CLEMSON
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August 3, 2010

Christopher Meyer
Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS 15
Sacramento, CA 95814

Dear Mr. Meyer,

This communication should be considered an addendum to my letter to you of 26 July 2010, concerning the potential impact of the SES Solar Two energy project on the Flat-Tailed Horned Lizard, *Phrynosoma mcallii*.

Dr. Patrick Mock estimated a population of 20 to 30 individuals based on 40% coverage of the area and assuming a 25% detection rate, and a finding of three individuals on the project site. I believe that this estimate is probably too low as it would constitute a non-viable population. CEC biologists made a much higher estimate of some 2,000 to 5,000 FTHLs (DEIS at C.2-22) on the proposed project site. My concern is that there may be an even higher population of lizards. If sand-raking were used to detect lizards that were subsequently captured marked, and then re-captured, it might be possible to obtain more accurate numbers. Turner and Medica (*Copeia 1982:815-823*), using mark-recapture methods, found 6 to 8 lizards per hectare in the Yuha Basin. Assuming 75% of the project area is poor to good habitat that yields 4,638 acres or 1,877 hectares of occupied habitat. If we select 6 per hectare as the "high" estimate, that would yield 11,262 FTHLs at the project site. If we take 50% of 6, or 3 per hectare, that would be 5,631 FTHLs at the project site. I believe these limits (5,631 to 11,262) are realistic. If nothing else, they tend to support the estimates from CEC biologists.

A second point concerns the applicant's decision not to place SunCatchers in some of the larger washes, claiming that the washes would serve as dispersal corridors between the Yuha Basin and West Mesa management areas. I have reviewed the extensive literature on habitat preferences, and cannot find any statements that suggest the FTHL utilize washes to any extent. My own limited field experience with this species is in agreement with the literature information on habitat. Furthermore, the washes at the project site are high energy washes that receive both winter and summer monsoon floods. Visual inspection of the washes reveals scour marks around creosote and galleta grass, indicating strong, high volume water flow. Most likely, any lizards occupying the washes would be periodically eliminated, and the area would have to be re-colonized. This suggests that wash areas, while they might be occupied periodically, would not serve well as dispersal corridors.

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Sincerely,

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