



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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RE Cinco Gen-Tie Project
(EA Number: DOI-BLM-CA-D000-2015-0002-EA)
(Case File Number: CACA-053735)
Decision Record
December 2014

1.0 Introduction

It is the decision of the Bureau of Land Management (BLM) to approve the issuance of a right-of-way (ROW) grant in support of the construction, operation, maintenance, and decommissioning of a generation interconnection line (gen-tie) across BLM managed land associated with the RE Cinco Solar generation facility in Kern County, California.

The BLM's preferred alternative is identified in the Environmental Assessment (EA) for the RE Cinco Gen-Tie Project published November 26, 2014 as Alternative 2 – BLM Preferred Alignment. This alternative included three options (Option A – H-frame Option, Option B – Lattice Tower Option, and Option C – Double-Circuit Support Structures for Future Renewable Generators) that were each fully analyzed in the EA. Each option consisted of different structure types and quantities within the same transmission ROW alignment. Alternative 2, Option A is the Preferred Alternative design. This Alternative includes (1) an approximately 2.0 mile gen-tie line with a 1.5 mile length across BLM managed land for construction, operation, maintenance, and decommissioning of an above-ground 230 kilovolt (kV) gen-tie line and use of existing associated access road with newly created 20 foot wide spur roads; (2) an estimated 18 structures with 12 structures located on lands managed by the BLM; (3) a maximum 60-foot radius area around each structure site cleared of obstructions and used for construction and operation and maintenance on the BLM managed lands; (4) approximately 7 tensioning / pulling sites with four sites and a portion of a fifth site located on BLM managed land, resulting in a total of 12.91 acres of disturbed land with 8.26 acres of that total on BLM managed land, and (5) an optical ground wire and distribution circuit installed on the same structures as the main power conductors.

The RE Cinco Gen-Tie Project EA was prepared in response to the ROW application submitted by RE Barren Ridge 1 LLC for a gen-tie line on August 23, 2011. In connection with the ROW application, the BLM published an Environmental Assessment (EA) on November 26, 2014. The BLM requested public comment for 30 days, until December 26, 2014. No public comments were received.

Bureau of Land Management Purpose and Need for the Proposed Action

In accordance with the Federal Land Policy and Management Act (FLPMA) (43 United States Code [USC] Section 1701 *et seq.* Section 103(c)), public lands are to be managed for multiple uses in a manner that takes into account the long-term needs of future generations for renewable and non-

renewable resources. The Secretary of the Interior is authorized to grant ROWs on public lands for systems of generation, transmission, and distribution of electric energy (FLPMA Section 501(a)(4)). Taking into account the BLM's multiple use mandate, the need for action is to respond to the FLPMA ROW application submitted by RE Barren Ridge 1 LLC to construct, operate, maintain, and decommission the infrastructure gen-tie transmission line from the Applicant's solar generation facility located on private property over public lands administered by the BLM in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies.

In conjunction with FLPMA, the BLM's applicable authorities include the following:

1. Executive Order 12312, dated May 18, 2001, which mandates that agencies act expediently and in a manner consistent with applicable laws to increase the "...production and transmission of energy in a safe and environmentally sound manner."
2. Secretarial Order 3285A1, dated February 22, 2010, which "...establishes the development of renewable energy as a priority for the Department of the Interior."

2.0 Description of Project

Each alternative analyzed in the RE Cinco Gen-Tie Project EA consists of a method to connect the proposed private land solar generation project to the existing Los Angeles Department of Water and Power (LADWP) Barren Ridge Switching Station. The alternatives use different pathways for the gen-tie to reach the substation. The main differences in the alternatives are the length of the gen-tie and the pathway.

The portion of the gen-tie located on BLM managed lands requires the issuance of a ROW grant by the BLM. Because all alternatives that would require a BLM ROW grant are within a designated Utility Corridor, the California Desert Conservation Area Plan, as amended, does not need to be amended to accommodate this project. Two of the alternatives, the No Action Alternative and the Private Land Gen-tie Alternative, allow the private land solar generation plant to connect to the LADWP Barren Ridge Switching Station without further action or a decision from the BLM. The solar generation plant was considered as a cumulative effect in the EA.

