United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Desert District Office
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553
http://www.blm.gov/ca/cdd
November 23, 2009

In Reply Refer To:
2850
CAD000.46 (P)
CACA-049016

Solar Millennium LLC
Nicole Tenenbaum, Senior Project Manager
1625 Shattuck Ave., Suite 270
Berkeley, CA 94709-1611

Dear Ms. Tenenbaum:

On June 9, 2009, the Bureau of Land Management (BLM) received and reviewed Solar Millennium's third update to the Plan of Development (POD) for the proposed Ridgecrest Solar Power Plant (Project), filed under BLM Serial Number CACA-049016. The BLM also reviewed Solar Millennium's Application for Certification (AFC) filed with the California Energy Commission (CEC) September 1, 2009.

Upon review of the latest POD and AFC, the BLM has determined the information provided is sufficient to proceed with publication of the Notice of Intent. Data requests have been made through CEC for additional information; however, the BLM was unable to include all requests. Therefore, the following items addressed in this letter and attached to the POD checklist are to be addressed and included in the POD when you update it as we move through this process.

Since June 9, 2009, there have been changes to the proposed project; such as, the elimination of the proposed natural gas pipeline, addition of the propane tanks, changes in the projects footprint and adjusted acreages to the solar fields, and any other changes must be addressed in the new POD. Please include a map identifying the project's buildings, transmission lines, equipment, solar fields, which are tied to the Public Land Rectangular Survey System (township, range, section, aliquot parts). Also, the AFC data request responses must be included in the POD, such as the biological surveys, relocation/translocation plans, identify possible mitigation lands, etc. Address the status and summarize the results, if possible, of both the Phase I and II Interconnect Studies, in laymen terms.

Please note, the written legal description on page 17 in the POD dated June 9, 2009, does not match the outline of the ROW boundary identified on the map as Figure 6. The N1/4 of section 2 is not a proper legal description and is corrected to show the N1/2N1/2 (or properly described as Government Lots 1, 2, 3 and 4) of Township 28 South, Range 39 East. The E1/4E1/2NE1/4 is not a proper legal description. It has been corrected to read the E1/2NE1/4 of section 34,

Township 27 South, Range 39 East. Please correct the legal description to match the boundary of the map with the following:

> The NW1/4SW1/4, S1/2SW1/4, SE1/4 of section 14, All of sections 23, 24, 25, 26 and 35, the E1/2SE1/4, NE1/4 of section 27 and the E1/2NE1/4 of section 34, Township 27 South, Range 39 East; and Government Lots 1 through 4 (also described as the N1/2N1/2) of section 2, Township 28 South, Range 39 East, Mount Diablo Meridian, Kern County, California, containing approximately 3,926.46 acres, more or less.

The AFC, under Chapter 2, section 2.4.1, states that "It is anticipated that this corridor . . . will be assigned to SCE as part of the transmission line relocation process." For clarification, the BLM's term to transfer all or part of an "authorized" ROW to another person or entity is an Assignment. There will not be an assignment to SCE. The BLM will amend SCE's existing ROW's once an SF-299 application is submitted to the BLM for each transmission line and the NEPA review is complete. Furthermore, Solar Millennium and SCE, or any other authorized right-of-way holder, can share the same ROW as long as they are not in conflict with one another.

The BLM analyzes any electric power transmission system associated with the facility under the same environmental document as the proposed power generation facility so that a decision on any necessary transmission right-of-way can be incorporated into the Record of Decision (ROD). The BLM intends to prepare a ROD to include both Solar Millennium's Ridgecrest Solar Project and SCE's transmission line. For this reason, the SCE transmission line must be addressed as a connected action in the Staff Assessment/Environmental Impact Statement (SA/EIS). Therefore, the SCE must submit an SF-299 application to amend their existing transmission lines authorized under CACA-021596 and RI-968 immediately.

Also, the BLM intends to include the proposed 12-inch water pipeline in the ROD but has been informed by the applicant that the pipeline will not affect BLM-managed land. The BLM has authorized several ROWs along the same China Lake Boulevard route where you indicated that BLM land will not be affected. Also, the AFC, under Chapter 5.7.2, Affected Environment, states the "Project water line route includes lands within the jurisdiction of the BLM and Kern County." The BLM will require engineer drawings showing the proposed pipeline route, width, length, location, and work areas, identifying private and public lands. If BLM determines that BLM-managed lands are not affected, no further action is needed, however if BLM-managed lands are affected, Indian Wells Valley Water District must file an SF-299 application immediately to be included as a connected action in the SA/EIS.

The BLM requires bonds on projects involving EISs prior to issuance of a right-of-way grant to ensure compliance with the terms and conditions of the authorization and the requirements of the regulations, including reclamation. The reclamation provisions within the POD should include not only removal of solar collectors and other structures, but also the reclamation of access roads and disturbed areas. The amount of the bond will consider potential reclamation and administrative costs to the BLM and will include inflation factor based on the anticipated life of the facility.

