



May 8, 2008

Mr. John Kessler
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Comments for the Biological Resources Mitigation Workshop for Victorville 2
Hybrid Power Project

Mr. Kessler,

First of all, I would like to extend my appreciation in modifying the workshop schedule, due to my limited availability, to discuss the proposed habitat compensation lands. After reviewing the potential compensation areas that was provided by AMEC, I have the following comments:

I am relieved to see that the acquisition lands being considered are within the known Mohave Ground Squirrel (MGS) range and that the Brisbane Valley area is no longer a consideration.

Consideration should be given to potential acquisition areas that would function as corridors between core areas. I would recommend coordinating with California Department of Fish and Game and Dr. Phillip Leitner to create a long-range acquisition plan of potential corridor areas that could be applied to this project and subsequent projects. I would rank this as a high priority since the majority of known core areas are indirectly protected on federal lands while many of the potential corridors are not.

I am not in favor of acquisition area "A". Area "A" is within the Kramer Hills. This area has been trapped previously by Jeffrey Aardahl and Paul Roush in 1985. MGS numbers were low when they trapped this area and they commented on the possibility of shallow soils and rapid drainage of water as possible reasons for the low numbers in this area (Aardahl & Roush, 1985). This area was also trapped by Dr. Phil Leitner in 1999 with negative results (Leitner, 2001). Both trapping events followed above average rainfall years which should have produced favorable trapping success for MGS.

Area "B" may be a potential target for acquisition if the habitat appears suitable. In my opinion, suitable habitat would be areas of high shrub diversity and cover. Soils should be sandy-loam with numerous small mammal burrows present. Large washes and Joshua Tree woodlands should be considered along with areas that receive sufficient rainfall to provide forage on drought years. Connectivity and long-term land use practices should

also be considered. Areas to avoid would be monotypic stands of Creosote and rocky or sandy soils.

I am not in favor of acquisition in area "C". I have concerns with the long term survivability of the populations associated with Desert Tortoise Natural Area due to expansion of California City and subsequent "island effects", noticeable increase in off-highway vehicles (OHV) in the area and the possibility of disease transmission or behavioral modifications associated with introduced non-native mammals from California City.

The remaining areas (D-G) seem to be the best options for potential targets of MGS acquisition lands due to their proximity of known core areas and other protected lands. When the project proponent has narrowed the options down to 1-2 choices, I would recommend that Dr. Phillip Leitner is given a chance to perform a field reconnaissance and provide input on the potential sites prior to finalizing the decision.

My final recommendation, if the opportunity arises, is to secure funding through the land acquisition funds for further MGS research. Conservation of MGS should rely on protecting areas with known populations that can persist through drought periods and to provide linkages between the known populations. Additional research would be helpful to determine trends in known populations or to detect other, previously unknown core areas.

Thank you for the opportunity to provide comments on this project.

Cordially,

Ryan
Young

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References:

Aardahl, Jeffrey & Roush, Paul. 1985. Distribution, Relative Density and Habitat Preference and Seasonal Activity Levels of the Mohave Ground Squirrel (*Spermophilus mohavensis*) and the Antelope Ground Squirrel (*Ammospermophilus leucurus*) in the Western Mojave Desert, California.

Leitner, Phillip, 2001. California Energy Commission and Desert Tortoise Preserve Committee Mohave Ground Squirrel Study. Final Report 1998-2000.