With this decision, the BLM is approving issuance of a ROW grant for the Alternative 2 – BLM Preferred Alignment with Option A (H-frame Option) ("Alternative 2" or "Preferred Alternative"). Those project components for the Preferred Alternative, as presented in the EA, are described above, and were fully described and analyzed in the EA. The solar generating facility and a portion of the transmission line and access road will be located on privately owned land and is not within the scope of the ROW grant being issued by the BLM. Furthermore, the solar generating facility and gen-tie line on private land could be built without this ROW grant being issued. Prior to the BLM issuing a Notice to Proceed, necessary leases and easements for the private land facilities must be secured by the applicant.

3.0 Decision

Under Federal law, the BLM is responsible for reviewing ROW grant applications to determine whether and to what extent to authorize projects such as gen-ties on land it manages. Because the RE Cinco project is a privately initiated venture that has ancillary facilities sited on lands managed by the BLM, RE Barren Ridge 1 LLC applied for a ROW grant from the BLM pursuant to Federal law and

regulations as described earlier. Based on the information in the EA, the Finding of No Significant Impact (FONSI), the Project record, and consultation with BLM staff, I have decided to approve the Preferred Alternative as described and analyzed in the EA. The Preferred Alternative includes a ROW grant covering lands north of the northern boundary of the RE Cinco Solar generation facility to the existing LADWP Barren Ridge Switching Station to accommodate the gen-tie line, temporary construction areas, construction of the spur roads, and access along an existing linear access road. The total approved ROW for the Preferred Alternative is approximately 1.5 miles in length and encompasses 61.6 acres (including 27.9 acres for transmission infrastructure and 33.7 acres for access and temporary disturbance) as described in the EA.

The BLM uses SF 2800-14 (ROW Lease/Grant) as the instrument to authorize the ROW grant for the project; and will include the Plan of Development (POD) and all other terms, conditions, stipulations, and measures required as part of the grant authorization. Consistent with BLM policy, the RE Cinco Gen-tie ROW grant will include a diligent development and performance bonding requirement for installation of facilities consistent with the approved POD. Construction of the gen-tie must commence within 12 months after issuance of the NTP and no later than 24 months after the effective date of the issuance of the ROW grant unless reasonable cause is provided to the BLM and the BLM grants an extension.

As explained in the FONSI, the impacts of the Approved Action have been analyzed in the EA and determined to not result in significant impacts to the quality of the human environment, individually or cumulatively with other actions. This decision is conditioned on the implementation of all mitigation measures incorporated as terms and conditions of the ROW grant. BLM mitigation measures and analyses of their impacts can also be found in the EA. Additional mitigation measures relating to desert kit foxes and their burrows are described in the project's Multi-Species Relocation and Burrow Closure Plan: RE Cinco Gen-tie Line, Substation, and Access Roads dated November 2014. This burrow closure plan will be reviewed and approved by CDFW and BLM prior to implementation. Failure of the Applicant to adhere to these mitigation measures or other terms and conditions in the ROW grant could result in administrative actions up to and including termination of the ROW grant and a requirement to relocate or remove the facilities and rehabilitate disturbances. These measures, terms and conditions are determined to be in the public interest pursuant to 43 CFR 2805.10(a)(1). All practicable means to avoid or minimize environmental harm have been adopted under this decision.

4.0 Alternatives Considered but not Selected

In addition to the Preferred Alternative (Alternative 2 – BLM Preferred Alignment with Option A), the EA evaluated two additional options for Alternative 2 and three additional alternatives, including one located on BLM managed lands (Alternative 3 – The Kern County Alignment) and two that do not involve BLM managed land (Alternative 1- The No Action Alternative and Alternative 4 – The Private Land Alignment). Each of these alternatives is described briefly below and shown in Figure 1. In addition, five additional alternatives were discussed but not analyzed in further detail as described in Section 2.7 of the EA. These included:

- Direct Connection to LADWP Transmission Lines Alternative. This alternative was considered but not analyzed further due to LADWP's direction that a direct interconnection would violate LADWP policies and compromise the reliability of the overall system.
- Shared LADWP Poles and Towers Alternative. This alternative was deemed infeasible, as LADWP indicated that there are currently no vacancies on the existing and planned poles

for additional conductors, so this alternative was not analyzed further.