It is important that the BLM receives the updated POD as soon as possible to use in conjunction with Information Hearing/Scoping meeting and analyze the in SA/DEIS. The BLM realizes the timeframe to produce an updated POD prior to the SA/DEIS Information Hearing/Scoping meeting by January 5th and 6th may not be sufficient time; therefore, the BLM will accept a draft prior to the meeting and a final that will include comments or suggestions from the Information Hearing/Scoping meeting to be submitted no later than January 15, 2009.

The POD is a standalone and dynamic document. The BLM will require the POD be updated as necessary until the BLM is prepared to issue a Right-of-Way Authorization. When updating the POD, please use the attached POD checklist to address the identified deficiencies and reference the new page number where the updated items will appear for easy and quick reference.

If you have any questions pertaining to this request, please contact Janet Eubanks of my staff at (951) 697-5376.

Sincerely,

Gil Adam Stein

for Steven J. Borchard
District Manager

cc:
Josef Eichhammer, CEO
Solar Millennium LLC
1625 Shattuck Ave., Suite 270
Berkeley, CA 94709-1611

Eric Solorio, Project Manager
California Energy Commission
1516 Ninth St. MS-15
Sacramento, CA 95814

2 - Enclosures:
1 – Solar Plan of Development Check-List
2 – Reclamation Information

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
		Introduction			
Pg 6	1.1	Type of Facility	✓		
Pg 6	2.5.7	Planned	✓		
Pg 6	2.0/ 2.1	Generation Output	✓		
Pg 6	2.5.7	Project schedule	✓		
Pg 59	5.2/5.3-3 5.5-3/5.7-5 5.12-3 5.13-3 5.16-3 7.17-3 5.18-5	Permitting timelines	✓		
Pg 61	2.5.7.1	Construction/Operation Timelines including phases	✓		
	2.2	Project Purpose & Need	✓		
Pg 19	2.5	Facility Description	✓		
Pg 15	2.3	• Location	✓		• Tie to public land survey system (PLSS)
Pg 15	1.0	• Land Ownership/Jurisdiction	✓		• Provide on water pipeline, transmission line maps
Pg 17	2.3	• Legal land description		✓	• Correct legal as shown on letter
Pg 17	1.0	• Total acreage	✓		• Acreage within ROW is 3,926 • Provide an alternative design showing solar array layout on North side of Brown Road and drop ROW from MGS and out of Utility Corridor. • What is the remainder of 2,180 acres being utilized for?
Pg 20	Fig. 2.5, 2.6.4	Facility Dimensions w/all components	✓		• Provide legal description and detailed maps (PLSS) for the location of the power line route outside of the plant, the relocated five miles of transmission line and water pipeline. • Identify the temporary access locations for the private land owners during trenching operations for the water supply line on China Lake Blvd.

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
					• Transmission line and rerouted transmission lines are not shown on figure referenced in text: Figure 5.15-2. Only KOP are shown and water pipeline route
Pg 23	Fig. 25	Description of Power Plant	✓		
Pg 17	2.5.3	Description of thermal conversion process	✓		
Pg 17	Fig. 25	# & dimensions of solar array	✓		• AFC and POD acreage doesn't match
Pg 17	Fig. 25	# & dimensions of power generation units (wet & dry cooling)	✓		• Changed from wet to dry cooling
Pg 20	2.6.2	# & dimensions of towers		✓	• Provide a more detailed map and description regarding tower the tower placement in connection to the transmission line.
Pg 20	Not addressed	# & dimensions of substation		✓	• Identify by legal description where the switchyard is being located and where the substation is located. • Is it a new substation or the Inyokern Substation? (AFC 5.14) • Indicate proposed reroute ROW length and width. Provide location details of the generator tie- in, switchyard, and the number of pole need along with the span between poles. • Provide a map indicating the route to the switch yard.
Pg 20	1.0	# & dimensions of transmissions lines and Switchyard	✓		• Indicate if any poles are being placed and provide a map of the route. Provide time CPUC will give permission to move lines. SCE provided an alternative. Explain why SM did not respond.
Pg 20	Fig. 2-2, 2.5.6.5	# & dimensions of access roads	✓		
Pg 20	2.5.6.3	# & dimensions of buildings	✓		
Pg 20	5.13.3.2	# & dimensions of parking areas	✓		
Pg 29	2.6.2/ 5.13.3.2	Description of temp. construction workspace, yards, staging areas	✓		• Provide more description/details of temporary construction areas, etc.
Pg 29	Appendix	Description of geotechnical studies and data	✓		• Have the results been provided to the BLM?

