



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001  
(760) 833-7100 Fax (760) 833-7199



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OCT 12 2012

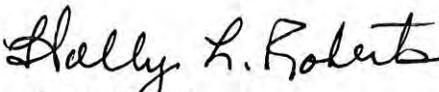
Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Dear Secretary Bose:

Enclosed are two letters requesting your recommendation regarding two separate rights of way (ROW) for solar energy projects (the Desert Sunlight and Desert Harvest Solar Projects) on public lands in eastern Riverside County, California. Both projects include access roads and power lines which would cross a linear withdrawal of public land created pursuant to section 24 of the Federal Power Act (FPA), when Eagle Crest Energy Company's (Eagle Crest) filed an application for a preliminary permit for the Eagle Mountain Pump Storage Project, Power Project P-13123.

The Bureau of Land Management (BLM) is consulting with the Federal Energy Regulatory Commission (the Commission) regarding ROW's for these projects as provided in a July 20, 1966 Memorandum of Understanding (MOU) between BLM and the Federal Power Commission. If you have any questions regarding these requests, please contact me at either the above address, or by email at [jkalish@blm.gov](mailto:jkalish@blm.gov) or by phone at (760) 833-7100.

Sincerely,

  
John R. Kalish  
Field Manager

Cc: Kenneth Hogan  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Attachments: 2 letters



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OCT 12 2012

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Bureau of Land Management's request for concurrence to issue a Notice to Proceed for construction of a transmission line crossing land withdrawn pursuant to sec. 24 of the Federal Power Act under P-13123; SBM T.4S., R.15E, sections 22 & 27, Riverside County, California**

Dear Secretary Bose:

On August 11, 2011, the Bureau of Land Management (BLM) issued a right of way (ROW), serial # CACA 48649, to Desert Sunlight Holdings, LLC (Desert Sunlight) for construction of a 550 MW solar project located on public and private lands in eastern Riverside County. Desert Sunlight's project includes a 230 kV transmission line to connect the solar project to the electric grid at the Red Bluff substation.

Desert Sunlight's 230 kV transmission line would cross a linear withdrawal of public land created pursuant to section 24 of the Federal Power Act (FPA), when Eagle Crest Energy Company's (Eagle Crest) filed an application for a preliminary permit for the Eagle Mountain Pump Storage Project, Power Project P-13123.

Due to an oversight on our part, BLM did not consult with the Federal Energy Regulatory Commission (the Commission) prior to issuing the ROW as provided in a July 20, 1966 Memorandum of Understanding (MOU) between BLM and the Federal Power Commission. The MOU provides at VII (B) Other rights-of way:

"The Bureau of Land Management will transmit all right of way applications involving power sites to the FPC, through the GS, for recommendation concerning allowance, as well as for any special conditions or stipulations which the FPC may deem necessary to protect the power values."

Although BLM did not consult with the Commission prior to issuing the ROW to Desert Sunlight, we have delayed issuing a notice to proceed for construction of that portion of Desert Sunlight's transmission line crossing the linear withdrawal due to potential conflicts with Power Project P-13123.

As you know, under section 24 of the FPA, Eagle Crest's applications for preliminary permit and license created two linear withdrawals of public lands necessary for Power Project P-13123, one for a water pipeline and another for a 500 kV transmission line to connect the project to the electric grid. We understand the current withdrawal is defined by the project boundary in Eagle Crest's June 22, 2009 license application.

Desert Sunlight's transmission line would cross the linear withdrawal for the water pipeline, but would not cross the current linear withdrawal for Eagle Crest's 500kV transmission line. Desert Sunlight's transmission line would cross the Staff Alternative transmission line route shown in the final Environmental Impact Statement (EIS) for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project, P-13123, but this crossing would occur on private land, which is not under BLM's jurisdiction and not subject to the withdrawal provisions in section 24 of the FPA.

After considering input from Desert Sunlight and Eagle Crest, we have concluded Desert Sunlight's transmission line could, subject to appropriate conditions, be constructed without affecting the use of public lands withdrawn for Power Project P-13123.

BLM proposes to issue a notice to proceed to Desert Sunlight for construction of their transmission line with the following stipulation:

“The right of way for this transmission line crosses public lands subject to a withdrawal created for Power Project P-13123, pursuant to section 24 of the Federal Power Act (FPA). The effect of the withdrawal is to reserve the public lands for future use for a water pipeline by the licensee of Power Project P-13123, if authorized under the FPA. The holder shall construct, operate and maintain all facilities located within the withdrawal, so as to not interfere with or preclude use of the withdrawn public lands by Power Project P-13123. The holder shall be responsible for any costs necessary to modify the holder's facilities to accommodate use of the withdrawn public land under Power Project P-13123. If Power Project P-13123 is licensed by FERC, the holder shall also be responsible for reimbursing the licensee for all reasonable costs incurred by the licensee as a result of the holder's use of withdrawn public land.”

I regret the oversight on BLM's part in not previously consulting with the Commission prior to issuing ROW CACA 48649 in accordance with the July 20, 1966 MOU. To correct that oversight BLM is now requesting the Commission's concurrence to issue a Notice to Proceed to Desert Sunlight as described above and subject to the above stipulation. We are also seeking your recommendation as to whether any additional conditions or stipulations are necessary to protect Power Project P-13123.

Following is a more detailed description of the FPA withdrawal and Desert Sunlight's project.

### **Eagle Mountain Pump Storage Project, Power Project P-13123**

The current withdrawal of public lands is based on the maps in Eagle Crest's June 22, 2009 license application. Attachment 1a & 1b are the Project Boundary Maps (Sheets 1 & 2) from the license application showing the general location of the water supply line and transmission line. Attachment 2 is a map from the Final EIS for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project, P-13123, again showing the location of the water supply line and the transmission line (as proposed in the license application), but also showing the Staff Alternative/State Water Board's preferred route for the transmission line.

### **Desert Sunlight**

Desert Sunlight is a 550 MW solar project located generally southeast of Power Project P-13123 on public and private land in eastern Riverside County. Attachment 3 is figure 2-19 from the final EIS for the Desert Sunlight Solar Farm Project, showing the location of the 230kV transmission line to be constructed under Alternative A-1 and as authorized in ROW CACA 48649.

### **Desert Sunlight's Use of Public Lands Withdrawn for Power Project P-13123**

Attachment 4 shows Desert Sunlight's ROW in relationship to the project boundary for Power Project P-13123. As shown on Attachment 4, Desert Sunlight's transmission line leaves the solar farm near the southwest corner of Section 22, and crosses the 145-foot-wide linear withdrawal for the buried water supply line for Power Project P-13123, turns to the southeast and parallels the linear withdrawal for approximately 1,970 feet in T.4S. R.15E., sections 22 and 27 before crossing into private property. Attachment 5 depicts in detail Desert Sunlight's transmission line crossing of the linear withdrawal for the water supply line in Section 22. Attachment 6 provides additional detail showing the overlap of Desert Sunlight's ROW on the linear withdrawal for Power Project P-13123 in Section 22 and Section 27.

Attachment 6 also shows two short access routes from Kaiser Road to Desert Sunlight's solar project. These access routes would be graded, but not paved.

As noted earlier, Desert Sunlight's 230kV transmission line would not cross the route for the transmission line proposed in the license application for Power Project P-13123. BLM recognizes that the transmission line route proposed in the license application is no longer a feasible alternative given the location of the Red Bluff substation authorized in conjunction with Desert Sunlight's project. This effectively narrows the alternatives for the transmission line for Power Project P-13123 to the two other alternatives considered in the final EIS for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project; the Commission's Staff Alternative and Interior's Preferred Alternative.

