

**APPENDIX B.**  
**Consultation Letters**

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## United States Department of the Interior

U.S. Fish and Wildlife Service  
Arizona Ecological Services Field Office  
2321 West Royal Palm Road, Suite 103  
Phoenix, Arizona 85021-4951

Telephone: (602) 242-0210 Fax: (602) 242-2513



RECEIVED  
PDO

09 AUG 12 PM 1:23

BUREAU OF LAND MGT  
PHOENIX, ARIZONA

In Reply Refer to:

AESO/FA

22410-2008-I-0344

August 11, 2009

### Memorandum

To: Field Manager, Bureau of Land Management, Phoenix District, Lower Sonoran Field Office, Phoenix, Arizona (Attn: Tim Hughes)

From: Field Supervisor

Subject: Request for Species List for Sonoran Solar Project

Thank you for your memorandum dated July 8, 2009, which we received July 8, requesting a species list for the Sonoran Solar Project, south of Buckeye, Maricopa County, Arizona, to assist in the development of Biological Assessment (BA) in accordance with section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.). Typically, we refer requests for species lists to our internet homepage, where we post lists of the endangered, threatened, proposed, and candidate species occurring in each of Arizona's 15 counties: <http://www.fws.gov/southwest/es/arizona>. However, because the Bureau of Land Management is seeking specific information to be used in the preparation of an Environmental Impact Statement, we offer the following comments regarding threatened and endangered species.

Based on our knowledge of the proposed project, it is unlikely that any endangered, threatened, proposed, and/or candidate species occur on those lands where solar fields and associated amenities would be constructed. However, these lands could provide habitat for the Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*) and the Sonoran desert tortoise (*Gopherus agassizii*). On July 29, 2008, the Fish and Wildlife Service published a 90-day finding that a petition to list the Tucson shovel-nosed snake presented substantial information indicating that listing the species may be warranted. On October 9, 2008 we were petitioned to list the Sonoran desert tortoise. Our conclusion on that petition is pending, but is expected this calendar year. Although not protected at this time, we recommend your BA evaluate potential effects to both of these species as their status may change prior to project completion.

Additionally, we understand that the project will rely on wells to provide water for steam generation and evaporation ponds. Although we currently have no information regarding the effects this groundwater pumping may have on surface waters, we recommend that the BA address potential effects to the nearby Gila River and species that may reside there. The Gila River contains riparian and wetland vegetation that may provide habitat for the endangered

Yuma clapper rail (*Rallus longirostris yumanensis*), the endangered southwestern willow flycatcher (*Empidonax traillii extimus*), and the candidate yellow-billed cuckoo (*Coccyzus americanus*). Again, we recommend consideration of the cuckoo because its status could change prior to project completion.

We have also noted your designation of Environmental Planning Group as a non-Federal representative and Boulevard Associates, LLC, as the Applicant for the purposes of consultation under section 7 of the ESA. We encourage you to coordinate the review of this project with the Arizona Game and Fish Department. If we can be of further assistance or you have questions, please contact Mike Martinez (x224) or Debra Bills (x239).

*Debra Bills*  
for Steven L. Spangle

cc: District Manager, Phoenix District, Bureau of Land Management, Phoenix, AZ  
Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ

*Mike*  
8/12/09

W:\Mike Martinez\Section7\Sonoran\_Solar\_Jojoba\SonoranSolar\_30day.docx; jkey



## United States Department of the Interior

U.S. Fish and Wildlife Service

Arizona Ecological Services Field Office

2321 West Royal Palm Road, Suite 103

Phoenix, Arizona 85021-4951

Telephone: (602) 242-0210 Fax: (602) 242-2513



In Reply Refer to:

AESO/FA  
22410-2008-I-0344

January 11, 2010

### Memorandum

To: Field Manager, Bureau of Land Management, Phoenix District, Lower Sonoran Field Office, Phoenix, Arizona (Attn: Tim Hughes)