- Shared LADWP ROW Alternative. This alternative was deemed infeasible because there is a lack of adequate ROW width to ensure compliance with California Public Utilities Commission (CPUC) General Order 95 standards if additional poles were to be placed in the LADWP existing or planned ROW. Therefore this alternative was not analyzed further.
- Private Lands Avoidance Alternative. This alternative avoided private lands for which easement terms could not originally be reached. Subsequently, an agreement was obtained; however, the Alternative 2 alignment was viewed as more favorable because it would provide a greater degree of transmission line consolidation, so this alternative was not analyzed further.
- Combination Gen-Tie within Caltrans ROW and Private Lands Alternative. This alternative is the longest of the five routes considered. Caltrans has given the Applicant notice that this route is not viable due to existing Caltrans policies that limit private developers from installing transmission lines longitudinally through public transportation ROWs. Therefore this alternative was not analyzed further.

Alternative 2 - BLM Preferred Alignment Option B and Option C

The BLM Preferred Alignment (Alternative 2) also included full analysis of two additional options for tower construction: Option B – Lattice Tower Option and Option C – Double-Circuit Support Structures for Future Renewable Generators. These options would not change the length of the gen-tie line but would change the number and type of structures as well as the associated spur roads.

Alternative 2 Option B and Option C would permanently impact approximately 1.99 acres of BLM managed lands (3.23 acres total) compared to 1.69 acres of BLM managed land (2.51 acres total) for the Preferred Alternative with Option A. Alternative 2 Option B and Option C could temporarily impact approximately 8.11 acres of BLM managed lands (11.99 acres total), compared to 12.93 acres on BLM managed lands (19.78 acres total) under the Preferred Alternative. Option B was not chosen as the preferred alternative because the environmental impacts were similar to Option A, which the applicant preferred. Option C was not chosen because there is no additional capacity at the substation to accommodate another transmission line.

Alternative 1 – No Action Alternative

Under this alternative the BLM would not approve the ROW grant for either of the gen-tie alternatives on BLM-managed land (Alternatives 2 and 3). Under this alternative, the RE Cinco solar generation facility would obtain gen-tie access via an alternative means that does not require use of BLM-managed land or an action by the BLM. In this case, because a private land alternative is possible, it is anticipated that, in the event that the BLM were to deny the ROW grant for the use of BLM lands, Alternative 4 (the private lands alignment, described below) would be the likely alternative for construction.

This alternative does not require any Federal approvals or action, as the BLM would not approve the ROW grant for the construction and operation of the gen-tie.

Alternative 3 – Kern County Alignment (or Alternative BLM Lands Alignment)

Alternative 3 is a primarily public land alignment approximately 1.9 miles in length, and would exit the solar facility in the northeast corner of the site and travel north across BLM managed lands before rejoining the Alternative 2 alignment described above just south of Pine Tree Canyon Wash and then

connecting to the LADWP Barren Ridge Switching Station. This alternative would be constructed and operated in a similar manner as the Alternative 2 alignment; however, this alignment would require construction of a new, linear service road along its entire length. The roadway would commence at the northeast corner of the private lands solar facility site and would parallel the Alternative 3 gen-tie alignment northward to the Barren Ridge Switching Station. The new roadway would not be constructed across Pine Tree Canyon Wash, but would instead terminate at either side of the wash with a vehicle turnaround, thus minimizing impacts to surface hydrology and vegetation across BLM managed lands. Alternative 3 would permanently impact approximately 2.6 acres of BLM managed lands (3.2 acres total) compared to 1.69 acres of BLM managed land (2.51 acres total) under the Preferred Alternative. Alternative 3 could temporarily impact approximately 42.8 acres on BLM managed lands (73.1 acres total), compared to 12.93 acres on BLM managed lands (19.78 acres total) under the Preferred Alternative.

This alternative would require Federal approval and issuance of a ROW grant for the construction and operation of the gen-tie. Alternative 3 was not considered a preferred alternative due to the increased impacts (direct and indirect) resulting from the construction of an entirely new access road.

