



May 28, 2010

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California Energy Commission  
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**DOCKET**  
**08-AFC-5**

DATE MAY 28 2010RECD. JUN 14 2010

Re: 08-AFC-5, Imperial Valley Solar (Formerly called SES Solar Two Project),  
Application for Certification

Dear Mr. Meyer:

The Colorado Desert District of the California Department of Parks and Recreation (State Parks) offers the following comments for the above project.

First and foremost, it would seem to us (as has undoubtedly been pointed out by others) that from a land use and landscape conservation perspective the proposed 6,000+ acre project would provide far more benefit to the public and the citizens of California if it were sited on nearby fallowed farmlands, or other previously disturbed lands – rather than undisturbed desert lands currently in public ownership. Virtually all of the negative biological and aesthetic impacts associated with the proposed project (and the necessity of a large-scale mitigation program) could be eliminated with a change to a previously-disturbed site.

Biologically, the loss of over 6,000 acres of habitat for the proposed-endangered Flat-tailed Horned Lizard should be considered significant and will require costly mitigation according to formulas derived as part of the Flat-tailed Horned Lizard Conservation Strategy. The loss of over 6,000 acres of habitat for burrowing owls (a California Species of Special Concern), likewise will need to be mitigated. The presence of individuals of the State- and federally-listed endangered Peninsular Range population of the Desert Bighorn Sheep will also require mitigation as a result of this project. Some 312 acres of desert washes and waterways would be impacted by the proposed project and require mitigation under the U.S. Army Corps of Engineers and California Department of Fish and Game guidelines. Numerous other sensitive plant and animal species will also need to be mitigated.

State Parks also has concerns regarding the aesthetic impacts the proposed project would have on the desert lands surrounding the southern portion of Anza-Borrego Desert State Park; the impact of nearly 550 miles of unpaved and paved access roads on the project site – the same amount of roads

found in the entire 600,000+ acre Anza-Borrego Desert State Park; and the impact in terms of erosion and air pollution that would potentially result from construction of the project.

The Colorado Desert District of the California Department of Parks and Recreation (State Parks) appreciates the opportunity to provide comments on, and express our concerns, about the proposed Imperial Valley Solar project.

Sincerely,

Gail Sevens  
District Superintendent, Acting