June 30, 2010

Via Overnight & Electronic Delivery

Hector Villalobos
Field Manager
Bureau of Land Management
Ridgecrest Field Office
300 S. Richmond Rd.
Ridgecrest, CA 93555

Eric K. Solorio
Project Manager
Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: Ridgecrest Solar Power Project - BLM Serial Number: CACA – 49016; AFC - Docket No. 09-AFC-9

Dear Mr. Villalobos and Mr. Solorio:

By this letter, Solar Millennium, LLC requests the BLM and CEC suspend the application of the Ridgecrest Solar Power Project (CACA 49016) and Docket No. 09-AFC-9. The suspension is desired to allow for the analysis of the connectivity of Mojave Ground Squirrel (MGS) in the project area.

It has become apparent project approval hinges on the question of the relative impact of the project site and facilities on the connectivity of MGS populations in the area. The staff recommendation in the SA/DEIS was denial because the biological impacts could not be mitigated. Agency staff and environmental organizations are reluctant to support a recommendation for approval in the absence of more definitive data. The project was reconfigured to address the connectivity issue based upon guidance from the agencies. However, agency views did not change significantly. Rather than press for approval in the face of this concern and staff opposition, Solar Millennium would rather address the question by conducting a study of MGS behavior in the area. The study would begin in the spring of 2011 and run for two consecutive years. Upon completion of the study the application would be restarted if the findings show the project does not significantly affect the connectivity of the MGS.

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Solar Millennium further requests the CEC, California Department of Fish and Game, BLM and U.S. Fish and Wildlife Service work with Solar Millennium to agree upon the content and oversight of the proposed study. Enclosed is a first draft scope of work for the suggested study to guide the discussions.

Solar Millennium believes the Ridgecrest project is an important one in the portfolio of renewable energy projects envisioned in the state and national energy policies designed to meet climate change goals. Our commitment is reflected in our project changes to address issues, including the study described in this letter. We will continue to seek solutions to reach approval of an environmentally sound project in the best solar resource in the U.S., the Mojave Desert.

Your attention to this matter is appreciated.

Sincerely,

James H Caldwell, Jr.
President

Enclosure

cc: Secretary of Interior Ken Salazar
Governor of California
Director, United States BLM, Bob Abbey
Acting State Director, BLM, Jim Abbott
Chairman, California Energy Commission

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Enclosure

Ridgecrest Solar Power Project
Mohave Ground Squirrel Habitat Connectivity Study

Scope of Work Outline—PRELIMINARY DRAFT

Background and Purpose

On behalf of Solar Millennium, LLC, AECOM and Dr. Philip Leitner propose to develop and implement a study of Mohave ground squirrel (MGS, *Spermophilus mohavensis*) habitat connectivity near Ridgecrest, CA. The objectives of the study are to determine: (1) where landscape connections among MGS populations exist on and near the proposed Ridgecrest Solar Power Project (RSPP) site, and whether those connections presently function as movement corridors; (2) the relative importance of the existing RSPP site to MGS movements and population connectivity; and (3) the degree to which construction of the RSPP could impair connectivity among MGS populations.

Concerns about the effects of the proposed RSPP on MGS habitat connectivity have been raised and discussed during environmental review of the project. However, empirical data to evaluate the existing importance of the site for local and regional MGS movements, dispersal, and population connectivity do not currently exist. MGS habitat connectivity will be assessed by collecting and analyzing a combination of data describing MGS distribution, abundance, movements, and genetic relationships.

Approach

Based on current understanding of the distribution of MGS populations, the Ridgecrest area appears to be important for connectivity. This study will take an integrated approach to assessing connectivity among MGS populations in the Ridgecrest area by conducting intensive studies on and adjacent to the RSPP site. These field studies will provide information on MGS occurrence and abundance over a region extending out 5-10 miles from the RSPP site. By the use of radio-telemetry, they will provide insight into landscape movement patterns of both adult and juvenile MGS within the study region. New genetic data from animals within the study region and existing data from adjoining populations can be utilized to show current patterns of gene flow. By integrating these three types of data, it will be possible to assess the relative importance of the RSPP site for connectivity as compared to other areas within this region. Anticipated analysis techniques include the use of relevant analytical tools to model connectivity (e.g., circuit theory) and identify the relative value of alternative landscape connections for MGS. By conducting the study over two years, it will be possible to greatly increase the probability of collecting adequate data in the face of variability in winter rainfall and forage availability.

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Work Plan

Task 1. Initiate Project

- Organize and participate in up to three project start-up meetings, including one kick off meeting with the client to discuss project approach, goals, schedule, and expectations; one coordination meeting with CEC, CDFG, Bureau of Land Management (BLM) and client to discuss land access and anticipated schedule; and one internal meeting among AECOM staff to identify personnel roles, field crew members, equipment needs, and anticipated schedule.

- Gather necessary equipment for the field portion of the project and prepare an anticipated project schedule, including milestones and deliverables.

Assumptions: Since the proposed study region is almost entirely federal land managed by BLM, it should be possible to obtain access for the study activities. Field crew who will be responsible for capturing, marking, and obtaining tissue samples from MGS will be required to obtain permits from California Department of Fish and Game (CDFG). Equipment for live-trapping will be provided by Dr. Leitner, but radio-telemetry equipment will need to be purchased.