From: Field Supervisor

Subject: Request for Concurrence with No Effect Determination Pursuant to Section 7 of the Endangered Species Act for the Sonoran Solar Energy Project

Thank you for your correspondence of December 8, 2009, which we received December 9, requesting our concurrence, in accordance with section 7 of the Endangered Species Act of 1973 (ESA) as amended (16 U.S.C. 1531 et seq.), that the proposed Sonoran Solar Energy Project will have no effect on listed, proposed, or candidate species. We also received the November 2009 Biological Assessment (BA) that accompanied your memorandum. Listed species at issue in this consultation include the endangered Yuma clapper rail (*Rallus longirostris yumanensis*) and the endangered southwestern willow flycatcher (*Empidonax traillii extimus*) and its critical habitat.

We appreciate your agency's willingness to also evaluate potential effects to the yellow-billed cuckoo (*Coccyzus americanus*), Sonoran desert tortoise (*Gopherus agassizii*), and Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*) as requested in our August 11, 2009, memorandum. We believe the conservation measures detailed in your Biological Assessment will ensure protection of the Sonoran desert tortoise. The yellow billed cuckoo and Tucson shovel-nosed snake are not expected to be impacted by the proposed action.

The proposed project would be constructed on nearly 4,000 acres of Bureau of Land Management lands in the Little Rainbow Valley, located east of Arizona State Route 85, and south of the Buckeye Hills and the Town of Buckeye in Maricopa County, Arizona. The project would consist of power blocks, solar fields, evaporation ponds, a heat transfer fluid land treatment area, a well field, and linear facilities such as access roads, transmission line, water pipeline, and gas pipeline. A complete project description can be found in the BA.

Based on the information received, we concur with your determination that the proposed action will have no effect on the Yuma clapper rail and the southwestern willow flycatcher and its critical habitat, and our rationale is provided below.

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BUREAU OF LAND MGT  
PHOENIX, ARIZONA

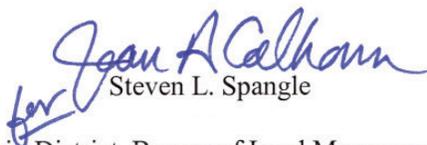
- No habitat suitable for Yuma clapper rail or southwestern willow flycatcher occurs within the project footprint. The project area is dominated by Sonoran desertscrub, while the rail relies on wetland marshes and the flycatcher on riparian gallery forests.
- Designated critical habitat for the southwestern willow flycatcher is not present in the project area.
- Although suitable habitat exists for both species along the Gila River north of the project area, we anticipate that this habitat would be unaffected by groundwater pumping associated with the project because proposed wells will tap an aquifer that is reportedly not hydrologically connected to the Gila River.

Although we concur the project would not affect the Yuma clapper rail or the southwestern willow flycatcher, we offer the following conservation recommendation. During the informal consultation period, our staffs have discussed the benefits that could be provided by a groundwater monitoring program. Based on these discussions, we understand a groundwater monitoring plan is being prepared. Accordingly, we recommend that a groundwater monitoring program be developed and implemented that will track and confirm that there are no unanticipated effects to the Gila River.

In response to Secretarial Order 3206, the American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the ESA, by this letter we are notifying the Gila River Indian Community, which may be affected by this action, and encourage you to coordinate with them and the Bureau of Indian Affairs regarding this consultation. We also encourage you to coordinate the review of this project with the Arizona Game and Fish Department.

In all future correspondence regarding this consultation, please refer to the consultation number 22410-2008-I-0344. No further section 7 of consultation is required for this project at this time. Should project plans change, or if additional information on the distribution or abundance of listed species or critical habitat becomes available, or effects become evident, this determination may need to be reconsidered.

Thank you for your interest in the conservation of threatened and endangered species. If we can be of further assistance or you have questions, please contact Mike Martinez (x224) or Debra Bills (x239).