Alternative 4- Private Land Alignment

The Alternative 4 – Private Land Alignment would be located entirely on private and LADWP-owned lands. This alternative assumes that the proposed generating facility would be completed and that a transmission line would be developed without a need for action from the BLM. Alternative 4 could permanently impact approximately 8.7 acres, compared to 2.51 total acres (1.69 acres permanent impact on BLM managed lands) under the Preferred Alternative. Alternative 4 could temporarily impact approximately 126 acres, compared to 19.78 acres (12.93 acres on BLM managed lands) under the Preferred Alternative. All impacts of Alternative 4 would be on private land.

Under NEPA, this alternative does not require any Federal approvals or action, as the BLM would not approve the ROW grant for the construction and operation of the gen-tie. Alternative 4 was not considered a preferred alternative due to the increased impacts (direct and indirect) resulting from the increased length of the gen-tie and access roads required.

5.0 Decision Rationale

This decision approves a ROW for the RE Cinco Gen-tie Project, specifically Alternative 2 as analyzed in the EA. The Preferred Alternative addresses the BLM's purpose and need to respond to a FLPMA right-of-way application submitted by RE Barren Ridge 1 LLC to construct, operate, maintain, and decommission a gen-tie and associated infrastructure on public lands managed by the BLM from the RE Cinco Solar facility to the LADWP Barren Ridge Switching Station in compliance with FLPMA, BLM ROW regulations, and other applicable Federal laws and policies. The BLM's decision to approve the Selected Alternative is based on the following considerations:

1. The gen-tie line and other ancillary facilities are located in an existing utility corridor across BLM managed lands;
2. The gen-tie line and ancillary facilities would have no adverse effect on cultural resources (see below);
3. The Preferred Alternative will not require the construction of a new main access road on BLM-managed public lands, resulting in less ground disturbance on public lands, limiting impacts to Mohave ground squirrel and desert tortoise habitat and other wildlife species and habitat;

4. The Preferred Alternative would locate the gen-tie parallel to existing and approved transmission lines, consolidating the transmission corridor on BLM managed land; and
5. The mitigation measures identified and analyzed in the EA and are incorporated as terms and conditions of the ROW grant will be implemented.

6.0 Consultation and Coordination

United States Fish and Wildlife Service

The BLM has, consistent with Section 7 of the Endangered Species Act (ESA), engaged in consultation with the US Fish and Wildlife Service (USFWS) related to the Mojave desert tortoise, a federally threatened species that could potentially be impacted by the requested BLM ROW authorization. The USFWS has jurisdiction over threatened and endangered species listed under the Endangered Species Act (ESA). The BLM requested formal consultation with the USFWS with submittal of a Biological Assessment (BA) on or about November 27, 2013. The USFWS issued a Biological Opinion (BO: Appendix A) for the RE Cinco Gen-tie Project which addressed potential impacts to desert on February 11, 2015. Implementation of the discretionary conservation measures identified in the BO will reduce potential adverse impacts to the identified species. The BO concluded that the levels of anticipated take associated with the Project are not likely to jeopardize the continued existence or significantly impair the recovery of the desert tortoise or other listed species. Implementation of terms and conditions to minimize take identified in the BO are mandatory and a condition of approval set forth in this DR. The ROW grant for the Project contains a standard stipulation requiring compliance with the BO.

Section 106 and Tribal Government-to-Government Consultation

The BLM has formally invited the following six federally recognized tribes to consult on a government-to-government basis for the RE Cinco Gen-tie Project, as provided in the Executive Memorandum of April 29, 1994, Executive Order 13175, and Sections 101 and 106 of the National Historic Preservation Act (NHPA):

- Big Pine Paiute Tribe of the Owens Valley, Bishop Paiute Tribe, Fort Independence Band of Paiute Indians, Lone Pine Paiute-Shosone Tribe, San Manuel Band of Mission Indians, Timbisha Shoshone Tribe

In addition to the federally recognized tribes, the BLM has also formally invited the following four non-federally recognized tribes to consult on the Project:

- Kern River Paiute Council, Kern Valley Indian Council, Monache Intertribal Council, Tubatulabals of Kern Valley

All of the tribes were invited to be consulting parties as provided in 36 C.F.R. Part 800, the implementing regulations for Section 106 of the NHPA.

