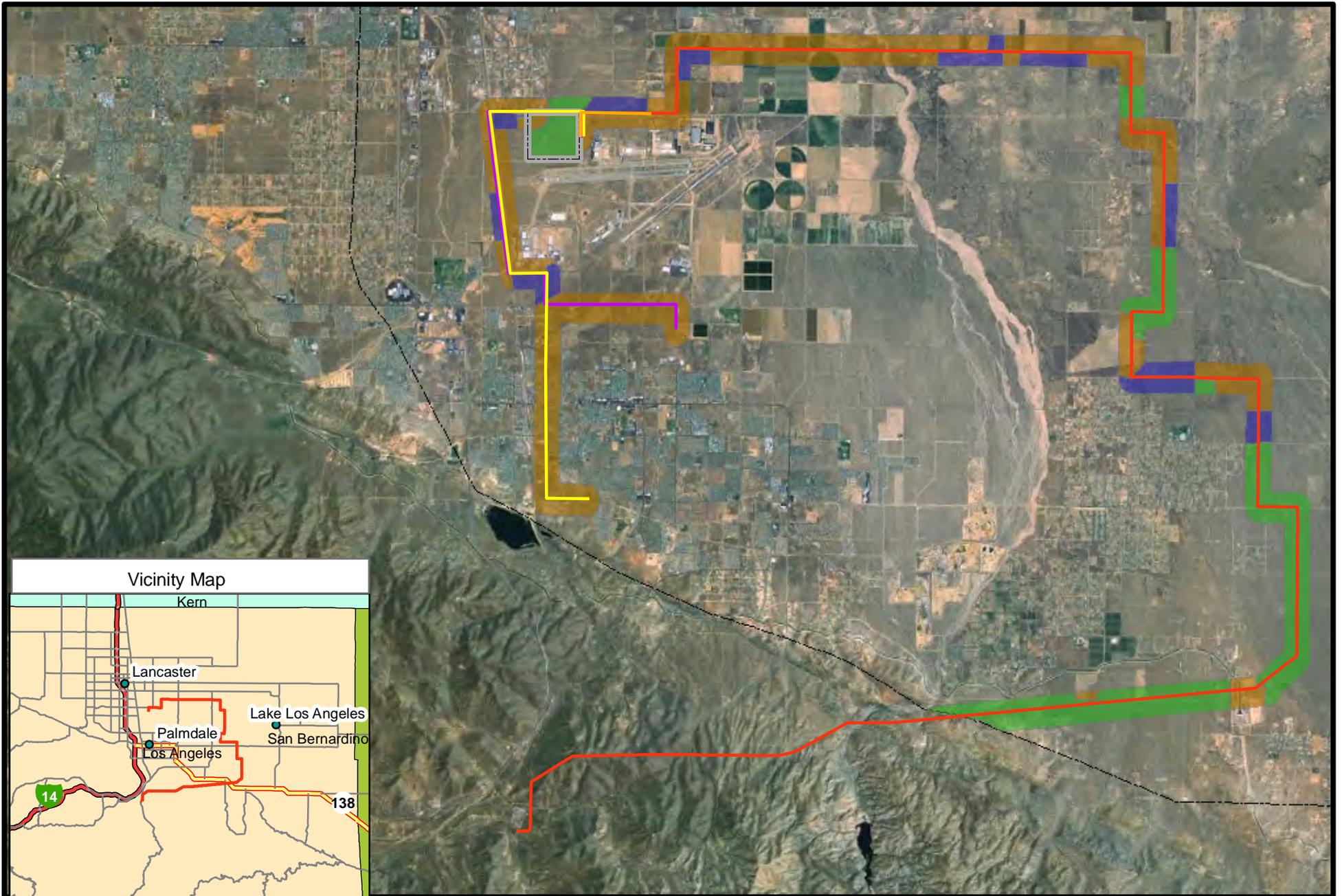
AECOM Environment 2009b. PHPP Responses to CEC Data Requests Set 1 (1-88), Docket 08-AFC-9, Response to Data Request #80. January 12, 2009.

AMEC 2009a. Palmdale Hybrid Power Project. Final burrowing owl habitat assessment and focused survey. Prepared for City of Palmdale and Inland Energy under contract to AECOM Environment, Camarillo, CA. (Supplemental Response #3 to CEC Data Request Set 1, submitted on April 9, 2009).

AMEC 2009b. Palmdale Hybrid Power Project. Special-Status Species Surveys Addendum, Biological resources technical report. Prepared for City of Palmdale and Inland Energy under subcontract to AECOM Environment, Camarillo, CA. (Supplemental Responses #4 to CEC Data Request Set 1 submitted on May 1, 2009).

AMEC 2009c. Palmdale Hybrid Power Project, Inventory Report for Joshua trees and California junipers, City of Palmdale Native Vegetation Ordinance. Prepared for the City of Palmdale, California, and Inland Energy. 8 pp. (submitted on June 2, 2009).

AMEC 2008. Palmdale Hybrid Power Project. Biological resources technical report. Prep. for ENSR Corporation, Camarillo, CA. 98 pp. (Appendix H of the AFC)



Legend

- Transmission Line Route
- Boundary of MGS Historic Range
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

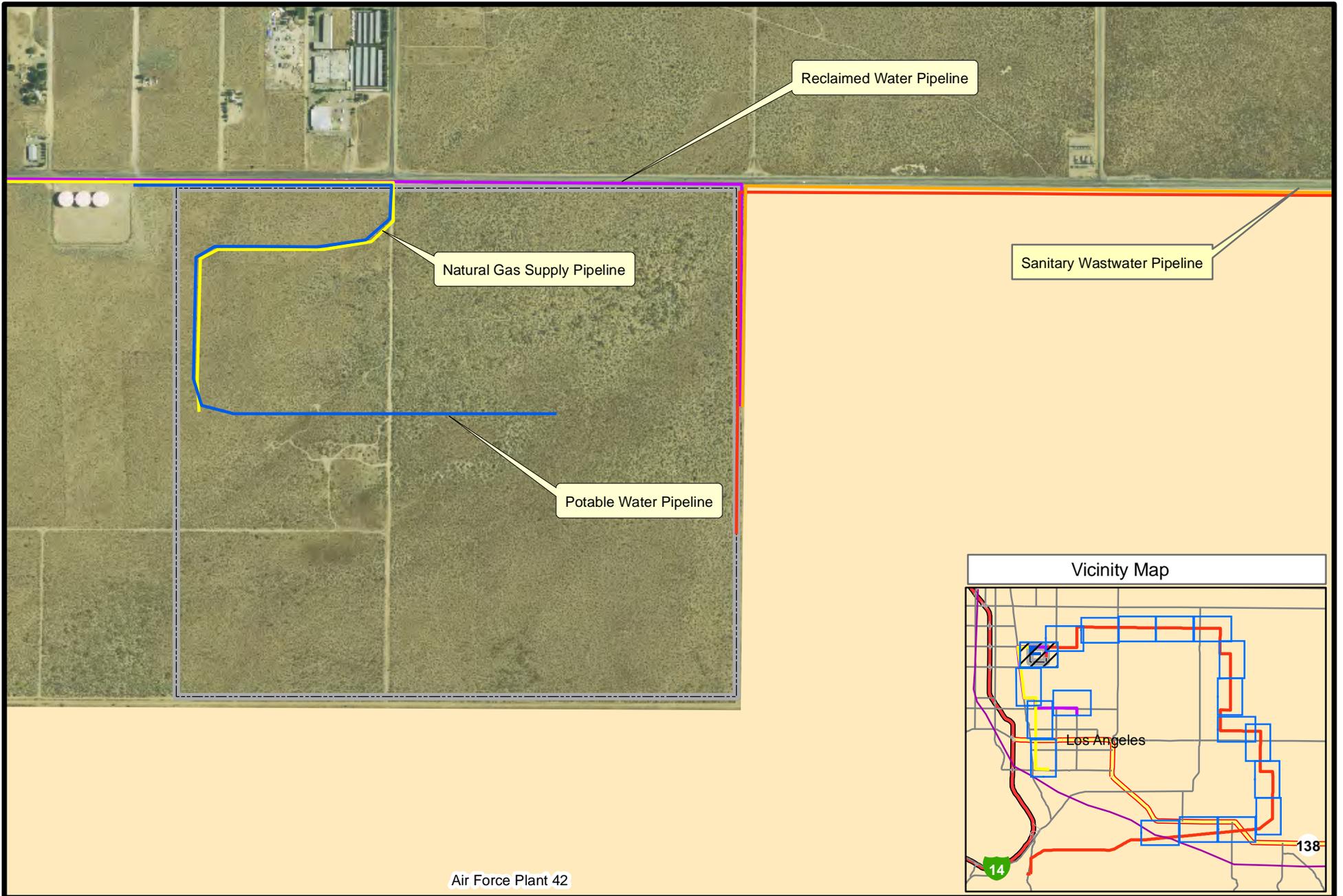
Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Overview

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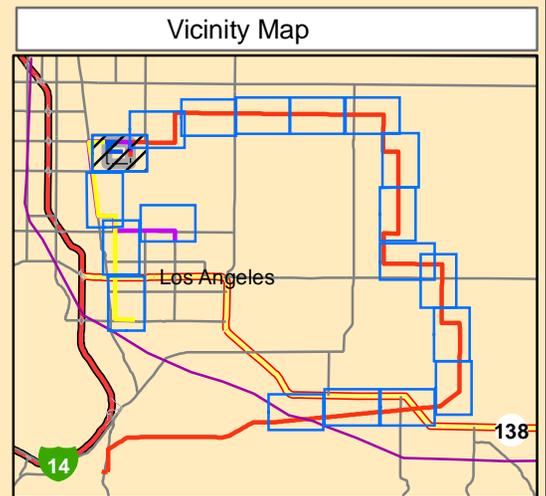
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 Date: 05/29/09



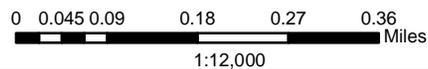
Air Force Plant 42



- Legend**
- █ Suitable Adjacent to Corridor
 - █ Suitable
 - █ Unsuitable
 - Transmission Line Route

Palmdale Hybrid Power Project

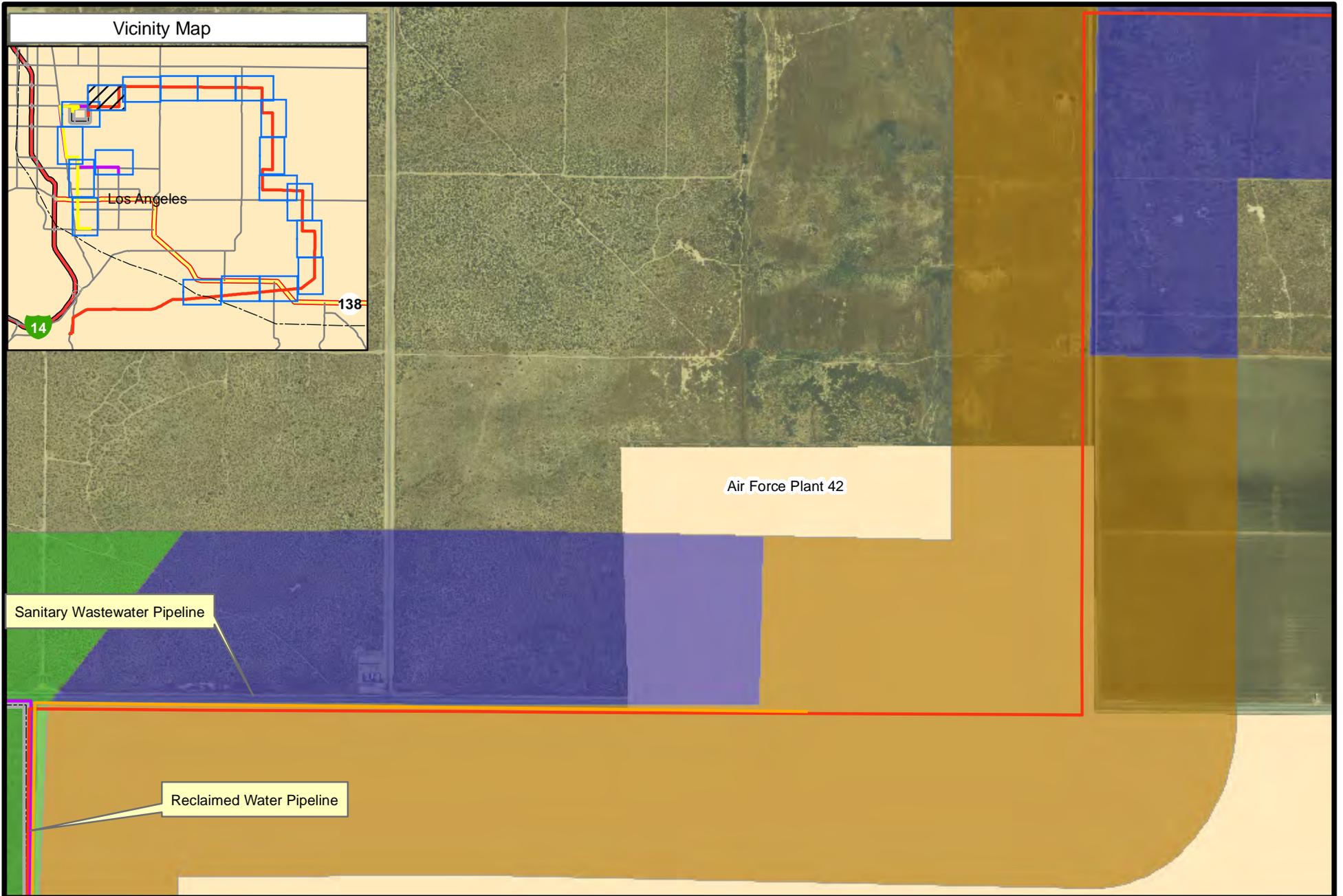
Habitat Suitability for Mohave Ground Squirrel
Figure A



Map Notes:

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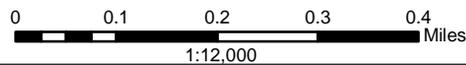


Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project

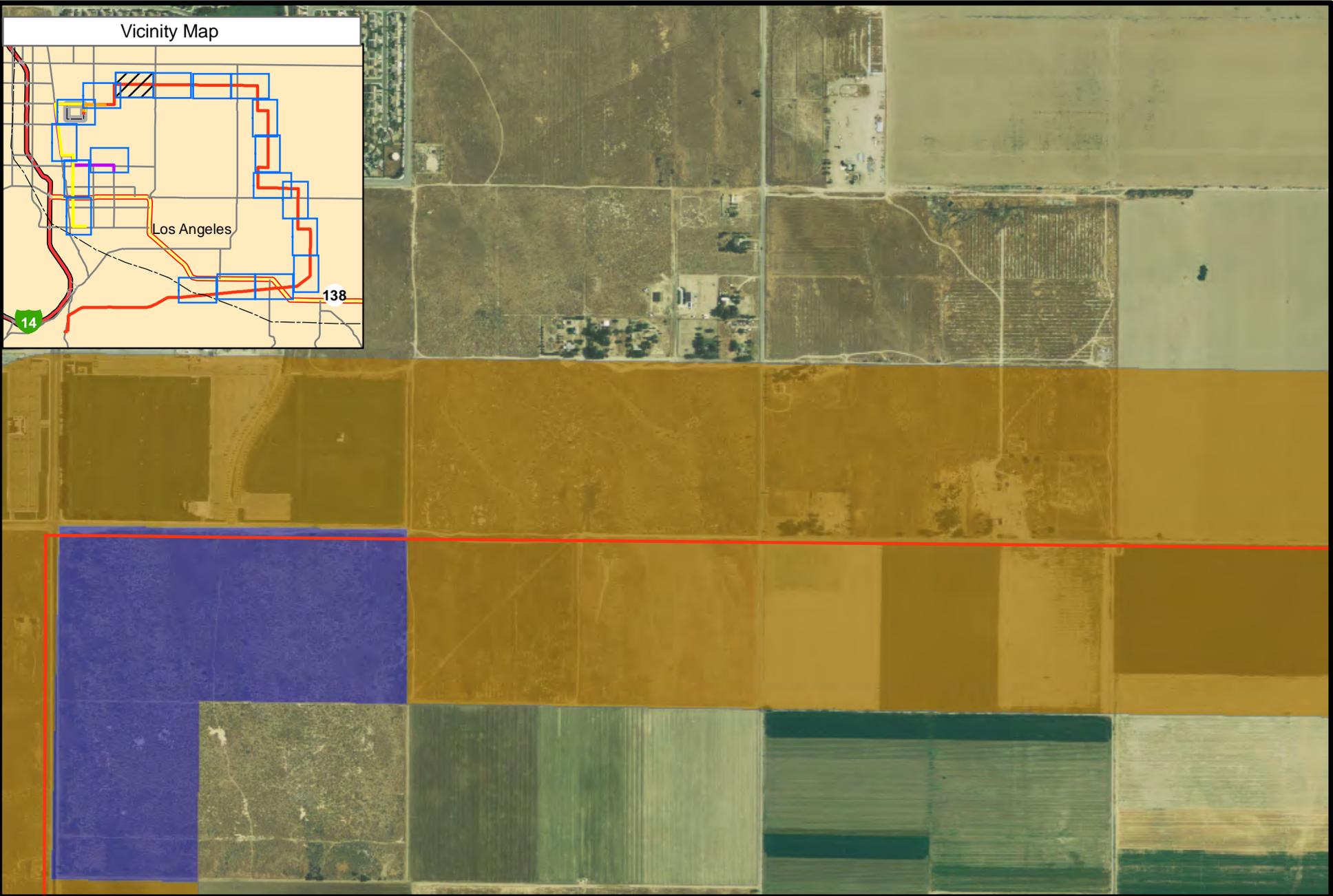
Habitat Suitability for Mohave Ground Squirrel
Figure B



Map Notes:

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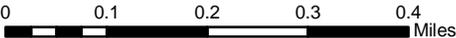


Legend

-  Transmission Line Route
-  Suitable
-  Unsuitable
-  Suitable Adjacent to Corridor

Palmdale Hybrid Power Project

Habitat Suitability for Mohave Ground Squirrel
Figure C



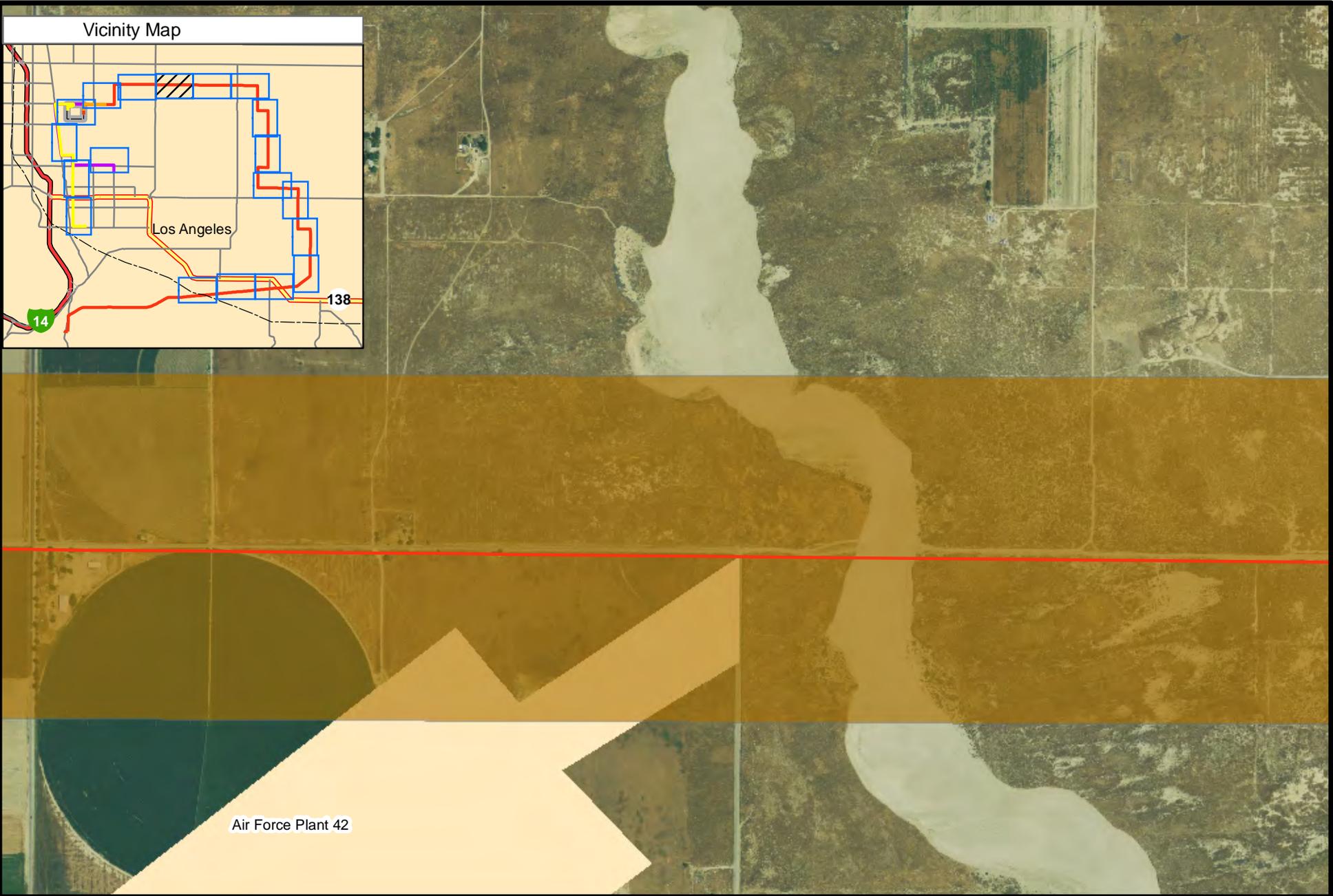
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Map Notes:

Projection: NAD 83, Zone 11
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 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure D

