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**DOCKET**  
**09-AFC-6**

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May 13, 2010

Alan Solomon  
Project Manager, Siting, Transmission and Environmental Protection Division  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, California 95814

Via email to: [asolomon@energy.state.ca.us](mailto:asolomon@energy.state.ca.us)

Re: Comments on Staff Assessment/Draft Environmental Impact Statement for the proposed Blythe Solar Power Project (09-AFC-6)

Dear Mr. Solomon:

Thank you for the opportunity to review and comment on the Staff Assessment/Draft Environmental Impact Statement (SA/DEIS) for the proposed Blythe Solar Power Project. These comments are intended to supplement our previously submitted letter dated 5/4/10 containing comments on the subject document. The purpose of these supplemental comments is to identify a potentially viable alternative that was not addressed in the SA/DEIS

The California Energy Commission (CEC) and Bureau of Land Management (BLM) approach the subject of alternatives to the proposed project differently. BLM considers alternatives that would entail the use of private lands or other lands outside their control to be unreasonable. The CEC approach to alternatives appears to be somewhat broader in that private lands in some cases are considered feasible provided site control can be obtained in a reasonable timeframe and with some certainty.

In recent discussions with the project applicant, and further reading of the SA/DEIS, it appears there may be an additional alternative that would satisfy the reasonable/feasible definitions of the BLM and CEC, respectively.

Defenders recommended in previous comments on this proposed project that the entire western half should be removed from consideration due to significantly higher biological resources than on the eastern half. The western half contains significant and abundant Desert Wash Woodland habitats comprised of various species including Palo Verde, Smoke Tree and Ironwood, and appreciable amounts of native perennial shrubs and grasses. Furthermore, the greatest abundance and diversity of plant and animal species occurs here as well.

The SA/DEIS describes the public land alternative and a largely private land alternative, the latter called the Blythe Mesa alternative, as two separate and independent alternatives. However, Section 1 of the Blythe Mesa alternative and the eastern half of the proposed project share a

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common boundary. Section 1 of the SA/DEIS describes Section 1 of the Blythe Mesa alternative:

*Section 1 is located on private land, immediately east of the proposed site, approximately 1 mile from the Blythe Airport. It is 2,780 acres in size and comprised of 56 parcels with 10 landowners. No residences are located within Section 1, and it has appropriate insolation and minimal slope, and has been previously graded for agriculture. Access to the site is via I-10 at the W. Hobson Way exit. There are no structures on this land, it is immediately north of the Blythe Energy Project Substation. Section 1 is sufficiently large for two 250 MW projects.*

The eastern half of the proposed project located on public land is sufficient in acreage to support two 250 MW projects. We recommend that strong consideration be given to an alternative that would be based on a combination of these public and private lands comprising Section 1 of the Blythe Mesa alternative. Combined, these lands appear to be sufficient in acreage to support a 1000 MW project, the same size as proposed by the applicant.

Please contact me by telephone at (916) 313-5800 x110 or via email at [jaardahl@defenders.org](mailto:jaardahl@defenders.org) if you have any questions or need clarification on our recommended new alternative. Thank you again for the opportunity to participate in the environmental review for this proposed project.

Sincerely,

Jeff Aardahl  
California Representative

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