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
	B	needs, including testing			
30% designs	5.11/5.17	Description of ancillary facilities		✓	
Pg 31	5.17.3.2	Description of water needs/usage during construction		✓	• What effect will dewatering have on existing water level? • The POD and Hydrology report state an Average usage = Construction supply = 1,000 acre feet over 2 years (estimated) or 500 af/y. This office was informed that it is now 1,500 acre feet. Please update POD and inform BLM why the water usage changed and if it has to be re-evaluated in the hydrology report.
Pg 32	5.17.3	Description of water needs/usage during operations	✓		
Pg 9		Description of water sources during construction and operations	✓		
Pg 35	5.17.3	Erosion control measures	✓		• Update POD to include Hydrology report recommendations.
Pg 35	Figure 5.17-12	Description of storm water drainage	✓		
Pg 37	Appendix L, 500-3, .5.2 Attachment C, BMP	Description of methods of vegetation treatment and weed management		✓	• The BLM will require consultation with Kern County and BLM. • Invasive - Need a more detailed weed management plan than that provided in the AFC.
Pg 39	Appendix L, 500.5.11	Description of waste and hazardous materials management	✓		• BLM will require confirmation permit received
Pg 36	5.18	Fire protection plan	✓		
Pg 37	2.3/2.5.6.5 Appendix F map	Site security and fencing	✓		
Pg 38	2.3	Electrical components, new equipment and	✓		

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
		existing system upgrades			
Pg 38	2.1, 2.5.4, Figure 2-9, 2.6.1	Description of interconnection to electrical grid	✓		
Pg 39	Appendix L SWPPP	Spill prevention and containment for construction and operation of facility	✓		
Pg 40	Table 5.18-1	Health and safety program		✓	• Plan for closure/decommissioning not supplied.
Pg 46 Table 3	Table 5.18-5	Identify required federal, state, and local permit requirements	✓		
Pg 47…	Table 5.18-5	Status of all required permits		✓	• Require proof of (1)test hole permit for Kern County Environmental Health (2) DoT and Kern County Road encroachment permits (3) DoD permission, etc or an explanation as to why not. • Provide status of all required permits
Pg 58		Describe financial and technical capability of applicant	✓		
Pg 59-61	2.6.2/2-3b	Construction of Facilities	✓		
30% design	2.1	Solar field design & layout	✓		
Pg 60	2.5.7.1	Solar field installation and construction processes including timetable and sequence of construction	✓		
Pg 13		Describe approach to phased projects for construction and operations	✓		
Pg 61	5.13.3.2	Access to facility including worker access	✓		
Pg 61	5.13.2.5	Transportation system		✓	• Not enough data to determine if Caltrans road construction will affect BLM land. If so, will require an SF 299. • Provide status of encroachment permits with Caltrans and County Road Dept.
Pg 62	5.13.2.5	Component delivery	✓		• Access should also be considered from Inyokern road.

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
Pg 61	5.13.2.5	Construction work force numbers, vehicles, equipment and timeframes	✓		
Pg 62	2.5.7.1	Site preparation, surveying and staking		✓	• Must provide a preliminary construction plan and drawings identifying stake locations and what will be involved.
Pg 62	2.5.	Site preparation, vegetation removal and treatment		✓	• BLM will require how site will be prepared and how vegetation will be removed and if possible, reused.
Pg 62	2.0 2.5.7.1 5.17.3.1 5.17.4.1	Site clearing, grading and excavation		✓	• BLM requires an approved grading plan, • Detailed soil plan to deal with the re-distribution, removal, and/or off-site storage of soil removed in the course of laser leveling solar project sites. Formulate a prescription to restore the surface grade and return soil after removal of solar panel arrays during solar site decommissioning
Pg 62	2.5.6.2	Solar array assembly and construction		✓	• Provided a summary but BLM will require full operation plan and construction plan
Pg 61	2.5.7.1	Power plant construction		✓	• Is a substation included in the project site or is the applicant using the Inyokern Substation? The BLM will need detailed construction plans for the transmission lines, water pipeline, and any upgrades to Inyokern substation. Provide legal description (PLSS) for substation and drawings.
Pg 64	2.5.6.5	Gravel, aggregate, concrete needs and sources	✓		• Will the sources be local?
Pg 61		Electrical construction activities	✓		• More details will be required
Pg 63	5.14-2 5.14.3/ 2.5.5.10	Aviation lighting (i.e., power towers, transmission)	✓		
Pg 63	5.5/5.12.4	Site stabilization and protection	✓		• More details will be required
Pg 63	3.2	Site reclamation practices		✓	• The BLM will require a more detailed reclamation plan and an estimated cost to reclaim land to its natural state.

Solar Plan of Development Check-List					
POD Page #	AFC Page #	Description	Adequate Info.	Deficient Info.	Notes
					• See attached reclamation guidance – BLM will require a reclamation bond
Pg 7	2.5	Related Facilities and Systems		✓	• Related facilities i.e., water line, transmission line. Need detailed explanation and engineer drawings. Discuss if contacted other BLM ROW holders • What is the status of the groundwater well (27/39-35B1) within the project area? Will it be used by SM? Capped?
Pg 28	2.5.4/2.6.1 fig 2-8, 2-9	Transmission system interconnect		✓	• Will Phase II Study be completed? Need a summary of Phase I specifically affecting project. Provide information on Inyokern Substation to be used as an alternative. • Provide a map showing where the western and southern portions of the project are in the utility corridor indicating where the two existing SCE transmission lines and the new transmission line from the turbine generator to a new switchyard are located
Figure 11 Pg 25	2.5.3	Description of the existing and proposed transmission system		✓	• Will need additional information, drawings, assurance required county permits obtained or statement that the will be obtained.
Pg 12	2.5.1	Description of ancillary facilities		✓	• Need to know specific interconnection approach and more detailed plans.
Pg 63	5.1.3.1	Status of Power Purchase Agreements (PPA)		✓	• Update POD to include date and summary power purchase agreement
Pg 63	2.6.3	Status of Interconnect Agreement		✓	• Update POD to include date and information regarding Interconnect Agreement
Pg 18, etc	2.5	General design and construction standards	✓		
Pg 8	n/a	Gas supply systems (if applicable)	n/a		• Remove pipeline references from POD and 30% drawings, provide location of propane tank(s).
	n/a	Backup natural gas generation requirements	✓		
Pg 9	Fig 5.17-6	Pipeline routing considerations and		✓	• Water pipeline may affect 3.3 miles of BLM. SM

