

Kerncrest Audubon Society

P.O. Box 984

Ridgecrest, CA 93556

DOCKET

09-AFC-9

DATE NOV 15 2010

RECD. NOV 17 2010

15 November 2010

Eric Solorio
Project Manager California Energy Commission
1516 Ninth Street Sacramento, CA 95814

RE: Mohave Ground Squirrel (MGS) Habitat Connectivity Study – Ridgecrest Solar Project -
Docket No. 09-AFC-9

Dear Mr. Solorio,

Kerncrest Audubon appreciates the opportunity to review and comment upon the proposed Mojave Ground Squirrel study.

We believe the study does not directly address the key issue at hand.

The issue at hand can be stated as, “Will building the Ridgecrest Solar Project have insignificant impact upon genetic connectivity of populations of Mojave Ground Squirrel in the vicinity of the site?” This is not stated as a goal of the study. We believe this should be included as a purpose of the study and the study plan should specifically state how the results will address this issue and what results would resolve this issue.

Furthermore, Kerncrest Audubon points out that connectivity for the MGS is only one of a list of problems with the proposed site. The site is productive Desert Tortoise habitat. The site hosts a number of successfully nesting Burrowing Owls. Water to be used at the site has not been mitigated as required by law. Desert Kit Fox and Badger occupy the site. All together, the site is a rich and balanced ecosystem, an important part of the Indian Wells Valley.

We therefore believe this study to be irrelevant despite how scientifically valuable the results of the study might be. Whether or not the genetic connectivity for MGS is dependent upon this piece of land, the land is a unique and irreplaceable biological resource that should be protected.

Sincerely,

Daniel G. Burnett
Member of the Board
Kerncrest Audubon Society



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
For the *RIDGECREST SOLAR*
POWER PROJECT

Docket No. 09-AFC-9

PROOF OF SERVICE
(Revised 11/10/2010)

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DECLARATION OF SERVICE

I, Daniel G. Burnett, declare that on, 15 November 2010, I served and filed copies of the attached KAS Comments MGS Study 11-15-10. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest].

The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

XX sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery;

_____ by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

XX sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 09-AFC-9
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Daniel G. Burnett
Member of the Board
Kerncrest Audubon Society