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To: <esolorio@energy.state.ca.us>, <carspp@blm.gov>, <Hector_Villalobos@ca.b...>
Date: 5/4/2010 8:32 AM
Subject: Comments on the SA/EIS for the RIDGECREST SOLAR POWER PROJECT (09-AFC-9)
Attachments: Comment_Letter_MJ_McEwan_20100503.doc; El Paso Wash Plant List 4-17-10-1.xls

Dear Mr. Solorio and Ms. Eubanks, I have attached my additional comments with photographs on the SA/EIS for the Ridgecrest Solar Power Project (09-AFC-9) as well as an updated plant list from the proposed location. Thank you, Jane McEwan -- Jane McEwan Law Office of M.J. McEwan 350 E. Ridgecrest Blvd. Ste. 102 Ridgecrest, CA 93555 760 384 2615

DOCKET	
09-AFC-9	
DATE	<u>MAY 04 2010</u>
RECD.	<u>MAY 07 2010</u>

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May 4, 2010

Eric Solorio, Project Manager
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RE: RIDGECREST SOLAR POWER PROJECT (09-AFC-9)

Dear Mr. Solorio and Ms. Eubanks,

The plant list that was compiled from our local subchapter of the California Native Plant Society's field trip on April 17th to the proposed Ridgecrest Solar Power Project sites has been updated to include observations made by Kathy LaShure, our subchapter leader on a return visit to the "South Site" on April 30th. One of the interveners had asked her if our group had over looked *Krascheninnikovia lanata*, Winter Fat, since it was not listed on our first list. Mrs. LaShure did find it on the "South Site" and took the following photographs.

I went back to check for Winter Fat on the "North Site" on May 2nd and did not see it on the west side. I did not have time to look at the east side of the "North Site." However I did note that the broad flat areas on the west end of the "North Site" was still green and that the area which looked relatively barren in January was covered with *Chorizanthe brevicornu* which is one of the species consumed by tortoises in the studies by Jennings and Oftedal, et. al. Other plants consumed by tortoises were also still green: Hairy Lotus, Lupine and *Mirabilis bigelovii*. Five of my photographs of the "North Site" follow Mrs. LaShure's photographs of Winter Fat on the "South Site".

Sincerely,

Mary Jane McEwan

Mary Jane McEwan

Cc: Hector_Villalobos@ca.blm.gov, RFO



Winter Fat on "South Site" Photo by Kathy LaShure 4/30/10



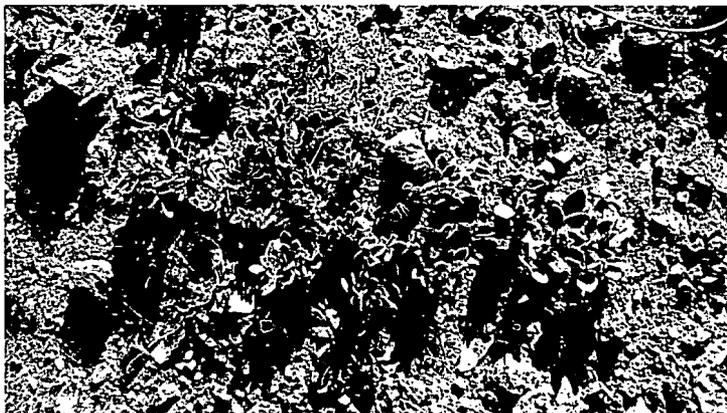
Winter Fat on "South Site" Photo by Kathy LaShure 4/30/10



“North Site” *Chorizanthe brevicornu* in the foreground 5/02/10 Photo by M.J. McEwan



Mirabilis bigelovii 5/02/10 Photo by M.J. McEwan



Hairy Lotus, growing on the flats above the wash on the “North Site” 5/02/10 Photo by M.J. McEwan



Lupines on the "North Site" were blooming 4/17/2010. These had gone to seed by 5/02/10 but still had green leaves. Photos by M.J.McEwan



One of several cholla on the "North Site" that are over four & five feet tall. Several cholla had bird nests in them. 5/02/10

Plant List for the Vicinity Surrounding El Paso Wash

**Prepared by Creosote Ring Sub Chapter, Bristlecone Chapter,
of the California Native Plant Society**

April 17, 2010 Field Trip to Proposed Sites for Solar Power Plant
Proposed by Solar Millenium, near Ridgecrest, California