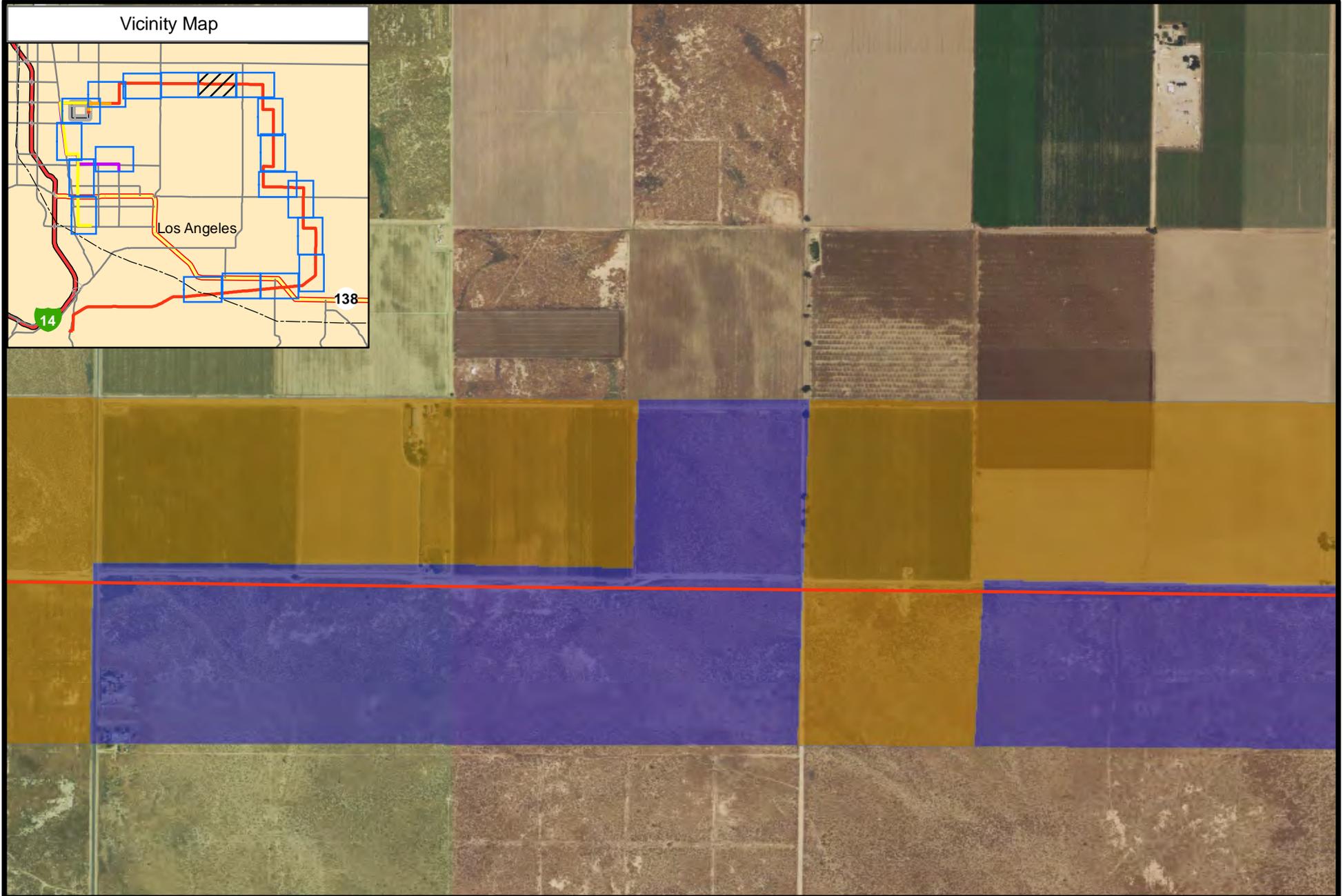
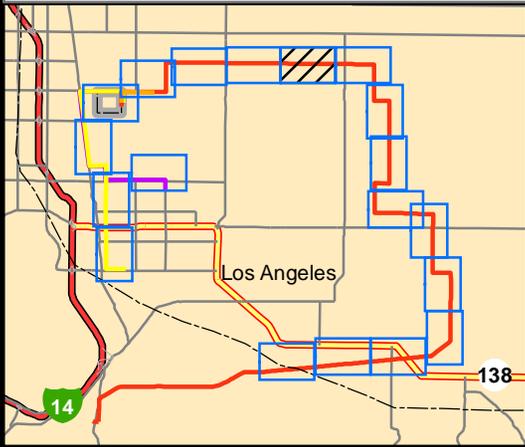
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Map Notes:
 Projection: NAD 83, Zone 11
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 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09




Vicinity Map



Legend

-  Transmission Line Route
-  Suitable
-  Unsuitable
-  Suitable Adjacent to Corridor

Palmdale Hybrid Power Project

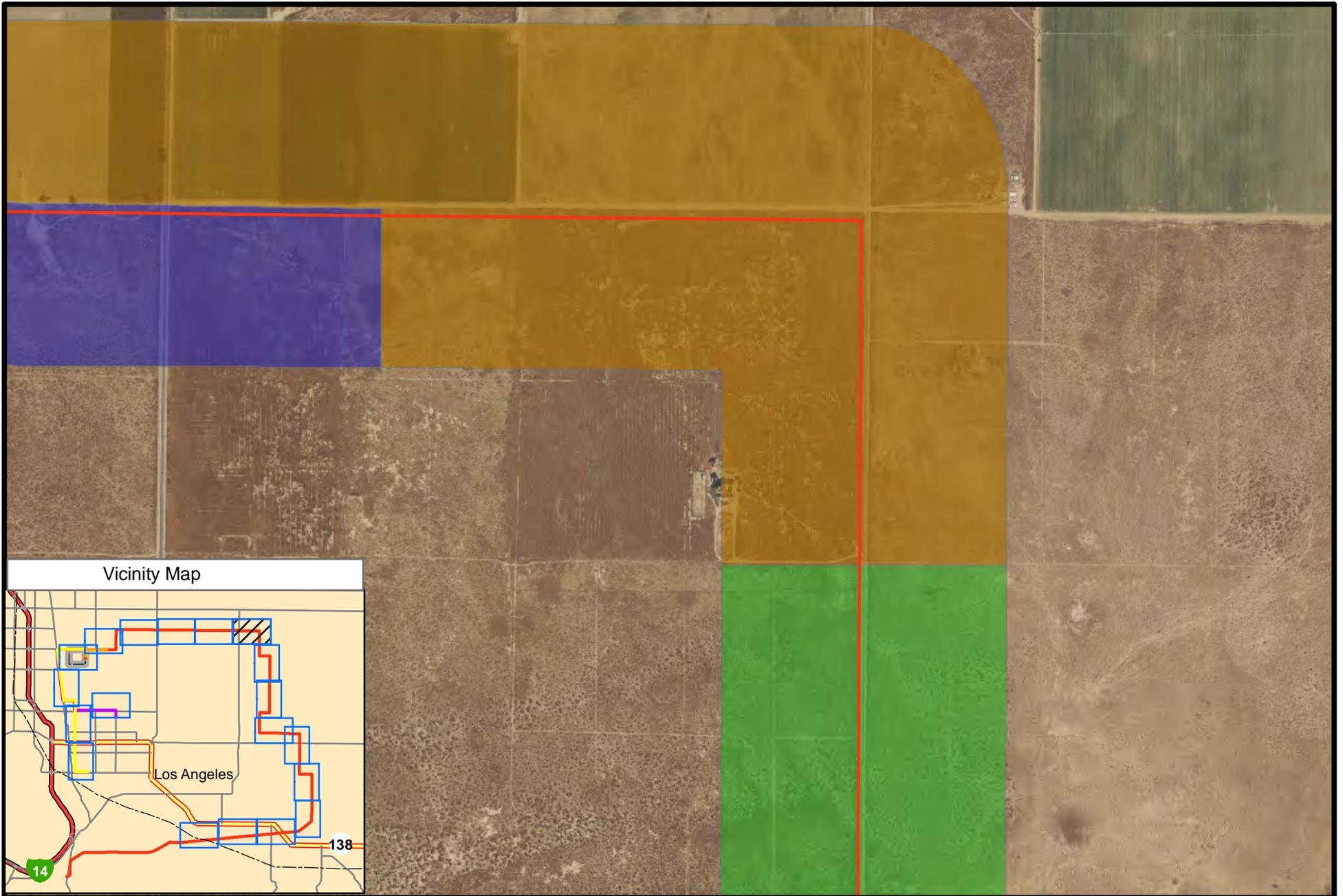
Habitat Suitability for Mohave Ground Squirrel
Figure E



Map Notes:

Projection: NAD 83, Zone 11
Path: S:\active projects\Palmdale
Power Plant Bio 6554000247\graphics\mxd\2009
Date: 05/29/09



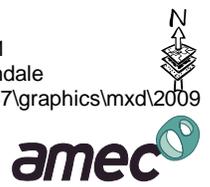


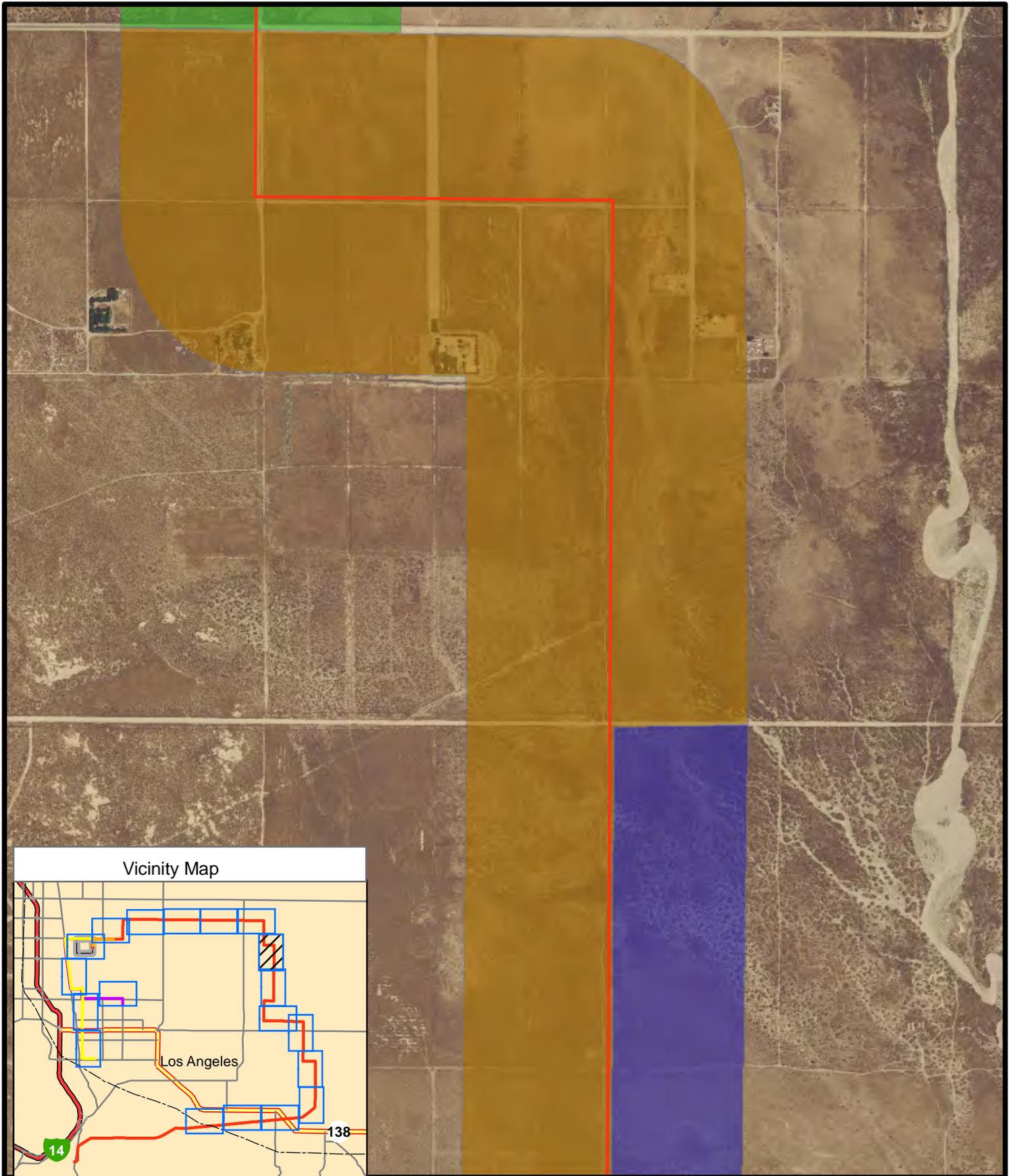
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure F



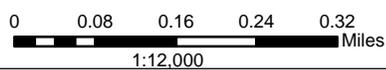
Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



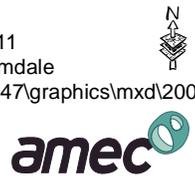


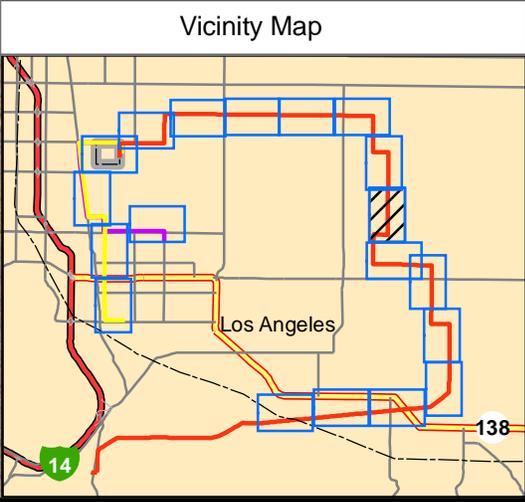
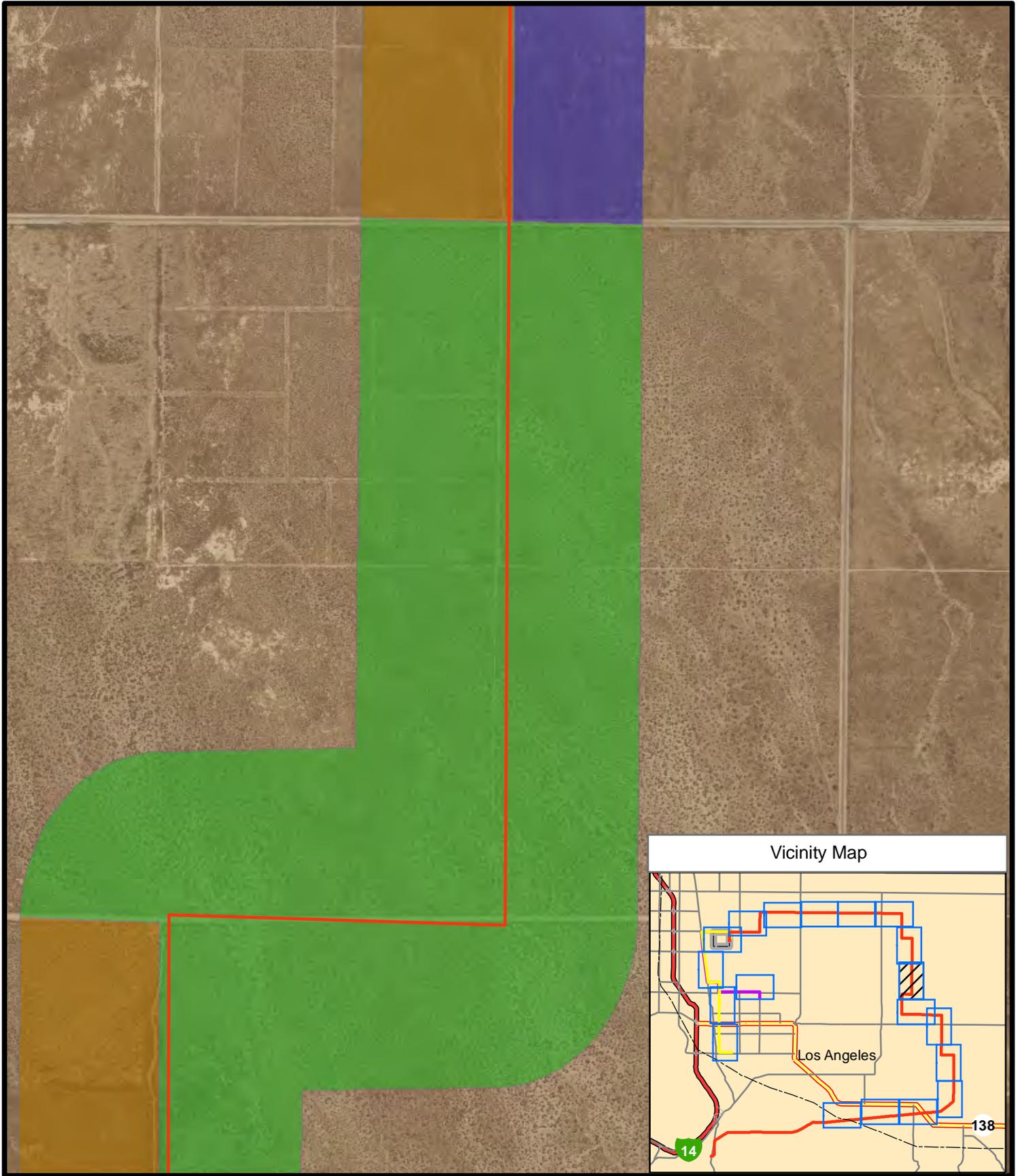
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure G



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09

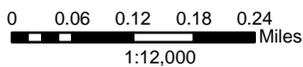




Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

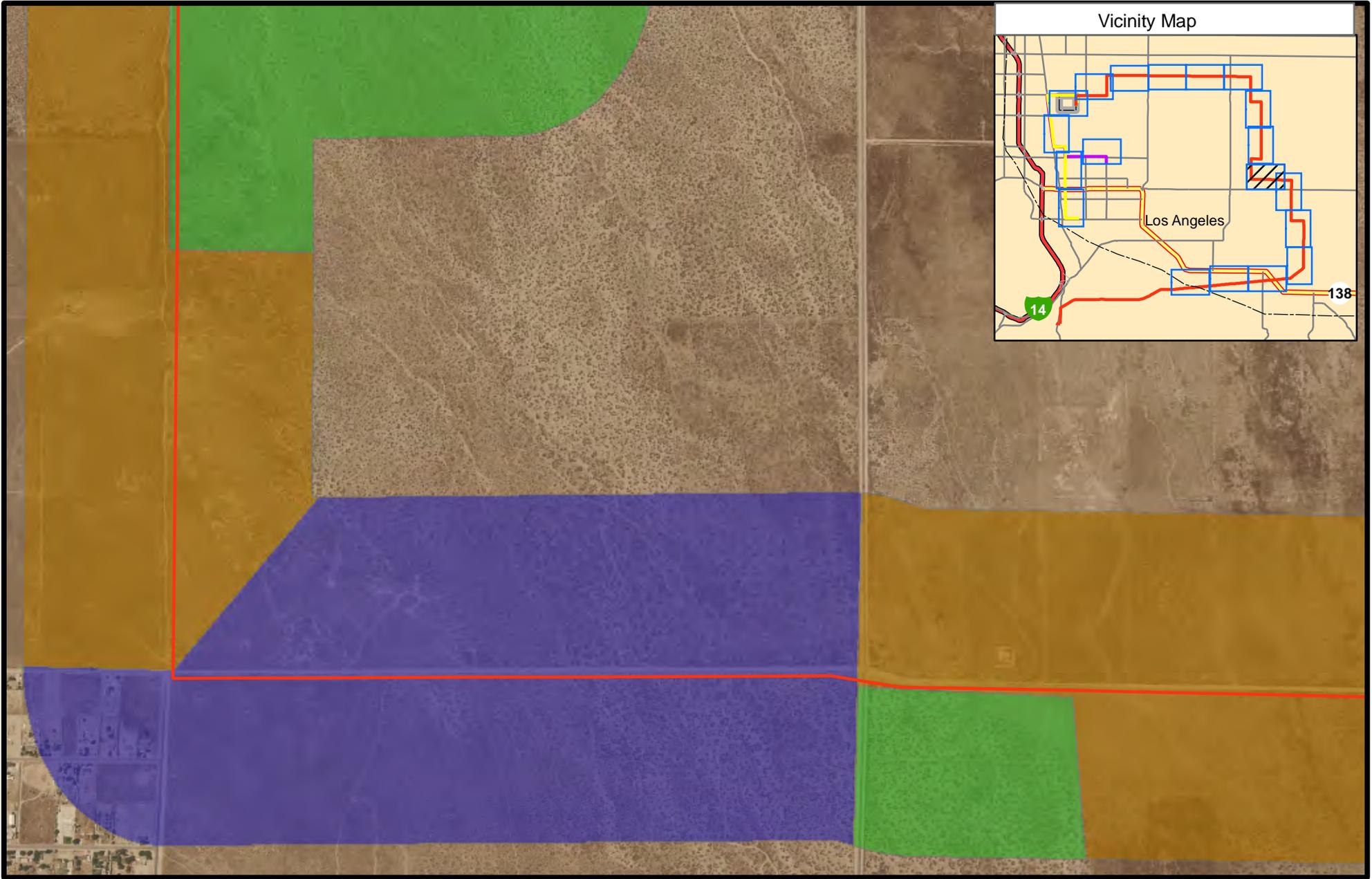
Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure H



Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



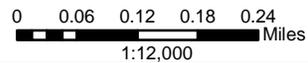


Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project

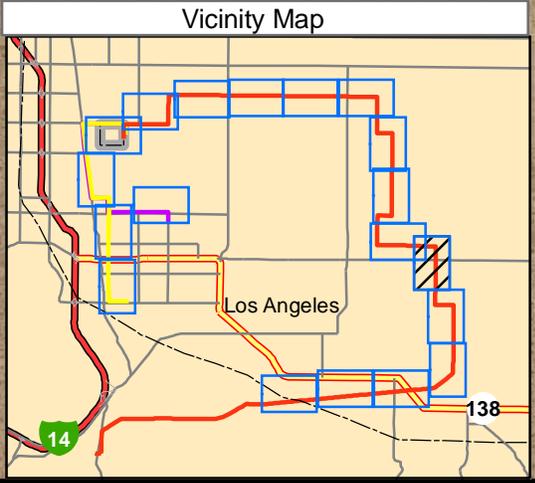
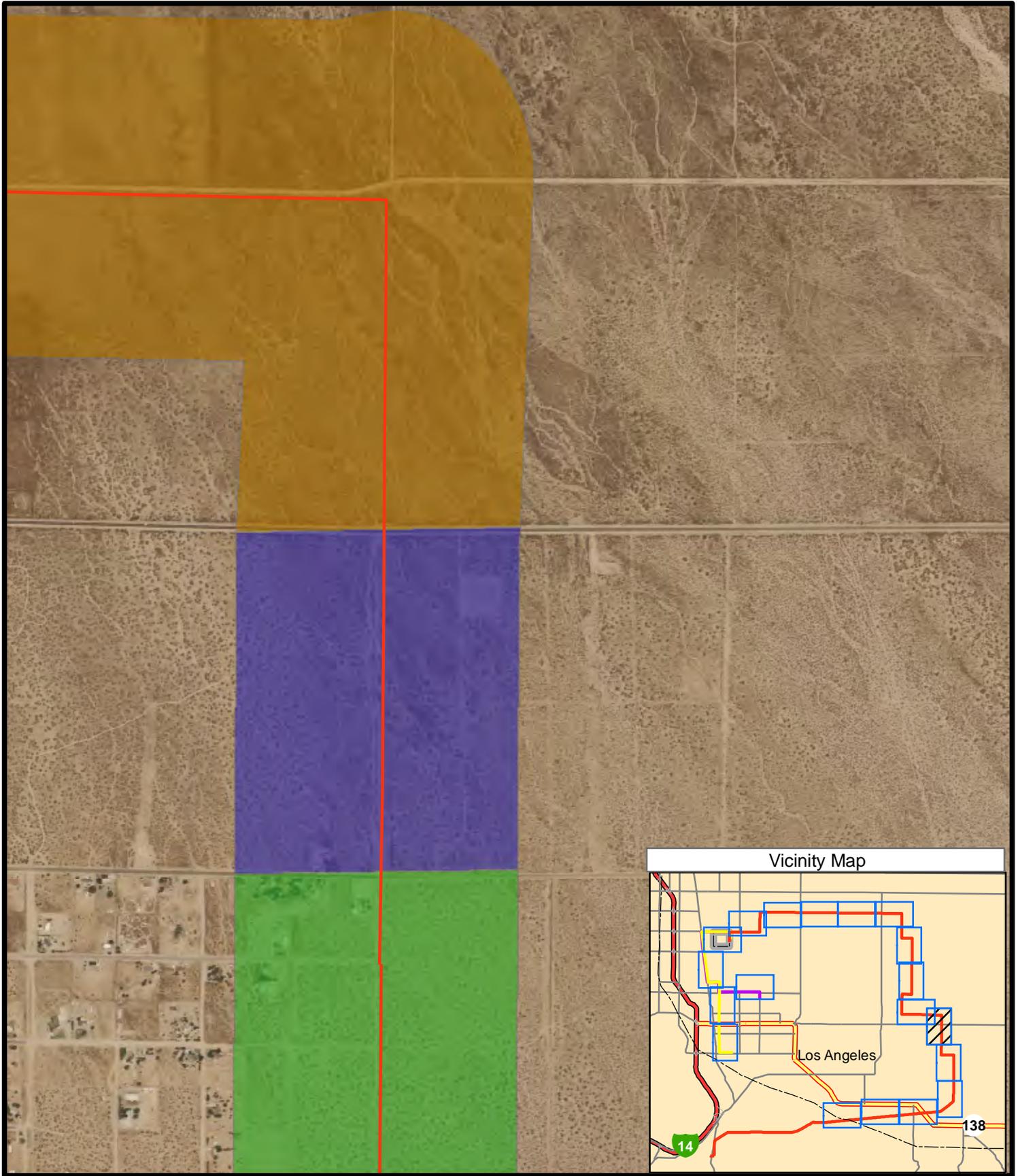
Habitat Suitability for Mohave Ground Squirrel
Figure I



Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09





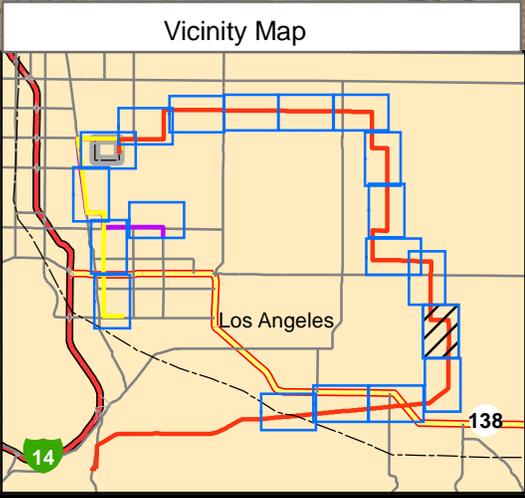
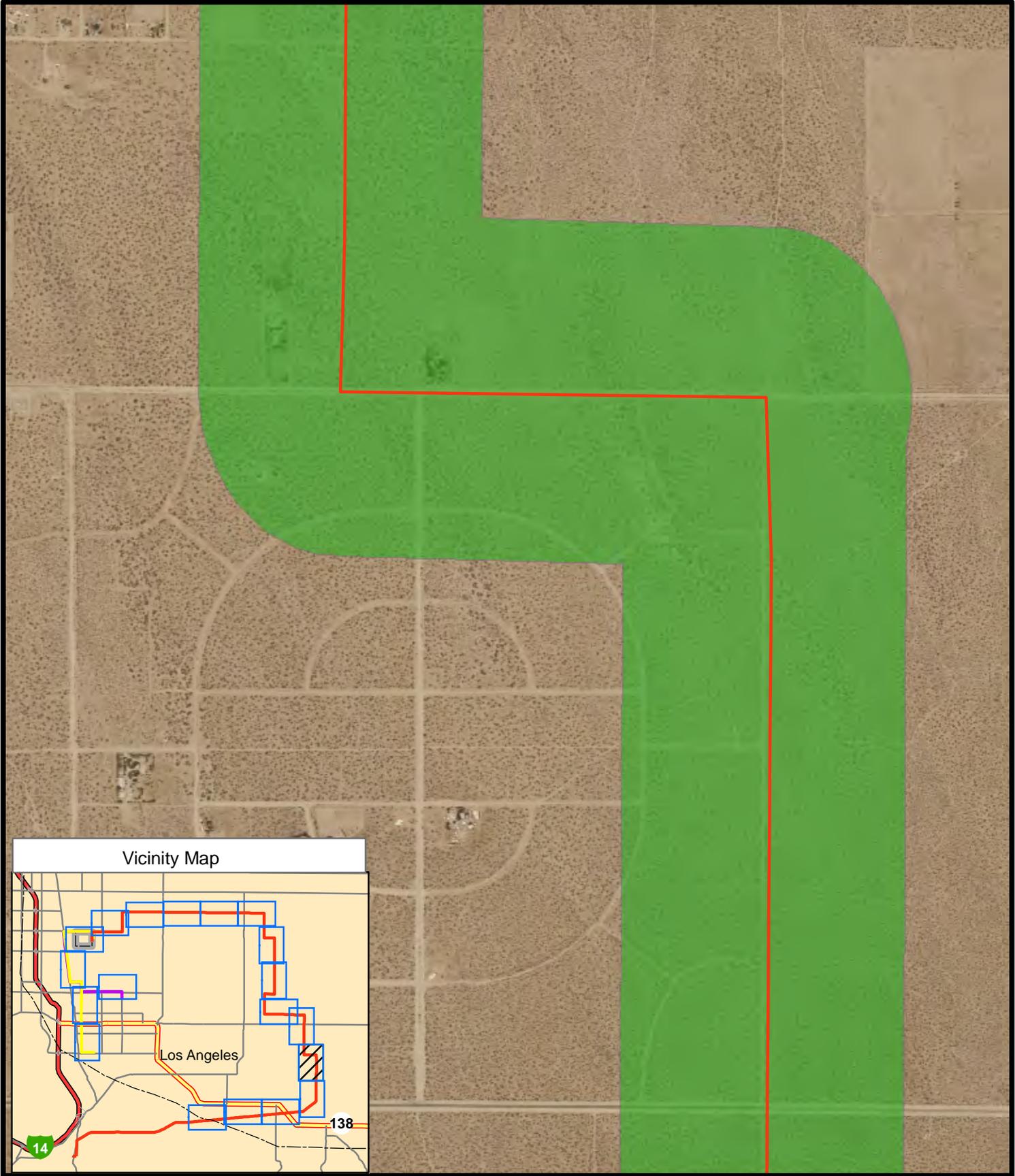
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground squirrel
 Figure J

0 0.06 0.12 0.18 0.24 Miles
 1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

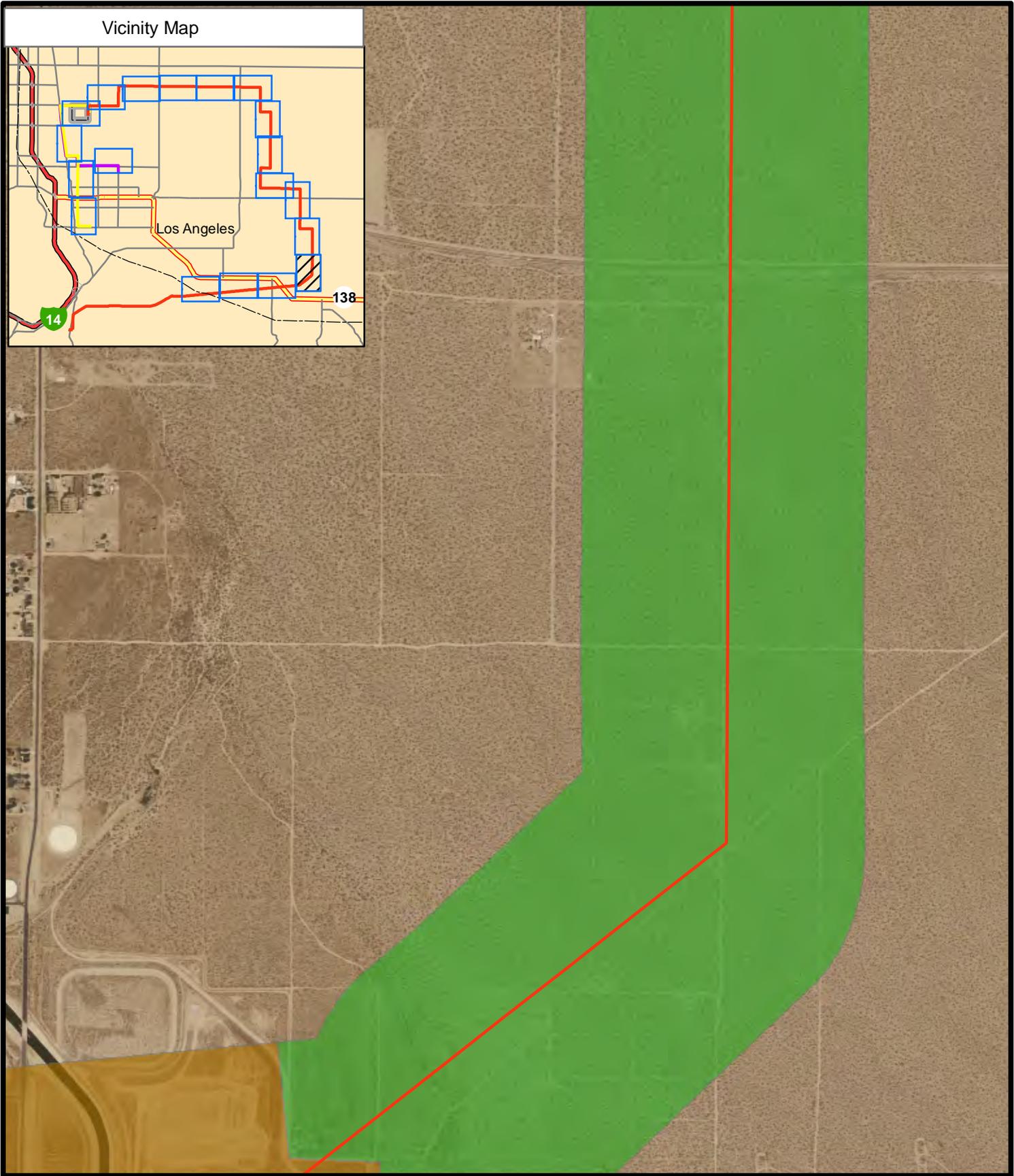
Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure K

0 0.06 0.12 0.18 0.24 Miles

1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09

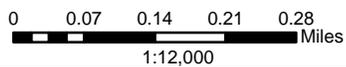


Legend

- Transmission Line Route
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

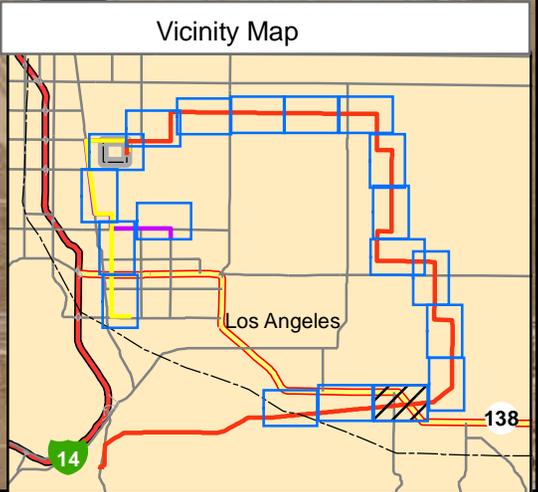
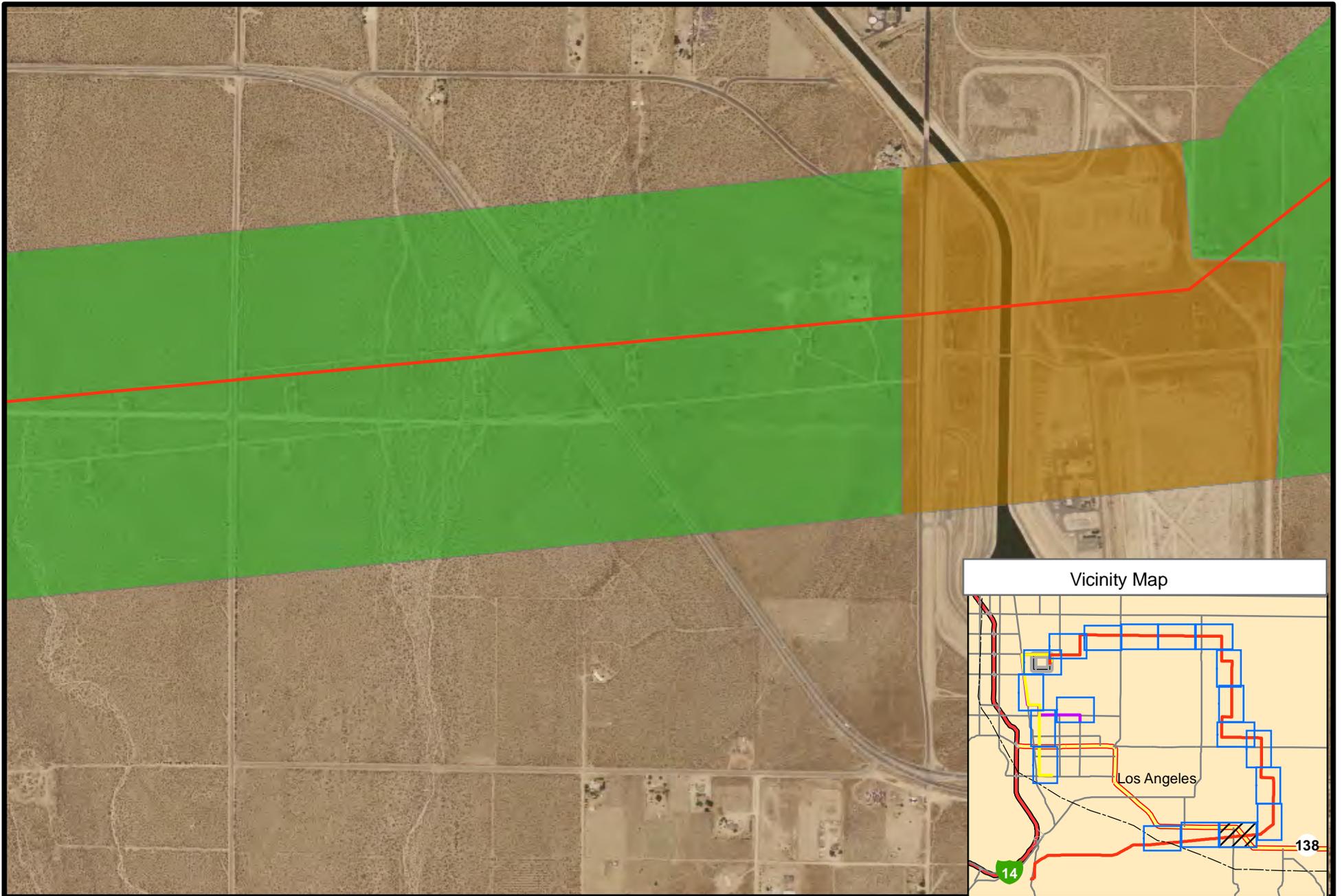
Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure L



Map Notes:

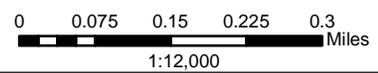
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 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



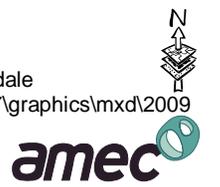


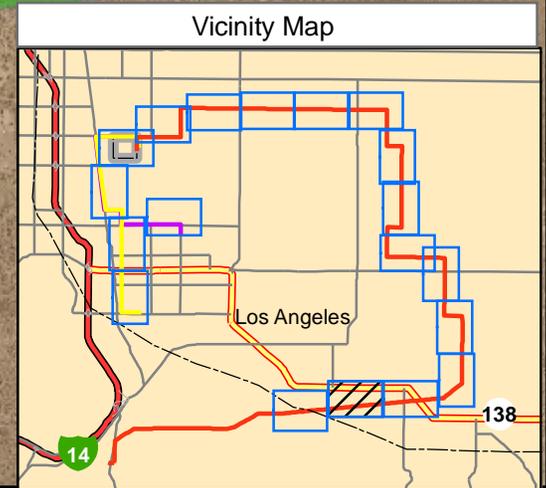
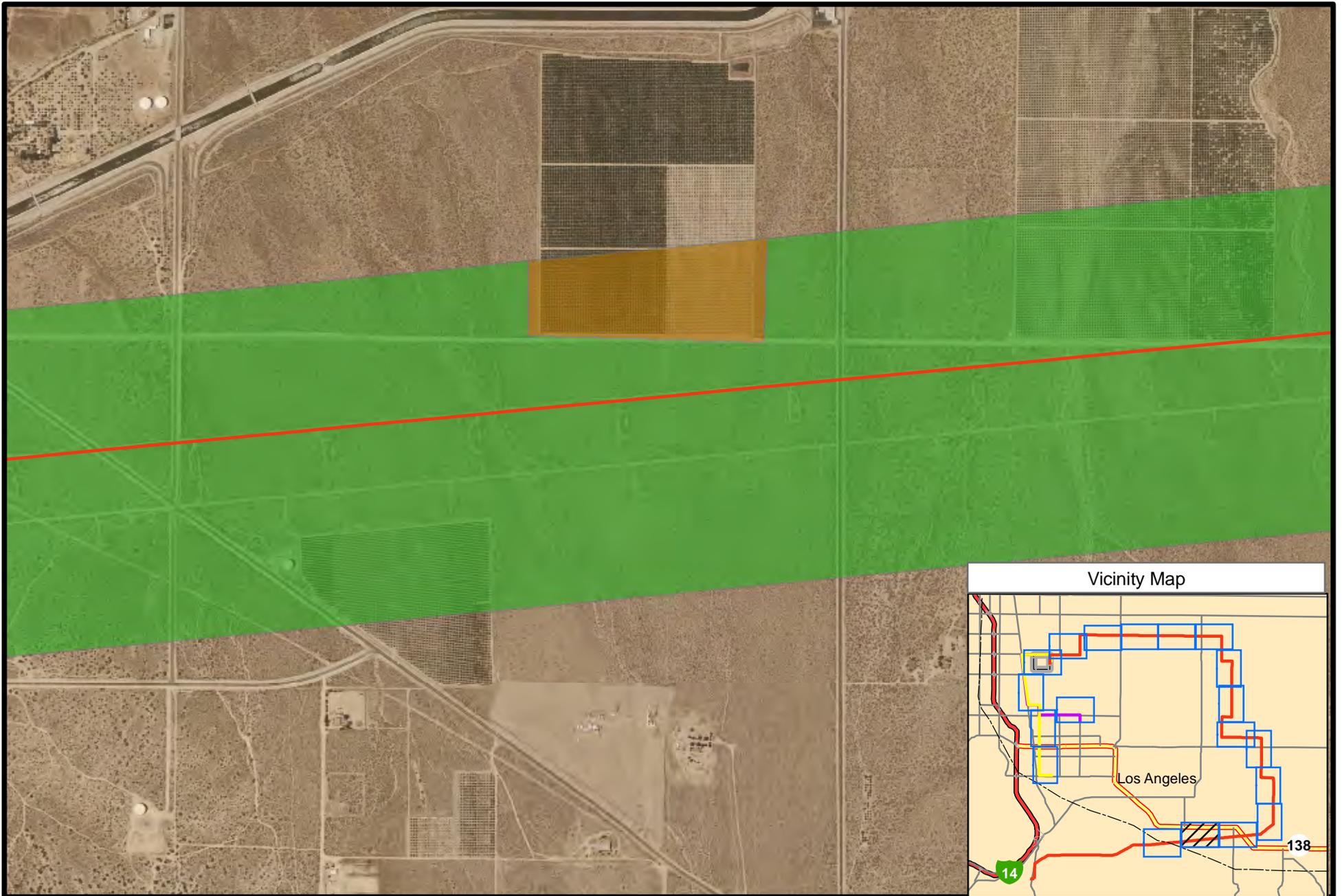
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure M



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



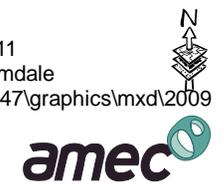


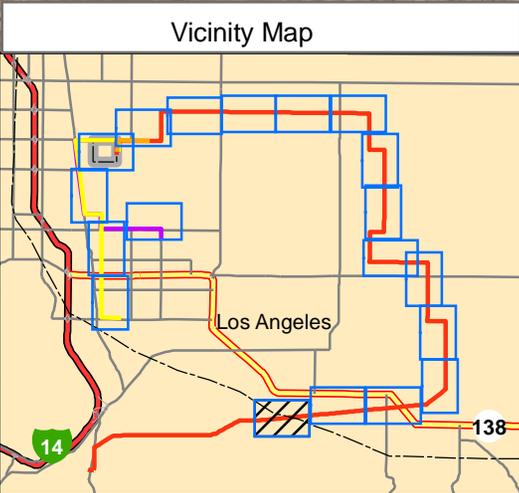
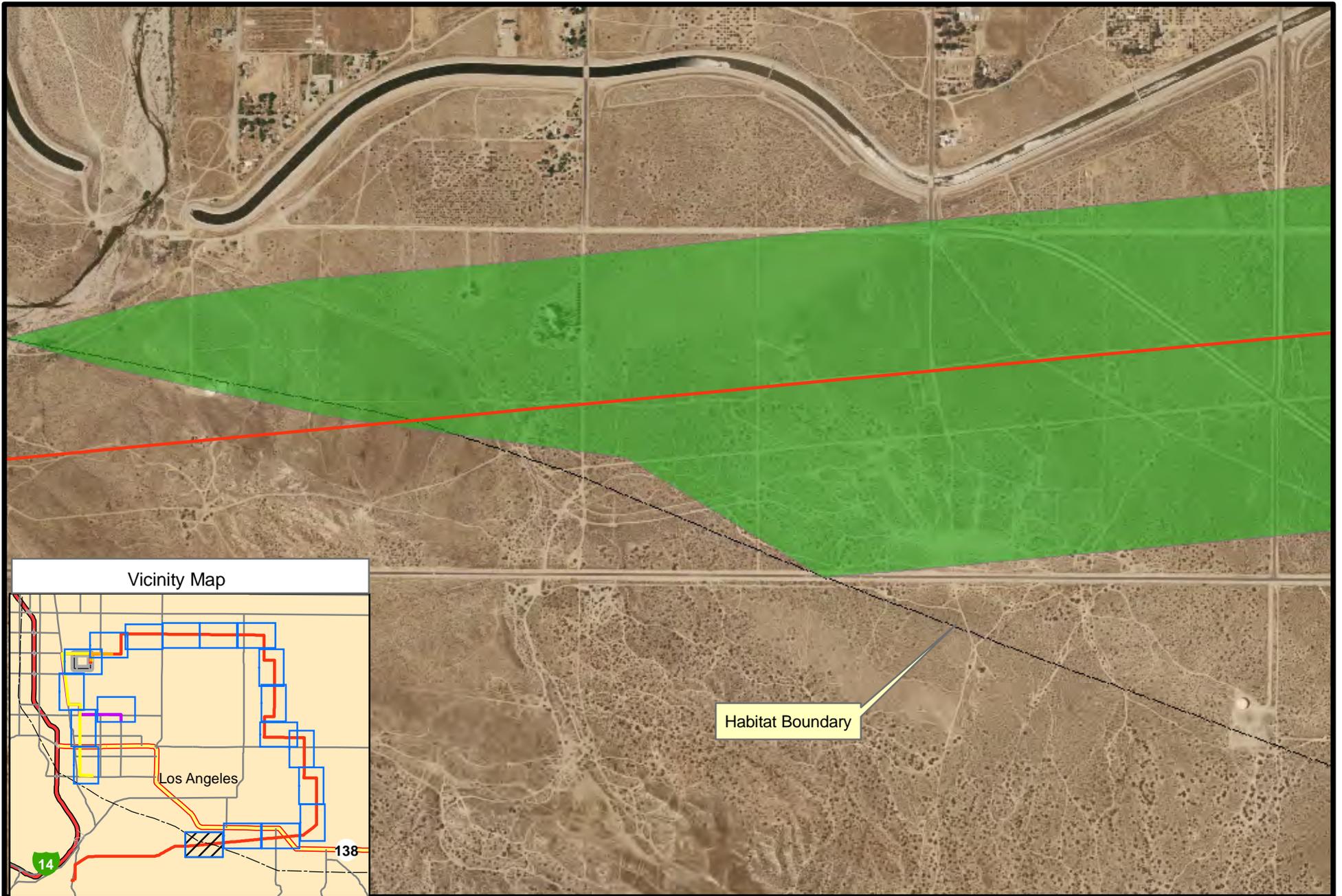
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure N



