

California Native Plant Society

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RE: RIDGECREST SOLAR POWER PROJECT (09-AFC-9)

Dear Mr. Solorio and Ms. Eubanks,

I am writing on behalf of the Creosote Ring Subchapter of the California Native Plant Society. We are part of the geographically large Bristlecone Chapter covering Mono and Inyo Counties and the northeast corner of Kern County, where the Subchapter is based (primarily the Indian Wells Valley communities of Ridgecrest and Inyokern). Our membership includes individuals who have lived in the area for a great many years and who have a significant understanding of the local flora. Many of our members have participated in the annual Wildflower Show at the Maturango Museum in Ridgecrest, as both collectors (with correct BLM permits) and identifiers of the area flora over many years. I believe this experience gives our group a unique appreciation of the biological resources contained within the Ridgecrest Solar Power Plant site.

The mission of The California Native Plant Society (CNPS) is to conserve California native plants and their natural habitats. CNPS has gone on record [scoping comments by Conservation Director Greg Suba to the BLM on 12-23-09] as opposing the siting of large-array renewable energy projects in functionally intact desert areas on public trust lands, especially *as the first option*. The Creosote Ring subchapter fully supports this view and believes that the Ridgecrest Solar Power Project site is an irreplaceable biological resource. We support the CEC biological staff assessment that this site should be protected.

The SA/DEIR for the proposed Ridgecrest Solar Power Project states that it is “to be constructed on land featuring unique habitat for sensitive species and biological resources” [page 19]. One of the key precepts that even grade school biology classes teach is that the web of life is everywhere dependent on plants, as they are the organisms able to create food resources through photosynthesis. Therefore, in order for the sensitive fauna present on this site (Desert Tortoise and Mojave Ground Squirrel, both of which are herbivores, i.e. plant eaters) to thrive, the proper plants must exist on the site. With a high occurrence of Desert Tortoise and a functioning genetic corridor linking Mojave Ground Squirrel populations, this is truly an irreplaceable location.

The Creosote Ring CNPS subchapter conducted a field trip to the site on April 17, 2010. Prior to that date the field trip leaders, Mary Jane McEwen and I, visited the site several



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times. Both leaders also visited the site at later dates. 23 participants helped to document the annual and perennial plant species found on both the North and South sites. 72 species from 25 plant families were observed, indicating a complex well-functioning ecosystem. Especially note-worthy were the existence of Winter Fat (*Krascheninnikovia lanata*) and Spiny Hop-Sage (*Grayia spinosa*), indicators of Mojave Ground Squirrel habitat and, perhaps more importantly, the occurrence of many preferred food plants for both juvenile and adult Desert Tortoises. A copy of the plant list was included with Ms. McEwen's comment letter dated 4-29-10. Her letter also discussed the research documenting preferred Desert Tortoise foods.

It should be pointed out that the Plant Communities section of SA/DEIR has insufficient information to fully analyze the impact of RSPP. "Unvegetated ephemeral dry wash" is not a known community in either of the sources cited. "Mojave desert wash" community may be misidentified, as its dominant species Catclaw Acacia (*Acacia greggii*) does not occur on the site (it is not mentioned as occurring by staff biologists and it was not observed by CNPS members).

In order to fully understand the complex biological functionality of the RSPP site, a detailed vegetation map should be created. This would show the mosaic of plant communities. These communities are intricately tied to the predominant land feature of the site, i.e. alluvial plain or bajada. By its very nature, this floodplain can, and has in the recent past, had sheet flow over a very large area in times of heavy precipitation in the El Paso Mountains. Grading of the site would destroy the small washes that help distribute this sheet-flow, preventing major flooding and also supporting the mosaic pattern of vegetation. Channelizing run-off from the RSPP site into the main wash would change the ability of the wash to support the same vegetation as it now does. In the desert where plants have evolved to survive, even thrive, with little annual precipitation, such a major alteration of hydrology as proposed within the RSPP site would be very detrimental to plant life and therefore to animal life.

Although the Creosote Ring CNPS subchapter has compiled a plant list, the SEC staff should include their own inventory of all plant species on the site. Such an inventory should be undertaken using the protocols outlined in detail in CNPS' comment letter of 12-23-09 (previously cited). It is quite likely that plant species that are locally rare (not just the special status plants listed in Biological Resources Table 2) may occur on the site. By looking only for Special Status plants, locally rare plants can be overlooked. Ideally plant surveys would be conducted over a multi-year period, as variable weather patterns can greatly affect the germination of annual species. Also fall surveys can be valuable in documenting those species that only appear after summer rains.

Disturbance of such a large area of pristine desert habitat would also encourage the invasion of alien opportunistic plant species further degrading the surrounding area both in terms of its ability to support wildlife and visual impact. Although a Weed Management Plan has been proposed many of the likely invading alien plants have proved difficult if not impossible to control elsewhere.

A final botanical point that has not been addressed in the SA/DEIR is the occurrence of Creosote Bush (*Larrea tridentata*) rings on the RSPP site. In the Mojave Desert Creosote Bush often grows in a clonal ring over millennia. The oldest documented ring in California is over 11,000 years old. There are many Creosote Bush rings in the Indian Wells Valley on both public and private lands. They should be conserved for future study. Construction of the RSPP would destroy this valuable research opportunity.

The Creosote Ring CNPS subchapter also supports the CEC staff finding that impacts to visual resources cannot be mitigated. The RSPP site is located in a very scenic area of the Indian Wells Valley with the backdrops of the El Paso Mountains to the south and the southern Sierra Nevada Range to the west. Over the spring months the Brown Road corridor is awash with golden blooms: first the low carpet of Goldfields (*Lasthenia californica*) punctuated by Desert Dandelion (*Malacothrix glabrata*) followed by many golden-hued shrubs such as Goldenhead (*Acamtopappus sphaerocephalus*) and Cooper Goldenbush (*Ericameria cooperi v. cooperi*) and finally, as the weather turns hot, the spectacular display of Desert Senna (*Senna armata*). For wildflower lovers this area offers much enjoyment. A number of subchapter members use the Railroad Bed Bike Trail for hiking – use would certainly drop off with the view being dominated by an industrial installation. Many subchapter members also use the current BLM recreational roads through the project area to access additional flora displays further into the El Paso Mountains.

In conclusion, the Creosote Ring CNPS Subchapter believes that the loss of such a unique and special place should not happen. The preferred alternative is that no project be constructed at this site.

Respectfully submitted,

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