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CLUB**
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January 23, 2009

John Kessler, Project Manager
Siting, Transmission and Environmental Protection Division California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
E-mail: jkessler@energy.state.ca.us

RE: Carrizo Energy Solar Farm
Power Plant Licensing Case, Docket Number: 07-AFC-8

Dear Mr. Kessler,

We are submitting the following for the administrative record as the comments of the Santa Lucia Chapter of the Sierra Club on the Siting Process for the Carrizo Energy Solar Farm.

The ability of the San Joaquin kit fox, tule elk and pronghorn to thrive throughout a range that can extend through the Salinas and Pajaro River watersheds and from the Salinas Valley to the Carrizo Plain is of critical concern to the Sierra Club and our 2,500 members in San Luis Obispo County. We commend the Commission for its decision to conduct a Wildlife Corridor Study in coordination with the applicants for the CESF and the applicants for the other proposed solar facilities on the Carrizo Plain.

We support the observation of Brian Maculla that the corridor study should inform the optimal placement of some of the habitat mitigation. We urge the Commission to consider mitigation options that include purchase and donation of inholdings in the Carrizo Plain National Monument and the purchase of the leases of Vintage Petroleum.

We trust the CEC will consider that the importance of the land proposed for the project sites as habitat includes both its value as open foraging ground and underground refuge for threatened species other than the focal species considered for the wildlife corridor study (such as the kangaroo rat). It is crucial that mitigation ratios of 5 to 1 for permanent habitat loss and 4 to 1 for temporary habitat loss be maintained in the licensing process. These ratios represent the minimal mitigation necessary to maintain biological integrity and should not be reduced.

Thank you for considering our comments,

Karen Merriam
Chapter Chair

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