Of these alternatives, BLM is no longer prepared to endorse Interior's Preferred Alternative over the Staff Alternative for Power Project P-13123. Although Desert Sunlight's transmission line would cross the Commission's Staff Alternative transmission line route for Power Project P-13123, the Staff Alternative route does not currently constitute a withdrawal of public land under section 24 of the FPA and crossing of the two transmission lines, should it occur, would occur on private land owned by the Metropolitan Water District of Southern California. BLM has no jurisdiction over these private lands and they are not part of Desert Sunlight's ROW. Desert

Sunlight has, however, assured us that their 230 kV transmission line would not preclude construction of the 500 kV Power Project transmission line under the Staff Alternative.

In conclusion, Desert Sunlight's project uses the public lands withdrawn for Power Project P-13123 only for a transmission line and access roads. Although the Desert Sunlight's transmission line and access roads would cross the linear withdrawal intended for use by a water supply line for the Power Project, as discussed below, BLM has concluded these facilities would not preclude use of the public lands withdrawn for Power Project P-13123.

Construction of Desert Sunlight's transmission line would not require placing any towers on the public lands withdrawn for Power Project P-13123. As shown on attachment 5, the closest tower for Desert Sunlight's transmission line would be approximately 88 feet from the western boundary of the withdrawal for the water supply line. Desert Sunlight's transmission line would be at least 40 feet above the ground at its lowest sag point. Given these factors, Desert Sunlight's transmission line would not interfere with the construction, operation and maintenance of the water supply line proposed to be located within the linear withdrawal for Power Project P-13123. Any equipment necessary to construct, operate and maintain the water supply line would have sufficient vertical and horizontal clearance to operate safely.

Although Desert Sunlight's ROW does overlap the linear withdrawal for the water supply line for a very short distance, the fence line for Desert Sunlight's solar farm is actually located approximately 250 feet from the eastern boundary of the linear withdrawal for Power Project P-13123. BLM estimates that Desert Sunlight's ROW occupies approximately 0.72 acres of the public land withdrawn for Power Project P-13123, including the crossing area and the slight overlap of in Section 22. Except for operations associated with Desert Sunlight's transmission line, and unpaved access roads, Desert Sunlight would not use the public lands withdrawn for Power Project P-13123.

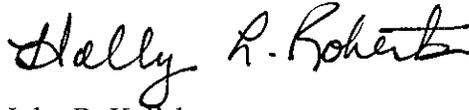
The final EIS for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project does not specify the depth of the proposed water supply line. However, if the water line is buried to a standard depth of four to five feet, the water line would not be damaged by heavy equipment crossing over the water line to work on either the Desert Sunlight's transmission line or the solar farm.

In summary, the construction, operation, and maintenance of Desert Sunlight's transmission line would not interfere with any future licensee's ability to use the public land withdrawn for the purposes described in the license application for Power Project P-13123. Moreover, considering the approved location of the Red Bluff substation, there appears to be no feasible route for Desert Sunlight's transmission line that would not require crossing the proposed water supply line associated with Power Project P-13123.

BLM is requesting concurrence from the Commission to issue a notice to proceed to Desert Sunlight to construct their transmission line across the linear withdrawal created for Power Project P-13123. We also want your recommendations regarding any additional stipulations you feel are necessary to protect Power Project P-13123. If we do not hear from you within 30 days,

BLM will assume the Commission does not object to the construction Desert Sunlight's transmission line across the linear withdrawal for Power Project P-13123.

