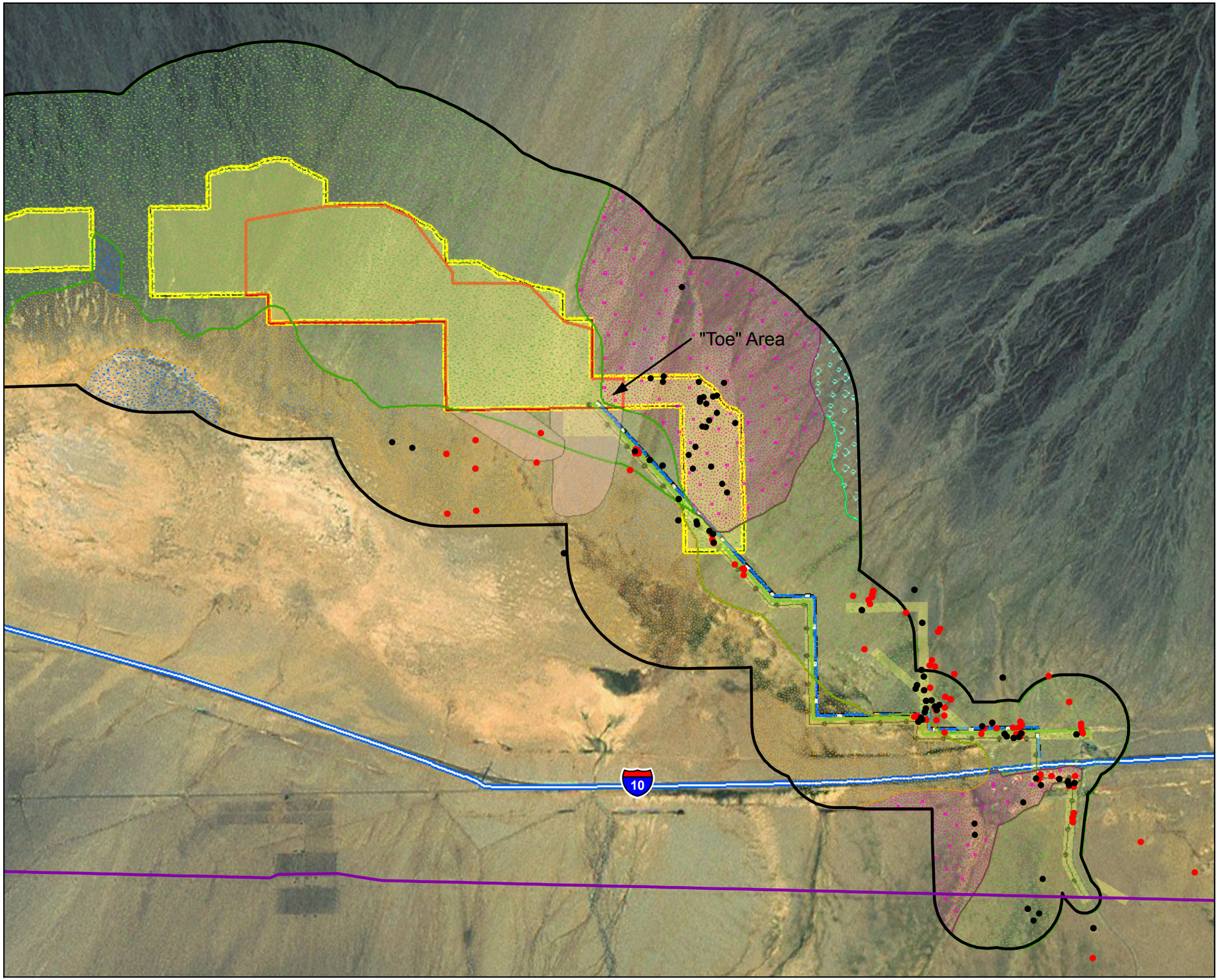
SAND DUNES/MOJAVE FRINGE-TOED LIZARD MITIGATION

Comment: The Applicant agrees with the 3:1 compensation for direct Project impacts to sand dune habitat, but disagrees with any additional mitigation requirements. Because the Applicant has agreed to drop the easternmost portion of the Plant Site (41.4 acres), the acreage of direct impact to sand dunes by the Plant Site would be eliminated. Project impacts to the sand dunes would be reduced to 0.8 acres, the entirety of which is located along the Linear Facilities. At 0.8 acres of direct impact, the compensation requirement would be 2.4 acres.

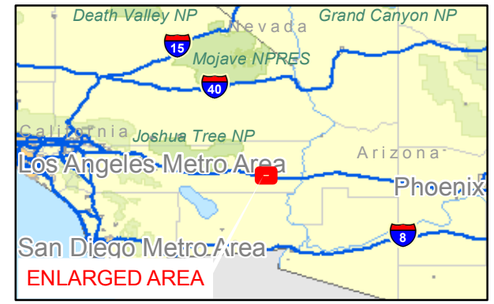
Mojave fringe-toed lizards are dune and loose-sand specialists. Mojave fringe-toed lizard sightings during intensive, focused surveys in both 2009 and 2010 that included 100% of the Project Area, 100% of an extension south of the Project Area in the area CEC Staff has indicated as a potential sand shadow area, and buffer transects extending outward from all 100% survey areas (see attached Figure; TTEC and Karl 2009) show that this species is most closely associated with Stabilized and Partially Stabilized Sand Dunes on and around the Project Disturbance Area.

To augment the potential identification of Mojave fringe-toed lizard habitat, observations of ribbed cryptantha (*Cryptantha costata*), also a loose sand associate, were mapped with those of Mojave fringe-toed lizard (see attached Figure). Assuming that both species adequately identify loose sand that could be occupied by Mojave fringe-toed lizard habitat, it can be seen that there is no suitable habitat for Mojave fringe-toed lizard habitat in the area south of the eastern toe of the Project Disturbance Area in the area the CEC identified as a potential eastern sand shadow, and very minimal habitat (one drainage) in the area the CEC identified as a potential westerly sand shadow. Based on these associations, there is little potential for direct or indirect impacts to Mojave fringe-toed lizard in the areas that CEC staff designated as potential sand shadows.



Genesis Solar, LLC

GENESIS SOLAR ENERGY PROJECT
RIVERSIDE COUNTY,
CALIFORNIA



- *Uma scoparia* Observations, '09 - '10
- *Cryptantha costata* Observations 2010
- 100% Survey Coverage
- CEC Preliminary Alleged Sand Shadow Area
- Chenopod Scrub
- Sonoran Creosote Bush Scrub
- Dry Desert Wash Woodland
- Playa and Sand Drifts over Playa
- Stabilized and Partly-Stabilized Sand Dune
- Plant Site
- Project Requested ROW
- Extent of Surveyed Area
- Blythe Energy Project Transmission Line
- Proposed Transmission Interconnect (7.5 Miles)
- Proposed Gas Line (5.9 Miles)
- Proposed Access Road (6.1 Miles)

N

0 0.5 1 1.5 2
Miles

Notes:
(a) UTM Zone 11, NAD 1983 Projection.
(b) Source data: A. Karl & Assoc., CEC, ESRI, TTEC, USDA

Biological Survey Results for
Uma scoparia* and *Cryptantha costata
and Natural Community Types

TETRA TECH EC, INC.