Consistent with policy, the BLM notified and formally requested consultation with Indian tribes at the earliest stages of the project planning and review by letter on February 25, 2014, and has formally reiterated requests to consult in all subsequent correspondence. The BLM Field Manager and staff have actively responded to all requests to meet with tribal leaders and staff throughout project review. A summary of the major consultation milestones includes:

- February 25, 2014: the BLM notified and formally requested consultation with Indian tribes at the earliest stages of the project planning and review. Invited tribes to attend a pre-application meeting for the Project.
- March 26, 2014: the BLM held a pre-application meeting and site visit for all potential stakeholders in the proposed Project, including tribes.
- April 11, 2014: the BLM updated the tribes on the status of BLM's efforts to identify cultural resources and sent a copy of the cultural resources work plan for the project.
- October 17, 2014: the BLM updated the tribes on the status of BLM's efforts to identify cultural resources, made copies of the cultural resources reports available upon request, and sent tribes the agency's determinations and findings for Section 106. Invited tribes to attend a Section 106 consulting party meeting regarding the Project.
- November 4, 2014: The BLM held a Section 106 consulting party meeting regarding the Project.

The primary issues of concern identified through consultation are focused on adverse effects to historic properties, including archaeological, religious and culturally significant properties. Indian tribes concerned that monitors be available during project construction to identify any new archaeological sites that may be discovered during construction activities. Tribes also concerned about biological resources, specifically desert tortoise. Through consultation, the BLM found that the Project will have no effect to historic properties.

The California Native American Heritage Commission (NAHC) was also contacted regarding cultural concerns in the Project Area. In particular, inquiry was made regarding Traditional Cultural Properties, Sacred Sites, resource collecting areas, or any other areas of concern in the Project area. The NAHC conducted a Sacred Lands File search of the Projects area of potential effect (APE) and found that no sacred sites are on file, but the area is known to be culturally sensitive. The NAHC recommended contacting tribes for additional information.

The BLM consulted with the California State Historic Preservation Officer (SHPO) in accordance with Section 106 of the NHPA and its implementing regulations at 36 CFR 800. The BLM initiated consultation by letter on March 7, 2014. The SHPO was notified of the project, the BLM's proposed APE and identification efforts, and expedited consultation was requested for the Project. On April 30, 2014 the SHPO responded to the BLM request to consult and concurred with the Agency's approach to identify and evaluate historic properties for the Project. The BLM sent its determinations of eligibility and findings of effect to the SHPO for review and concurrence on October 17, 2014. On December 4, 2014 the SHPO concurred with the Agency's no historic properties affected finding for the Project.

Consistent with the requirements of Section 106 of the NHPA, and BLM Information Memorandum 2013-020 Section 106 Compliance on Major Infrastructure Projects, the BLM sent an early project notification to the Advisory Council on Historic Preservation (ACHP). The BLM formally notified and invited the ACHP to participate in the Project on October 1, 2014. The ACHP declined to participate by letter dated October 16, 2014.

State and Local Agencies

California Department of Fish and Wildlife (CDFW)

The CDFW protects fish and aquatic habitats within the State of California through regulation of modifications to streambeds under Section 1602 of the California Fish and Game Code. CDFW regulates activities that could divert, obstruct, or change the natural flow or the bed, channel, or bank of any river, stream, or lake in California that the agency has designated as one that is used by or provides benefit to a fish or wildlife resource. The agency also evaluates potential impacts to vegetation and wildlife resulting from disturbances to waterways during its permitting process. If CDFW determines that a project may substantially adversely affect fish and wildlife resources, a Streambed Alteration Agreement (SAA) is required. The SAA includes reasonable conditions necessary to protect those resources and must comply with California Environmental Quality Act (CEQA). The Applicant may proceed with the activity in accordance with the final SAA.

The CDFW also protects state listed species through Section 2081 of the Fish and Game Code and issues Incidental Take Permits (ITPs) for take coverage of state-listed species. The RE Cinco Gen-tie Project has the potential to take the Mohave ground squirrel and the Mojave desert tortoise, which are both listed as threatened under the California Endangered Species Act (CESA). An ITP application (Fish and Game Code §2081(b)) was submitted by RE Barren Ridge 1 LLC for take coverage for these species.

The BLM and RE Barren Ridge 1 LLC consulted with CDFW under both Section 1602 and Section 2081 for impacts to Waters of the State and state listed species, respectively. A SAA between CDFW and RE Barren Ridge 1 LLC for the Project (Agreement 1600-2014-0063-R4) as well as a 2081 Incidental Take Permit issued to RE Barren Ridge 1 LLC (ITP 2081-2014-057-04) will be completed prior to the NTP. Compliance with the foregoing agreement and permit is a condition of the ROW grant.

