

CALIFORNIA ENERGY COMMISSION

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Solar Millennium, LLC
Attention: Alice Harron
1625 Shattuck Avenue, Suite 270
Berkeley, CA 94709

Re: Follow-up from the April 16, 2010 Palen Solar Power Plant Workshop

Dear Ms. Harron:

Thank you for your participation in our very productive workshop on April 16th. I wanted to follow up on some of our discussions at that workshop regarding information that Solar Millennium will be providing to help staff with additional analysis.

We understand that Solar Millennium has been gathering information on desert tortoise/wildlife connectivity and that you have been working with BLM to document the location of undercrossings beneath I-10 between Wiley Wells and Desert Center, conducting field surveys and mapping locations of these bridges and culverts. You apparently have also mapped desert dry wash vegetation associated with the washes passing under the freeway. Based on comments from the workshop, it sounds like that information has already been compiled and submitted to BLM for review, and that as soon as BLM has commented on it you will provide that to us, possibly as soon as the week of April 19th.

Regarding the direct and indirect impacts to sand dunes and Mojave fringe-toed lizards, I thought that the discussion during the workshop of potential mitigation measures was very useful. We understand that you will be providing the Energy Commission staff with some ideas as to how mitigation might be accomplished for the indirect impacts relating to depletion of sand habitat downwind of the project site. In addition, we discussed Solar Millennium providing some information as to the feasibility of land acquisition as a means of mitigating direct impacts, as well as other measures (for example, invasive weed control) that might also provide benefits to Mojave fringe-toed lizards. The list below enumerates some of the topics that the Energy Commission staff hopes you are able to provide to us:

- Availability of private lands within the Chuckwalla Valley that would meet the criteria for Mojave fringe-toed lizard compensation lands, as described in **BIO-20**.
- A discussion of how weed control (e.g. Sahara mustard removal) might be implemented, including some specific information describing areas on BLM lands where this enhancement action might occur.

- Examples from the literature describing how Mojave fringe-toed lizards or similar species have benefitted from these kinds of weed-control efforts.
- A discussion of long-term monitoring to document the benefits of proposed enhancement actions to Mojave fringe-toed lizards.
- How the proposed sand removal/redistribution would work, including a conceptual description of the process (for example, the kind of equipment that would be used, the seasonal timing and anticipated frequency of removal/redistribution) and a conceptual footprint of where these actions might occur. Also, it would be useful to include some discussion about potential impacts to Mojave fringe-toed lizards and other sensitive species as a result of sand removal/redistribution, and how these impacts could be avoided or minimized.
- Examples from other projects where a sand removal/redistribution in a sand transport corridor has been successfully implemented.

If staff is to incorporate any of this information into their revised Staff Assessment, we would need to receive it no later than **Friday, May 14th**. We understand that you would not have time to prepare complete responses to a number of the items listed above, but staff would find it useful to have even a preliminary or conceptual discussion of these topics.

We are also hopeful that Solar Millennium will make a concerted effort to develop alternative project configurations that avoid the direct and indirect impacts to the sand transport corridor but still maintain the desired 500 MW. We will work with you in any way that we can to facilitate development of such a reconfigured project footprint.

Please feel free to call me directly at 916-653-8236 if you have any questions.

Sincerely,

Alan H. Solomon
Project Manager