

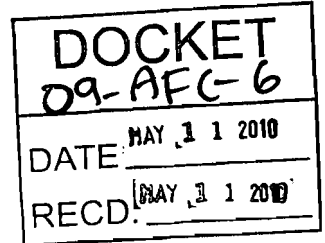
From: Alan Solomon
To: Alice Harron; 'Carolyn Chainey-Davis'
Date: 5/11/2010 4:30 PM
Subject: E-Mail from Carolyn Chainey-Davis to Alice Harron Requesting Additional Information

To: Alice Harron

Senior Director, Development
Solar Millennium, LLC

From: Carolyn Chainey-Davis

California Energy Commission, Siting Division, Biological Resources Unit



RE: Request for Additional Technical Information Regarding Coachella Valley Milk-Vetch Occurrence in the Blythe Solar Energy Project Buffer,

Blythe Solar Power Project, Docket No. 09-AFC-6, Draft Summary: Preliminary Spring 2010 Survey Results for Desert Tortoise, Rare Plants, and Jurisdictional Waters

Ms. Herron:

The Draft Summary of the 2010 Spring Survey Results for Biological Resources (including special-status plants) indicates that a population of 14 Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae* - a federal-listed endangered plant, was discovered by your biological consultants within the buffer east of the transmission alignment between I-10 and the proposed new Substation. The taxonomic status of the Coachella Valley-milk-vetch specimens from the Chuckwalla Valley area have been debated for some time and have characteristics that are intermediate between the more distinct plants in Coachella Valley and the common variety *A. l. variabilis* that is common in Chuckwalla Valley.

The USFWS Carlsbad office interviewed a number of recognized botanical experts (Andy Sanders, UC Riverside Herbarium and another botanist responsible for a recent genetic analysis of three specimens from Desert Center. All but three of the herbaria specimens collected historically from the Desert Center area (some of which were originally labeled as the Coachella Valley milk-vetch) have been annotated (re-labeled) as the common conspecific *Astragalus lentiginosus* var. *variabilis*. All but the same three specimens also were analyzed genetically and found to be the common variety. The three collections not annotated as *A.l. variabilis* and not genetically analyzed, but originally identified as *coachellae* (and therefore in question) were morphometrically inspected by an 'expert' botanist specializing in desert flora and found to have some intermediate characters but overall closer to *variabilis*. Based on this recent work, a portion of which was funded by the Service under a section 6 grant to the California Dept of Fish and Game, the Service concluded that the milk-vetch historically collected in Desert Center is not the listed taxon.

We need to resolve this issue immediately; this re-labeling of the historic.

collections from Desert Center does not necessarily preclude the occurrence of the federal-listed species occurring in your project area. Thus we need the following information from the biological consultants that conducted the botanical survey:

- 1) Completed CNDDDB form for the occurrence(s)
- 2) Voucher specimen (if collected) and photo
- 3) Detailed description of the habitat conditions, including invasive species, OHV or other threats, if present
- 4) Explanation for the identification as Coachella Valley milk-vetch (detailed description of the morphological characteristics used to distinguish the taxon collected from its common conspecific-Astragalus lentiginosus var. variabilis)
- 5) Description of the potential direct and indirect effects of the project and potential for avoidance

Thank you,

Carolyn Chainey-Davis