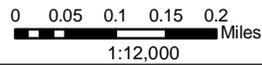
Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



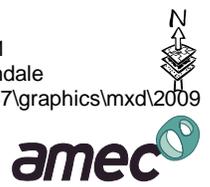


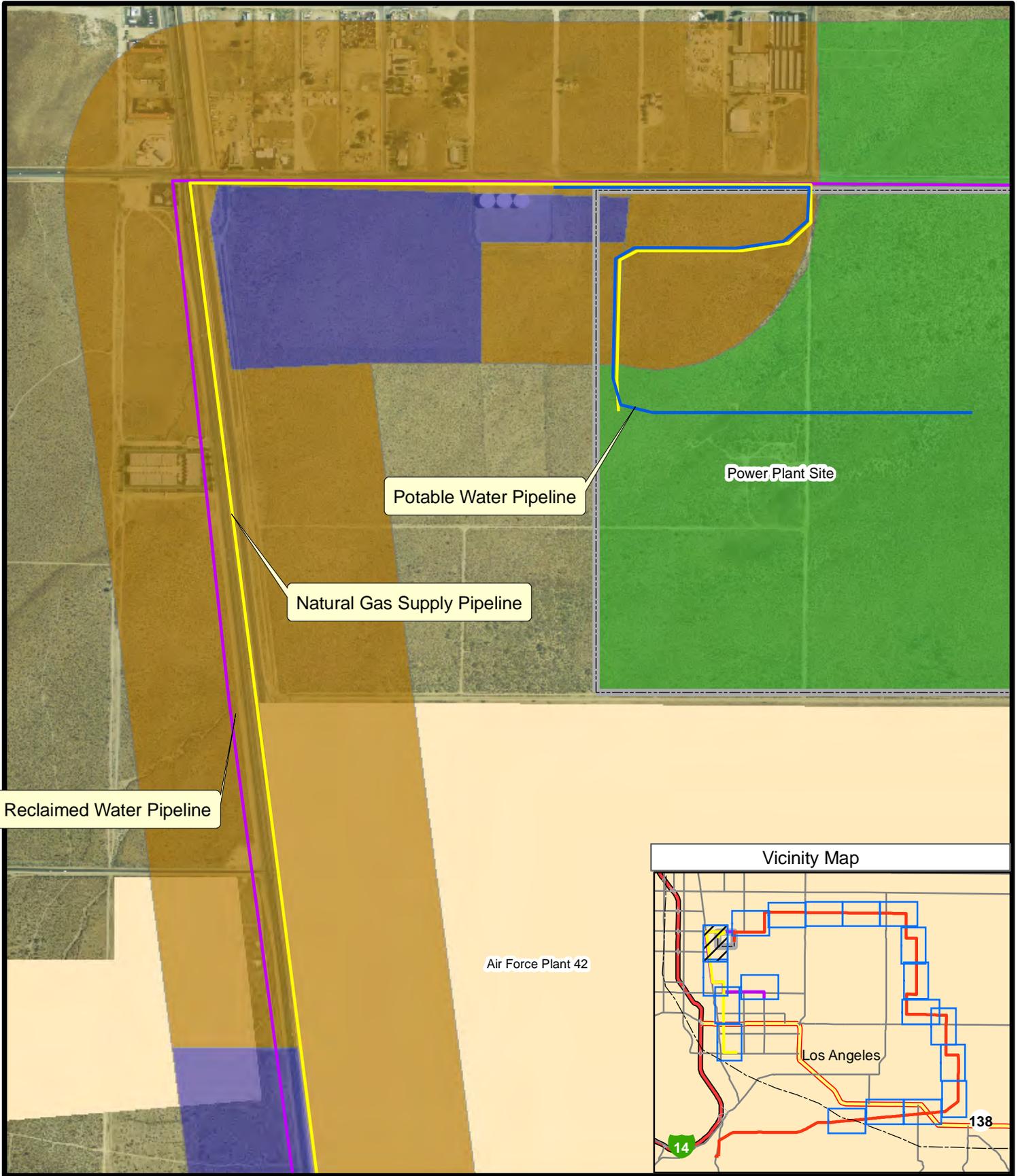
- Legend**
- Transmission Line Route
 - Suitable
 - Unsuitable
 - Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure O



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09





Legend

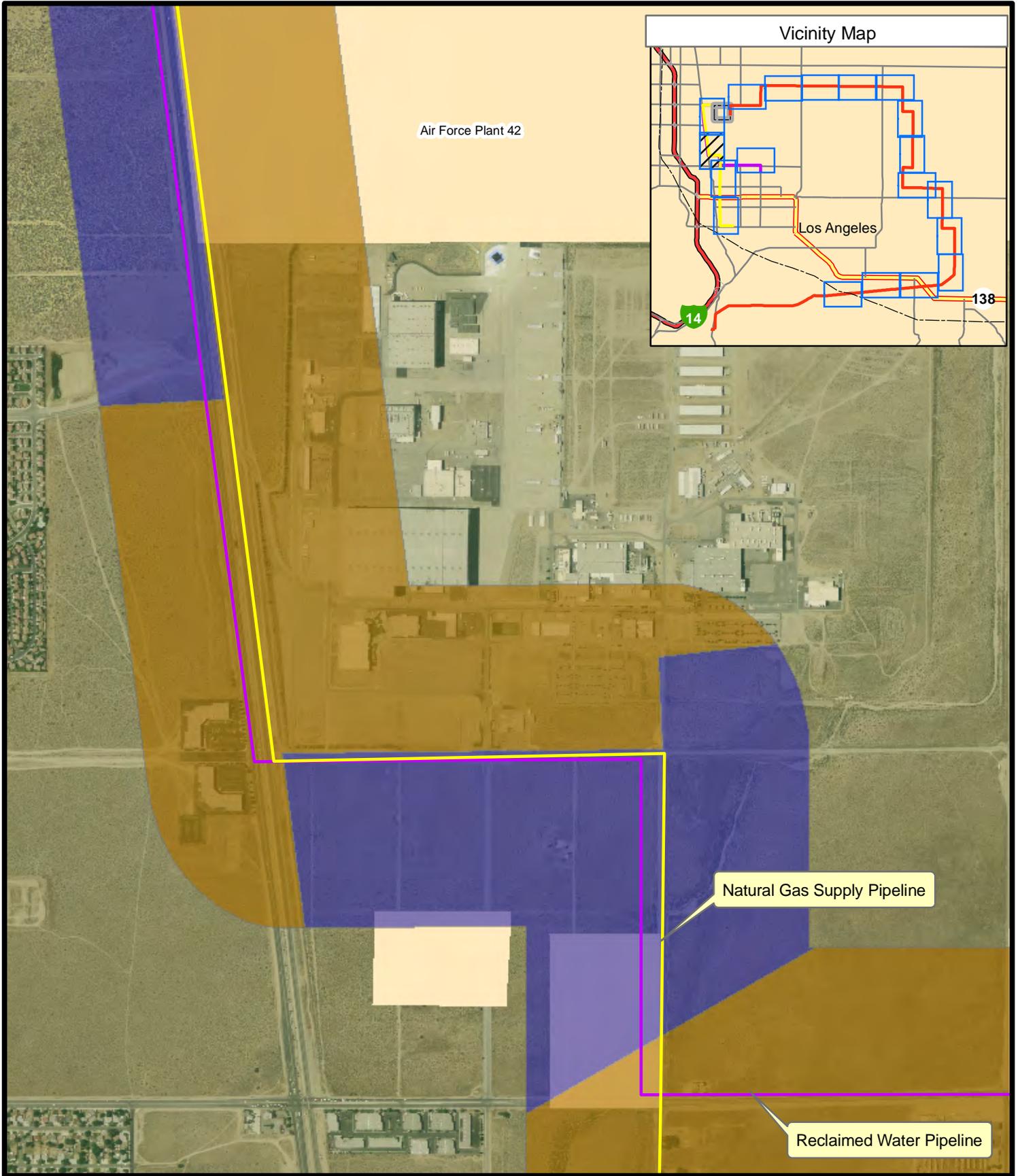
- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure P

0 0.06 0.12 0.18 0.24 Miles
 1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 06/16/09



Legend

- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure Q

0 0.06 0.12 0.18 0.24
 Miles

1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 06/16/09

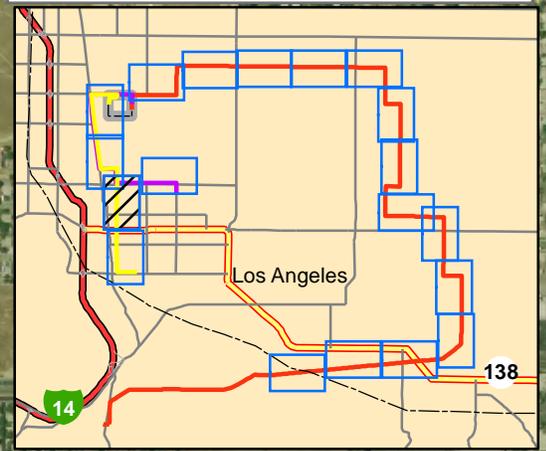



Air Force Plant 42

Reclaimed Water Pipeline

Natural Gas Supply Pipeline

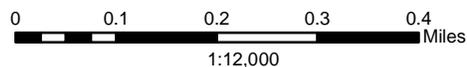
Vicinity Map



Legend

- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

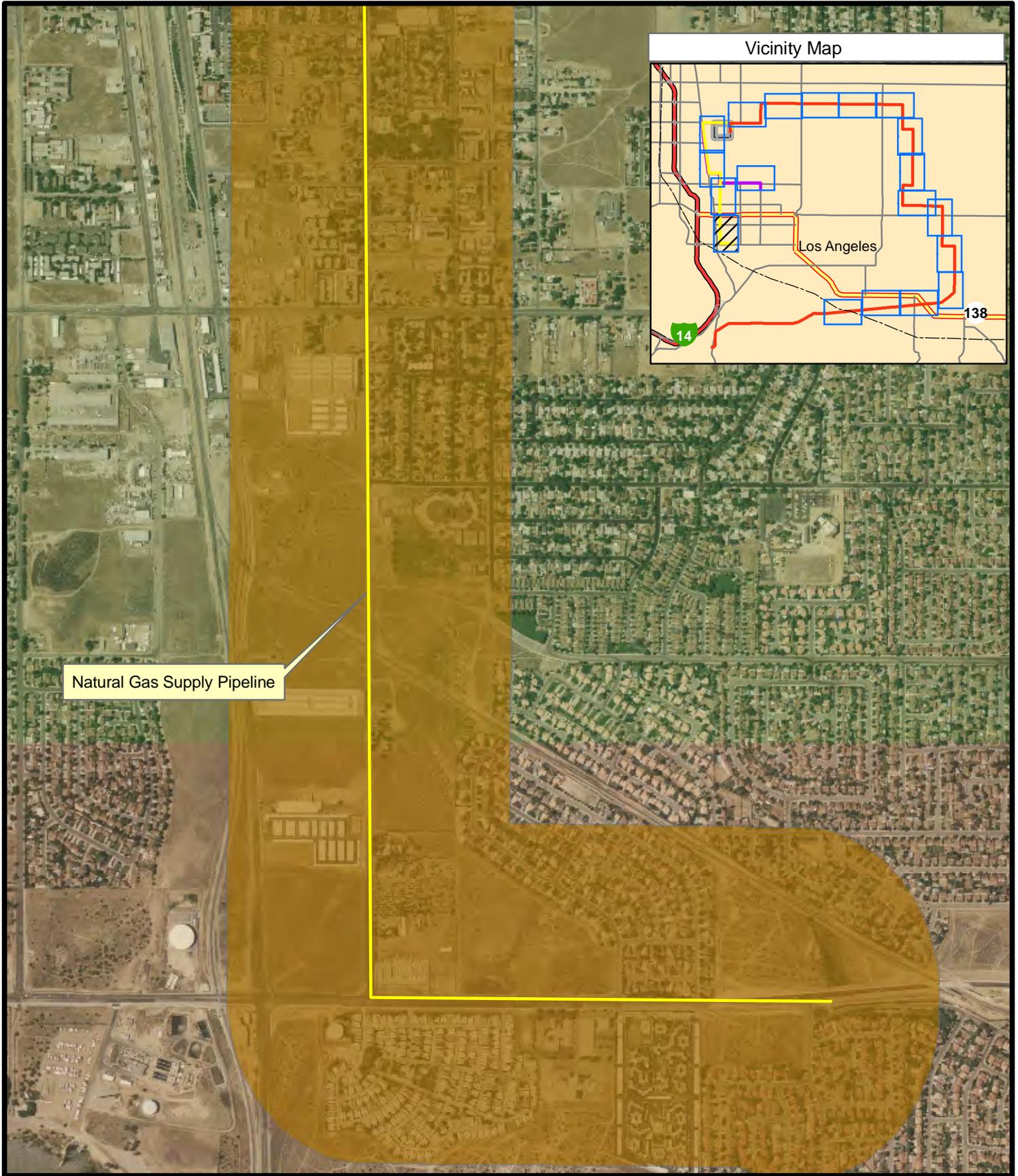
Palmdale Hybrid Power Project
 Habitat Suitability for Mohave Ground Squirrel
 Figure R



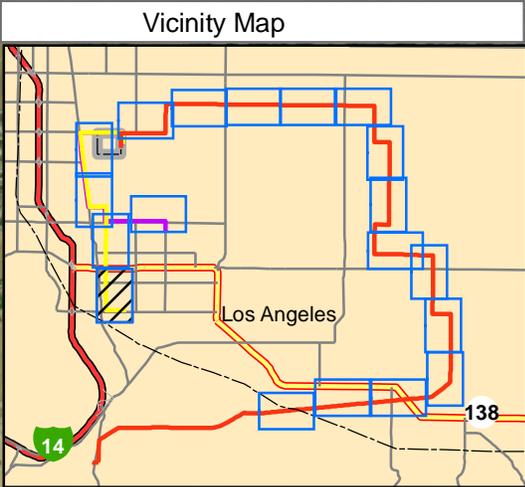
Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09





Natural Gas Supply Pipeline

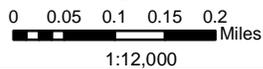


Legend

- Suitable
- Unsuitable
- Suitable Adjacent to Corridor

Palmdale Hybrid Power Project

Habitat Suitability for Mohave Ground Squirrel
Figure S

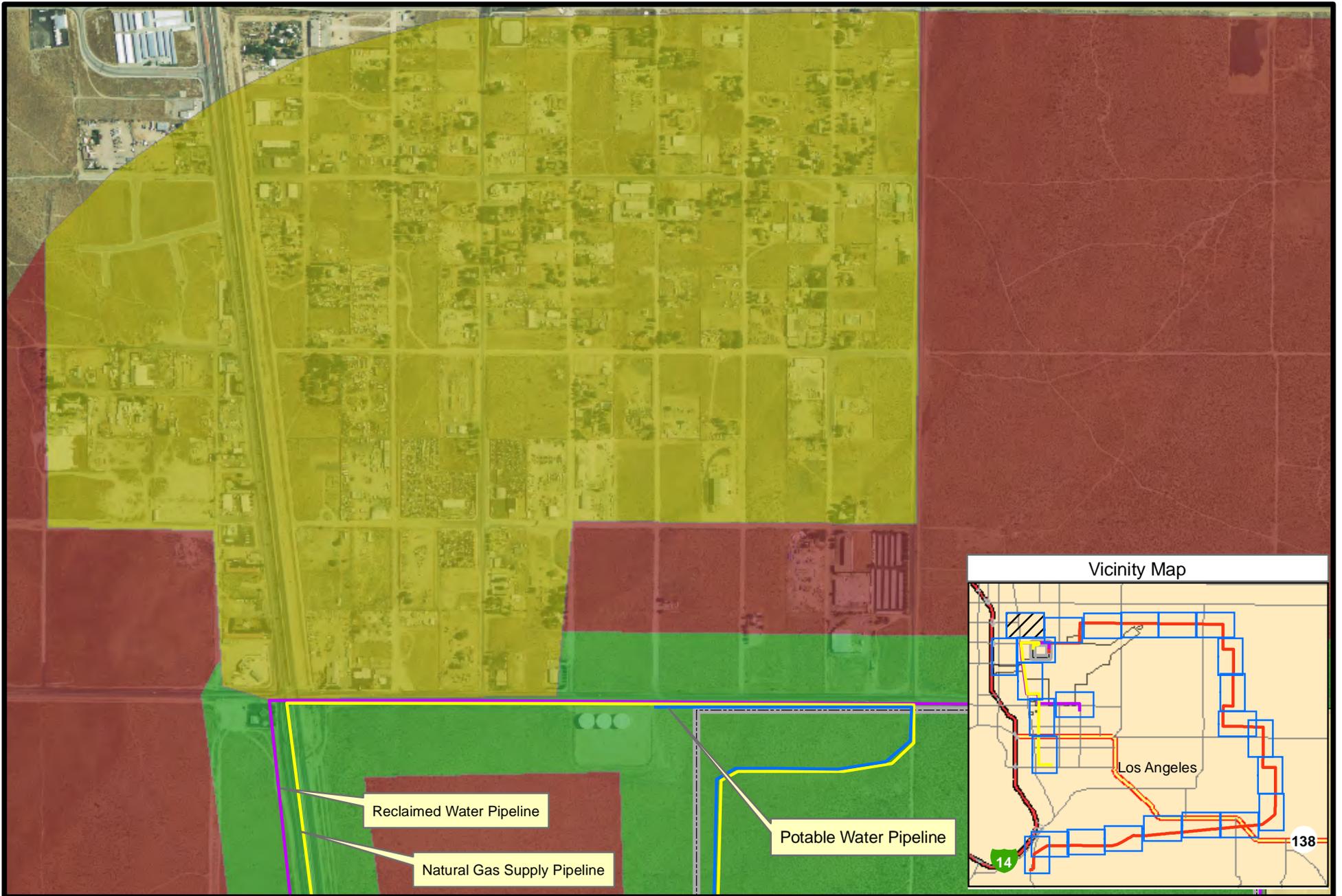


Map Notes:

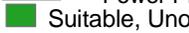
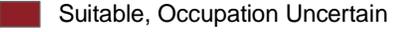
Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 Date: 05/29/09



Desert Tortoise Habitat Map



Legend

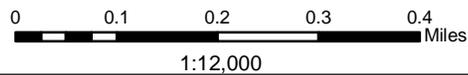
	Not Suitable		Power Plant Site
	Suitable, Unoccupied		
	Suitable, Occupation Uncertain		

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

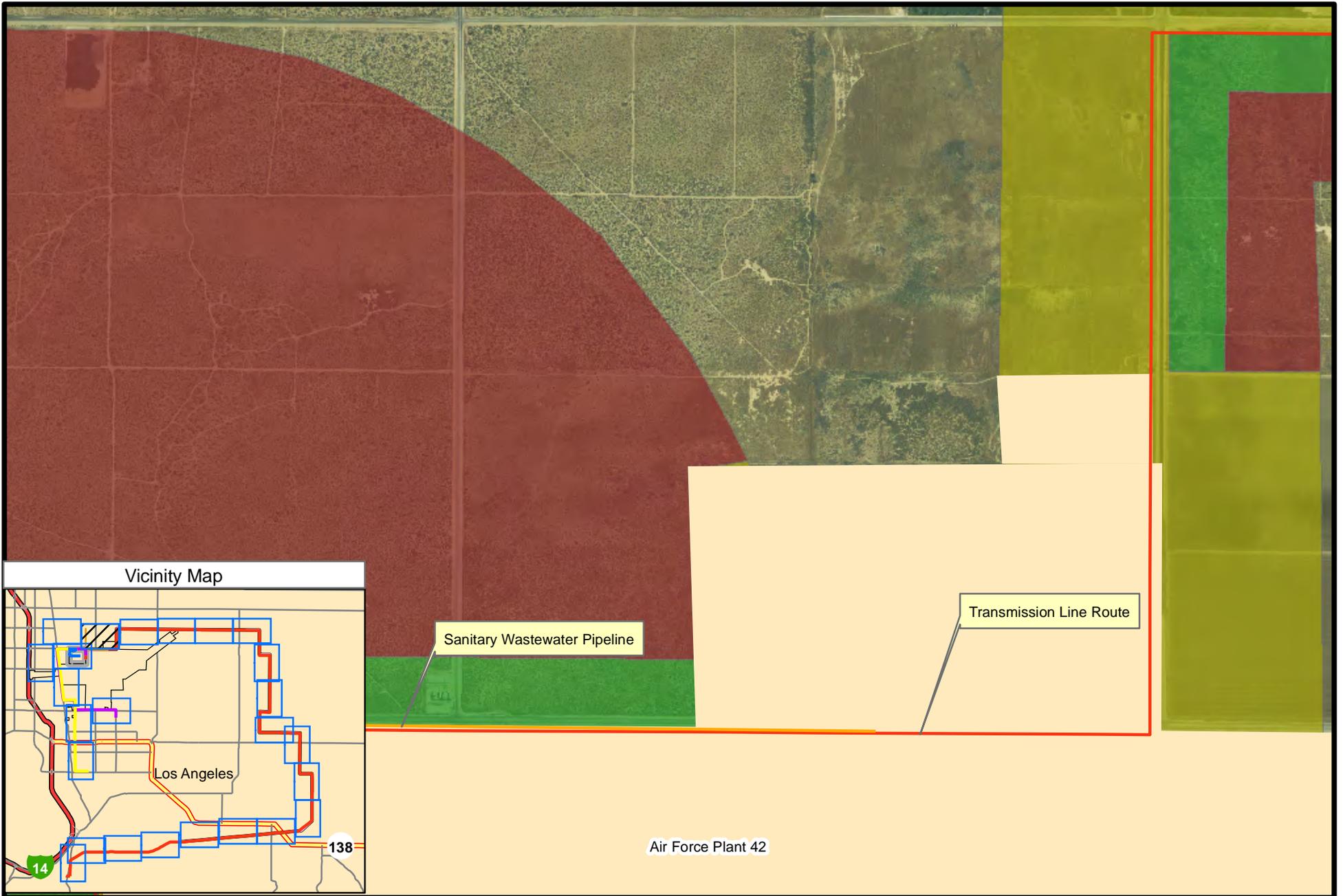
Habitat Suitability for Desert Tortoise

Figure A.1

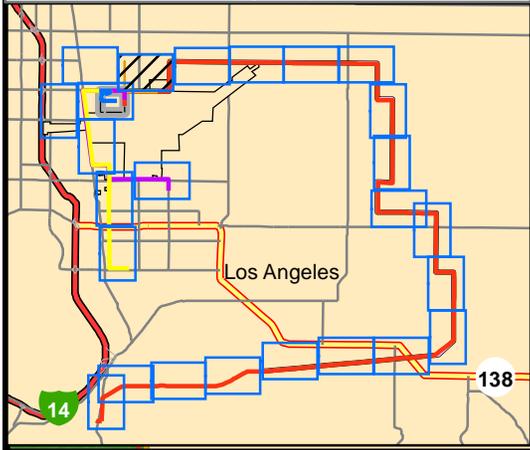


Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5.28
 Date: 06/23/09





Vicinity Map



Sanitary Wastewater Pipeline

Transmission Line Route

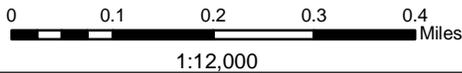
Air Force Plant 42

Legend

	Air Force Plant 42
	Not Suitable
	Suitable, Unoccupied
	Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure A.2