  
Steven L. Spangle

cc: District Manager, Phoenix District, Bureau of Land Management, Phoenix, AZ  
Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ  
Governor, Gila River Indian Community, Sacaton, AZ



## DEPARTMENT OF THE ARMY

Los Angeles District, Corps of Engineers  
Arizona-Nevada Area Office  
3636 N Central Avenue, Suite 900  
Phoenix, Arizona 85012-1939

January 20, 2010

REPLY TO  
ATTENTION OF

Office of the Chief  
Regulatory Division

Sunanda Behara  
Director, Development  
Boulevard Associates, LLC  
700 Universe Blvd  
Juno Beach, Florida 33408

SUBJECT: Approved Jurisdictional Determination regarding presence/absence of geographic jurisdiction

Dear Ms. Behara:

Reference is made to your request (File No. SPL-2009-00397-SDM) dated September 4, 2009, for an approved Department of the Army jurisdictional determination (JD) for the Sonoran Solar Energy Project site, located on BLM land near the city of Buckeye, Maricopa, Arizona.

The Corps' evaluation process for determining whether or not a Department of the Army permit is needed involves two tests. If both tests are met, then a permit is required. The first test determines whether or not the proposed project is located in a water of the United States (i.e., it is within the Corps' geographic jurisdiction). The second test determines whether or not the proposed project is a regulated activity under Section 10 of the River and Harbor Act or Section 404 of the Clean Water Act. As part of the evaluation process, pertaining to the first test only, we have made the jurisdictional determination below.

Based on available information, we have determined there are no waters of the United States on the project site in the locations depicted on the enclosed drawing. The basis for our determination can be found in the enclosed JD form(s).

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

Tom Cavanaugh  
Administrative Appeal Review Officer,  
U.S. Army Corps of Engineers

South Pacific Division, CESPDPDS-O, 2042B  
1455 Market Street, San Francisco, California 94103-1399

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 C.F.R. Part 331.5, and that it has been received by the Division Office within 60 days of the date on the NAP. Should you decide to submit an RFA form, it must be received at the above address by March 20, 2010. It is not necessary to submit an RFA form to the Division office if you do not object to the decision in this letter.

This verification is valid for five years from the date of this letter, unless new information warrants revision of the determination before the expiration date. If you wish to submit new information regarding the approved jurisdictional determination for this site, please submit this information to me at the letterhead address by March 20, 2010. The Corps will consider any new information so submitted and respond within 60 days by either revising the prior determination, if appropriate, or reissuing the prior determination. A revised or reissued jurisdictional determination can be appealed as described above.

This determination has been conducted to identify the extent of the Corps' Clean Water Act jurisdiction on the particular Project site identified in your request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

If you have any questions, please contact me at 602-640-5385 x222 or via e-mail at [Sallie.McGuire@usace.army.mil](mailto:Sallie.McGuire@usace.army.mil).

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

Sincerely,



Sallie D. McGuire  
Chief, Arizona Branch  
Regulatory Division

Enclosures

Copies Furnished:

Joe Incardine, Bureau of Land Management  
Robert D. Anderson, Fennemore Craig, P.C.

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

|  |  |                   |
|--|--|-------------------|
| Applicant: Sunanda Behara, Boulevard Associates, LLC | File Number: SPL-2009-00397-SDM                                    | Date: 01/20/2010  |
| Attached is:   |  | See Section below |
| <input type="checkbox"/>                             | INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission) | A                 |
| <input type="checkbox"/>                             | PROFFERED PERMIT (Standard Permit or Letter of permission)         | B                 |
| <input type="checkbox"/>                             | PERMIT DENIAL  | C                 |
| <input checked="" type="checkbox"/>                  | APPROVED JURISDICTIONAL DETERMINATION                              | D                 |
| <input type="checkbox"/>                             | PRELIMINARY JURISDICTIONAL DETERMINATION                           | E                 |