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
	Fig. 5.17-6b	construction standards			Engineers verbally claim BLM lands will not be affected. BLM wants confirmation with drawings and detailed plan of construction. Include ownership on the maps. • Will the pipeline be used for other entities? • What will be the resource impacts, i.e., desert tortoise and MGS habitat, cultural, etc., during waterline installation? • Provide detailed drawings of the pipeline location. Any proposed disturbance to public land will requires pre-project DT surveys. • Were the proposed project supply wells before IWVWD pipeline? If so remove from maps. If not, explain what they are for?
Pg 47		Metering stations		✓	• Discuss with the BLM regarding metering stations for dust, water, etc. (Refer to Draft BMP)
	?	Other related systems			•
Pgs 13, 14	2.5.7.1	Communications system requirements (i.e., microwave, fiber optics, hard wire, wireless) during construction and operation		✓	• Where is the land line (hard wire) going to be placed? Will a new communication tower be required? Referenced in index on c-05 south field but cannot locate on the map
Pg 65	2.0	Operations and Maintenance	✓		
	5.18-4	Operation and facility maintenance needs		✓	• Described throughout POD but not in detail. May be helpful to centralize in one location. Provide a section on Operation and Maintenance.
Pg 33	2.5.5.2	Maintenance activities, including mirror washing and road maintenance	✓		
Pg 60	2.5.7.1. 5.11/5.11.3 .2	Operations workforce and equipment	✓		
Pg 64	5.11.3	Environmental Considerations	✓		
Pg 64	5.3	Description of site characteristics	✓		
Pg 64	5.3-41	Description of potential environmental issues	✓		

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
Pg 65	Appendix F	Special or sensitive species & habitats		✓	DT • Applicant needs to provide a detailed plan for DT clearance based on new DTRO guidance – coming soon • Impacts analysis needs to address the impacts to relocated and resident DT populations. • We need a more detailed analysis of indirect effects to DT populations in surrounding area due to plant operations. • What are the downstream effects to DT populations and habitat due to hydrology changes? • BIO-1 is **incorrect**- Biologists will be covered under BO and not 10a1B; Reporting requirements will be based on requirements of BO for DT not as described in BIO-1 Ravens: • We need a more detailed plan for addressing raven increases at site during operation. (we have a draft plan that we can forward on to CEC). What type of monitoring will be done? What are the thresholds for adaptive management? What actions will be taken if a threshold for action is tripped? The service will work with BLM and the applicant on development of a framework. • Could mention upland game hunting, which occurs in the area. Raptors: • Transmission lines must be designed to be raptor proof or the latest technology
Pg 68	5.7	Special land use designations		✓	• Multiple Use Class L, (126.46 acres) Unclassified BLM land (2800 acres) • Provide copies of maps in AFC. i.e. figure 5.1-1 5.7-1 through 8) in POD.

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
					• Provide a copy of the CDCA BLM Solar Energy Projects Applications Map. • Agency contact should include the Military. Currently a ROW exists for direction markers in section 19 (CARI-0007494). • Need sections for each Township and Range. • This is not a former Sothern Pacific RR, a ROW exist for this RR. How far away is the western portion of the proposed ROW from the RR? • How is the pipeline being trench, back hoe, track hoe, or trencher? If track or back hoe is being use you may need to dynamite boulders that are not on the surface and will need a dynamite plan. • Explain how the open trench will not affect access to the private lands.
Pg 69		Cultural and historic resource sites and values		✓	• Stress the need to evaluate the nine prehistoric sites that the heritage consultant EDAW feels are significant and eligible by having them conduct a limited excavation testing effort at these nine sites. • This excavation would be targeted to showing that each site contains enough substantive archeological data to meet the eligibility threshold. • If none of these nine sites contain substantive data, then the entire project area would not contain any historic properties eligible for the National Register of Historic Places, and BLM can make a finding and determination of 'No Effects', thus concluding the Section 106 process. • If no eligible sites are present within the project area, then the need to develop further heritage mitigation measures are no longer needed, either as an independent document or within the EIR/EIS review process.