This area is west & east of El Paso Wash, and north and south of Brown Road,
Approximately Two Miles Northeast of the El Paso Wilderness Area
in the Indian Wells Valley, Mojave Desert, California

70 Species from 25 Plant Families were observed

Plants Eaten by Desert Tortoise
Numbers refer to the citations
below & indicate presence on
proposed sites of plants that have
been observed to be eaten by the

8 of top 10 Observed
species 10 of 16
preferred of plants
by adult preferred
tortoises in by
Jennings' juvenile
study were tortoises
observed in Oftedal

DICOTYLEDONAE		h Site	Sout h Site		Henen	Jennings	Oftedal et al.
Asteraceae (Compositae)							
<i>Ambrosia dumosa</i>	Bur-sage	✓	✓				
<i>Chaenactis fremontii</i>	Fremont's Pincushion	✓	✓				3
<i>Ericameria cooperi var. cooperi</i>	Cooper Goldenbush	✓					
<i>Eriophyllum pringlei</i>	Pringle's Eriophyllum		✓				
<i>Eriophyllum wallacei</i>	Wallace's Wooly Daisy		✓				3
<i>Filago depressa</i>	Dwarf Filago	✓					
<i>Glyptopleura marginata</i>	Keysia	✓					
<i>Hymenoclea salsola var. salsola</i>	Cheesebush	✓	✓				
<i>Lasthenia californica</i>	Goldfields	✓	✓				
<i>Lomatium mohavensis</i>	Mojave Wild Parsley		✓				
<i>Malacothrix coulteri</i>	Snake's Head	✓	✓				
<i>Malacothrix glabrata</i>	Desert Dandelion	✓	✓				3
<i>Stephanomeria pauciflora?</i>	Desert Straw		✓				
<i>Tetradymia axillaris</i>	Cottonthorn		✓				
<i>Xylorhiza tortifolia var. tortifolia</i>	Mojave Aster	✓					
Boraginaceae							

<i>Amsinckia menziesii</i> var. <i>intermedia</i>	Fiddleneck	✓	✓				
<i>Cryptantha micrantha</i>	Purple-rooted Forget-me-not	✓					
<i>Cryptantha pterocarya</i>	Winged-Nut Forget-Me-Not		✓				
<i>Pectocarya platycarpa</i>	Broad-margin Combseed	✓	✓		1		
Brassicaceae							
<i>Brassica tournefortii</i>	Sahara Mustard		✓				
<i>Lepidium fremontii</i>	Desert Alyssum		✓				
<i>Lepidium</i> sp.	Peppergrass	✓	✓				3
<i>Tropidocarpum gracile</i>	Slender Keel-Fruit		✓				
Cactaceae							
<i>Opuntia echinocarpa</i> var. <i>echinocarpa</i>	Golden Cholla	✓	✓		1		
Chenopodiaceae							
<i>Grayia spinosa</i> *	Spiny Hop-Sage		✓				
Cucurbitaceae							
<i>Cucurbita palmata</i>	Coyote Melon		✓				
Cuscutaceae							
<i>Cuscuta denticulata</i>	Toothed Dodder		✓				
Euphorbiaceae							
<i>Chamaesyce albomarginata</i>	Rattlesnake Spurge	✓	✓			2	
Fabaceae							
<i>Astragalus acutirostris</i>	Beaked Rattle Weed		✓				
<i>Astragalus didymocarpus</i> var. <i>dispermus</i>	Twin-fruit Locoweed ?	✓	✓			2	
<i>Astragalus laynae</i>	Layne's	✓				2	
<i>Lotus humistratus</i>	Hairy Lotus	✓	✓			2	
<i>Lupinus concinnus</i>	Bajada Lupine	✓	✓		1		
<i>Lupinus microcarpus</i> v. <i>horizontalis</i>	Chick Lupine		✓				