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

- A: INITIAL PROFFERED PERMIT:** You may accept or object to the permit.
- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
  - **OBJECT:** If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.
- B: PROFFERED PERMIT:** You may accept or appeal the permit.
- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
  - **APPEAL:** If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.
- C: PERMIT DENIAL:** You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.
- D: APPROVED JURISDICTIONAL DETERMINATION:** You may accept or appeal the approved JD or provide new information.
- **ACCEPT:** You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
  - **APPEAL:** If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.
- E: PRELIMINARY JURISDICTIONAL DETERMINATION:** You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

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

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

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

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

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

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

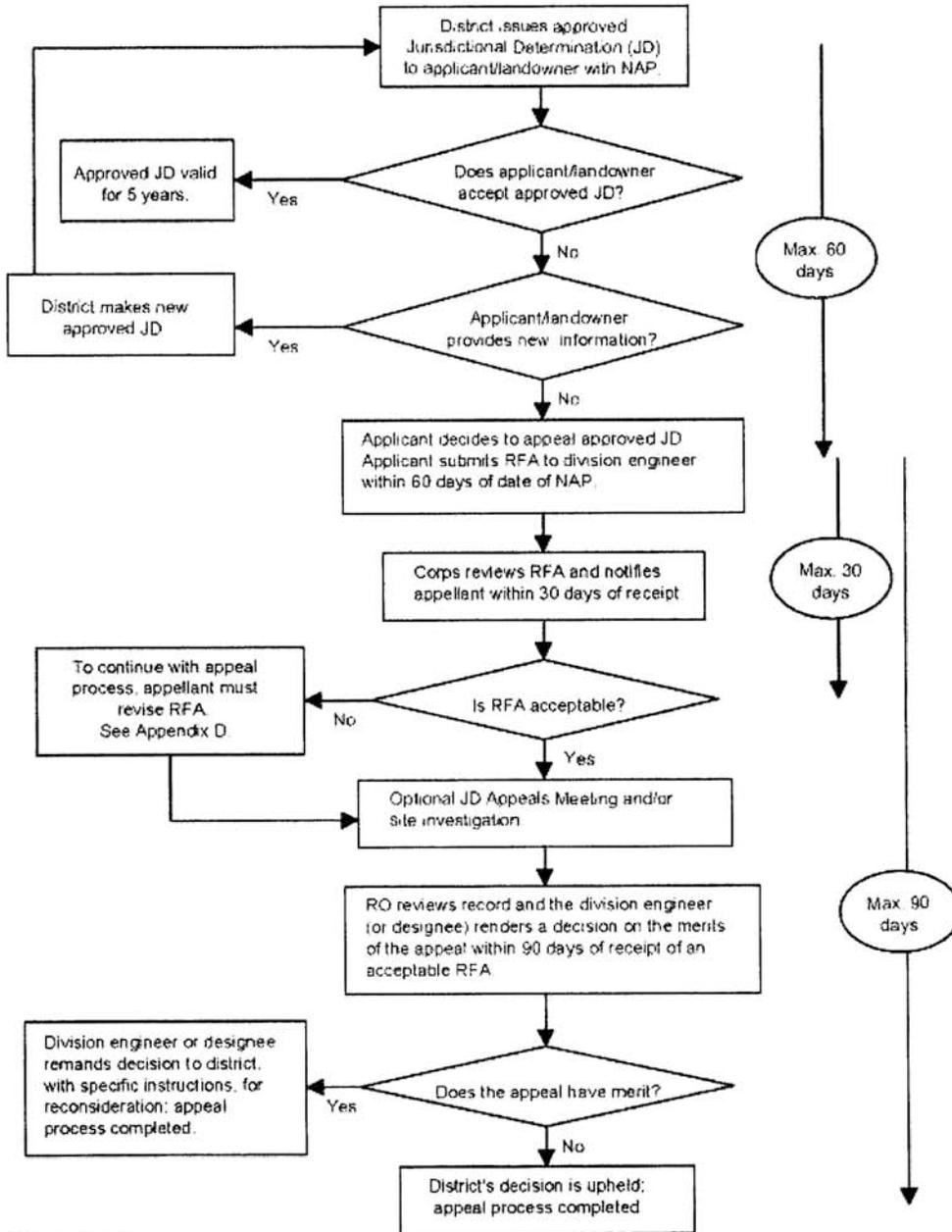
If you only have questions regarding the appeal process you may also contact:

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

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

|   |       |                   |
|---|-------|-------------------|
| _____<br>Signature of appellant or agent. | Date: | Telephone number: |
|---|-------|-------------------|

## Administrative Appeal Process for Approved Jurisdictional Determinations



Appendix C

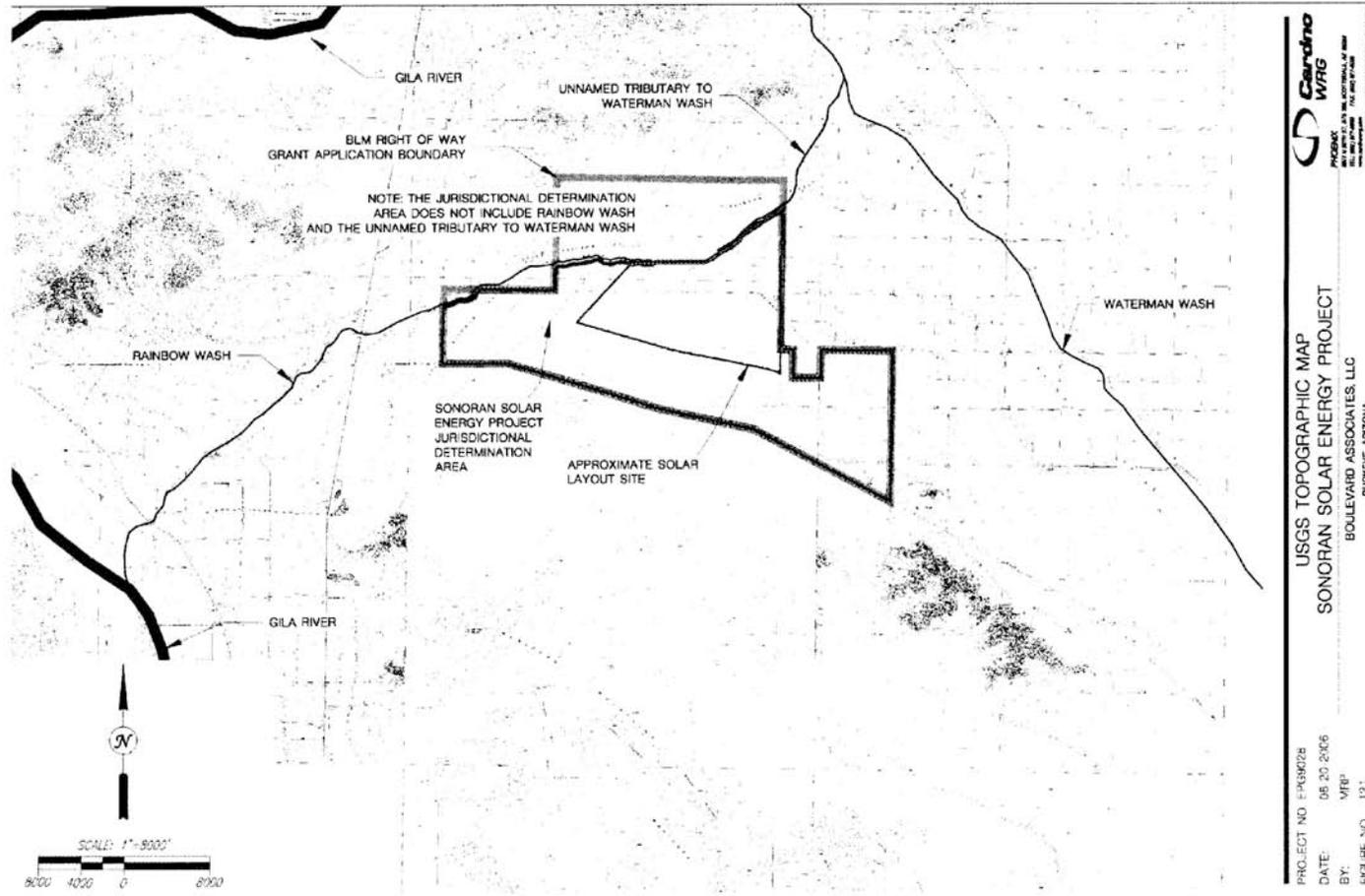


Figure 1.2.1 USGS Topographical Map



## DEPARTMENT OF THE ARMY

Los Angeles District, Corps of Engineers  
Arizona-Nevada Area Office  
3636 N Central Avenue, Suite 900  
Phoenix, Arizona 85012-1939

January 20, 2010

REPLY TO  
ATTENTION OF

Office of the Chief  
Regulatory Division

Sunanda Behara  
Director, Development  
Boulevard Associates, LLC  
700 Universe Blvd  
Juno Beach, Florida 33408

SUBJECT: Determination regarding requirement for Department of the Army Permit

Dear Ms. Behara:

Reference is made to your request (File No. SPL-2009-00397-SDM) dated September 4, 2009, for clarification on whether a Department of the Army Permit is required for the Sonoran Solar Energy Project, located on BLM land near the city of Buckeye, Maricopa, Arizona.

The Corps' evaluation process for determining whether or not a Department of the Army permit is needed involves two tests. If both tests are met, then a permit is required. The first test determines whether or not the proposed project is located in a water of the United States (i.e., it is within the Corps' geographic jurisdiction). The second test determines whether or not the proposed project is a regulated activity under Section 10 of the River and Harbor Act or Section 404 of the Clean Water Act. As part of our evaluation process, we have made the determination below.

*Geographic jurisdiction:*

Based on the attached, approved jurisdictional determination dated January 20, 2010, we have determined the Sonoran Solar Energy Project site does not contain waters of the United States pursuant to 33 C.F.R. §325.9.

*Activity:*

Based on the information you have provided, we have determined the proposed work, were it to occur in waters of the U.S. (see above, "*Geographic jurisdiction*"), **would** involve a discharge of dredged or fill material and therefore, **would** be regulated under Section 404 of the Clean Water Act if the activity is performed in the manner described in your application.