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5.28
 Date: 06/23/09



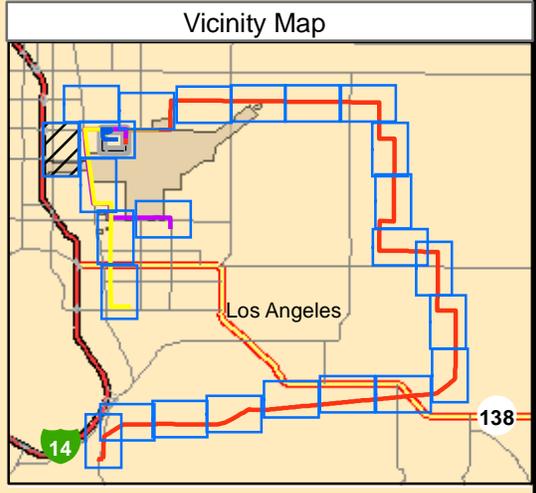
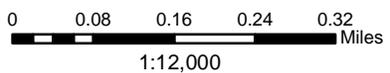


Legend

- Air Force Plant 42
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

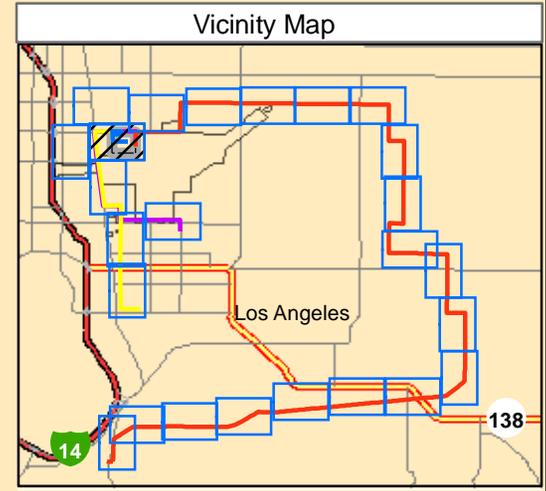
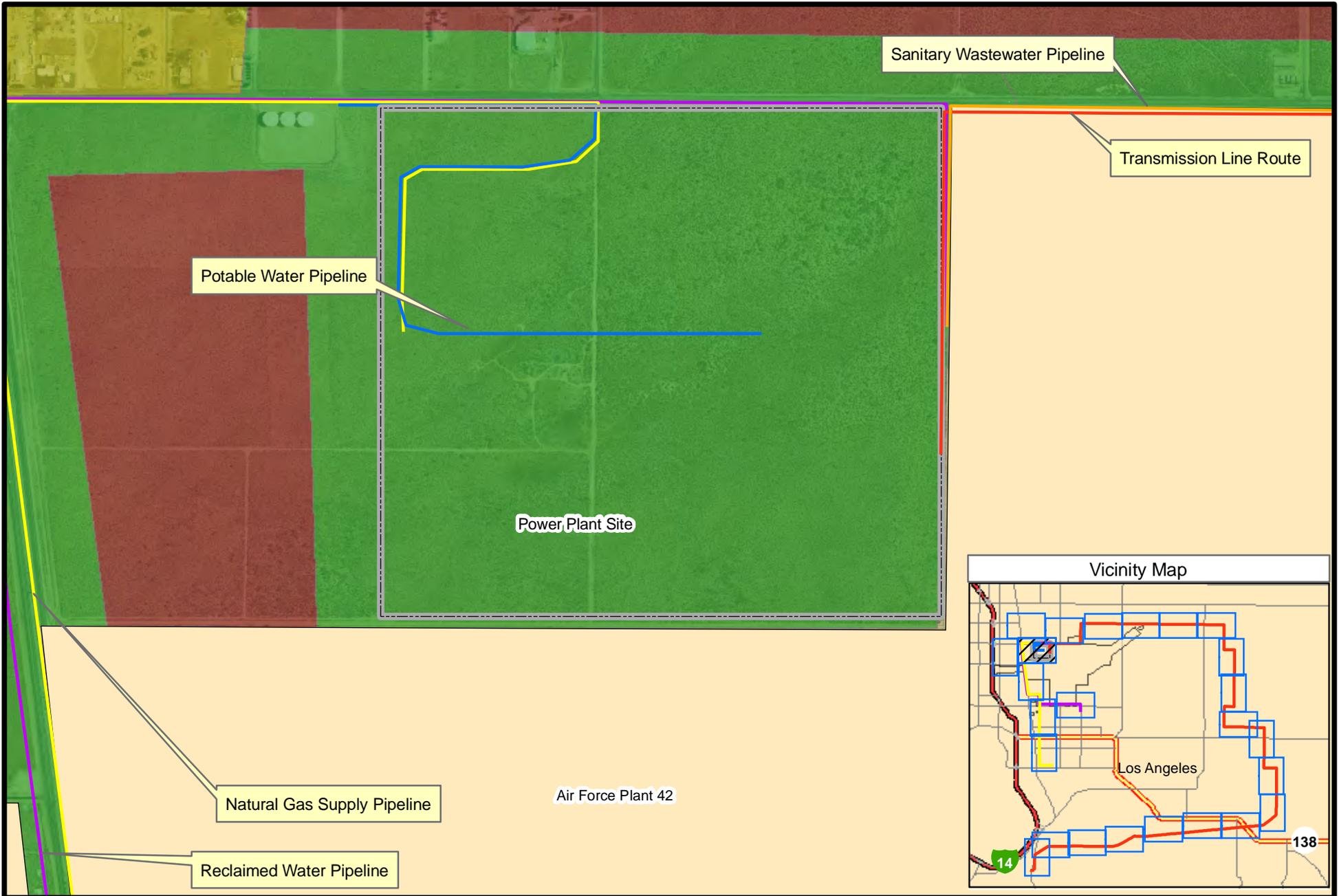
The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure A.3



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics
 \mxd\2009\5.28
 Date: 06/24/09





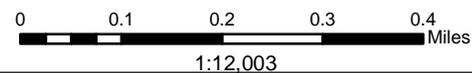
- Legend**
- Not Suitable
 - Suitable, Occupation Uncertain
 - Suitable, Unoccupied
 - Air Force Plant 42

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

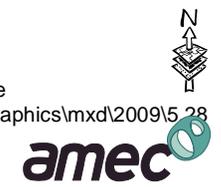
Habitat Suitability for Desert Tortoise

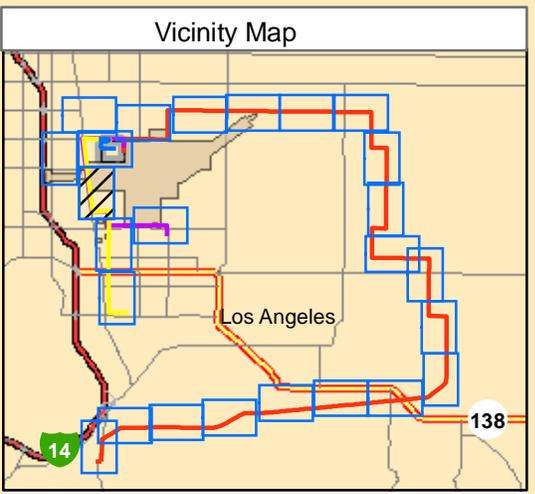
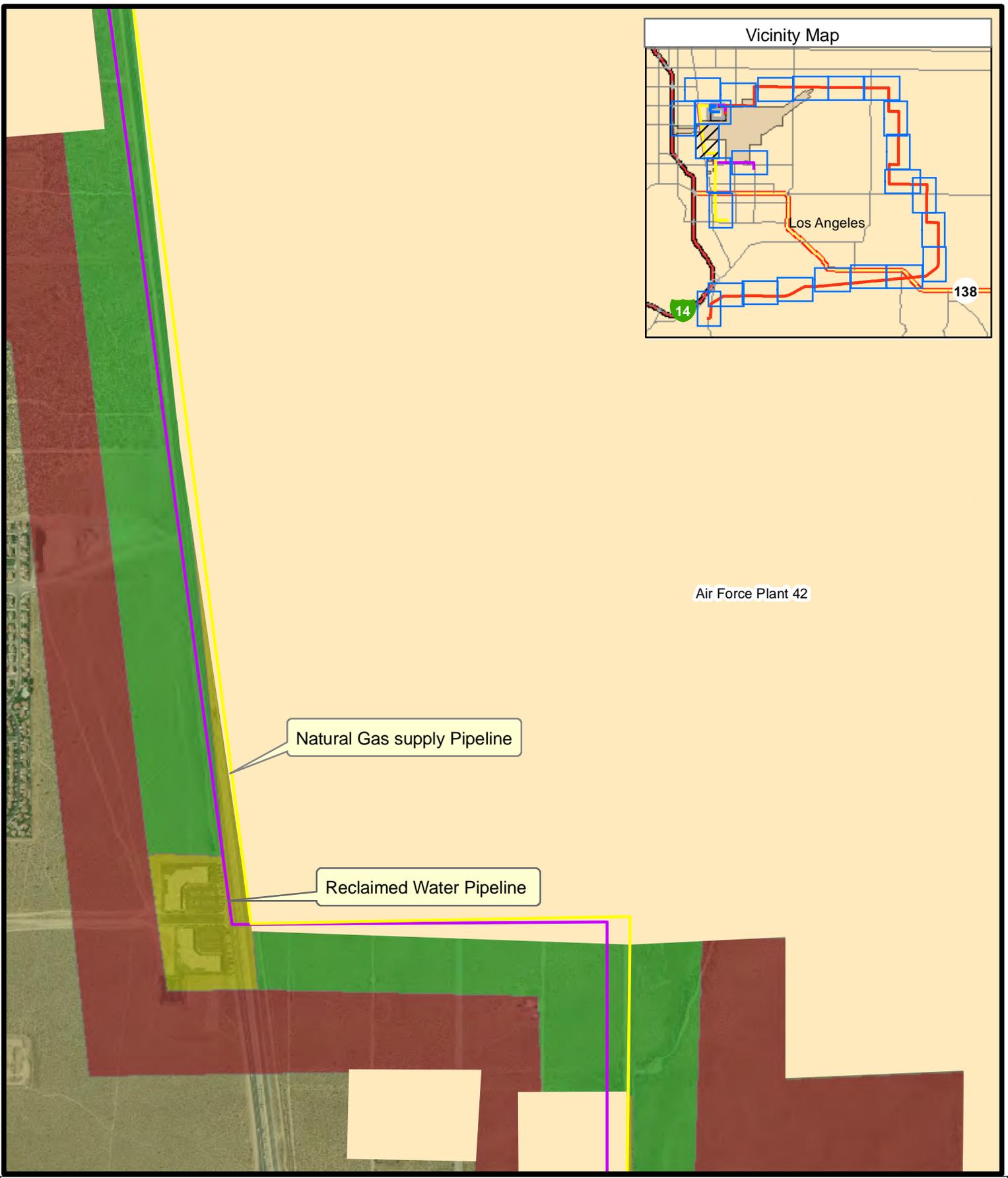
Figure A.4



Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5 28
 Date: 06/24/09





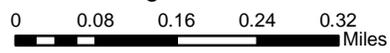
Legend

- Air Force Plant 42
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure B

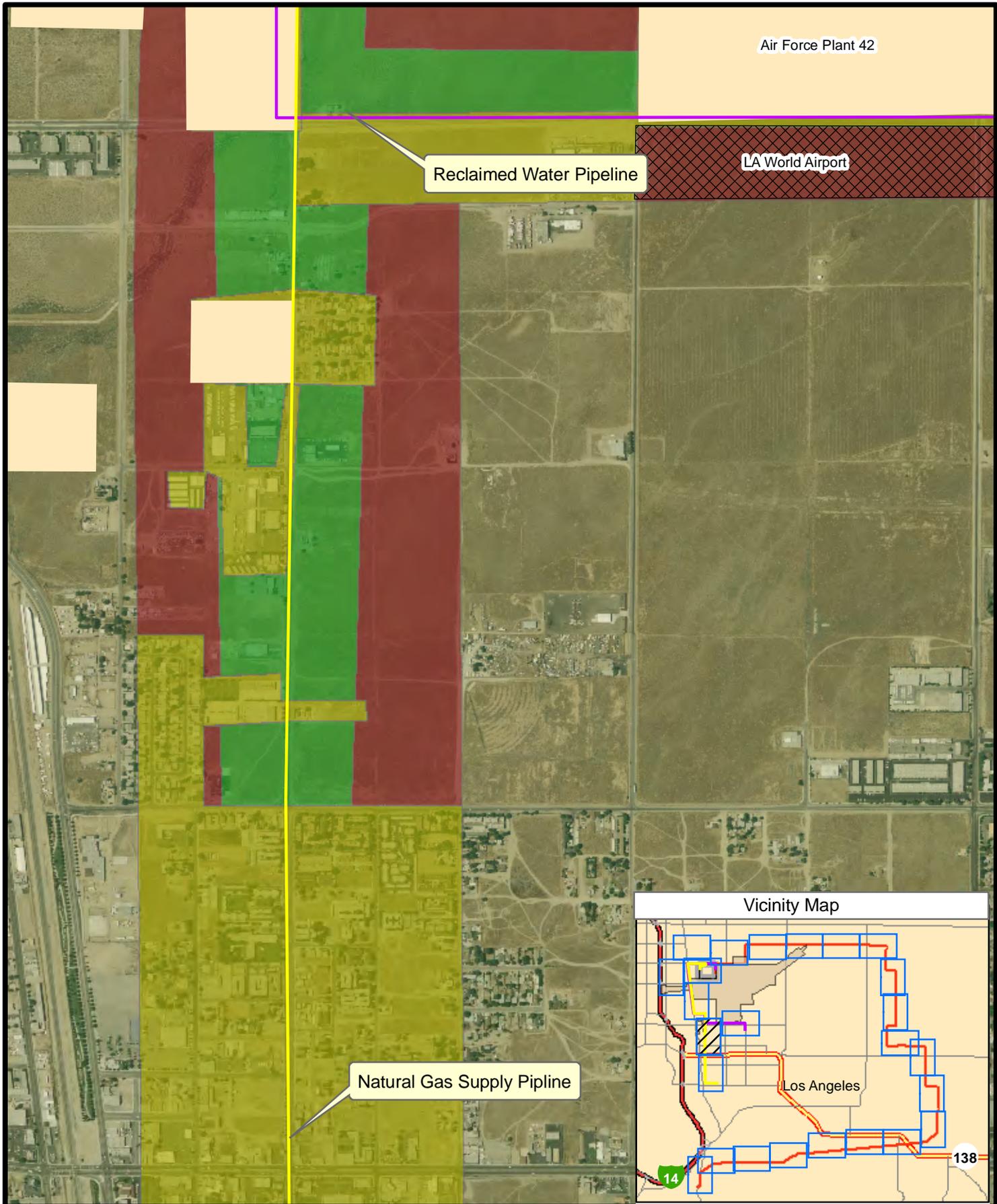


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale Power Plant Bio 6554000247\graphics\mxd \2009\5.28
 Date: 06/24/09



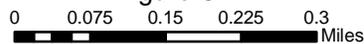
Legend

- Air Force Plant 42
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

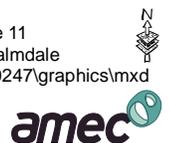
Habitat Suitability for Desert Tortoise
Figure C

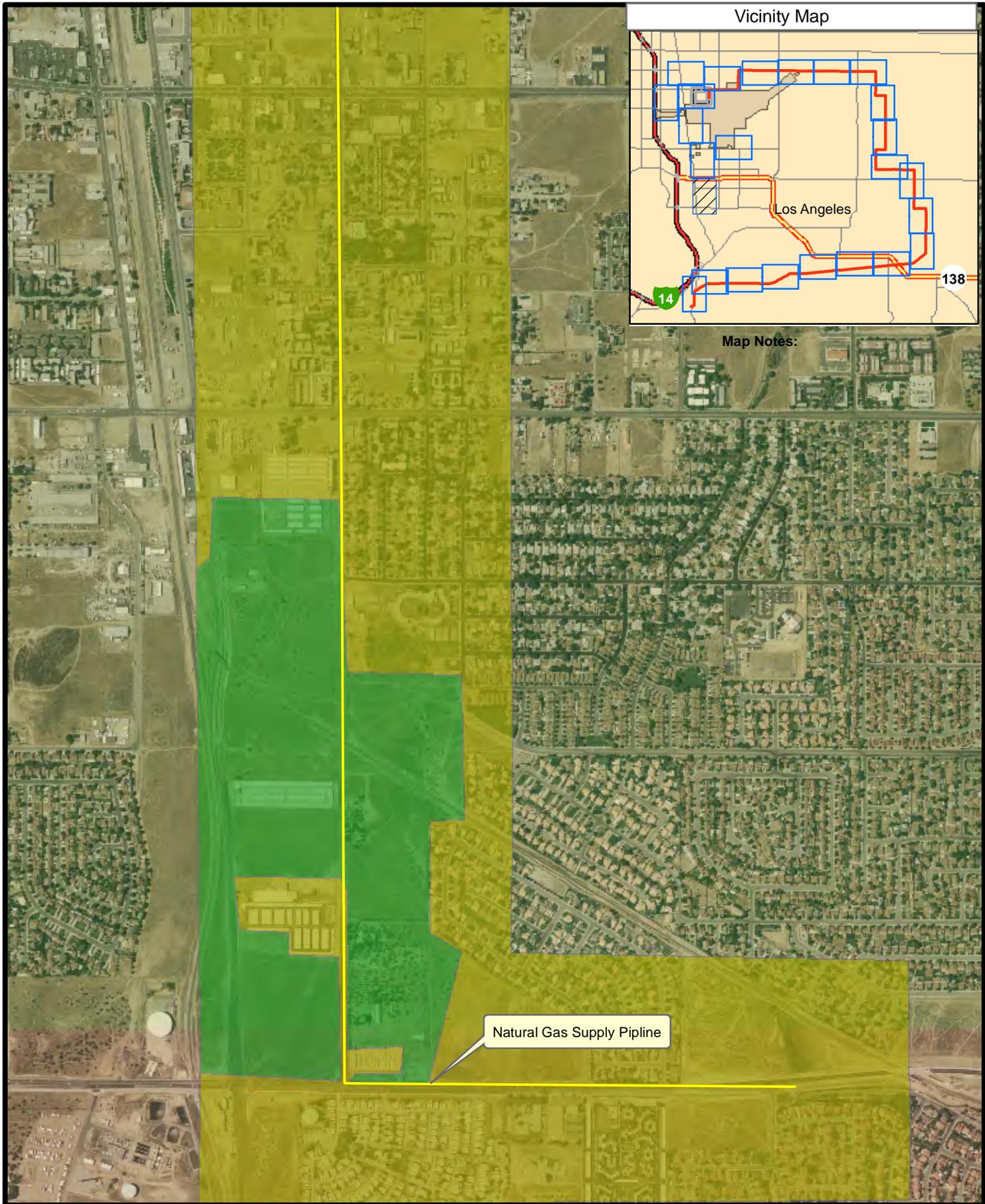


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
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 \2009\5.28
 Date: 06/24/09





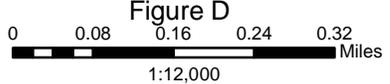
Natural Gas Supply Pipeline

Legend

	Not Occupied
	Suitable, Unoccupied
	Suitable, Occupation Uncertain

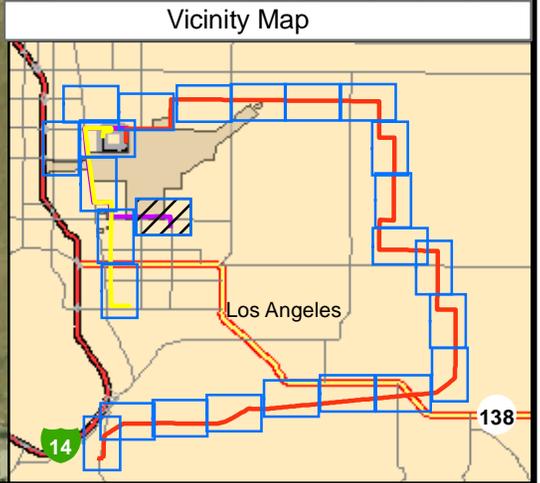
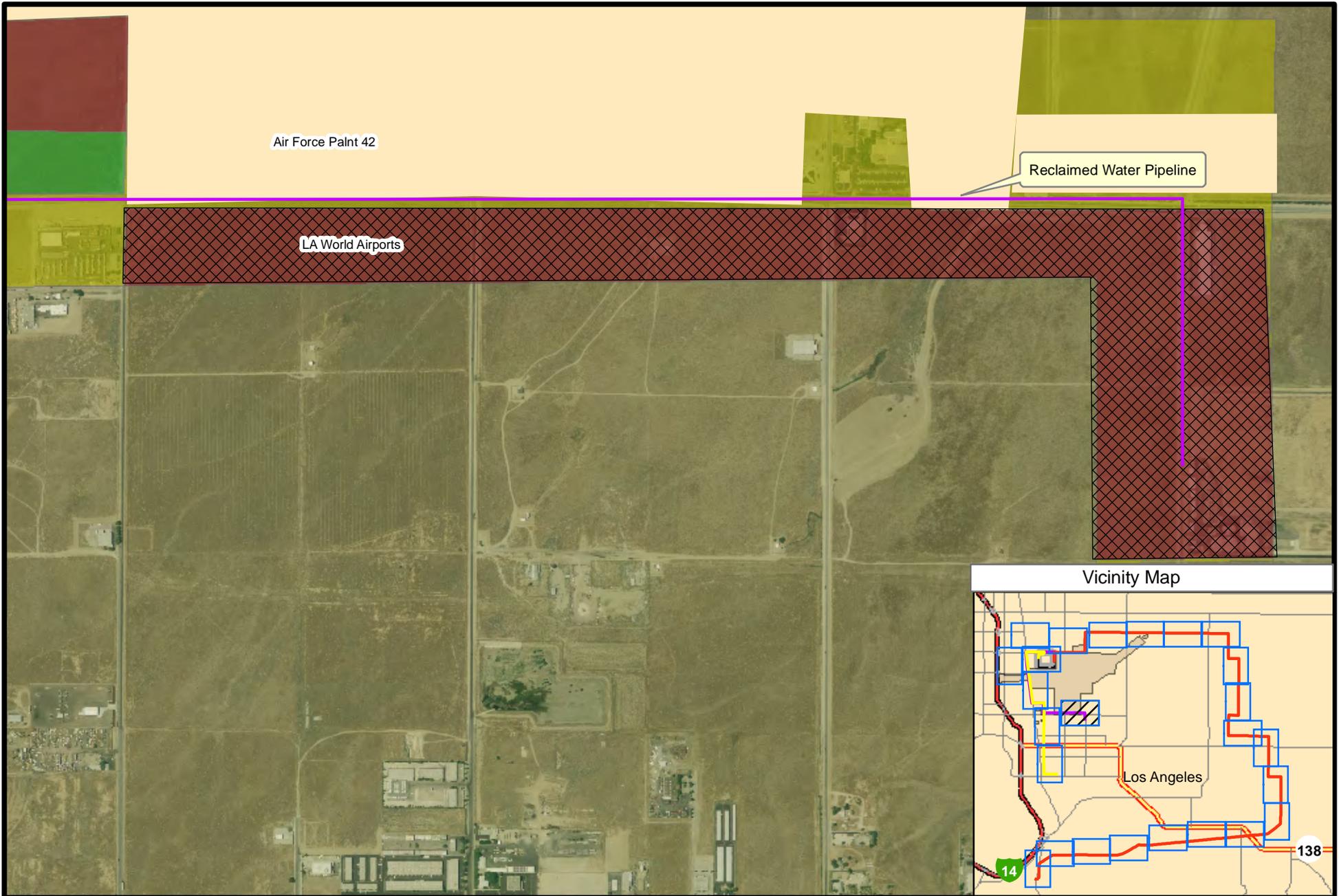
The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise



Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd
 \2009\5.28
 Date: 06/24/09

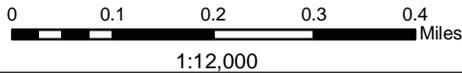


- Legend**
- Air Force Plant 42
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

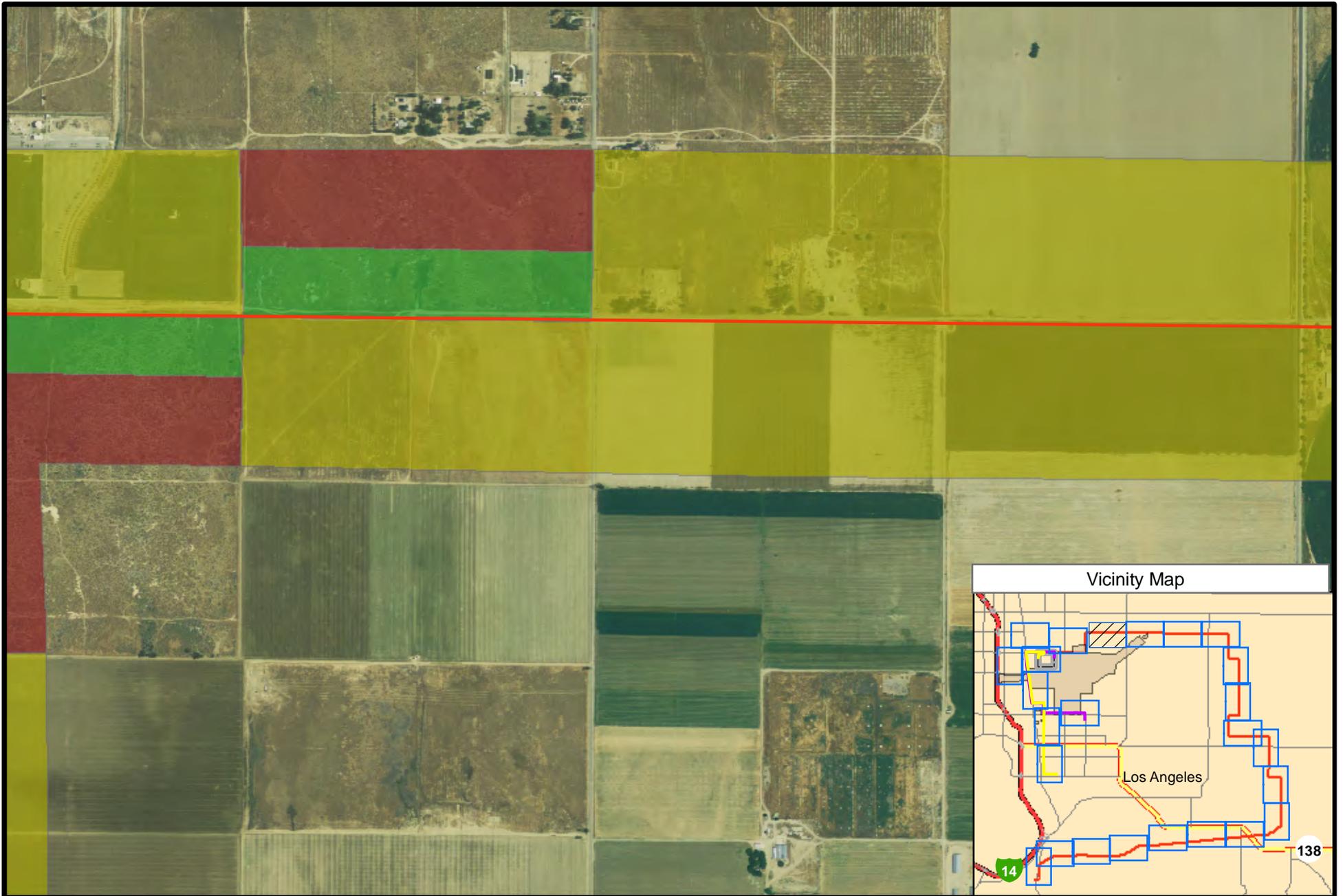
Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure E



Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
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 \2009\5.28
 Date: 06/24/09



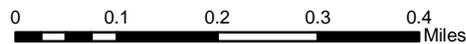


- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure F

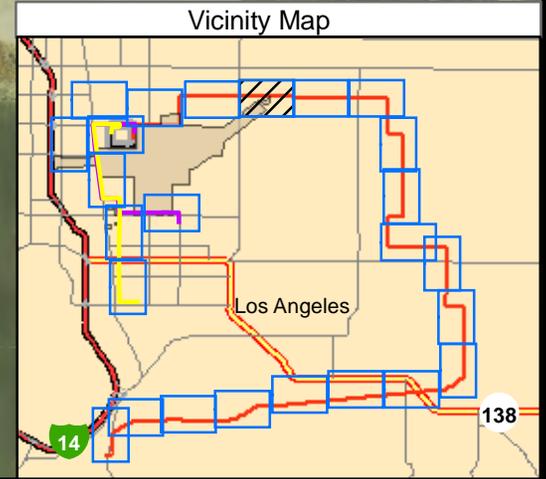
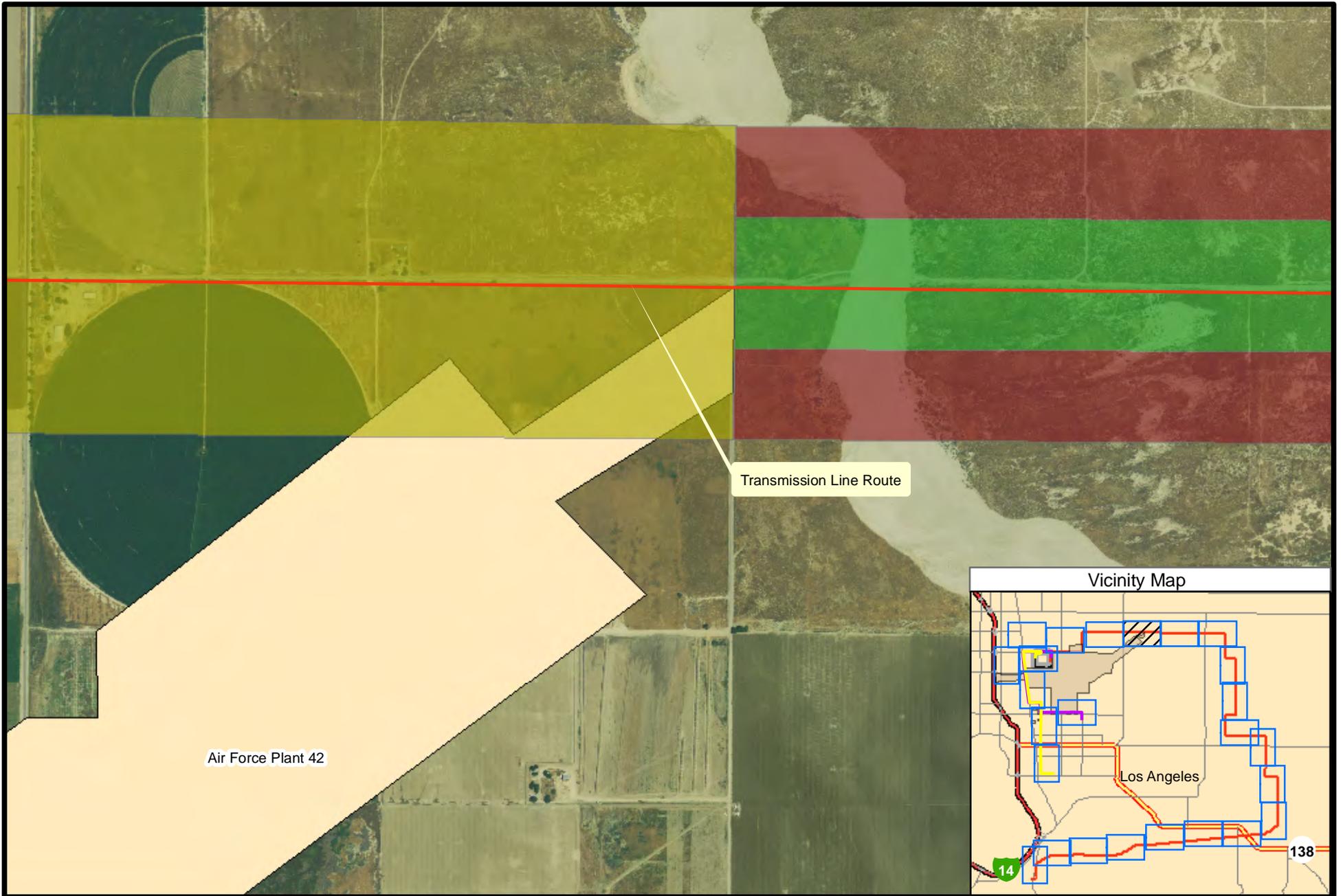


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5 28
 Date: 06/24/09





Legend

	Air Force Plant 42		Not Suitable		Suitable, Unoccupied
	Suitable, Occupation Uncertain				

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

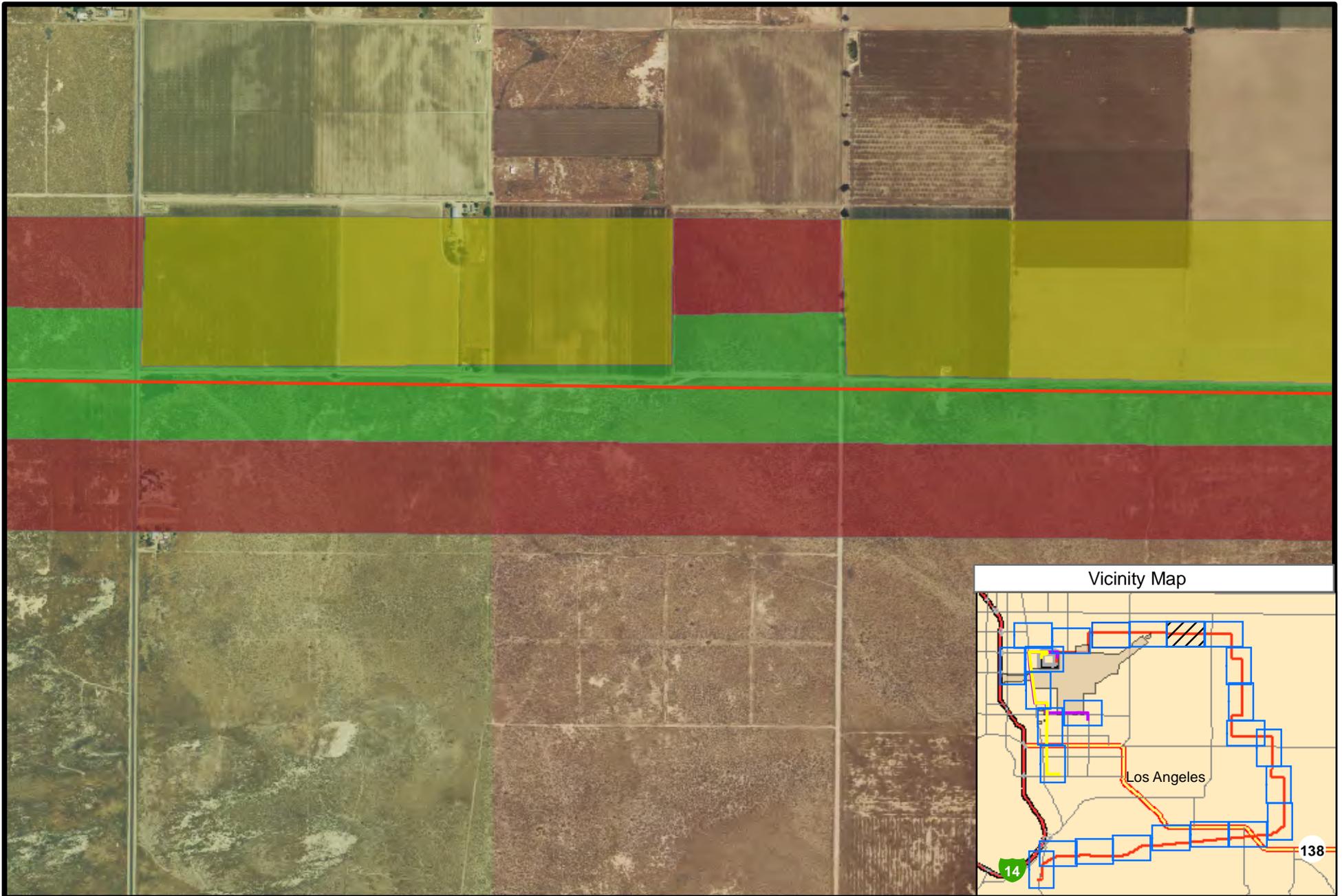
Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure G

0 0.1 0.2 0.3 0.4 Miles

1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5 28
 Date: 06/24/09



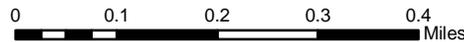
Legend

- Transmission Line Route
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure H

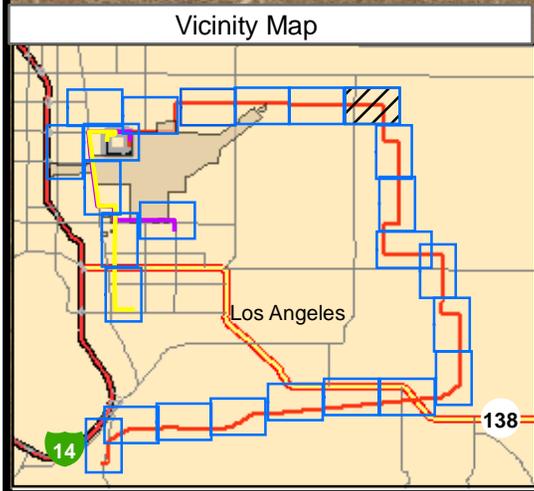


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale \209
 Power Plant Bio 6554000247\graphics\mxd\5.28
 Date: 06/25/09





- Legend**
- Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain
 - Transmission Line Route

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure I

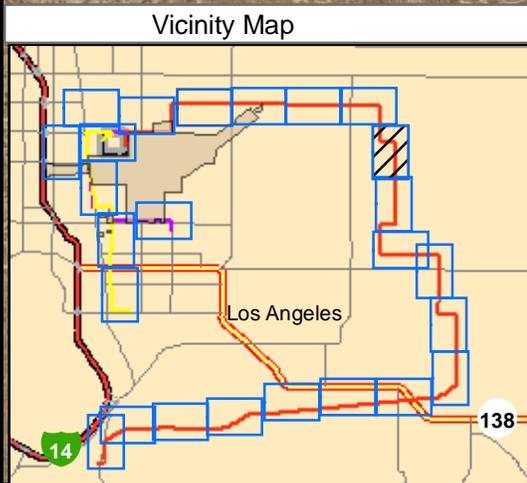
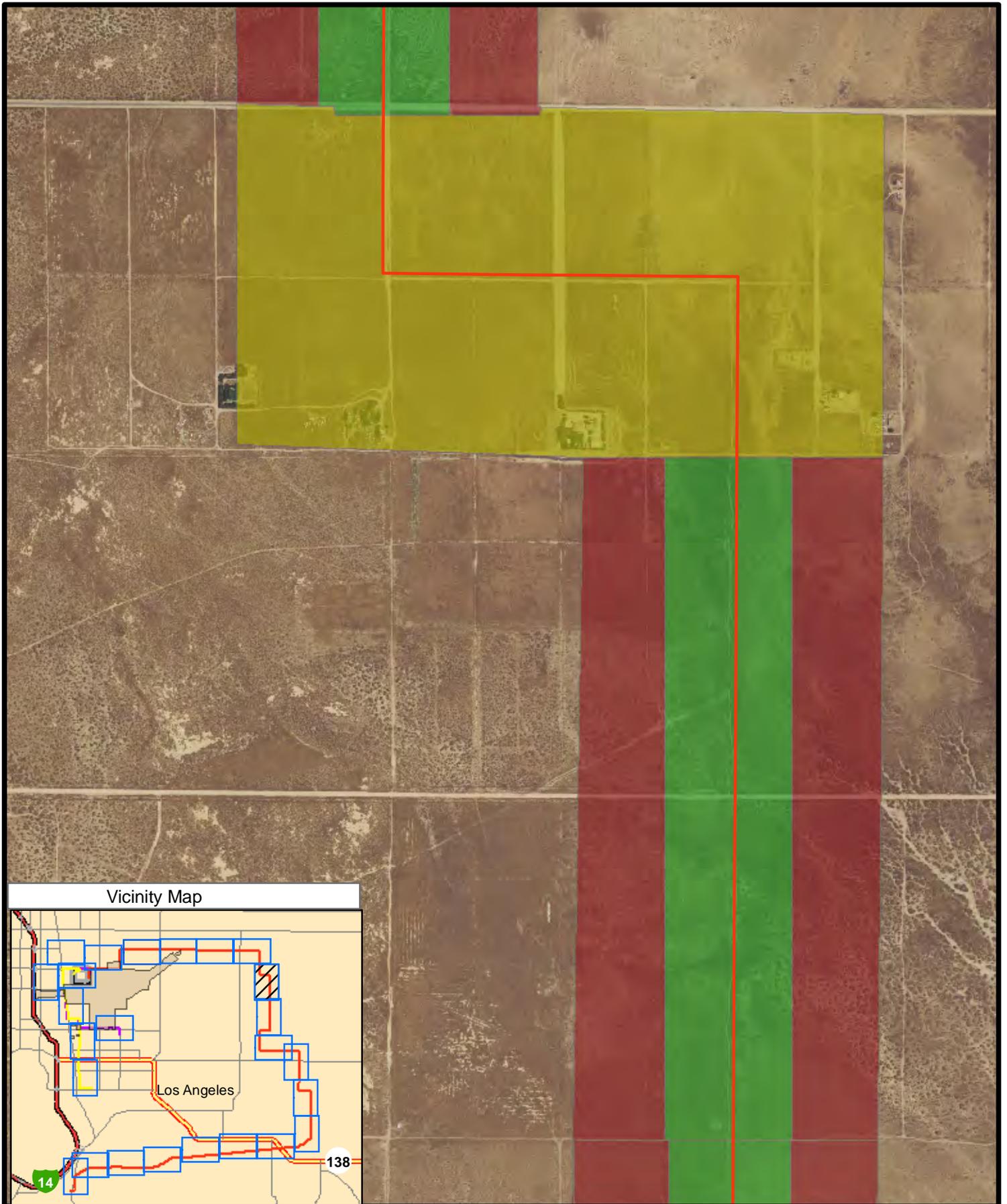


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009\5_28
 Date: 06/24/09





Legend

- Transmission Line Route
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

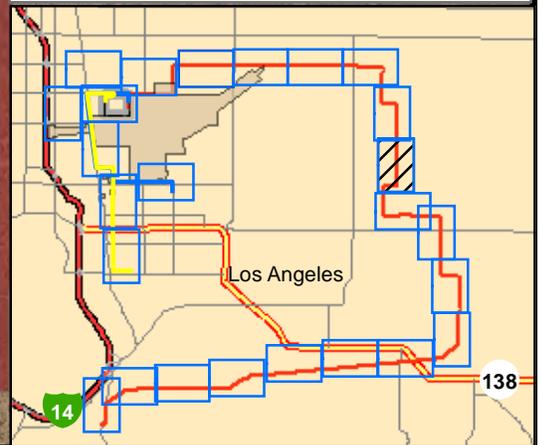
Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure J

1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale Power Plant Bio 6554000247\graphics\mxd\2009\5.28
 Date: 06/26/09



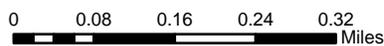
Vicinity Map



- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure K

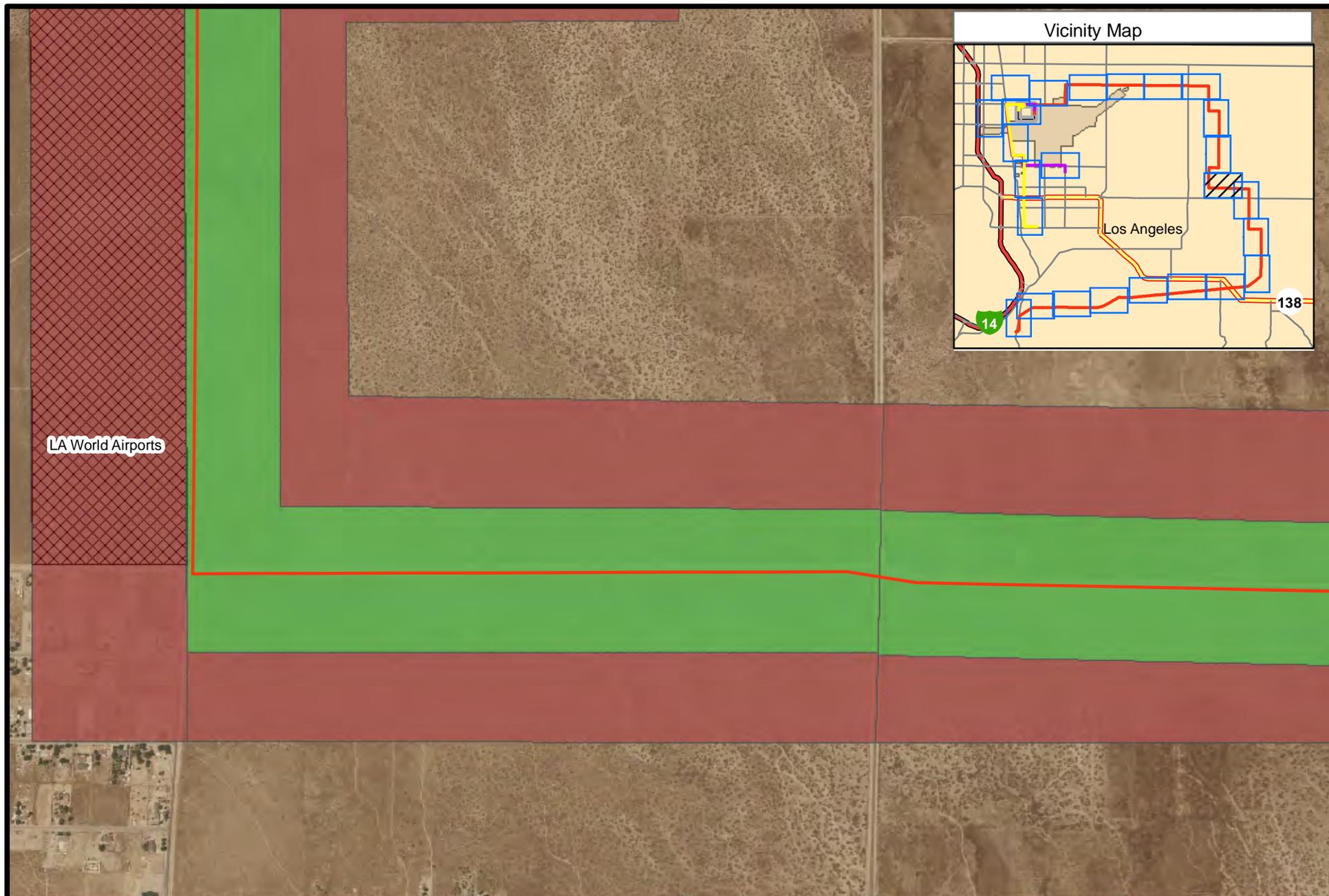


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale Power Plant Bio 6554000247\graphics\mxd\2009\5.28
 Date: 06/26/09