Sincerely,

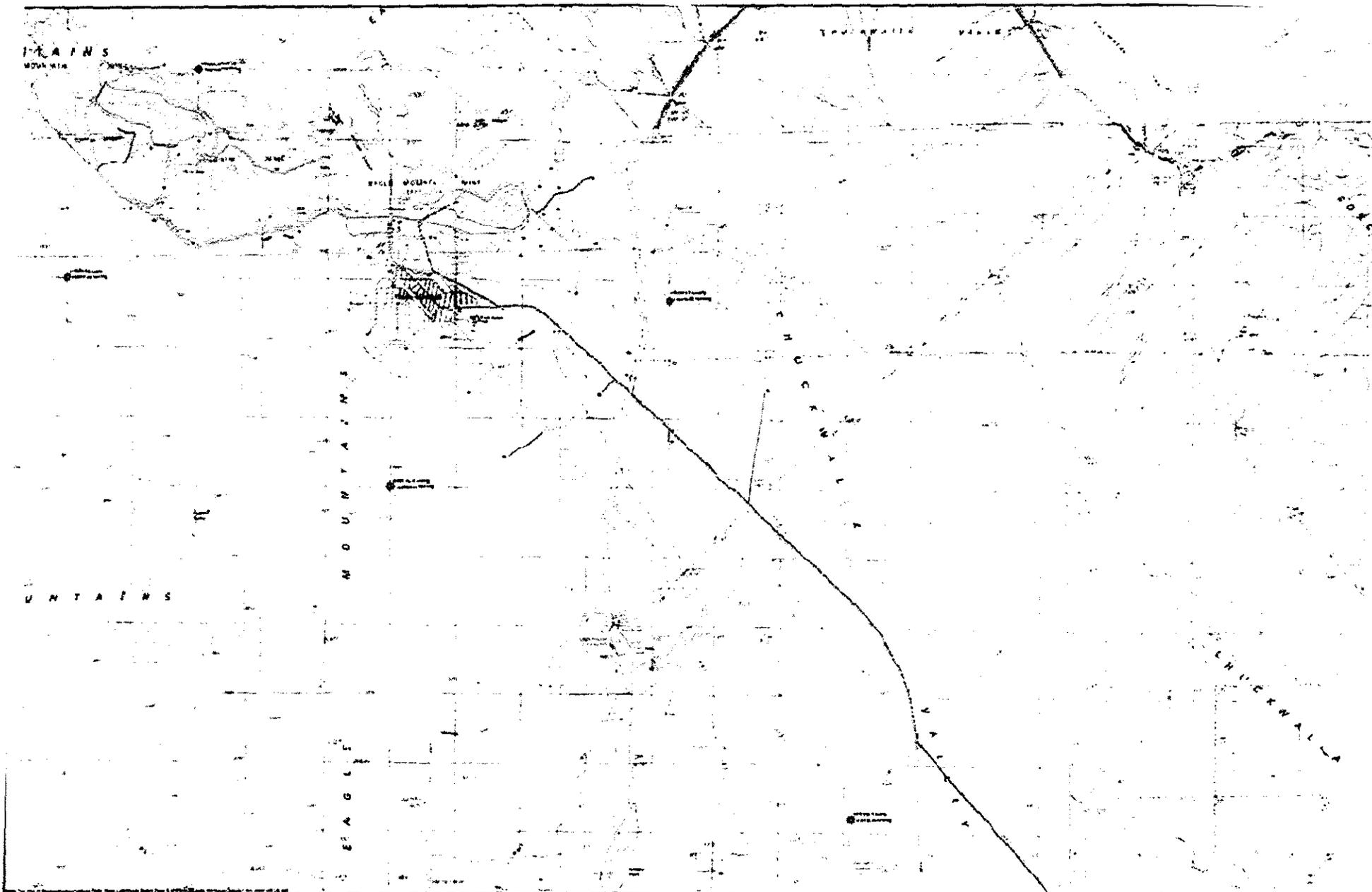


*for* John R. Kalish  
Field Manager

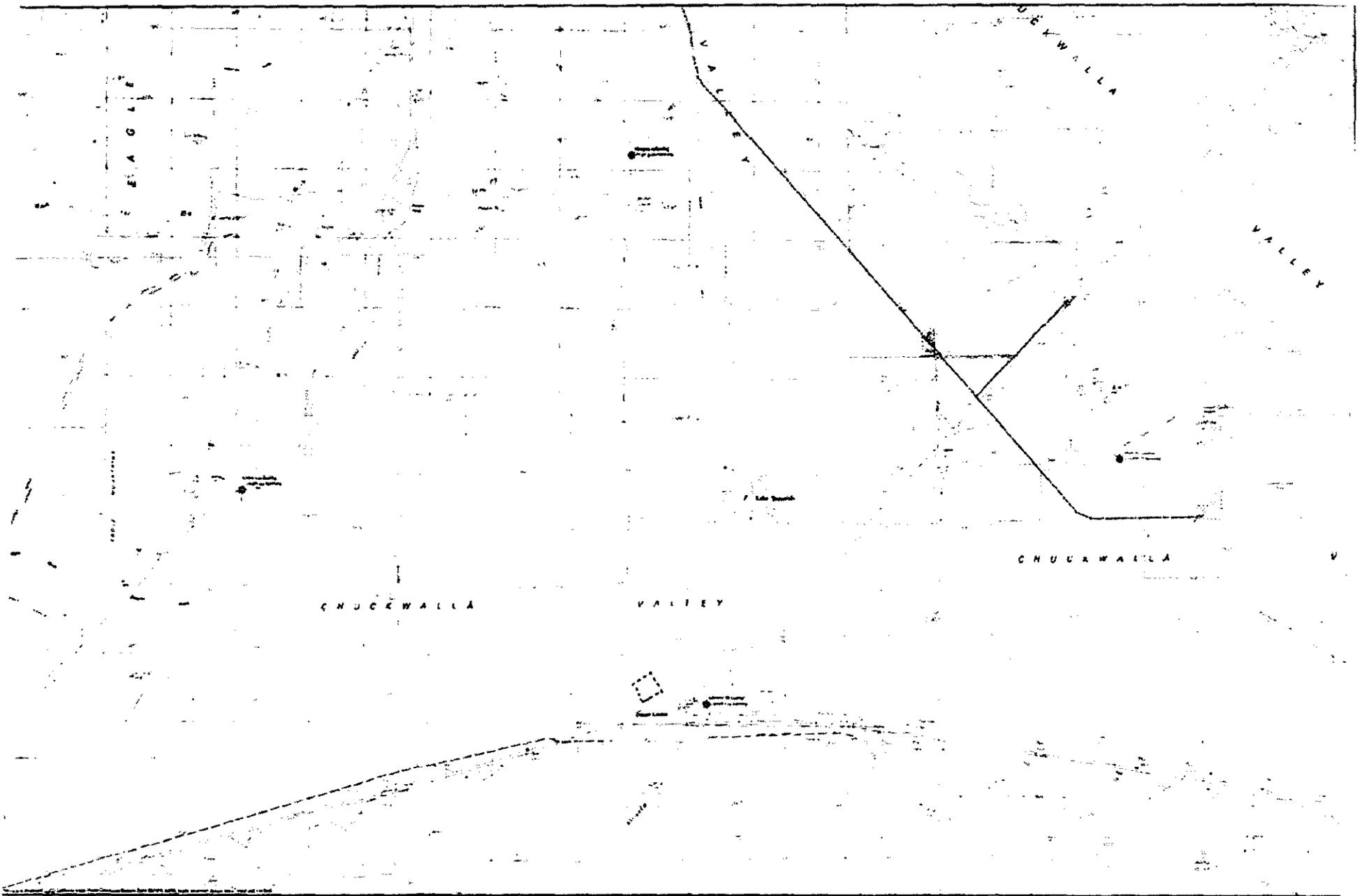
Cc: Kenneth Hogan  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Attachments: 7

- Attachment 1a&b, Power Project P-13123 Boundary Maps
- Attachment 2 Map from Final EIS for Power Project P-13123
- Attachment 3 figure 2-19, final EIS for the Desert Sunlight Solar Farm Project
- Attachment 4 Map showing Desert Sunlight Project & Power Project P-13123
- Attachment 5 Detail Map Desert Sunlight's transmission line crossing linear withdrawal
- Attachment 6 Detail of overlap of Desert Sunlight's ROW of linear withdrawal