*Requirement for a Department of the Army Permit:*

Based on the discussion above, we have determined your proposed project is not subject to our jurisdiction under Section **404 of the Clean Water Act** and a Section 404 permit would not be required from our office if the activity is performed in the manner described. Notwithstanding our determination above, your proposed project may be regulated under other Federal, State, and local laws.

If you have any questions, please contact me at 602-640-5385 x222 or via e-mail at [Sallie.McGuire@usace.army.mil](mailto:Sallie.McGuire@usace.army.mil). Please be advised that you can now comment on your experience with Regulatory Division by accessing the Corps web-based customer survey form at: <http://per2.nwp.usace.army.mil/survey.html>.

Sincerely,



Sallie D. McGuire  
Chief, Arizona Branch  
Regulatory Division

Enclosures

Copies Furnished:

Joe Incardine, Bureau of Land Management  
Robert D. Anderson, Fennemore Craig, P.C.

(74560) GC



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Arizona State Office  
One North Central, Suite 800  
Phoenix, Arizona 85004  
www.az.blm.gov

24 3 18 31

8100 (AZ9310)

October 1, 2009

Ms. Ann Howard  
State Historic Preservation Office  
Arizona State Parks  
1300. W. Washington Street  
Phoenix, AZ 85007

Dear Ann:

The Bureau of Land Management (BLM) wishes to initiate consultation under Section 106 of the National Historic Preservation Act for a proposed solar energy development project on federal lands. The Bureau of Land Management (BLM) Arizona has received an application from Boulevard Associates, LLC, for a Right-of-Way (ROW) grant of 14,760 acres on BLM administered lands to construct, operate, and maintain a 375 megawatt (MW) solar power station consisting of concentrated solar power units on support structures, with associated power generation stations, power transmission lines, and access and maintenance roads and facilities. The proposed project is known as Sonoran Solar Energy Project and is located on lands administered by the BLM in the Little Rainbow Valley, east of State Route 85, and south of the Buckeye Hills and the town of Buckeye in Maricopa County, Arizona (see attached regional context and project description maps).