Deliverables: (1) List of personnel with duties and work schedule, (2) list of field equipment to be provided and purchased, and (3) project schedule with milestones and deliverables.

Task 2. Review Existing Data

- Review MGS occurrence records and existing maps developed for the RSPP area that identify core and other MGS populations, potential movement corridors, and MGS habitat quality.

- Review topographic maps, vegetation maps, aerial images and other existing information useful for identifying field sampling locations and developing field methods.

Assumptions: This information is readily available from CDFG, BLM, GIS databases, and unpublished reports, data, and notes.

Deliverables: Memo presenting existing biological information and environmental data relevant to the study region.

Task 3. Develop Field and Analysis Methodology; Consult with Agencies

- Based on completion of Task 2, finalize the study design and field survey and analysis methods.

- Participate in one meeting with resource agencies to discuss the proposed field and analysis methodologies.

- Lead any ongoing consultation with resource agencies related to the study.

Assumptions: The resource agencies will be interested in cooperating to the extent of providing reactions and input to the methodology.

Deliverables: Memo that describes field and analysis methodology; map of survey locations.

Task 4. Conduct Field Sampling

Task 4a. Select locations for field sampling

Conduct up to two reconnaissance visits to the project area and accessible adjacent land during late January and early February to select suitable locations for MGS trapping.

- Prior to the field visits, prepare maps of the project area and adjacent lands with potential locations for trapping grids and potential movement corridors (based on existing MGS data for known and core populations) identified on map. Potential trapping locations would be selected based on the presence of suitable MGS habitat features, topography, site accessibility, proximity to a potential movement corridor, and other factors.

- During the field visits, visually survey the potential trapping locations and determine if the sites are suitable to address questions about MGS movement and habitat connectivity. Visually survey the potential movement corridor locations and select corridors that would be surveyed for habitat characteristics commonly associated with MGS presence.

- Following site visit, prepare map of selected site trapping locations and potential movement corridors that would be surveyed.

Task 4b. Collect data on habitat features in potential MGS movement corridors

Conduct two years of surveys in lands adjacent to the project area that could serve as MGS movement corridors. Biologists would collect quantitative data on plant community composition, percent plant cover, soil properties, and topographic features. The resources would be mapped for each potential movement corridor.

Task 4c. Collect data for MGS presence in and adjacent to the project area

Conduct two years of live-trapping to assess the occurrence, distribution, and abundance of MGS in the project area and adjacent lands. Trapping effort would attempt to determine if MGS, including resident adults, are present in the project area and which habitat characteristics are correlated with presence. The effort would also attempt to determine if MGS are isolated to the project area or also found in adjoining lands, indicating a regional population with possible movement of individuals and genetic information into and out of the project area. All trapping would occur under the supervision of Dr. Leitner.

Trapping Methodology:

- Establish trapping grids in selected sites within the project area and a five-to-ten mile radius surrounding the project area, including those areas that could serve as potential movement corridors based on the inferences made during field reconnaissance and an examination of site characteristics.

- Conduct three trapping sessions at each grid for five consecutive days during the period from February 15 through June 30.
- Collect data on age, sex, and reproductive status; mark individuals using pit tags.
- Each trapping grid would consist of 100 live traps equipped with trap covers during hot weather. The array of traps would vary based on site characteristics and may include a 4 x 25 or 10 x 10 array.
- Collect data on habitat characteristics (e.g., soils, slope, and plant community composition) at each trapping grid.

Task 4d. Gather data for Mohave ground squirrel movement in and adjacent to the project area
Conduct two years of radio-telemetry surveys of MGS adults and juveniles to assess movement patterns within the project area and the surrounding study region. (Note: adult males can move >1 km per day during the mating season [Feb 15-March 10] looking for mates and this may be important for gene flow. Juvenile females can also move up to 6 km during dispersal in late May-June so both adults and juveniles should be radio-collared.) By radio-tracking adult males in the breeding season, it will be possible to identify corridors for local gene flow. Radio-tracking adult females will allow identification of natal burrows where juveniles can be captured and radio-collared. This task would attempt to identify potential MGS movement corridors. By tracking the movements of juveniles as they disperse to new habitats within the project area and in adjoining areas, it will be possible to identify potential MGS movement corridors. All radio-telemetry would occur under the supervision of Dr. Leitner.

Task 4e. Collect genetic data
This task would be conducted if MGS are captured during live trapping. Collect tissue samples from the ear of all captured MGS for two consecutive years to identify the degree of relatedness, based on the similarity of microsatellite loci, among MGS individuals in the project area and with MGS individuals in adjacent lands. This task would attempt to identify potential MGS movement corridors by analyzing the degree of genetic relatedness among the individuals captured outside and inside the project area.

Task 5. Analyze Data, Conduct Connectivity Modeling, and Prepare Reports
Field data will be analyzed each year during the field season, with report preparation scheduled during the fall. A draft report (including maps) will be submitted for client review by October 31 and finalized within 30 days of receipt of client comments. For the final report during the second year, anticipated analysis techniques include the use of relevant analytical tools to model connectivity (e.g., circuit theory) and map the relative value of alternative landscape connections for MGS.

Assumptions: Field technicians will perform data entry and preliminary data analysis during the 7-month field season.

Deliverables: Draft report for first year results, finalized after review by client. A similar procedure will apply for second year, with final report covering both years.