<i>Psoralea argophylla</i>	Indigo Bush	✓					
<i>Senna armata</i>	Desert Senna	✓	✓				
Geraniaceae							
<i>Erodium cicutarium</i>	Red-stemmed Filaree	✓	✓		1	2	3
Hydrophyllaceae							
<i>Nama demissum</i>	Purple Mat	✓					
<i>Phacelia distans</i>	Fern Phacelia		✓				
<i>Phacelia fremontii</i>	Fremont Phacelia	✓	✓				
<i>Phacelia tanacetifolia</i>	Lacy Phacelia	✓				2	
<i>Pholistoma membranaceum</i>	White Fiesta Flower	✓					
Lamiaceae							
<i>Salvia carduacea</i>	Thistle Sage	✓	✓				
<i>Salvia columbariae</i>	Chia	✓					
Loasaceae							
<i>Mentzelia albicaulis</i>	Little Blazing Star	✓	✓				
Malvaceae							
<i>Eremalche exilis</i>	White Mallow	✓	✓				
Nyctaginaceae							
<i>Mirabilis bigelovii</i> var. <i>retrorsa</i>	Wishbone Bush	✓	✓			2	3
Onagraceae							
<i>Camissonia campestris</i> <i>campestris</i>	Mojave Sun Cup	✓	✓				
<i>Camissonia claviformis</i> <i>claviformis</i>	Brown-eyed Primrose	✓	✓				3
<i>Camissonia palmeri</i>	Palmer's Primrose	✓					
Papaveraceae							
<i>Eschscholzia minutiflora</i> <i>minutiflora</i>	Small-flowered Poppy	✓	✓				
Polemoniaceae							
<i>Eriastrum eremicum</i>	Desert Woolly Stars?	✓					
<i>Gilia minor</i>	Little Gilia		✓				
<i>Gilia</i> sp. (at least 2 different)		✓	✓				

Polygonaceae							
<i>Chorizanthe brevicornu</i> var. <i>brevicornu</i>	Bristle Spine Flower	✓	✓			2	3
<i>Chorizanthe rigida</i>	Rigid Chorizanth		✓				
<i>Chorizathe watsonii</i> ?	Watson Chorizanth		✓				
<i>Eriogonum gracillimum</i>	Rose & White Buckwheat		✓				
<i>Eriogonum inflatum</i> var. <i>inflatum</i>	Desert Trumpet	✓	✓				3
<i>Eriogonum pusillum</i>	Yellow Turban		✓				
<i>Mucronea perfoliata</i>	Perfoliated Spineflower	✓					
<i>Oxytheca perfoliata</i>	Punctured Bract	✓	✓				
Portulacaceae							
<i>Calyptridium</i> sp.	Sand-cress	✓					
Solanaceae							
<i>Lycium andersonii</i>	Anderson Boxthorn		✓				
Zygophyllaceae							
<i>Larrea tridentate</i>	Creosote Bush	✓	✓				
MONOCOTYLEDONAE							
Liliaceae							
<i>Calochortus kennedyi kennedyi</i>	Desert Mariposa Lily	✓					
<i>Dichelostemma capitatum capitatum</i>	Blue Dicks	✓					
Poaceae							
<i>Bromus madritensis</i> var. <i>rubens</i>	Red Brome		✓				
<i>Schismus barbatus</i>	Mediterranean Sheep Grass		✓		1		3

Journal Articles Regarding Plants Eaten by the Desert Tortoise

1: **Henen, Brian Thomas. 2002.**

Energy and water balance, diet, and reproduction of female desert tortoises (*Gopherus agassizii*).

Chelonian Conservation and Biology. 4(2): 319-329. Diet of female tortoises at Goffs, California, in study by Henen included *Lupinus concinnus*, which was very prevalent on Solar Millennium site.

2: **Jennings, W. Bryan. 2002.**

Diet selection by the desert tortoise in relation to the flowering phenology of ephemeral plants. Chelonian Conservation and Biology. 4(2): 353-358.

Eight species of the Top 10 preferred species of plants in desert tortoise diet during Jennings' spring 1992 study at Desert Tortoise Natural Area are present at the proposed Solar Millennium site. *Lotus humistratus* which accounted for 29% of the bites observed by Jennings was very prevalent on the proposed site east of El Paso Wash.

3: **Oftedal, Olav I; Niland, Scott; Morafka, David J. 2002.**

Selective spring foraging by juvenile desert tortoises (*Gopherus agassizii*) in the Mojave Desert: evidence of an adaptive nutritional strategy.

Chelonian Conservation and Biology. 4(2): 341-352.

Ten of sixteen species eaten by juvenile tortoises in Oftedal et al study are present at the proposed Solar Millennium site. Of these *Camissonia claviformis* which is present at this site accounted for 50% of all bites taken by juvenile tortoises, at 346.

Mojave Ground Squirrels Diet

Leitner, P. and B.M. Leitner. 1998.

Coso grazing exclosure monitoring study, Mohave ground squirrel study
Coso Known Geothermal Resource

Area, Major Findings 1988-1996. Final Report.

*Spiny hopsage was one of the most frequently consumed shrubs in study by Leitner and Leitner, 1998.