Within this ROW grant, Boulevard Associates, LLC is seeking approval to construct and operate an electrical generating facility using concentrated solar thermal (CST) power. The installation of this facility would require up to 6,000 acres of land, which would include a 500 kilovolt (kV) transmission line and other related facilities. This smaller 6,000 acre installation area would be located within the ROW grant application area. The difference in size between the larger ROW grant application area and the smaller installation area allows for some movement or relocation of the installation site within the ROW to address possible resource concerns.

The BLM, with input from the applicant, has identified an Area of Potential Effect (APE) within the overall ROW for the solar facility installation area. Those parts of the ROW grant outside of the identified installation area would not be subject to ground disturbing activities. To ensure that sufficient area is available for construction activities as well as vehicle movement, the BLM specified an additional 30 meter buffer zone surrounding all areas proposed for

construction activities (See attached project Class III/APE map). Should the installation area be changed or moved within the ROW grant, additional consultation on the proposed changes would take place.

BLM Class III pedestrian archaeological inventories will be required for all areas within the APE. These inventories will cover roughly 7,300 acres. Please note that this inventory area is considerably larger than the roughly 6,000 acres proposed for direct impact. When the information from the inventories and background research has been incorporated into a report, a copy will be provided to your office for review and comment.

The BLM has also initiated Section 106 consultation with the following tribes in order to identify any areas or places of traditional concern in or near the APE:

- Ak Chin Indian Community
- Gila River Indian Community
- Tohono O'odham Nation
- Pascua Yaqui Tribe
- Yavapai-Prescott Indian Tribe
- Ft. McDowell Yavapai Nation
- Salt River Pima-Maricopa Indian Community
- Hopi Tribe

Consultation with these tribes has so far consisted of written notification, including maps and project descriptions, and face-to-face meetings with four tribes. The Class III inventory report will also be supplied to these tribes as part of consultation prior to issuance of a grant.

The Sonoran Solar Project application includes a CST power plant, and will also include a 500 kV transmission line, water supply facilities, a natural gas pipeline, an access road, and other related facilities in the Little Rainbow Valley, east of State Route 85, and south of the Buckeye Hills and the town of Buckeye in Maricopa County, Arizona. The facility would be expected to operate for approximately 30 years. A ROW grant for the construction, operation, and maintenance of this project would be required from BLM.

The proposed solar power plant would include up to 375 MW of solar thermal electrical generation with options for natural gas backup and/or thermal storage capabilities. The solar facility would consist of solar fields made up of single-axis-tracking parabolic trough solar collectors. Each collector contains a linear parabolic-shaped reflector (glass mirrors) that focuses the sun's direct radiation on a heat collection element located at the focal point of the parabola. The collectors would track the sun from east to west during the diurnal cycle to ensure the sun is continuously focused on the linear receiver. A heat transfer fluid would be heated as it passes through the receivers and then circulated through a series of heat exchangers to generate high-pressure superheated steam. The steam would in turn power a conventional steam turbine generator which produces electricity. The plant would be made up of one or more power blocks. Each power block would be located near the center of its respective solar field and would contain multiple feedwater heaters, steam generators, steam superheaters, and feedwater pumps (see attached facility concept plan).