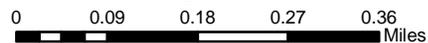


- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure L



1:12,000

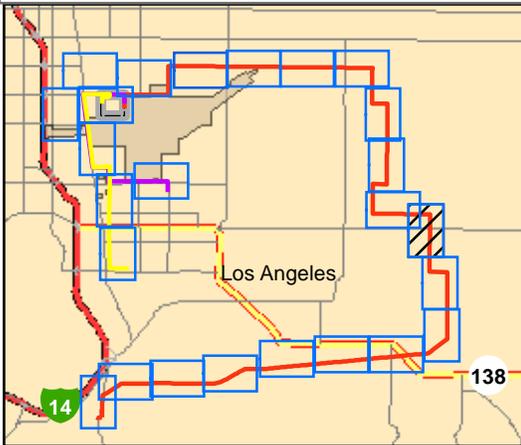
Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/26/09





Vicinity Map

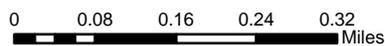


- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure M

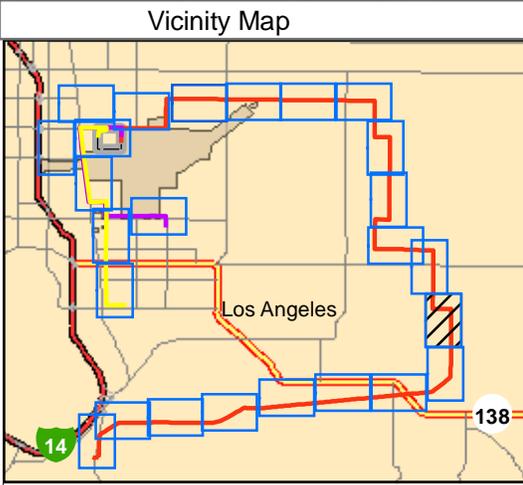
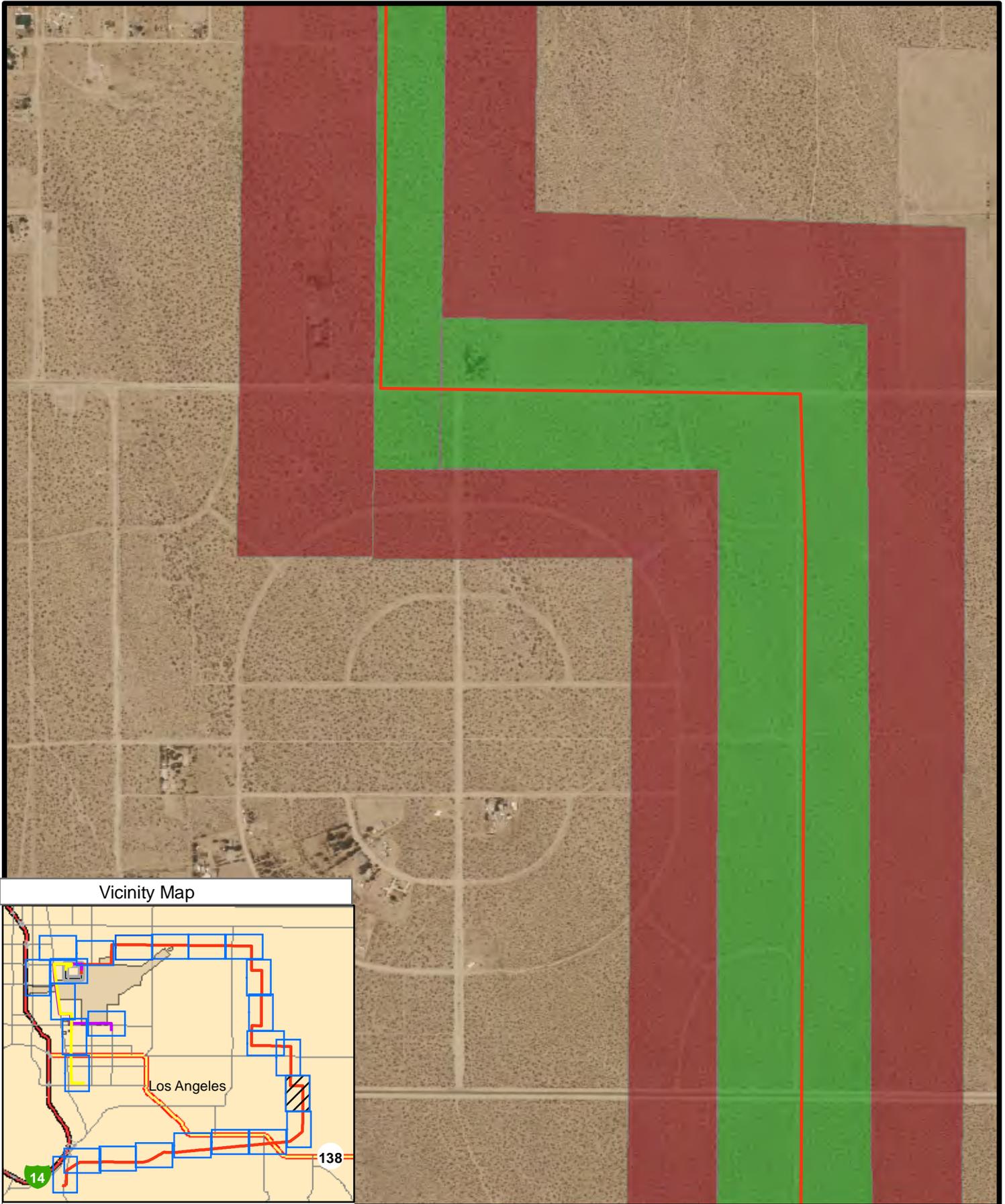


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 5.28
 Date: 06/30/09





Legend

- Transmission Line Route
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

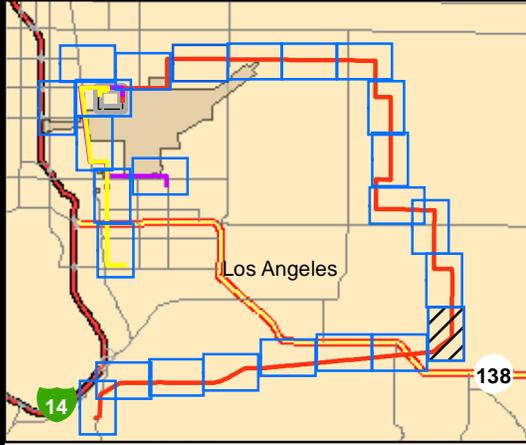
The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure N

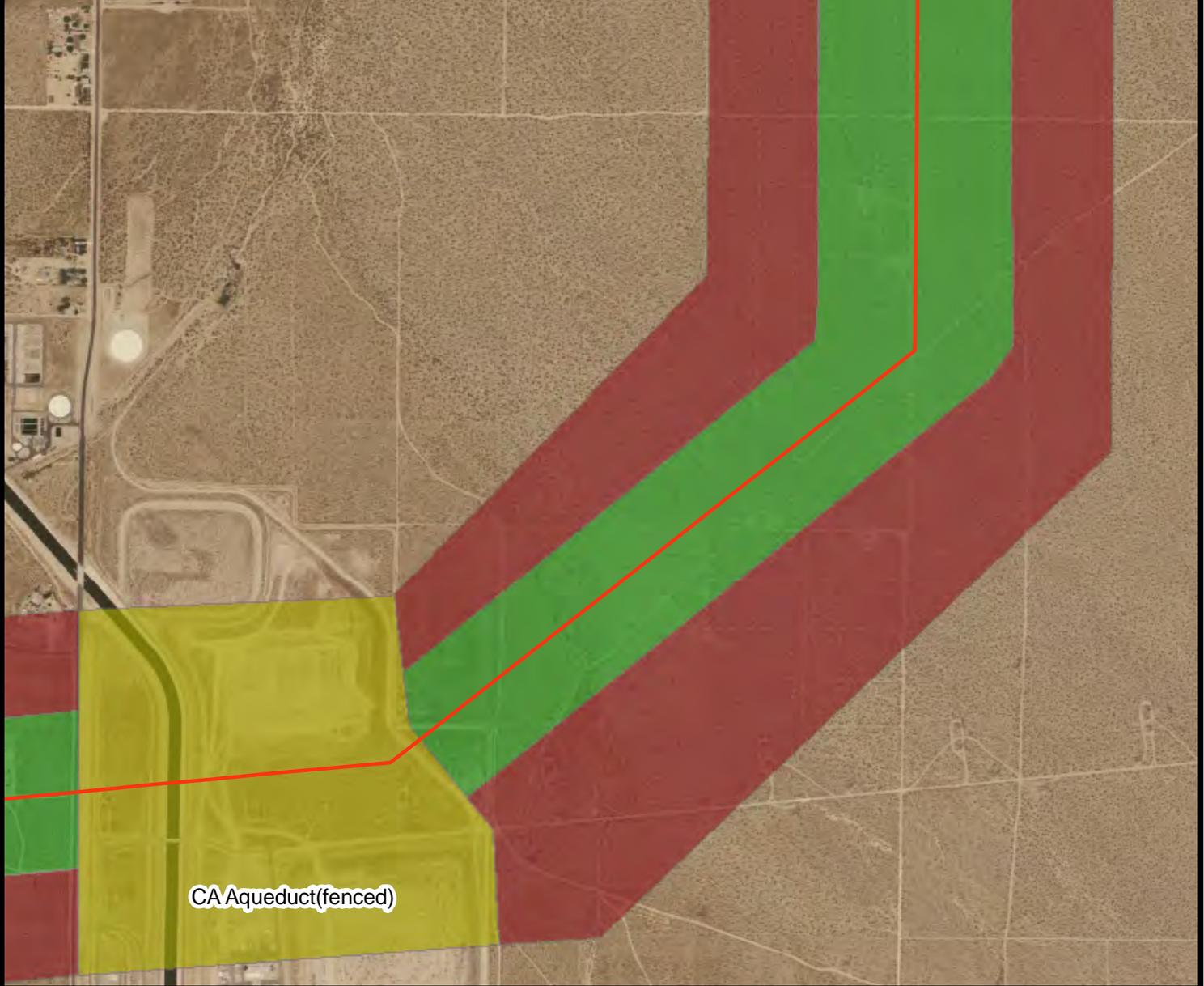
1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09

Vicinity Map



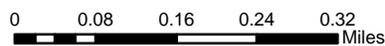
Legend



- Transmission Line Route
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project
Habitat Suitability for Desert Tortoise
Figure O

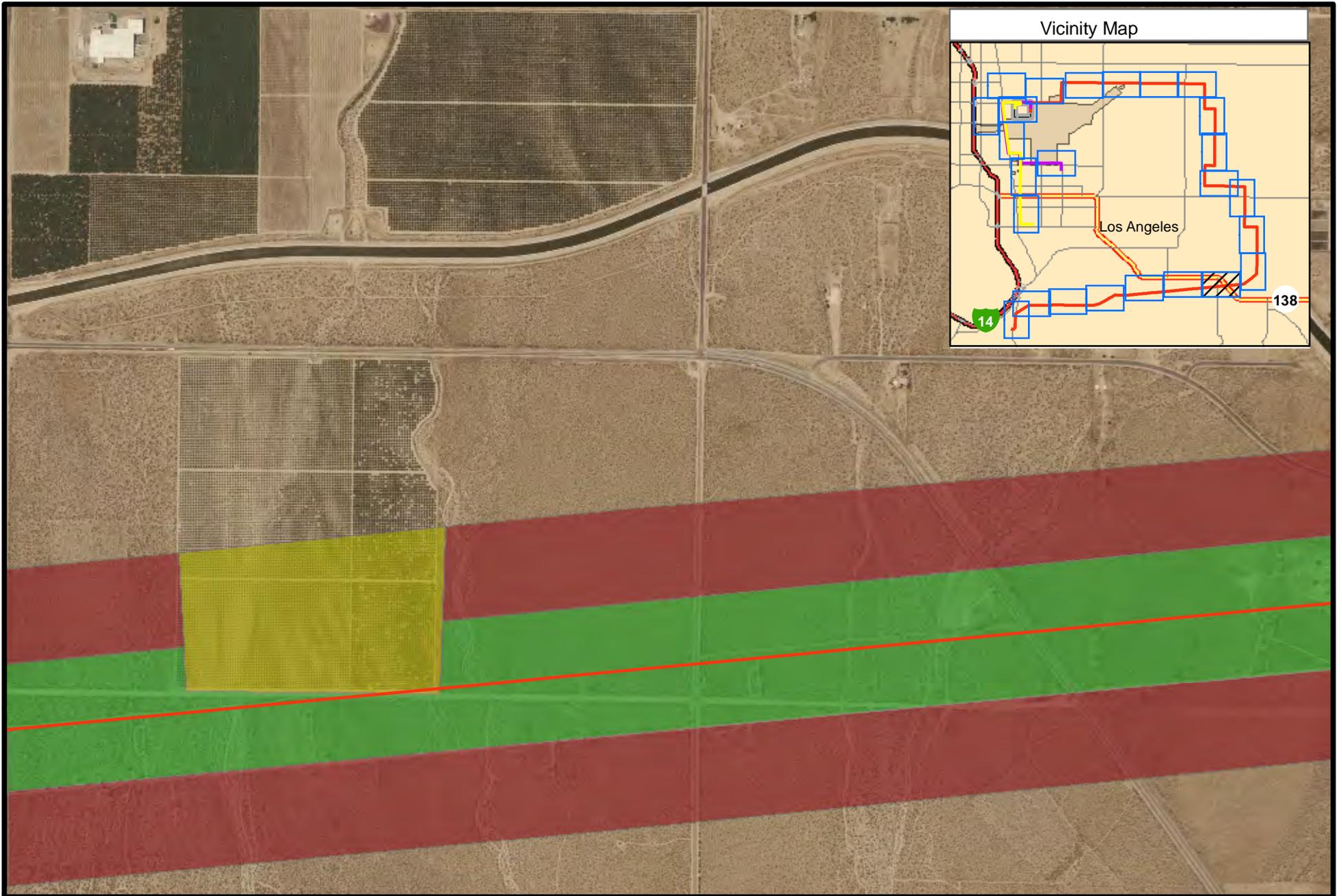


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 5.28
 Date: 06/30/09



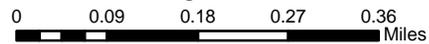


- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise
Figure P

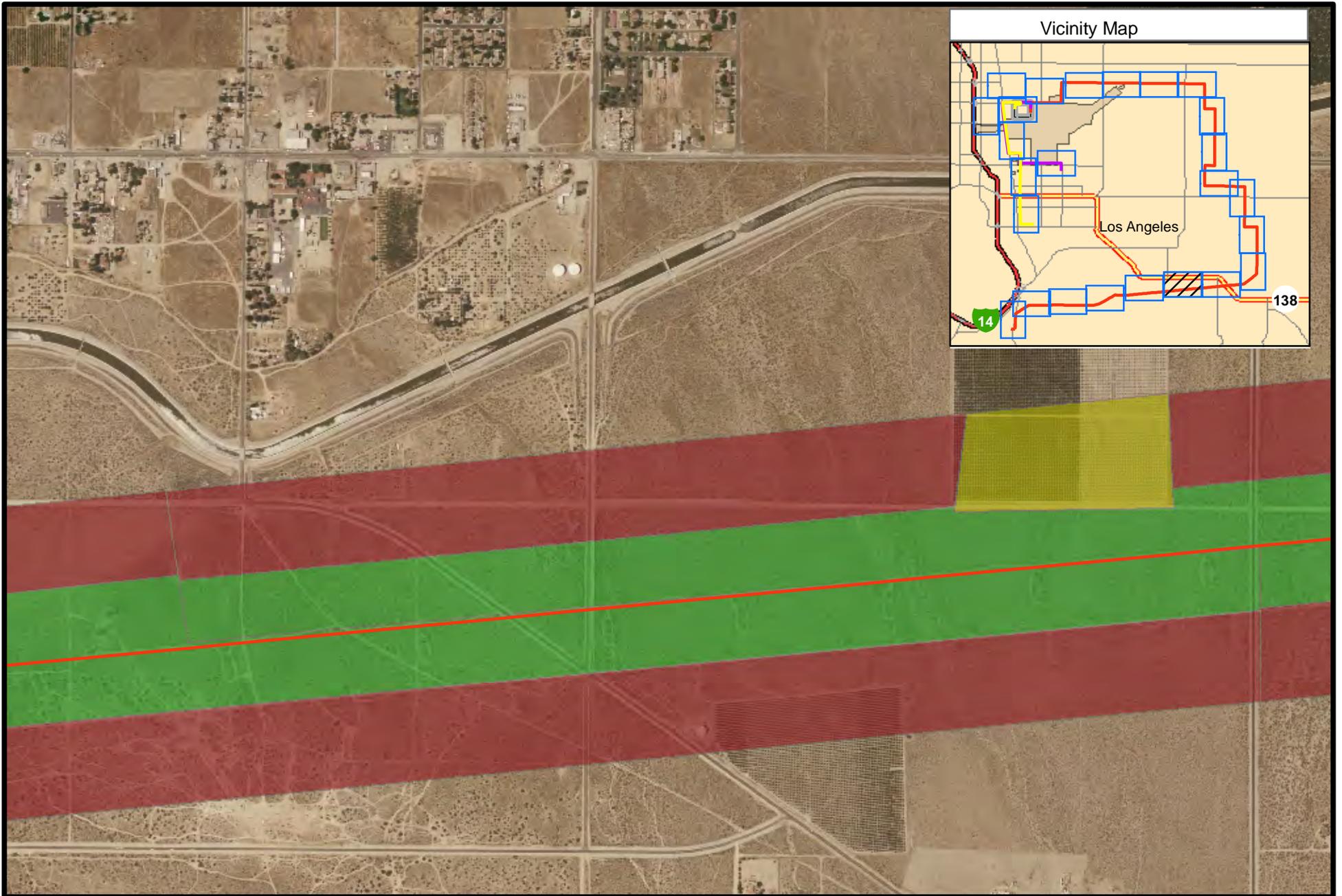


1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09





Legend

— Transmission Line Route

Not Suitable
 Suitable, Unoccupied

Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

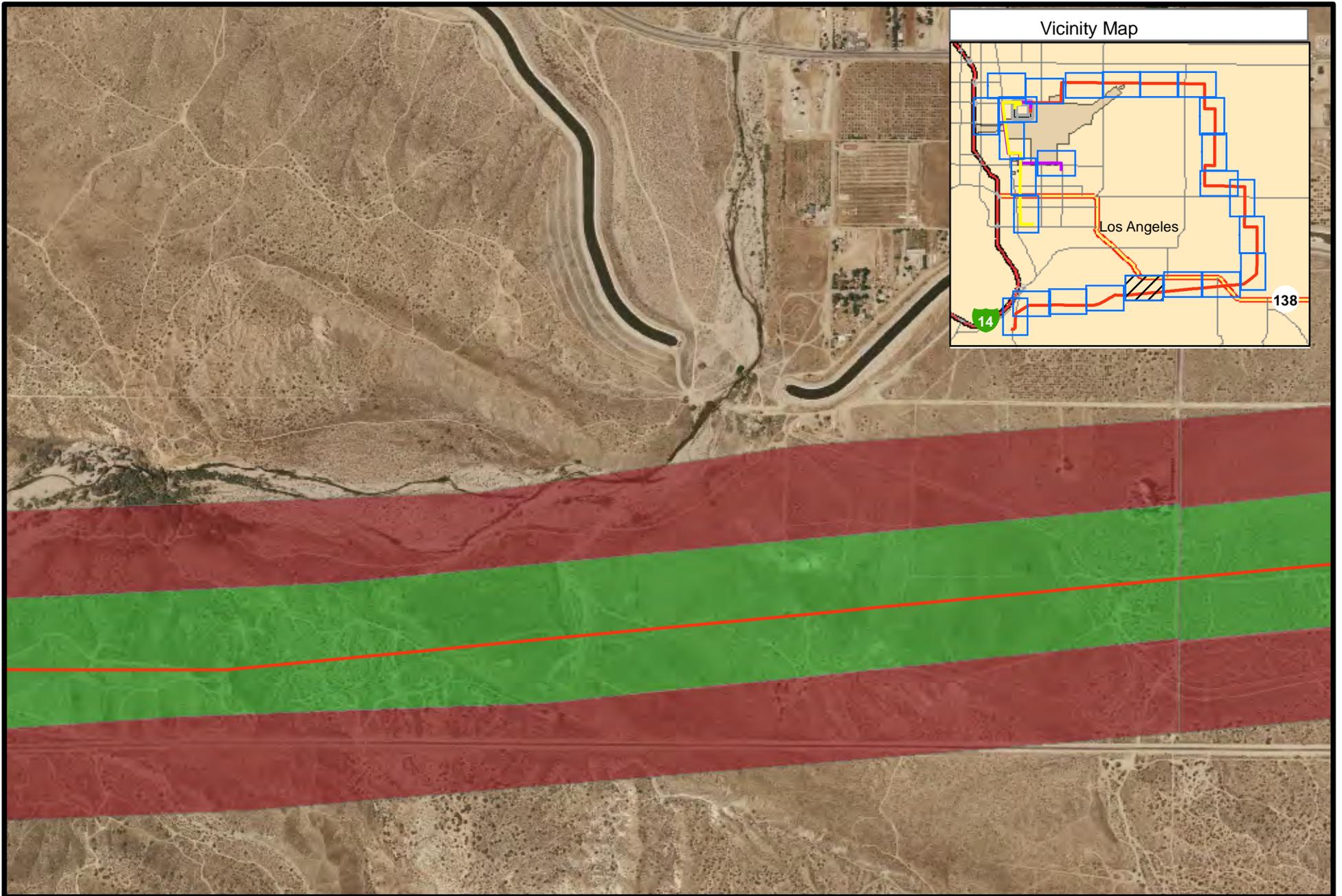
Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure Q

0 0.09 0.18 0.27 0.36
 Miles

1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09



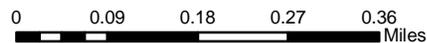
- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise

Figure R



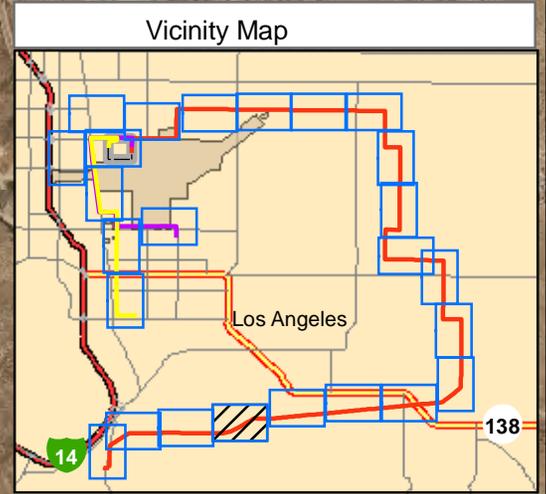
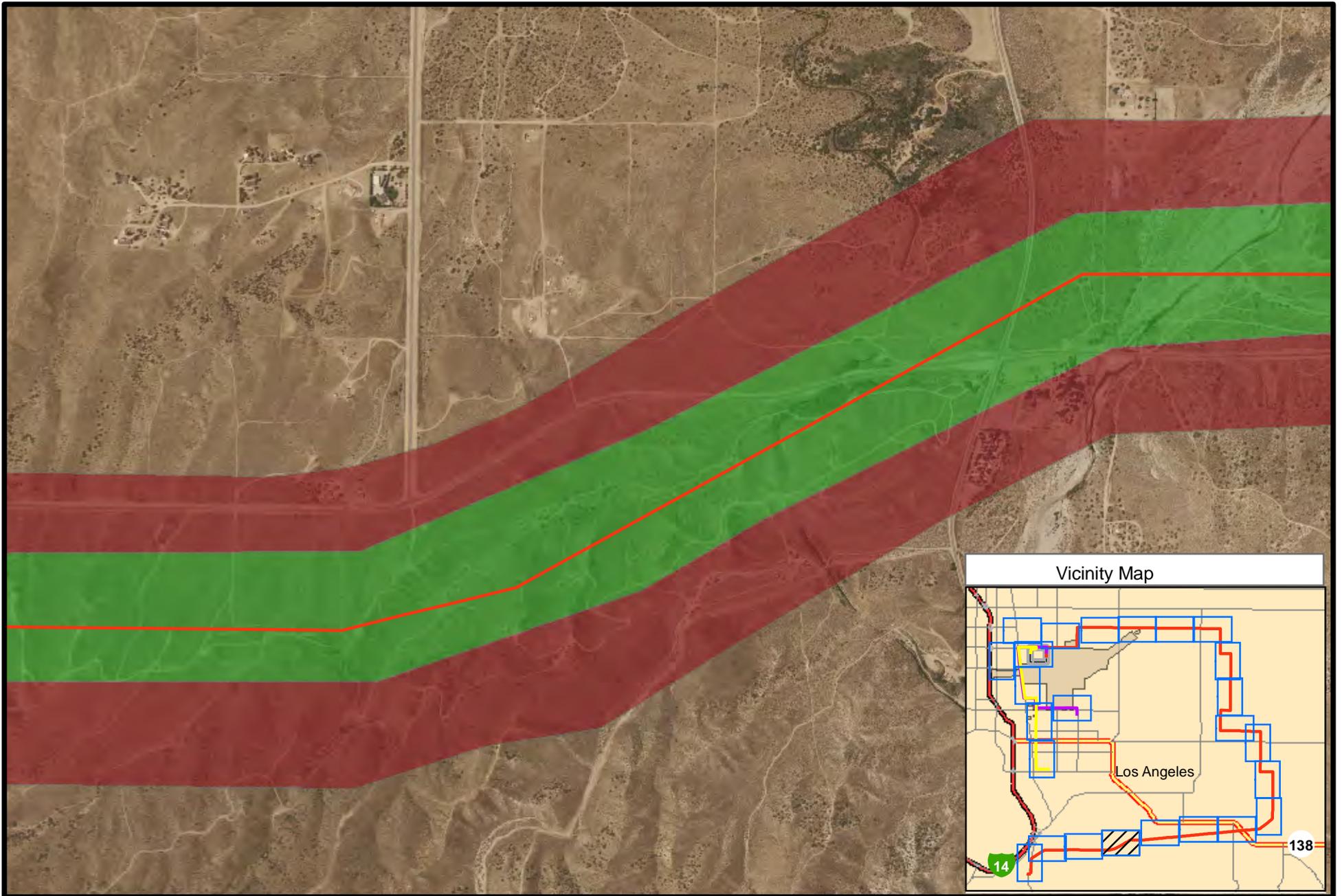
1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09



Mohave Ground Squirrel Habitat Map



Legend

- Transmission Line Route
- Not Suitable
- Suitable, Unoccupied
- Suitable, Occupation Uncertain

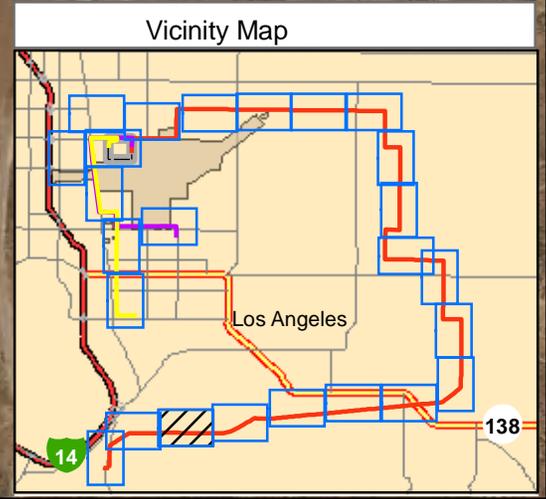
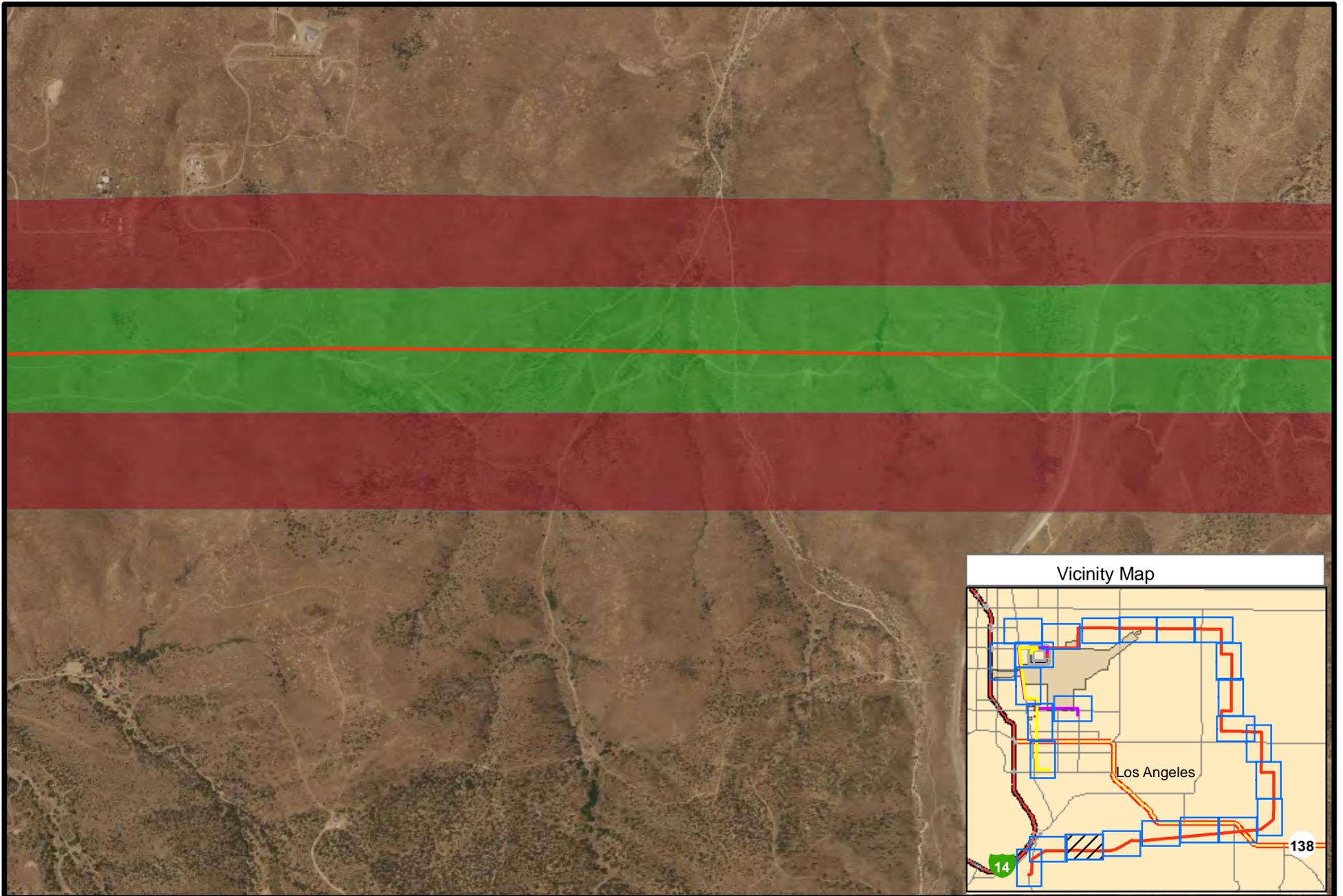
The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

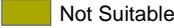
Palmdale Hybrid Power Project
 Habitat Suitability for Desert Tortoise
 Figure S

0 0.08 0.16 0.24 0.32
 Miles

1:12,000

Map Notes:
 Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09

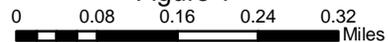


- Legend**
-  Transmission Line Route
 -  Not Suitable
 -  Suitable, Unoccupied
 -  Suitable, Occupation Uncertain

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise

Figure T



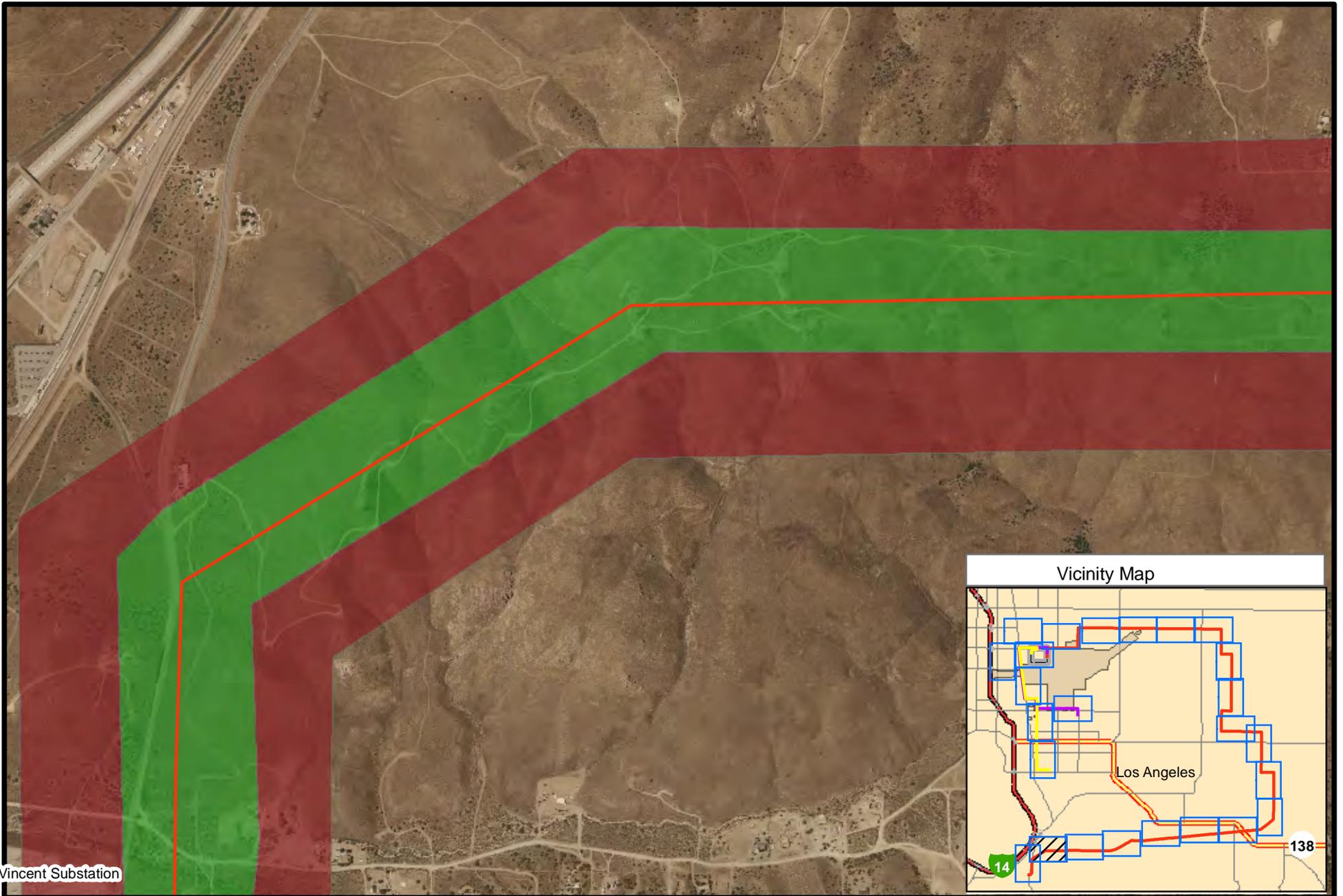
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Map Notes:

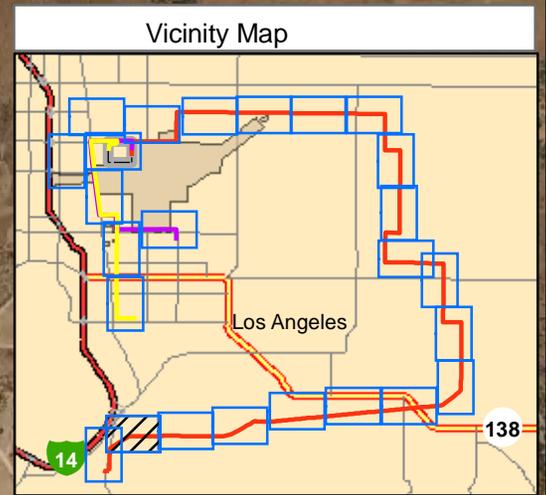
Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09



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Vincent Substation



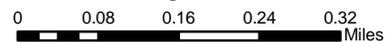
- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

The habitats on PHPP are not occupied by desert tortoise based on focused surveys. "Suitable" habitat is defined as inherently appropriate habitat regardless of regional context.

Palmdale Hybrid Power Project

Habitat Suitability for Desert Tortoise

Figure U



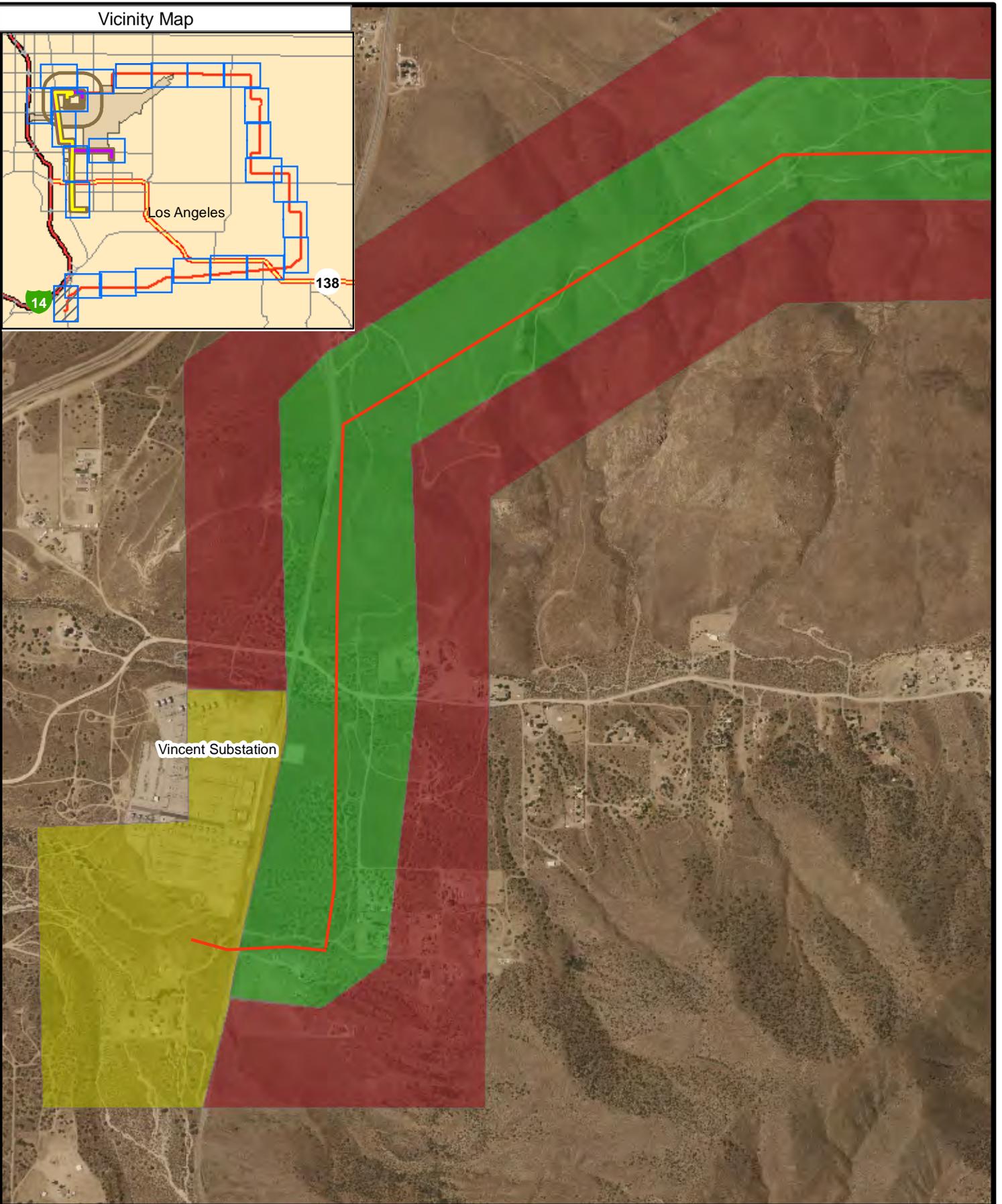
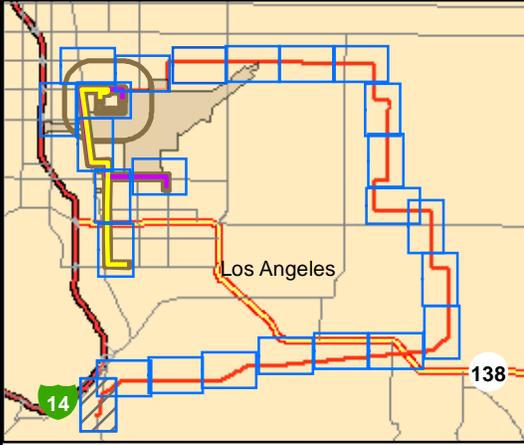
1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 \5.28
 Date: 06/30/09



Vicinity Map



- Legend**
- Transmission Line Route
 - Not Suitable
 - Suitable, Unoccupied
 - Suitable, Occupation Uncertain

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Palmdale Hybrid Power Project
Habitat Suitability for Desert Tortoise
Figure V



1:12,000

Map Notes:

Projection: NAD 83, Zone 11
 Path: S:\active projects\Palmdale
 Power Plant Bio 6554000247\graphics\mxd\2009
 15.28
 Date: 06/30/09



**STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:)	Docket No. 08-AFC-9
)	
Application for Certification,)	PROOF OF SERVICE
for the CITY OF PALMDALE HYBRID)	
POWER PLANT PROJECT)	(Revised June 30, 2009)
)	
_____)	

APPLICANT

Thomas M. Barnett
Executive Vice President
Inland Energy, Inc.
3501 Jamboree Road
South Tower, Suite 606
Newport Beach, CA 92660
tbarnett@inlandenergy.com

Antonio D. Penna Jr.
Vice President
Inland Energy
4390 Civic Drive
Victorville, CA 92392
tonypenna@inlandenergy.com

Laurie Lile
Assistant City Manager
City of Palmdale
38300 North Sierra Highway, Suite A
Palmdale, CA 93550
llile@cityofpalmdale.org

APPLICANT'S CONSULTANTS

Sara Head
Vice President
ENSR Corporation
1220 Avenida Acaso
Camarillo, CA 93012
SHead@ensr.aecom.com

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

INTERESTED AGENCIES

Michael R. Plaziak

Manager
Lahontan Regional Water Quality Control Board
14440 Civic Drive, Suite 200
Victorville, CA 92392-2306
mplaziak@waterboards.ca.gov

Rick Buckingham

State Water Project
Power & Risk Office
3310 El Camino Avenue, LL-90
Sacramento, CA 95821
E-mail preferred
rbucking@water.ca.gov

Manuel Alvarez

Robert J. Tucker

SoCal Edison
1201 K Street
Sacramento, CA 95814
Manuel.Alvarez@sce.com
Robert.Tucker@sce.com

California ISO
P.O. Box 639014
Folsom, CA 95763-9014
e-recipient@caiso.com

Christian Anderson

Air Quality Engineer
Antelope Valley AQMD
43301 Division St, Suite 206
Lancaster, CA 93535
E-mail preferred
canderson@avaqmd.ca.gov

ENERGY COMMISSION

Jeffrey D. Byron

Commissioner and Presiding Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
jbyron@energy.state.ca.us

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

Arthur H. Rosenfeld

Commissioner and Associate Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
pflint@energy.state.ca.us

Paul Kramer

Hearing Officer
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
pkramer@energy.state.ca.us

Felicia Miller

Project Manager
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
fmiller@energy.state.ca.us

Caryn Holmes

Staff Counsel
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
CHolmes@energy.state.ca.us

Elena Miller

Public Adviser
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
Publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, Paul Kihm, declare that on July 8, 2009, I served and filed copies of the attached:

APPLICANT'S RESPONSE TO THE CALIFORNIA DEPARTMENT OF FISH AND GAME'S COMMENTS ON THE REQUEST FOR INCIDENTAL TAKE PERMIT FOR MOHAVE GROUND SQUIRREL AND ADDITIONAL COMMENTS REGARDING IMPACTS TO BIOLOGICAL RESOURCES

to all parties identified on the Proof of Service List above in the following manner:

California Energy Commission Docket Unit

- Transmission via electronic mail and by depositing one original paper copy with FedEx overnight mail delivery service at Costa Mesa, California, with delivery fees thereon fully prepaid and addressed to the following:

CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 08-AFC-09
1516 Ninth Street, MS-4
Sacramento, California 95814-5512
docket@energy.state.ca.us

For Service to All Other Parties

- Transmission via electronic mail to all email addresses on the Proof of Service list; and
- by depositing one paper copy with the United States Postal Service via first-class mail at Costa Mesa, California, with postage fees thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses **NOT** marked "email preferred."

I further declare that transmission via electronic mail and U.S. Mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 8, 2009, at Costa Mesa, California.



Paul Kihm