		<h1>ATTACHMENT 1A</h1>	<p>1 inch = 2,000 feet</p>	<p>Eagle Mountain Purgal Storage Eagle Mountain, California</p>	<p>PROJECT BOUNDARY SHEET 1</p>
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	<p><b>Legend</b></p> <ul style="list-style-type: none"> <li>Project Boundary</li> <li>Construction Location</li> <li>Construction Area</li> <li>Other Utility and Area</li> <li>Water Main</li> <li>Water Main Line</li> </ul>	<h1>ATTACHMENT 1B</h1> <p>1 inch = 2,000 feet</p>	<p>Chuckwalla Pumped Storage Eagle Mountain, California</p> <p>Large Creek Service Company</p>	<p>Project 080473</p>	<p>PROJECT BOUNDARY SHEET 3</p> <p>June 2009 <span style="float: right;">Figure C</span></p>
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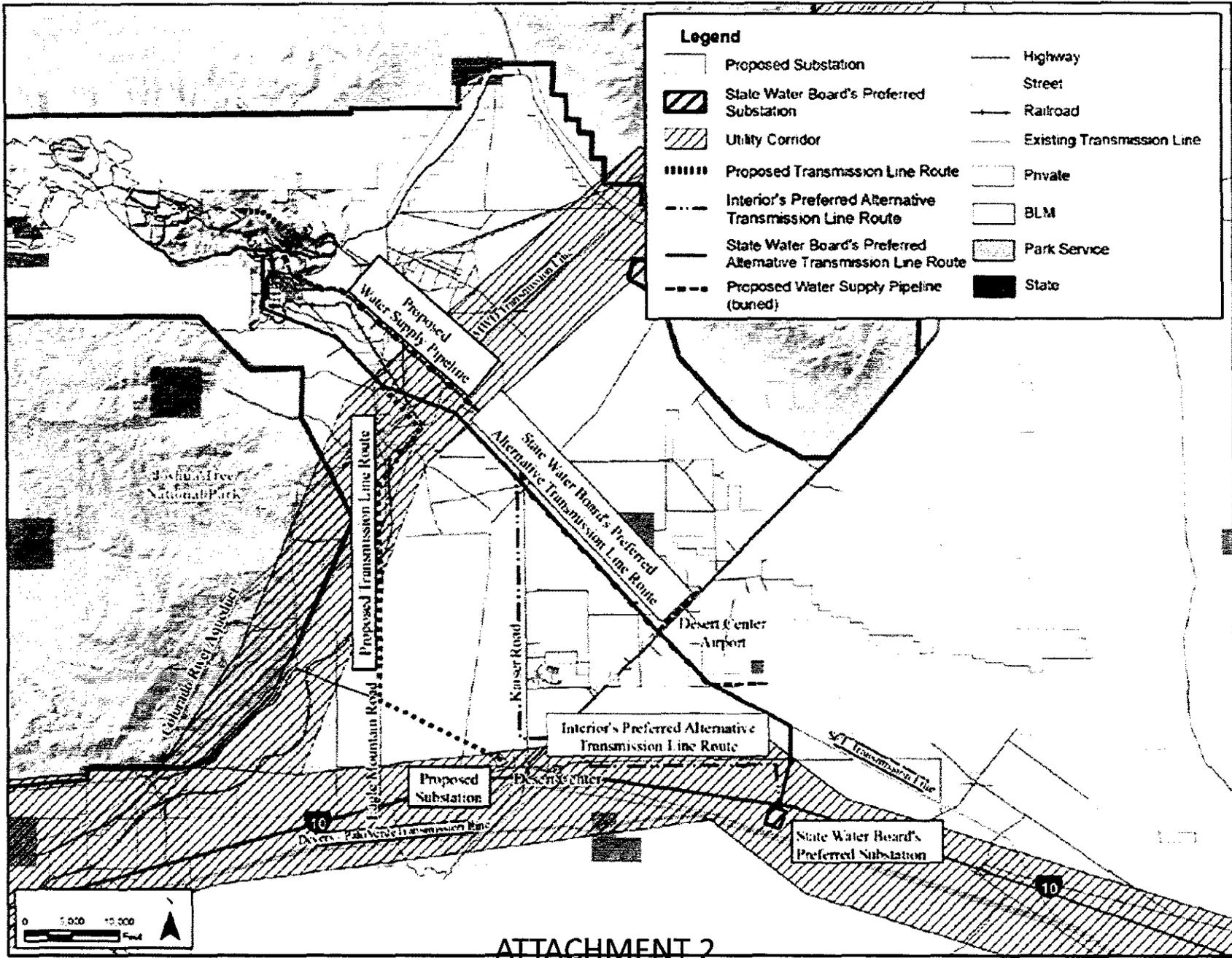
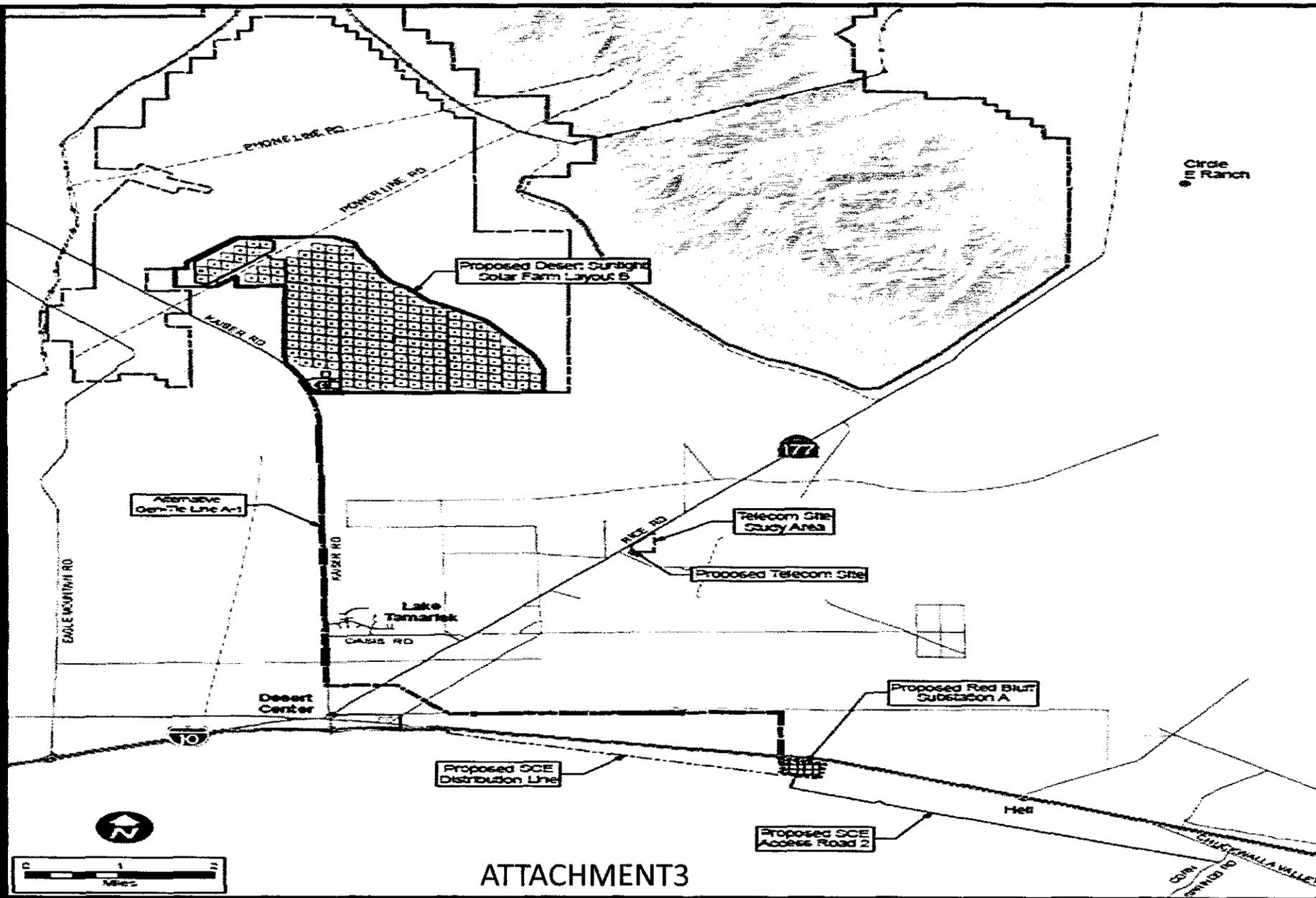


Figure 16. Land ownership in the vicinity of the proposed project (Source: Eagle Crest, 2009a, as modified by staff).



ATTACHMENT 3

LEGEND	
	Proposed Gen-Tie Line A-1
	SCE Access Road
	SCE Distribution Line
	Solar Farm Boundary (Alternative B)
	Red Bluff Substation (Alternative A)
	Joshua Tree National Park Boundary

Source: First Solar, 2010



DESERT SUNLIGHT SOLAR FARM

**Figure 2-19**  
**Alternative 1:**  
**Proposed Action Layout**









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Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Dear Secretary Bose:

In accordance with the July 20, 1966 Memorandum of Understanding (MOU) between BLM and the Federal Power Commission, the Bureau of Land Management (BLM) is requesting your recommendation regarding a right of way (ROW) application submitted by enXco Development Corporation (now EDF Renewable Energy). EDF Renewable Energy is seeking authorization to use public lands in Riverside County, California, for the Desert Harvest Solar Project (DHSP).

As proposed, certain access roads, power lines and other facilities associated with the DHSP would cross a linear withdrawal of public land created pursuant to section 24 of the Federal Power Act (FPA), when Eagle Crest Energy Company's (Eagle Crest) filed an application for a preliminary permit for the Eagle Mountain Pump Storage Project, Power Project P-13123.

The July 20, 1966 MOU between BLM and the Federal Power Commission provides at VII (B) Other rights-of way:

“The Bureau of Land Management will transmit all right of way applications involving power sites to the FPC, through the GS, for recommendation concerning allowance, as well as for any special conditions or stipulations which the FPC may deem necessary to protect the power values.”

