

**Defenders of Wildlife
Sierra Club**

California Energy Commission

**DOCKETED
08-AFC-13C**

TN 71490

JUL 01 2013

July 1, 2013

California Energy Commission
Dockets Unit, MS-4
Docket No. 08-AFC-13C
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Calico Solar Project (08-AFC-13C)

Dear Commissioners:

Defenders of Wildlife (“Defenders”) and Sierra Club, parties to the proceedings of the California Energy Commission (“CEC”) on the Calico Solar Project, hereby submit comments on the request from K Road Calico to the CEC to withdraw its proposed amendment to the project and surrender its license for the project. K Road Power notified the CEC of its intentions in a letter dated June 20, 2013.

Defenders and Sierra Club participated in all aspects of the proceedings for the Calico Solar Project conducted by the CEC, and the National Environmental Policy Act (“NEPA”) process for the project conducted by the Bureau of Land Management (“BLM”). Documents filed by Defenders and Sierra Club with the CEC and BLM on this project repeatedly expressed our concern over the significant adverse impacts the project would have on various special status species and their habitats. Those species included the threatened desert tortoise, the sensitive Mojave fringe-toed lizard, Golden eagle, Desert bighorn sheep, and rare plants. Throughout the proceedings we advocated for alternative locations for the project that would have fewer impacts to these species and their habitats, and specifically recommended alternatives involving degraded and fragmented lands located to the west of project in the Mojave Valley, also known as the Daggett Triangle.

The environmental significance and sensitivity of the lands associated with the Calico Solar Project far outweigh the renewable energy that would be generated by the project. The U.S. Department of the Interior (“DOI”), in its final decision on the Solar Energy Development Program for Six Southwestern States, designated public lands in the area affected by the project as an exclusion area for future solar energy project development as a means to avoid significant impacts to biological resources from future solar energy projects in this area. Specifically, this exclusion area covers a majority of the area previously identified the proposed Pisgah Solar Energy Zone. This proposed zone was eliminated by DOI because solar energy development was considered incompatible with needs to maintain and conserve sensitive species and their habitats in the area.

Defenders and Sierra Club strongly urge the CEC to accept the withdrawal of the proposed project amendment and the CEC-issued license for the Calico Solar Project. Such acceptance would allow the public lands affected by the project to remain in their current condition and contribute to the long-term needs of the threatened Desert tortoise and other species that currently occupy and utilize the natural community where the project was to be built.

Thank you for the opportunity to provide comment on the request from K Road Power and to consider our opinions for the CEC hearing to be held on August 14, 2013.

Sincerely,

A handwritten signature in black ink that reads "Kim Delfino". The signature is written in a cursive style with a large, prominent "K" and "D".

Kim Delfino
California Program Director
Defenders of Wildlife
1303 J Street, Suite 270
Sacramento, CA 95814

A handwritten signature in black ink that reads "Barbara Boyle". The signature is written in a cursive style with a large, prominent "B" and "B".

Barbara Boyle
Senior Representative
Beyond Coal Campaign
Sierra Club, Suite 2700
801 K St.
Sacramento, CA 95814