State Water Resources Control Board/Lahontan Regional Water Quality Control Board

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. The RWQCBs have authority to protect surface water and groundwater under their jurisdiction. During the NEPA process, the BLM and the RE Barren Ridge 1 LLC invited the Lahontan RWQCB to participate in the planning process and provided information to assist the agencies in evaluating the potential impacts and permitting requirements of the Project. RE Barren Ridge 1 LLC submitted an application for coverage under the General Waste Discharge Permits to Lahontan RWQCB and a Notice of Applicability (NOA) (NOA R6T-2003-0004-217) was issued to RE Barren Ridge 1 LLC on November 5, 2014. Compliance with this NOA is a condition of the ROW grant.

7.0 Public Involvement

Early Coordination

In order to identify any project specific issues associated with the relevant plans and programs discussed above, the BLM held an interagency meeting in Cantil, California for the Federal, state, and local agencies as well as Native American tribes with potential interest in the Project. This meeting was held on March 26, 2014 at the BLM Jawbone Station Visitor Center and was attended by the following agencies:

- BLM technical specialists
- US Fish and Wildlife Service
- California Department of Transportation
- San Manuel Band of Mission Indians
- Kern Valley Indian Council
- Cantil Water District, California

The issues identified were consistent with the missions of each agency and the issues addressed above in the relevant plans and programs. Biological and cultural resources were identified as the primary issues associated with the portions of the project on BLM land.

RE Barren Ridge 1 LLC also coordinated with other Federal agencies including the US Army Corps of Engineers. The Applicant also coordinated with state and local agencies including the California Department of Fish and Wildlife, Regional Water Quality Control Board, and various departments within Kern County.

EA Public Comment Period

In consideration of the information generated by the early coordination for this project, BLM prepared an EA for the project. By issuing a press release and posting the EA on the BLM's website, the EA was circulated for a 30-day public review period from November 26, 2014 through December 26, 2014. No written comments on the EA were received during the public review period.

8.0 Plan Consistency

The Selected Alternatives have been reviewed and found to be in conformance with the following BLM Land Use Plans:

California Desert Conservation Area (CDCA) Plan of 1980, as amended

The proposed gen-tie for the RE Cinco Gen-Tie Project is entirely within a CDCA-designated Utility Corridor. This area is designated as Multiple-Use Class L-Limited Use. As shown in Table 1 in the CDCA Plan, Multiple-Use Class Guidelines, within the Limited Use area, "New gas, electric, and water transmission facilities and cables for interstate communication may be allowed only within designated corridors" (see Energy Production and Utility Corridors Element). The proposed gen-tie line and road spurs within BLM lands are an allowed use under the CDCA Plan because they would be within a designated Utility Corridor, and therefore the construction and operation of the proposed gen-tie and access road spurs are consistent with the requirements of the CDCA Plan.

Desert Renewable Energy Conservation Plan

The California Desert Renewable Energy Conservation Plan is a Natural Community Conservation Plan, Habitat Conservation Plan, and BLM Land Use Plan Amendment being developed by a joint Federal and State Renewable Energy Action Team to provide for effective protection and conservation of desert ecosystems while allowing for the appropriate development of renewable energy projects. The draft for the California Desert Renewable Energy Conservation Plan (BLM 2014) was published in September 2014, and included a draft amendment to the CDCA Plan. The Draft California Desert Renewable Energy Conservation Plan does not propose any changes to transmission corridors on BLM-managed land.

9.0 Final Agency Action

Right-of-Way Authorization

Based on the foregoing, it is my decision to approve ROW grants to RE Barren Ridge 1 LLC for the gen-tie line, access road, spur roads, and temporary construction areas for the Selected Preferred Alternative as described above, subject to the terms and conditions described therein, the Plan of Development, and all environmental mitigation measures developed by the Department of the Interior and referenced in this Decision Record. This decision is effective on the date this Decision Record is signed.

/s/ Carl B. Symons

February 23, 2015

Carl B. Symons
Field Manager, Ridgecrest Field Office
Bureau of Land Management
Department of the Interior

Date