As you know, under section 24 of the FPA, Eagle Crest's applications for preliminary permit and license created two linear withdrawals of public lands necessary for Power Project P-13123, one for a water pipeline and another for a 500 kV transmission line to connect that project to the electric grid. We understand the current withdrawal is defined by the project boundary in Eagle Crest's June 22, 2009 license application.

The transmission line for the DHSP would cross the linear withdrawal for the water pipeline, but would not cross the current linear withdrawal for Eagle Crest's 500kV transmission line. The transmission line for the DHSP would cross the Staff Alternative transmission line route shown in the final Environmental Impact Statement (EIS) for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project, P-13123, but this crossing would occur on private land, which is

not under BLM's jurisdiction and not subject to the withdrawal provisions in section 24 of the FPA.

After considering input from EDF Renewable Energy and Eagle Crest, we have concluded the DHSP could, if modified and subject to appropriate conditions, be constructed without affecting the use of public lands withdrawn for Power Project P-13123.

BLM proposes to authorize the DHSP subject to the following stipulation:

“This right of way crosses public lands subject to a withdrawal created for Power Project P-13123, pursuant to section 24 of the Federal Power Act (FPA). The effect of the withdrawal is to reserve the public lands for future use for a water pipeline by the licensee of Power Project P-13123, if authorized under the FPA. The holder of this right of way shall construct, operate and maintain all facilities located within the withdrawal, so as to not interfere with or preclude use of the withdrawn public lands by Power Project P-13123. The holder shall be responsible for any costs necessary to maintain and or modify the holder's facilities to accommodate use of the withdrawn public land under Power Project P-13123. If Power Project P-13123 is licensed by FERC, the holder shall also be responsible for reimbursing the licensee for all reasonable costs incurred by the licensee as a result of the holder's use of withdrawn public land.”

We are also seeking your recommendation as to whether any additional conditions or stipulations are necessary to protect Power Project P-13123.

Following is a detailed description of the FPA withdrawal, the DHSP, and areas of overlap.

#### **Eagle Mountain Pump Storage Hydroelectric Project, Power Project P-13123**

The current withdrawal of public lands is based on the maps in Eagle Crest's June 22, 2009 license application. Attachment 1a & 1b are the Project Boundary Maps (Sheets 1 & 2) from the license application showing the general location of the water supply line and transmission line. Attachment 2 is a map from the Final EIS for the Proposed Eagle Mountain Pumped Storage Hydroelectric Project, P-13123, again showing the location of the water supply line and the transmission line (as proposed in the license application), but also showing the Staff Alternative/State Water Board's preferred route for the transmission line.

#### **Desert Harvest Solar Project**

The proposed DHSP is a 150 MW solar photovoltaic (PV) energy-generating project. The project would be located on public lands in Riverside County, California, 5 miles north of Desert Center. The DHSP would occupy 1,208 acres, comprised of two parcels of public land separated by land owned the Metropolitan Water District of Southern California.

The northern parcel consists of 1,053 acres and the southern parcel comprises 155 acres. The southern parcel is bisected by the linear withdrawal for Power Project P-13123. The DHSP would include an approximately 10-mile, 220 kV generation interconnection line (transmission line) to the Southern California Edison Red Bluff Substation located south of Interstate 10. DHSP's transmission line would cross over Kaiser Road and then connect to a joint use

transmission line, authorized as part of the Desert Sunlight solar project. The parcels and transmission line are shown on the attached Figure 1-1.

The DHSP has a minimum expected lifetime of 30 years, with an opportunity of 50 years or more with equipment replacement, repowering, and an extension of the applicable permits, approvals and authorizations. It is expected to generate up to 341,000 megawatt hours per year of renewable energy.

On January 27, 2012, the DHSP was recognized by the Secretary of the Interior as a Nationally or Regionally Significant Project and was assigned a “High Priority” status for environmental permitting. The Notice of Availability of the draft EIS for the DHSP was published in the Federal Register on April 13, 2012. On August 7, 2012, President Obama announced that processing of the DHSP would be expedited under the “We Can’t Wait” initiative.

**Detailed description of the DHSP’s Use of Public Lands Withdrawn for Power Project P-13123 and areas of potential conflict.**

As initially proposed, the DHSP ROW would cross over and/or occupy public and private lands which would also be used for a transmission line (as identified as the State Water Board’s Preferred Alternative in the final EIS) and water pipeline by the Eagle Mountain Pump Storage Project, Power Project P-13123. The following components of the DHSP could potentially conflict with Power Project P-13123 at locations shown on Figure 1-2, attached.

1. **DHSP’s transmission line.** DHSP’s transmission line would leave the DHSP northern parcel and, at locations 2 & 4 on Figure 1-2, cross over the 145 foot wide linear withdrawal for the buried water supply line for Power Project P-13123 and then cross over Kaiser Road and connect to a joint use transmission line authorized as part of the Desert Sunlight Project. As noted in our letter to you regarding the Desert Sunlight Project, this joint use transmission line (Desert Sunlight & DHSP) would cross the Commission’s Staff Alternative transmission line route for Power Project P-13123, at location 1 in Figure 1-2. The Staff Alternative route does not currently constitute a withdrawal of public land under section 24 of the FPA and the crossing would occur on private land owned by the Metropolitan Water District of Southern California. EDF Renewable Energy has assured us that the joint use transmission line would not preclude construction of the 500 kV Power Project transmission line under the Staff Alternative.
2. **The main access driveway** (unpaved) from Kaiser Road to the DHSP (on the northern parcel) would cross over the 145 foot wide linear withdrawal for the buried water supply line for Power Project P-131231 at location 3 on Figure 1-2.
3. **The proposed solar PV array** layout on the DHSP southern parcel overlaps the linear withdrawal for Power Project P-131231 at location 5 on Figure 1-2.
4. **The DHSP’s interior access roads and electrical collector lines** on the southern parcel crossing from west to east would cross over the 145 foot wide linear withdrawal for the buried water supply line and under the transmission line (staff alternative route) for Power Project P-131231 at locations 6 and 7 on Figure 1-2.
5. **DHSP’s proposed buried electrical collector line** between the southern and northern parcels would cross over the water pipeline and under the transmission line (staff

alternative route) for Power Project P-131231 at locations 8 and 9 on Figure 1-2. This crossing would occur on private land owned by the Metropolitan Water District of Southern California.

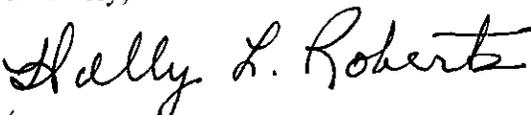
With regard to item 3 above, BLM has concluded that the DHSP should avoid any potential conflict between the solar PV arrays on the southern parcel and the transmission line (Staff Alternative route) and water pipeline for Power Project P-13123, by removing all proposed solar PV arrays from the 145 foot linear withdrawal as shown on Figure 1-3.

If the DHSP is modified to remove all solar PV arrays from the linear withdrawal area for Power Project P-13123, the DHSP would then only use the public lands in the linear withdrawal for power line purposes (transmission & collector lines) and unpaved access roads. Although these power lines and access roads would cross the linear withdrawal intended for use by a water supply line for the Power Project, as discussed below, BLM has concluded these facilities would not preclude use of the public lands by Power Project P-13123.

