

<b>DOCKET</b>
<b>09-AFC-5</b>
DATE _____
RECD. FEB 23 2010

**Abengoa Mojave Solar Project - LESA Peer Review**

Hello Craig,

Mojave Desert Land Trust has been contacted by Susanne Huerta of Aspen Environmental regarding the need for 1,588.5 acres of land for farmland mitigation. Although there has historically been some agricultural activity in the project area, agricultural production is a complex issue in the Mojave Desert . Agricultural mitigation in the Mojave Desert presents challenging issues related to land availability, impacts to water resources, water quality, and impacts to sensitive species. G

I understand that a LESA analysis has been preformed for the proposed project. Given the difficulties associated with a LESA analysis for a project site such as Abengoa's, I suggest you obtain a peer review of the LESA from the staff at CA Department of Conservation's Land Resource Protection Division. Chuck Tyson in that office was instrumental in developing the California model of the LESA and would be a great resource for you. Chuck can be reached at: (916) 324-0862

Should agricultural mitigation ultimately be required for the Abengoa project we would be happy to work with your team to develop a suitable outcome. In the meantime, please do not hesitate to contact us if there is anything we can do to assist you in resolving the agricultural mitigation issue.

Regards,

Kate

~~~~~

Kate Kelly

Kelly Group  
PO Box 868  
Winters, CA 95694  
(530) 794-8090

[kate@kgconsulting.net](mailto:kate@kgconsulting.net)