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
Pg 69	5.4.1.4	Native American Tribal concerns	✓		• Update in POD - Letters sent – response period ended approx. 8/20/09
Pg 69	5.7-8, -3, table 5.7-7	Recreation and conflicts		✓	• Identified but OHV routes need to be analyzed further
Pg 71	5.8.1	Other environmental considerations	✓		• Any new OHV routes will need to be reviewed under the NEPA and 43 CFR 8342.1 route designations.
Pg 59	5.11	Mitigation measures proposed by applicant and included in POD		✓	• Mitigation measures on tortoise, MGS and cultural proposed but require more study and input from state and federal agencies. Alternative mitigation strategies • Is 1603 mitigation likely to result in project design changes?
	Appendix C	Maps and Drawings		✓	• Include PLSS and tie in major facilities within the ROW
	Figure 2-1, appendix L, figures 1, 2, etc., civil engineer drawings	Footprint of solar facility (7.5 min topographic maps or equivalent		✓	• AFC identifies the southern solar field to be an 844 acres footprint than the discussed 770 acres. What is the actual footprint for disturbed land and footprint for each solar field?
		References to Public Land Survey System on maps		✓	• Need to correct legal description to match ROW. • No maps tie to the Public Land Survey System i.e., Township, Range, Section, Aliquot parts.
Pg 7, 34 30% drawings		Initial design drawings of facilities layout and installation including all facilities (typically a 30% Engineering and Civil Design package to describe proposed project and evaluate the design considerations for soils, drainage and watershed management	✓		• Changes made to the layout needs to be updated in the POD, i.e., power block location, gas pipeline, propane tank – describe capacity and size, location, permitting, etc. • Need 70% engineer drawings of Power Block Layout? • Map of 100-year flood and plan

Solar Plan of Development Check-List					
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
Pg 38	Appendix L Appendix F	Initial site grading plan		✓	• Discussion of site grading (direct, indirect impacts) • Need a more detailed plan, i.e. 70% drawings • Did BLM receive the results from the hole boring?
30% Designs	Figure 4-1	Maps with transmission facilities	✓		• SCE will need to provide engineer drawings or written approval if using SM engineer drawings.
Pg 38	2-5/2.6.4 5.14-3	Maps with substations & distribution		✓	• No maps showing substation. • Need detailed map showing facilities that are tied to the public land survey system indicating where the facilities will be located on the ground. • Ensure maps and acreage are updated with the most current data • Not sure where to find information on substations
Pg 13	2.5.5.9	Maps with Communications		✓	• No map. • Need more details on location, legal description, map, structures for switchyard and land line
Pg 26, fig. 11	5.13	Access and transportation maps	✓		• What is the status with Kern County Road Department and CalTrans on traffic and road situation?
Not found	5.15	Visual Resource Management (VRM)		✓	• Cumulative Impacts reference I-10 corridor and do not adequately describe Ridgecrest site impacts • KOP 7, 8, and 9 have a high level of dominance not a moderate level as referenced in the document. • Mitigation Measures: "neutral color and non reflective surface" buried in document. Should be relisted in mitigation measures for full public disclosure and knowledge. • Note at 1:24,000 scale, directions of view missing.

Solar Plan of Development Check-List					
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Pg 48	5.2-16 5.2.2.3 5.2-16,17 5.2.2.3	Air Quality		✓	• Federal Conformity not discussed. • NO_2 is also ozone precursor emission (pending federal ozone nonattainment area See: http://www.arb.ca.gov/desig/8-houroz/8-houroz.htm • Federal agencies must comply with part 93 not 51 also description should state that regulations require federal agencies to determine if action conforms to implementation plan (SIP) and not cause or contribute to exceedances. • The project area is in PM10 maintenance area and federal conformity will be necessary. Also USEPA is considering reclassifying area as nonattainment for new 8 hour ozone standard which would also require conformity for ozone (see ARB site above). • No discussion as to the applicability of data to project site. As an example the use of CO data from Lancaster. Should note that Lancaster site is nearly 100 miles away and in a populated area of over 300,000 population in contrast to the Ridgecrest area with a much smaller population (approximately 10% of Lancaster population) • There is ozone data available from both Trona and China Lake and the area is being considered by the USEPA for a federal nonattainment designation (See ARB reference above). The project is in the Indian Wells Valley PM10 area which is designated as federal attainment/maintenance not unclassifiable/attainment as stated in text on page 5.2-17.