Both the DHSP and Eagle Mountain Pumped Storage Hydroelectric Project are in the early engineering design stages and the DHSP applicant is actively engaging with Eagle Crest to avoid potential conflicts. Due to this early stage of development for both projects, BLM is confident that conflicts with can be avoided prior to construction with minimal design revisions. In summary, BLM believes the construction, operation, and maintenance of the DHSP, as modified, would not interfere with any future licensee's ability to use the public land withdrawn for the purposes described in the license application for Power Project P-13123.

As provided by the July 20, 1966 Memorandum of Understanding (MOU), the BLM is requesting your recommendation regarding the approval of a ROW for the DHSP. We also want your recommendations regarding any additional stipulations you feel are necessary to protect Power Project P-13123. If we do not hear from you within 30 days, BLM will assume the Commission does not object to the issuance of a ROW for the DHSP, subject to the modification and stipulation previously described.

Sincerely,

  
for John R. Kalish  
Field Manager

Cc: Kenneth Hogan  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Attachments:

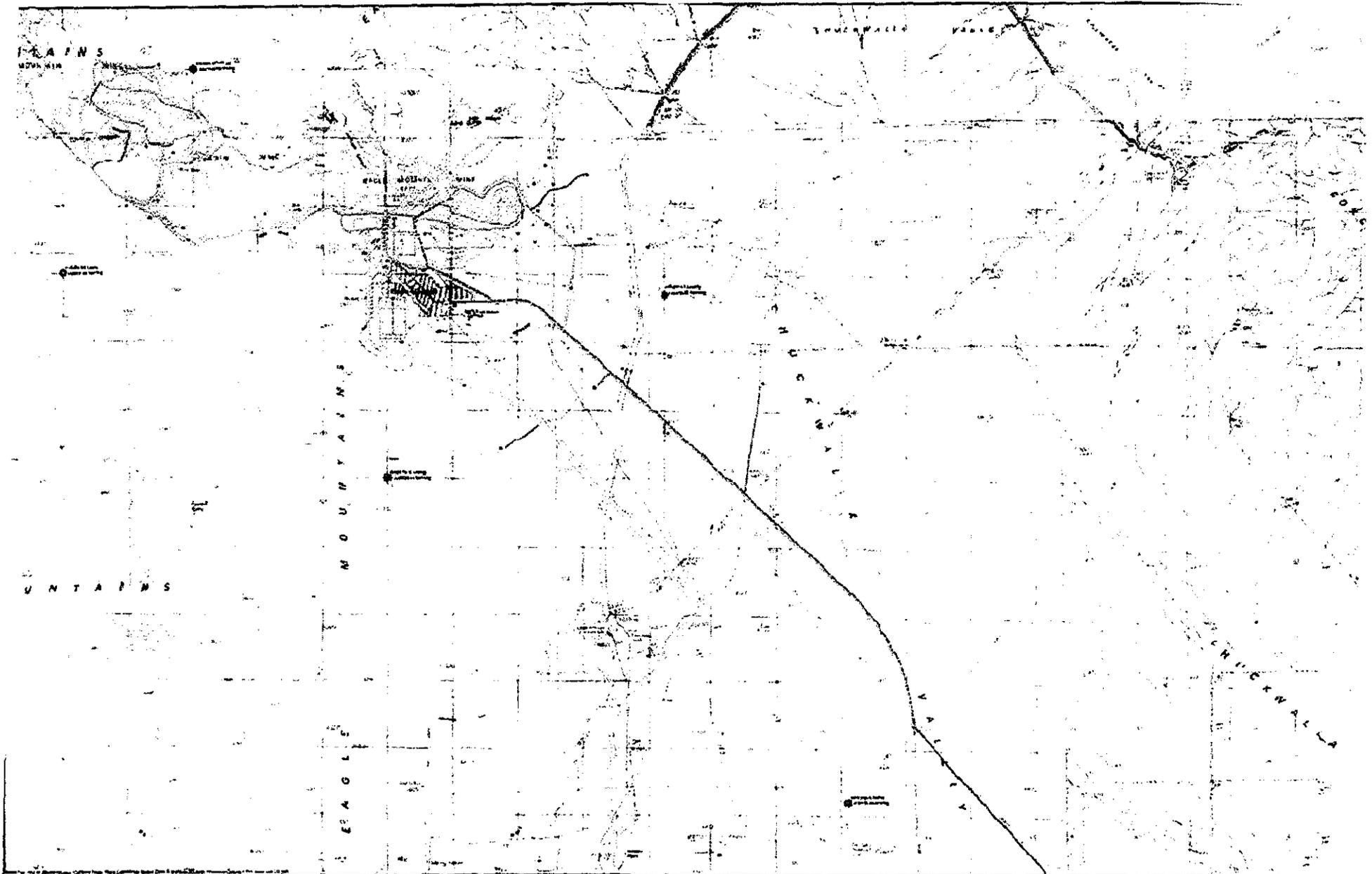
Attachment 1a&b, Power Project P-13123 Boundary Maps

Attachment 2 Map from Final EIS for Power Project P-13123

Attachment 3 Figure 1-1 (Figure 2-2 from Draft EIS for the DHSP)

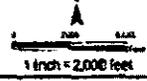
Attachment 4 Figure 1-2

Attachment 5 Figure 1-3



Legend  
 Project Boundary  
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 Elevation  
 1 inch = 2,000 feet

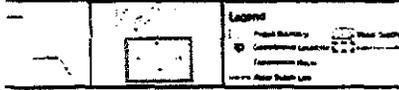
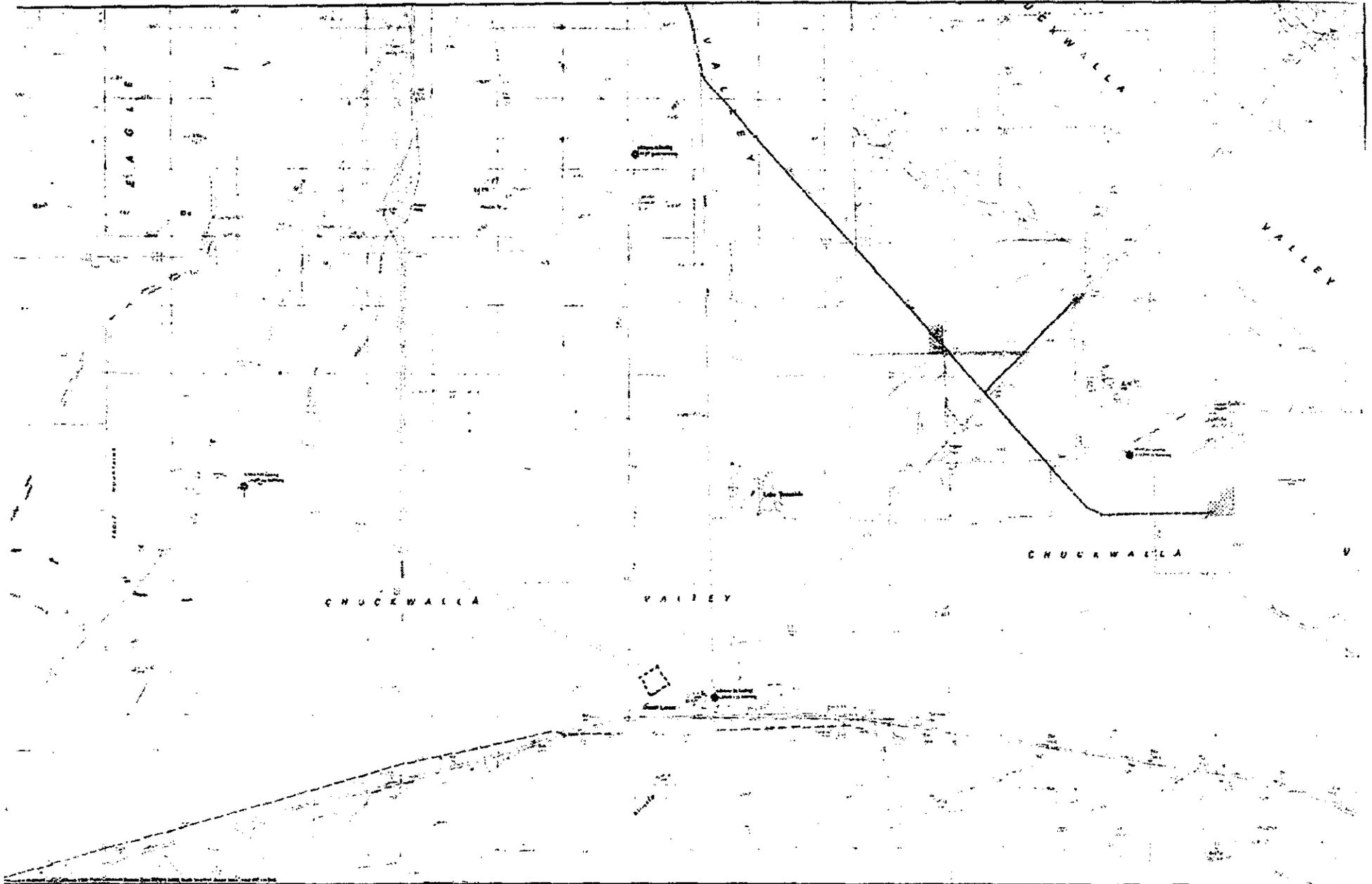
# ATTACHMENT 1A