To optimize the output capacity of the project, both natural gas backup and/or thermal energy storage would be used as needed. Natural gas backup would include the addition of a partial or full load burner arrangement that would generate additional steam when solar energy is absent or insufficient by itself. Annual output from natural gas would be limited to twenty five percent (25%) of annual capacity to ensure that the plant remains predominantly a solar powered facility. Thermal energy storage would provide the option of transferring some or all of the solar energy into molten salt contained in insulated tanks for use when solar generation is not optimum.

Wet cooling technology would be used for cooling the power generating equipment. A mechanical draft cooling tower, cooling water circulating pumps, circulating water piping, valves, and instrumentation would be located within the facility. Multiple evaporation ponds would be constructed to hold discharge from the cooling towers and steam cycle that can no longer be recycled back into the plant.

The solar energy production facility would be connected to the electrical grid using a newly constructed, 3-4-mile, 500 kV generation tie-line with a point of interconnection at the existing Jojoba Substation, west of the proposed project site and operated by the Salt River Project. If any upgrades are required to the Jojoba Substation as a result of this undertaking, those upgrades would be included in the ROW grant. The transmission line and other related facilities that would be developed specifically for this project would be included in the ROW grant and considered part of the larger undertaking.

In addition to Section 106 compliance, an Environmental Impact Statement (EIS) for the project will analyze site-specific impacts on air quality, biological resources, cultural resources, water resources, geological resources and hazards, and hazardous materials handling. The EIS will also analyze land use, noise, paleontological resources, socioeconomics, soils, traffic and transportation, visual resources, waste management, wildlife corridors, health and human safety, and fire protection. Additionally, information on facility design engineering, efficiency, reliability, transmission system engineering and transmission line safety and nuisance will be included in the EIS. It is anticipated that the EIS process will be completed by December 2010.

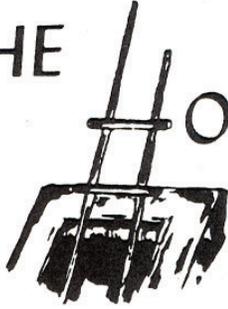
Should you have any questions, please contact me at (602) 417-9236, or by email at [Michael\\_D\\_Johnson@blm.gov](mailto:Michael_D_Johnson@blm.gov). Thank you.



Michael Johnson  
Deputy Preservation Officer

*Excellent (thorough!) Section  
106 initiation letter! Thank  
you! We look forward to  
reviewing the survey report.  
Ann D. Howard 10-31-09  
for S.H.P.O.*

THE



OPI TRIBE

RECEIVED  
PDO

09 JUL 20 AM 10: 29

BUREAU OF LAND MGT  
PHOENIX, ARIZONA

CHAIRMAN

VICE-CHAIRMAN

July 13, 2009

Teresa A. Raml, District Manager  
Attention: Joe Incardine, National Project Manager  
Bureau of Land Management, Phoenix District, Lower Sonoran Field Office  
21605 North 7<sup>th</sup> Avenue  
Phoenix, Arizona 85027

Re: Sonoran Solar Energy Project

Dear Ms. Raml,

This letter is in response to your correspondence dated July 7, 2009, regarding an application from Boulevard Associates, LLC, for a right-of way grant of 14,760 acres on Bureau of Land Management (BLM) land to construct, operate and maintain a 375 megawatt solar power station, transmission lines, and access and maintenance roads and facilities known as the Sonoran Solar Energy project south of Buckeye in Maricopa County. The Hopi Tribe claims cultural affiliation to the prehistoric cultural groups in Arizona. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the BLM's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office understands the project will require up to 4,000 acres within the right-of-way grant application area. And therefore, to assist us in determining whether this project will adversely affect cultural resources significant to the Hopi Tribe, we look forward to receiving a copy of the cultural resources survey of the currently proposed 6,700 acre project area. If the survey report identifies prehistoric cultural resources that will be adversely affected by project activities, we will look forward to continuing consultation, including being provided with a copy of any proposed treatment plan for review and comment.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Leigh J. Kuwanwisiwma".

Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

xc: Arizona State Historic Preservation Office