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**Comments on the Imperial Valley Solar Project**

We have a great interest in this project as it lies in a unique part of the California Desert that we have both visited and spent time in, the Colorado Desert of the Imperial Valley, an imperiled biologically rich region. We have both participated in Flat-tailed horned lizard surveys in the county near the project site. But even more, we have camped and hiked in the area, on public land, and enjoyed the scenic value of deserts outside of parklands.

There is so much history here, beauty, that cannot be replaced or mitigated. We urge the No Action alternative with no future solar projects.

**Water**

We consider the water use estimates to be too low, based on personal observation of the amount of dust and fine sand blown up into the air in

Imperial Valley. On May 23, 2010, for instance, a wind storm blew dust far into the sky all over the valley, and this is a regular occurrence. The Ridgecrest Solar Power Project applicant admits that mirror washing would need to be weekly or bi-weekly to maintain the highest efficiency. Though different technology, the SunCatchers still use mirrors to reflect sunlight, and still need washing. Water use may be grossly underestimated in this dusty desert area, especially considering the location just south of the Plaster City off-road use area, and the ground disturbance of the site itself by the applicant grading, cutting vegetation, building more than 200 miles of new roads, driving, and other development.

Cunningham walked through several parts of the project site on May 24 and 25, 2010, and noticed evidence of flood events that appeared to be stronger than those described by the applicant. Washes come down from the south and head north through the site, and a large wash spreads out into anastomosing channels from the south-central to the east. The strength of flows is indicated by two-foot high scour banks, ripple marks in wash sands, mud-cracks of pooled-up water in front of blockages, debris thrown up three feet into shrubs and trees, and sediment piled up around shrubs. Even individual Galleta grass bunches has scour six inches deep and one foot wide on the sides facing flows, and we wonder if similar scour will occur around SunCatcher pedestals over the years.

This desert has an intense summer monsoon. How will the perimeter fence not block flows and debris? This is not described in the Staff Assessment/Draft Environmental Impact Statement.

We disagree that these impacts will be insignificant. Downstream effects could be significant to habitat and agricultural lands.

Biological soil crusts need to be analyzed, as we have seen them on the project site. When disturbed they may take decades to recover, and provide important soil-binding and carbon-storing functions.

### **Visual Resources**

The area now provides scenic views while driving along Highway 8, in a historic area of the Anza Trail. If this historic route is to be maintained, the viewshed should not be compromised by large-scale developments.

This historic value cannot be mitigated. We would much rather have a trail corridor with interpretive displays in this desert, than a scraped and industrialized projects.

Views from nearby wilderness areas would also be ruined by this huge expanse of mirrors reflecting light, and loud noise.

### **Flat-tailed horned lizard**

The Flat-tailed horned lizard (FTHL) is proposed for Federal listing, and adding fragmentation of its habitat to the list of threats would not be wise. This project lies in a poor location, a connectivity corridor between the Yuha Basin management area and West Mesa management area to the north. Currently, there are highways, roads, and rail tracks that act as filters, but not barriers, to lizard movement and population connection. On May 24 and 24, 2010, Cunningham visited the project site and determined that Highway 8 was not a barrier to FTHL crossing. The roadway is low, often a few feet above desert ground level, and has no barrier fencing to prevent lizard access. The entire road adjacent to the project has habitat on both sides. Mortality would occur on the road, but not prevention of crossing. Thus it is not a barrier.

Adding a much wider industrial project into the broad corridor area of the flat desert between management areas would add a greater hindrance of chainlink fencing that would collect debris, increase disturbance, roads and driving during construction, operation, and maintenance. Mortality would increase greatly because of the size of the project.

The applicant indicates that the Coyote Wash underpassing on Highway 8 would be adequate to maintain connectivity after the project is built. But on a site visit, we determined that this is much too small to guarantee movement and genetic connectivity north and south of the project site.

This case is similar to the Ridgecrest Solar Power Project (RSPP) in Kern County, California, where the project would block a 13-mile wide flat gap between mountain ranges, thus cutting off connectivity for Mojave ground squirrels. Staff has recommended against the project because this connectivity cannot be mitigated under NEPA and CEQA.

We suggest that for FTHL on the Imperial Valley Solar Project, connectivity would also be greatly reduced for FTHL, a species on the brink of federal protection, if the relatively wide valley floor were taken up by an industrial project. CEC and California Department of Fish and Game biologists said in the RSPP case that the risk of blocking a wide corridor and relying on a very narrow alternate corridor was too great. The best way to maintain connectivity of metapopulations would be to keep the widest possible area for a corridor.

Recent ecological concepts such as “matrix ecology” should be kept in mind when managing FTHL populations, where the permeability of less-desirable habitat around core populations in optimum habitats must be maintained so that movement can occur between good habitat patches (see *Corridor Ecology*, 2006, by Jodi Hilty, William Lidicker, Jr, and Adina Merenlender, Island Press: Washington).

Relocation as a mitigation measure has had a poor record of success for sensitive lizard species. Efforts to relocate the Blunt-nosed leopard lizard in San Joaquin region areas has had very high failure rates according to studies undertaken by Dr. David Germano of California State University, Bakersfield, and Steve Juarez of the California Department of Fish and Game. At a minimum a fool-proof study design needs to be incorporated into a relocation plan, which should be available for public review long before construction begins.

### **Bighorn Sheep**

Attention has been raised as to the importance of flats and upper alluvial fans adjacent to mountain ranges for spring foraging habitat, especially used by ewe herds. We have seen several times Desert bighorn sheep herds feeding on spring vegetation on fans away from typical steep hill habitat. Thus the sighting of bighorn sheep on the project site may not be an aberration, but a regular part of the behavioral ecology of Peninsular bighorn sheep in the area. This habitat should be preserved so that this important foraging habitat can be preserved.