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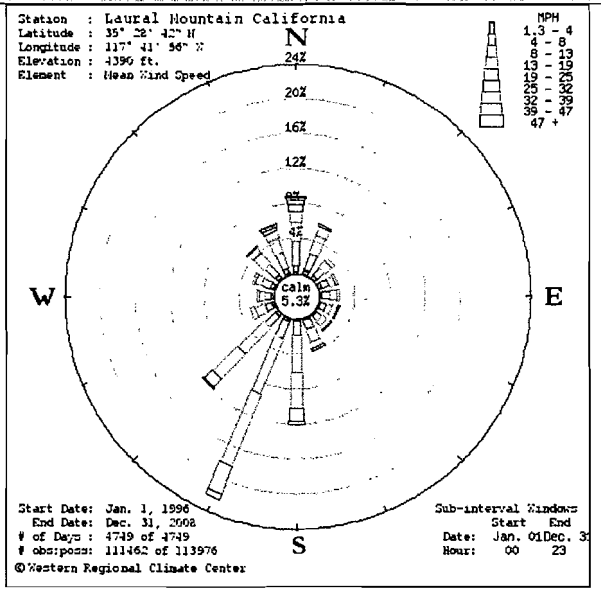
POD Page #	**AFC Page #**	**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
	p 5.2-14 p5.2.2.1	Climate and Topography			
	5.2-14-16 5.2.2.2	Meteorological Data			• The text states that the minimum temperatures below 32° occur on an average of one day per year. Climate data from Inyokern, approximately 5 miles north of site, shows the average low in December is 30.3° and January is 30.7° and the average is 65.6 days per year with minimums below 32° (http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca4278). This is important because the emission calculations are based on maintaining temperature in the fluids and boiler run time. The text indicates there are two local met stations that have similar wind data. In addition to the noted Ridgecrest data, there is a Class I RAWS (Remote Automated Weather Station), Laural Mountain, located 5 miles SE of the projects site with 1 hour data from 1996. The Ridgecrest and RAWS data are within 5 miles of the project site. The referenced

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					Figure 5.2-1 is actual the table of NAAQS. The wind rose presented is Figure 5.2-8 which is from Mojave, CA which is well outside project area. The attached figure 5.2-8 shows that the predominant wind direction for Mojave is WNW. A 12 year wind rose from Laurel Mountain indicates that the predominant wind direction is SSW in the project area (see attached). This represents a 90 degree change in wind direction. The analysis (p5.2-38) states there is a lack of met data and Mojave data used for site layout and the analysis. This could was jeopardize many of the analysis that relied on the wind direction and the site layout. Met Data presented was not quarterly, but summarized several years. No RH data presented.

Solar POD Supplemental Information Check-List					
Suppl. #		**Description**	**Adequate Info.**	**Deficient Info.**	**Notes**
	Appendix C	Engineering and Civil Design		✓	
		Facility survey and design drawing standards	✓		
Pg 32	Appendix C	Final engineering and civil design packages for all solar facilities and ancillary facilities that incorporate all mitigation measures developed in the NEPA analysis & incorporated into the final POD		✓	• Received only 30% design drawings = Need more detailed engineer drawings
Pg 33	2-21/ figure 5.17-11	Watershed and drainage analysis and calculations	✓		• Comply with recommendations in hydrology report • Need more detail in plan to reroute channels and materials they are going to use; how are they going to minimize threats to DT associated with these channels?
30% drawings	Table 5.17-8	Watershed protection and erosion control design drawings	✓		• Comply with recommendations in hydrology report
		Final site grading plans		✓	Need final site grading plan
Pg 15	4.0	Alternatives considered by the Applicant		✓	• Applicant is within MGS and high density tortoise population. BLM prefers they move out of MGS habitat and to a lesser tortoise density. • Alternative Site • Does CEC/BLM anticipate analyzing an alternative site configuration to avoid Mojave Desert Wash Scrub where a relatively larger concentration of DT sign occurs? • Figure 4-4 does indicate that the Baron alternative site would avoid biological resource, good transmission tie point, good slope, and is a good solar resource. Why is this site not being analyzed? What is the location of the alternative locations? Provide the legal description. • The footprint falls within the 2,000 acres needed, however, they are not contiguous. POD indicates a footprint of 1,583 acres and total of 3,920 acre needed for this project. What is the justification for an additional 2,337 acres?

					• Explain why the site should not be located 10 miles from CAISO-interconnect. • Military should make this determination. • Figure 4-4 does not show sites and slope. Change to read Figure 4-3. • Provide a map for each alternative site for Figures 4-1 through 4-5. • Elaborate on how this site will only be 1/16 of the WEMO MGS CA. Provide a list of other projects that fall within the MGS area. • Figure 4-1 should read Figure 4-5. • Provide a map showing the route and interconnect location. Has SCE filed for an amendment to their ROW or is Solar Millennium filing for a separate ROW? If the second is the case please file ASAP and provide a map and route.
?	4.3	Alternative site evaluation criteria		✓	
	4.3.2	Alternatives considered but not carried forward by proponent	✓		
	4.2	Comparative analysis of proponents alternatives	✓		
	4.5	Alternative site configurations		✓	• Solar array should be shown in different layouts in order to avoid MGS habitat and tortoise population.
?	?	Facility Management Plans		✓	
	Appendix L	Storm Water Pollution Prevention and Protection Plan	✓		
	5.6	Hazardous Materials Management Plan	✓		• Need more detail using worst case scenario – who will do the cleanup, what are their qualifications?
Pg 36	5.16	Waste Management Plan	✓		
Pg 36	5.3.4.1 bio-13	Invasive Species and Noxious Weed Management Plan		✓	• Need to consult with the BLM and County
?	5.18	Health and Safety Plan (meeting OSHA requirements)	✓		
?	?	Environmental Inspection and Compliance Monitoring Plan			• No action plan, just mention will be done.
		Facility Decommissioning		✓	• Site reclamation