Green Mountain Pulped Storage  
 Green Mountain Cisterns  
 Eagle Creek Energy Company



PROJECT BOUNDARY  
 SHEET 1  
 Project 02012  
 June 200



**Legend**

- Project Boundary
- County Boundary
- City Boundary
- State Route
- Local Road
- Water
- Power Lines
- Other Utility Lines
- Other Structures
- Other Features

# ATTACHMENT 1B



Circle Mountain Purwood Storage  
 Eagle Mountain Customs  
 Sage Creek Energy Company



PROJECT BOUNDARY  
 SHEET 1  
 June 2009  
 Figure C

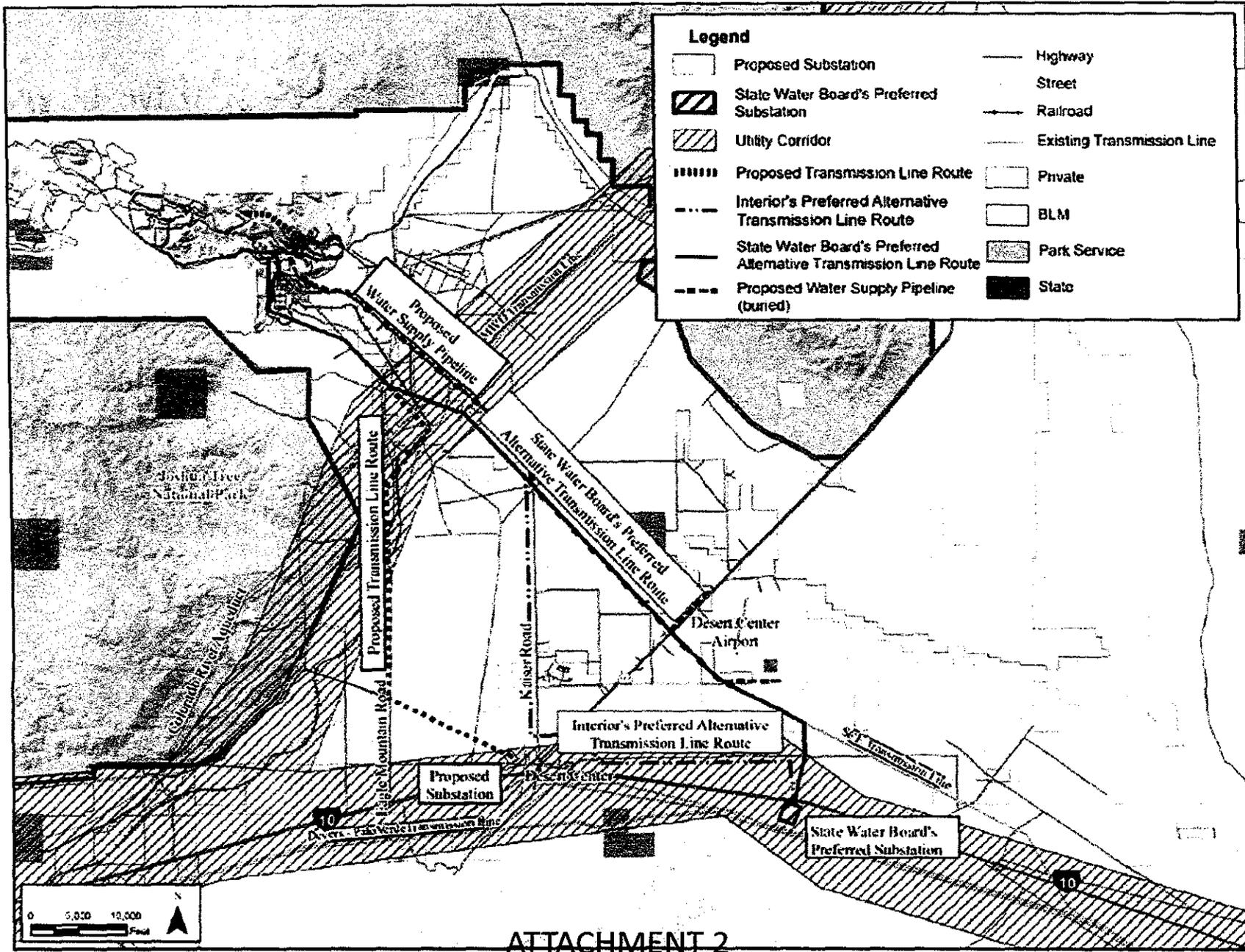
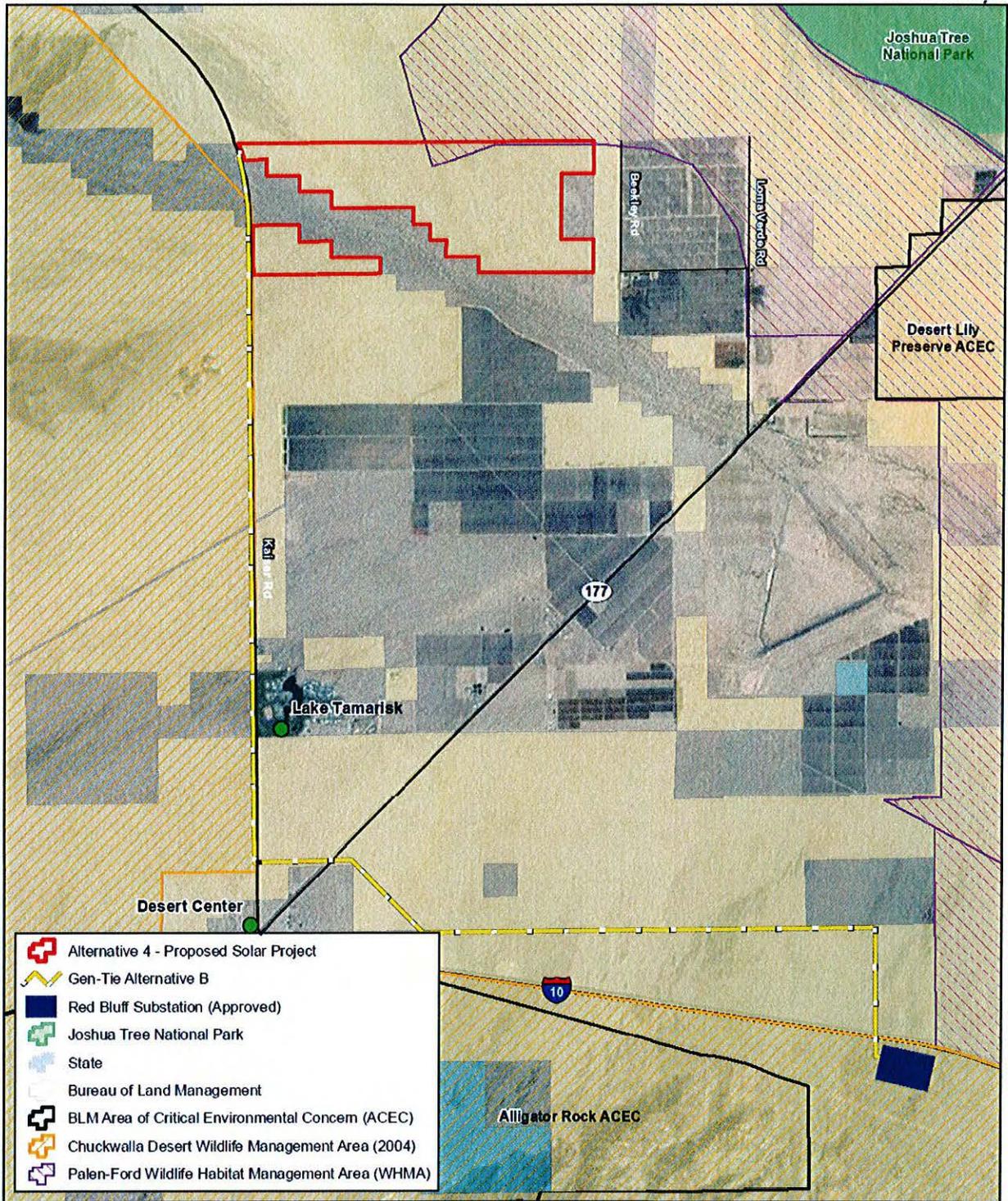


Figure 16. Land ownership in the vicinity of the proposed project (Source: Eagle Crest, 2009a. as modified by staff).

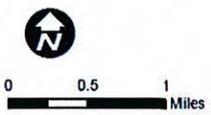
FIGURE 1-1



-  Alternative 4 - Proposed Solar Project
-  Gen-Tie Alternative B
-  Red Bluff Substation (Approved)
-  Joshua Tree National Park
-  State
-  Bureau of Land Management
-  BLM Area of Critical Environmental Concern (ACEC)
-  Chuckwalla Desert Wildlife Management Area (2004)
-  Palen-Ford Wildlife Habitat Management Area (WHMA)



U.S. DEPARTMENT OF THE INTERIOR  
 Bureau of Land Management  
 California Desert District  
 The Bureau of Land Management makes no warranties, implied or expressed, with respect to information shown on this map



**Figure 2-2**  
**Alternative 4:**  
**Proposed Solar Project**

FIGURE 1-2

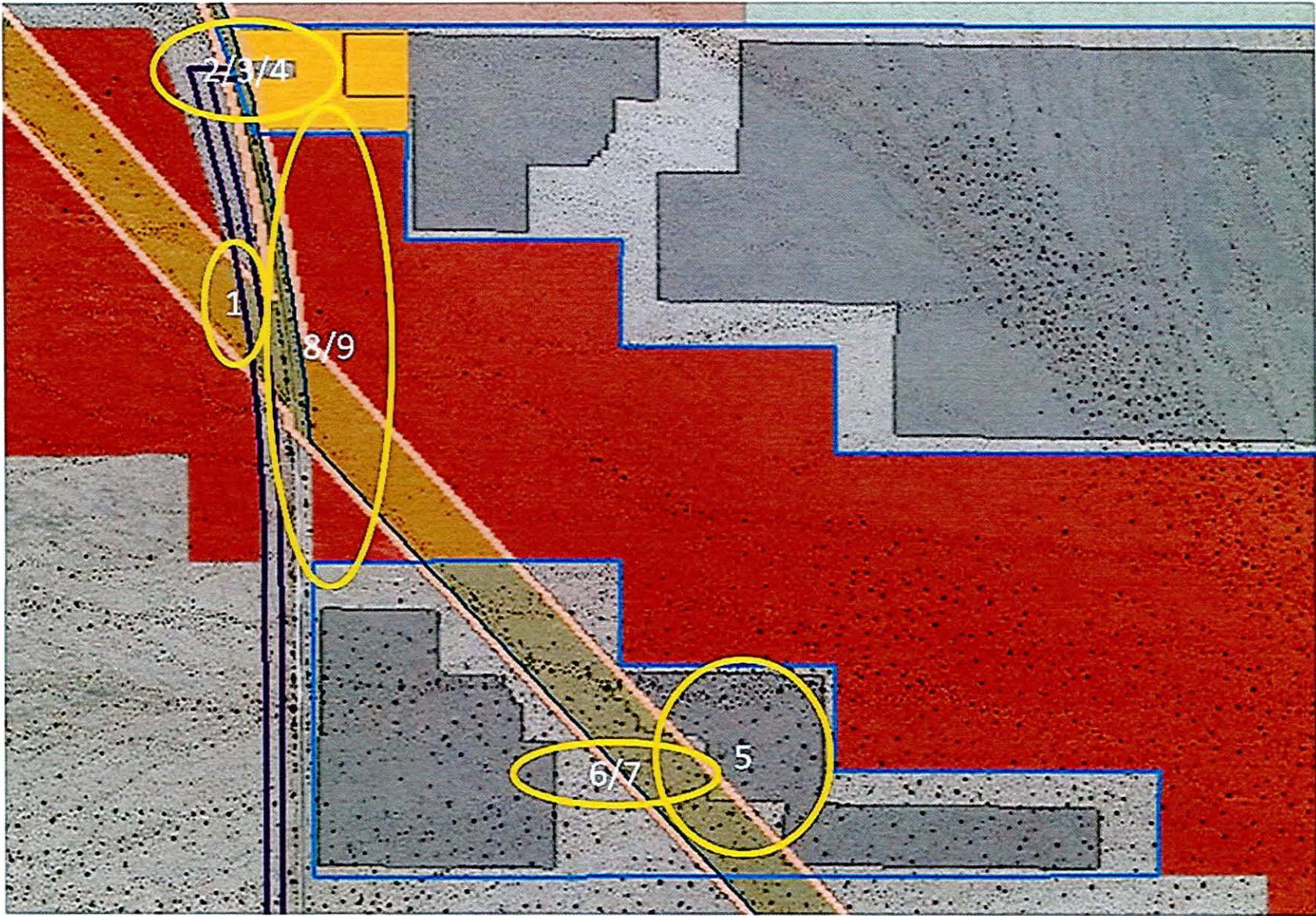


FIGURE 1-3