					• We need a more detailed plan to address plant closure / site reclamation. • SEE Attached Reclamation Information
		Reclamation and site stabilization planning		✓	• SEE Attached Reclamation Information
		Temporary reclamation of disturbed areas		✓	• SEE Attached Reclamation Information
		Removal of power generation and substation facilities		✓	• NAWS also has a third use (Direction Markers in section 19) CARI-007494. Has the Military been contacted and cleared the area where the directional marks are located? • Residence will not have access when the trench from the pipeline. Identify how access will be attained by local residence. • Identify the plan mitigation measure and how they will lesson impacts. • Explain how construction activities will be minimized to existing land uses. • The trenching of the water pipeline will divide the residents from the land if no access is considered; furthermore, a new ROW application would have to be submitted for the pipeline ROW. The only linear ROW is China Lake Blvd road. • Explain how the project has been reduced as much as possible when the footprint is 1,440 acres and a site area of 3,920 acres for the proposed ROW, leaving 2,480 acres of undisturbed land? • Explain how the open trench will not jeopardize the public health and safety. • Explain how RSPP and other renewable energy projects may alter land use patterns in the undeveloped desert areas of Kern County and not affect Public Land. • Change "proposed Super Walmart" to "remodeled Super Walmart."
63	3.2	Removal of heliostats/panels		✓	• Decommissioning plan not prepared. Need to have at least an outline of what the applicant plans to do.
63	3.2	Removal of other ancillary facilities		✓	

RECLAMATION INFORMATION

Interim and Final Reclamation

The objective of reclamation in the short-term is to provide site stability and basic resource productivity. The final goal of reclamation is to restore the character of the land and water as close as possible to its pre-disturbance condition. The operator is responsible for completing the reclamation activities necessary to achieve the short-term objective, and upon abandonment, establishing the conditions on the site so that no impediment exists that would prevent achieving the final goal.

To reduce areas of disturbance not needed for long-term operations, interim reclamation will be initiated for areas such as active facility locations, pipelines, and roads when facility installation operations are concluded. All surface disturbances associated with facility abandonment must be reclaimed after operations have concluded. The final closure will not be approved by the BLM until reclamation work is determined to be successful by the BLM.

Reclamation Objective

Energy development is one of many uses of the public lands and resources. While development may have a short- or long-term effect on the land, successful reclamation can ensure the effect is not permanent. During the life of the development, all disturbed areas not needed for active support of production operations should undergo "interim" reclamation in order to minimize the environmental impacts of development on other resources and uses. At final abandonment, facilities, and access roads must undergo "final" reclamation so that the character and productivity of the land and water are restored.

Planning for reclamation prior to construction is critical to achieving successful reclamation in the future. Reclamation becomes significantly more difficult, more expensive, and less effective if sufficient topsoil is not salvaged, interim reclamation is not completed, and if proper care is not taken to construct facilities and roads in locations that minimize reclamation needs.

The long-term objective of final reclamation is to set the course for eventual ecosystem restoration, including the restoration of the natural vegetation community, hydrology, and wildlife habitats. In most cases, this means returning the land to a condition approximating or equal to that which existed prior to the disturbance. The operator is generally not responsible for achieving full ecological restoration of the site. Instead, the operator must achieve the short-term stability, visual, hydrological, and productivity objectives of the BLM and take the steps necessary to ensure that long-term objectives will be reached through natural processes.

The reclamation process involves restoring the original landform or creating a landform that approximates and blends in with the surrounding landform. It also involves salvaging and reusing all available topsoil (whatever soil is on top) in a timely manner, revegetating disturbed areas to native species, controlling erosion, controlling invasive non-native plants and noxious weeds, and monitoring results. Reclamation measures should begin as soon as possible after the disturbance and continue until successful reclamation is achieved. With proper reclamation measures, over time, local native species will become re-established on the site and the area will regain its original productive and scenic potential.

Reclamation generally can be judged successful when a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community is established on the site, with a density sufficient to control erosion and non-native plant invasion and to re-establish wildlife habitat or forage production. Erosion control is generally sufficient when adequate groundcover is reestablished, water naturally infiltrates into the soil, and gullying, headcutting, slumping, and deep or excessive rilling is not observed. The site must be free of State- or county-listed noxious weeds, debris, contaminated soil, and equipment. The operator should inform the

surface management agency that reclamation has been completed and that the site is ready for final inspection when these requirements have been met.

Reclamation Plan

A reclamation plan is included in the development Plan of Operations and should discuss plans for both interim and final reclamation. Reclamation is required of any disturbed surface that is not necessary for continued production operations. The operator should submit a new reclamation plan when facilities that do not have an approved reclamation plan or when the operator would like to update the plan. Additional reclamation measures may be required based on the conditions existing at the time of abandonment and made a part of the conditions of approval. Earthwork for interim and final reclamation generally must be completed within 6 months of construction or abandonment (weather permitting). The following information includes components of the reclamation plan.

Pit Reclamation

All pits must be reclaimed to a safe and stable condition and restored to a condition that blends with the rest of the reclaimed area. If it was necessary to line the pit with a synthetic liner, the pit must not be breached (cut) or filled (squeezed) while still containing fluids. Pits must be free of oil and other liquid and solid wastes prior to filling. Pits may be allowed to air dry or may be solidified in place with BLM approval. The pit liner must be removed to the solids level or treated to prevent its reemergence to the surface or its interference with long-term successful revegetation. If necessary, the pit area should usually be mounded slightly to allow for settling and positive surface drainage.

The concentration of nonexempt hazardous substances in the pit at the time of pit backfilling must not exceed the standards set forth in the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 USC 9605, as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), PL 99-499. All hazardous substances removed from a location must be disposed of in accordance with applicable Federal and State regulations.

Site Preparation and Revegetation

Disturbed areas should be revegetated after the site has been satisfactorily prepared. Site preparation will include respreading topsoil to an adequate depth, and may also include ripping, tilling, disking on contour, and dozer track-imprinting. The operator will usually be advised of the revegetation methods, objectives, and seasons to plant. Native perennial species or other plant materials specified by BLM will be used. Seeding should be accomplished by drilling on the contour whenever practical or by other approved methods such as dozer track-walking followed by broadcast seeding. Seeding or planting may need to be repeated until revegetation is successful, as determined by the BLM.

When conditions are not favorable for the establishment of vegetation, such as periods of drought or the lack of sufficient salvaged topsoil, the BLM may allow for subsequent reseedings to be delayed until soil moisture conditions become favorable or may require additional cultural techniques such as mulching, fertilizing, irrigating, fencing, or other practices. It is the operator's responsibility to monitor the site, take the necessary steps to ensure reclamation success, and to notify the BLM when success is achieved.

Reclamation is most effective when the ecology of the site is considered. The previous plant community or potential plant community native to the site should be identified to help determine the plant communities that can exist on the reclaimed site. Revegetation efforts will be hampered and costs increased if the site contains conditions detrimental to revegetation, such as heavy grazing pressure, insufficient salvaged topsoil, erosion, and compacted or contaminated soil.

Additional Guidelines

Supplemental guidelines and methods may be available that reflect local site and geographic conditions. These guidelines or methods may be obtained from the local surface management agency. Technical advances in reclamation practices are continually being developed that may be successfully applied to lands affected by the development.

Pipeline and Flowline Reclamation

Pipeline routes and roads should be co-located as much as possible to reduce reclamation needs and impacts to other resources. Pipeline trenches are to be compacted during backfilling and must be maintained to correct backfill settling and prevent erosion. Reclamation involves placing fill in the trench, compacting the fill, regrading cut-and-fill slopes to restore the original contour, replacing topsoil, installing temporary waterbars only where necessary to control erosion, and revegetating in accordance with a reclamation plan. Waterbars and other erosion control devices must be maintained and repaired as necessary.

Following successful revegetation, surviving water-bars must be flattened to blend with the slope and then revegetated. If berms of topsoil were originally placed over the trench to accommodate settling, the surviving berms should also be flattened to blend with the surrounding landform and revegetated.

Final abandonment of pipelines and flowlines will involve flushing and properly disposing of any fluids in the lines. All surface lines and any lines that are buried close to the surface that may become exposed due to water or wind erosion, soil movement, or anticipated subsequent use, must be removed. Deeply buried lines may remain in place unless otherwise directed by the authorized officer.

Road Reclamation

Interim reclamation consists of reclaiming portions of the road not needed for vehicle travel. Wherever possible, cut slopes, fill slopes, and borrow ditches should be covered with topsoil and revegetated to restore habitat, forage, scenic resources, and to reduce soil erosion and maintenance costs.

At abandonment, roads must be reclaimed by the operator unless the surface management agency or surface owner requests that they be left unreclaimed.

Final reclamation includes recontouring the road back to the original contour, seeding, controlling noxious weeds, and may also include other techniques to improve reclamation success, such as ripping, scarifying, replacing topsoil, constructing waterbars, pitting, mulching, redistributing woody debris, and barricading.

Seeds of native, perennial species or other plant materials specified by the BLM must be used. If waterbars were used, they should be removed and seeded following successful revegetation.

Reclamation of Other Associated Facilities

Other facilities and areas of surface disturbance associated with facility, including water impoundments, power lines, metering buildings, compression facilities, and tanks must be removed and reclaimed in accordance with the standards identified previously and with the requirements of the BLM.

Water Well Conversion

In some instances, the BLM may wish to acquire a monitoring well that has encountered ground water. In those cases, the operator must abandon the well and complete surface cleanup and reclamation according to BLM instructions. The BLM approval of the partial abandonment, completion of successful reclamation, and the signed release agreement will relieve the operator of further obligation for the well.

Inspection and Final Abandonment Approval

Upon completion of reclamation operations, the operator must notify BLM that the site meets reclamation objectives and is ready for inspection. Upon receipt of the notification, the BLM will inspect the site to ensure reclamation is fully successful. Final abandonment will not be approved by the BLM until the surface reclamation work required by the plan has been completed and the required reclamation is acceptable to the BLM. The operator is responsible for monitoring reclamation progress and taking the necessary actions to ensure success.

Release of Bonds

If the facilities are covered by a bond, the period of liability on that bond can be terminated once the final reclamation has been approved.