



Audubon CALIFORNIA

**Kern County Planning Department
Attn: Jaymie Brauer
2700 "M" Street, Suite 100
Bakersfield, CA 93301**

Kern River Preserve
18747 Highway 178
P. O. Box 1662
Weldon, CA 93283
Phone/Fax: 760-378-2531

**RE: Notice of Preparation for Weldon Solar Project by Renewable Resources
(PP10244).**

Date: April 6, 2010

On behalf of the 50,000 members and supporters of Audubon California, a state office of National Audubon Society, a 501(c)(3) status non-profit corporation, we would like to submit the following comments regarding the Notice of Preparation and upcoming scope and content of the Environmental Impact Report (EIR) that will be prepared for the Weldon Solar Project by Renewable Resources.

The National Audubon Society's Kern River Preserve is immediately adjacent to the parcels identified in this project description. As a neighboring private landowner we wish to make comments regarding the proposed project to ensure that the values of our property are not unnecessarily diminished by the proposed changes in zoning and the various elements of the project. We were not included in the mailing of the notification for this project and request that we be included in all future mailings and communications regarding public review and comment for this project.

Correspondences can be sent to:

Reed Tollefson
Audubon California
Kern River Preserve
P.O. Box 1662
18747 Hwy 178
Weldon, CA 93283
P/F (760)378-2531
rtollefson@audubon.org

General Comments

We respect the desire of a private landowner to benefit economically from their property. We also see the benefits of developing clean and renewable energy and providing jobs to our local and the wider community in Kern County. With this in mind we submit the following comments and suggestions regarding the potential negative impacts of this project to our community and our adjoining Kern River Preserve.

The agricultural lands proposed to be converted to an industrial solar energy plant have a great deal of value to the agricultural economy in the Kern River Valley. The loss of these farm lands will diminish the local economic base for agriculture and increase land values which may help to push other farm and ranchlands toward additional energy development or up zoning and subdivision for housing and industry. Furthermore, the agricultural fields that would be lost also provide important habitat to a variety of wildlife species and provide an important protective buffer to the adjoining Kern River Preserve.

Construction and operations of this project have the potential to negatively impact the wildlife in the adjacent riparian forest, wetland and grassland habitats on the subject property as well as Audubon's Preserve properties immediately adjacent. Steps should be taken to minimize and mitigate negative impacts.

Aesthetically an industrial solar development has the potential to greatly diminish the natural and rural beauty of the Kern Valley. This is an attraction to our visitors as well as appreciated by our residents. Steps should be taken to protect these values for the community.

The environmental analysis should fully consider the species of concern that might be affected by the project or are fully protected by law, and also list their current or proposed future status.

The environmental impact report should analyze the impacts on species of birds that are sensitive, threatened, endangered or fully protected by law through disruption of migratory pathways, habitat fragmentation, loss of foraging or breeding habitat, and cumulative effects of all of the renewable energy projects in Kern County.

Specific Comments

Kelso Creek Flood Channel Capacity – the flood channel on Kelso Creek must be wide enough to carry flood flows without backing water on to upstream properties. As it empties into the wetland and perennial grassland areas downstream of the project area it should be designed to spread flood water rather than channelize the flow. This will dissipate the energy of flood waters so they are not erosive and will increase the spreading and infiltration of the water to reduce downstream flooding of Hwy 178. The native perennial vegetation in the wetlands and perennial grasslands is critical to absorbing and dissipating flood water and preventing erosion. These areas should be protected with a permanent conservation easement.

South Fork Kern River Floodplain Issues – To ensure protection from flood events the undeveloped river set back area to the north of the project should be wide enough to accommodate flood flows and over bank flows that can be expected on the South Fork Kern. To mitigate for impacts to wildlife by the proposed project, this setback area and the undeveloped riparian forest should be protected by a permanent conservation easement. The terms of the easement should be compatible with the protection of the natural values on this land and the adjacent Kern River Preserve. Perennial grass pasture

should be established in the river setback area with plant species including alkali rye (*Leymus triticoides*), saltgrass (*Distichlis spicata*), and alkali sacaton (*Sporobolus airoides*). This perennial grass cover would provide excellent protection from erosion by wind and flood events. Construction activities should not occur in the portions of the project area nearest the riparian forest during the months of April through August to minimize disturbance to nesting birds including Southwestern Willow Flycatcher *Empidonax traillii*.

Wetlands/Perennial Grasslands – To mitigate for loss of wetlands and agricultural lands associated with the development, the undeveloped wetland and perennial grassland areas south of Hwy 178 and west of Kelso Valley Road should be placed in a permanent conservation easement that protects wetland and agricultural values. The easement should not allow these areas to be cleared, disked and plowed or otherwise developed; they should be managed with compatible livestock grazing. These areas are of great significance to Tricolored Blackbirds (*Agelaius tricolor*) and Kern Red-winged Blackbirds (*Agelaius phoeniceus*) and many other grassland and wetland species. This area will also accept flood waters and buffer flood peaks when Kelso Creek floods, thus minimizing damage to Hwy 178 downstream.

Dust Control – Steps should be taken to minimize wind erosion and blowing dust on the areas of the sites under the solar panels. We recommend establishing and maintaining native vegetation under the solar panels to the fullest extent practicable. Native vegetation on wetlands, river set back and buffer areas should be protected, re-established and managed to prevent wind erosion and dust.

Loss of Agricultural Lands – The loss of agricultural lands and associated wildlife values should be mitigated by placing permanent conservation easements on undeveloped wetlands south of Hwy 178 and the river setback area on the north of the proposed project. Perennial grass pasture should be established in the river setback area with plant species including alkali rye (*Leymus triticoides*), saltgrass (*Distichlis spicata*), and alkali sacaton (*Sporobolus airoides*). These areas should be managed with periodic livestock grazing. This would also help to offset negative impacts of the proposed project on Kern Red-winged and Tricolored blackbirds as well as other wildlife species.

In open space buffer areas that are too dry to establish native perennial pasture, we recommend establishing native cover including rabbitbrush (*Ericameria nauseosa*), fourwing saltbush (*Atriplex canescens*), big sagebrush (*Artemisia tridentata*), and silver cholla (*Cylindropuntia echinocarpa*), to benefit the esthetics and enhance wildlife value as well as dust control.

Visual Impact – Protect the rural and natural views along Hwy 178. Industrial fence with barbed wire backed by solar panels would be very undesirable. Please consider building block wall with plantings of well spaced water thrifty native shrubs. See list of native shrubs above for use in dry areas.

Dark Night Skies – Lights will likely be needed on this site for operations and security. Efforts should be made to direct lights only into specific project areas. Shielding should be used to minimize light upward into the night sky or outward from the project area. Lights with more natural hues and dimmed would be much appreciated.

Access to Kern River Preserve – Since the establishment of the Kern River Preserve in 1980 we have accessed the eastern portion of our property in Section 7, R34E, T26S, south of the river channel through farm roads leading from Hwy 178 behind the Methodist Church. We would like to work with the project proponent to continue our access to this portion of our property.

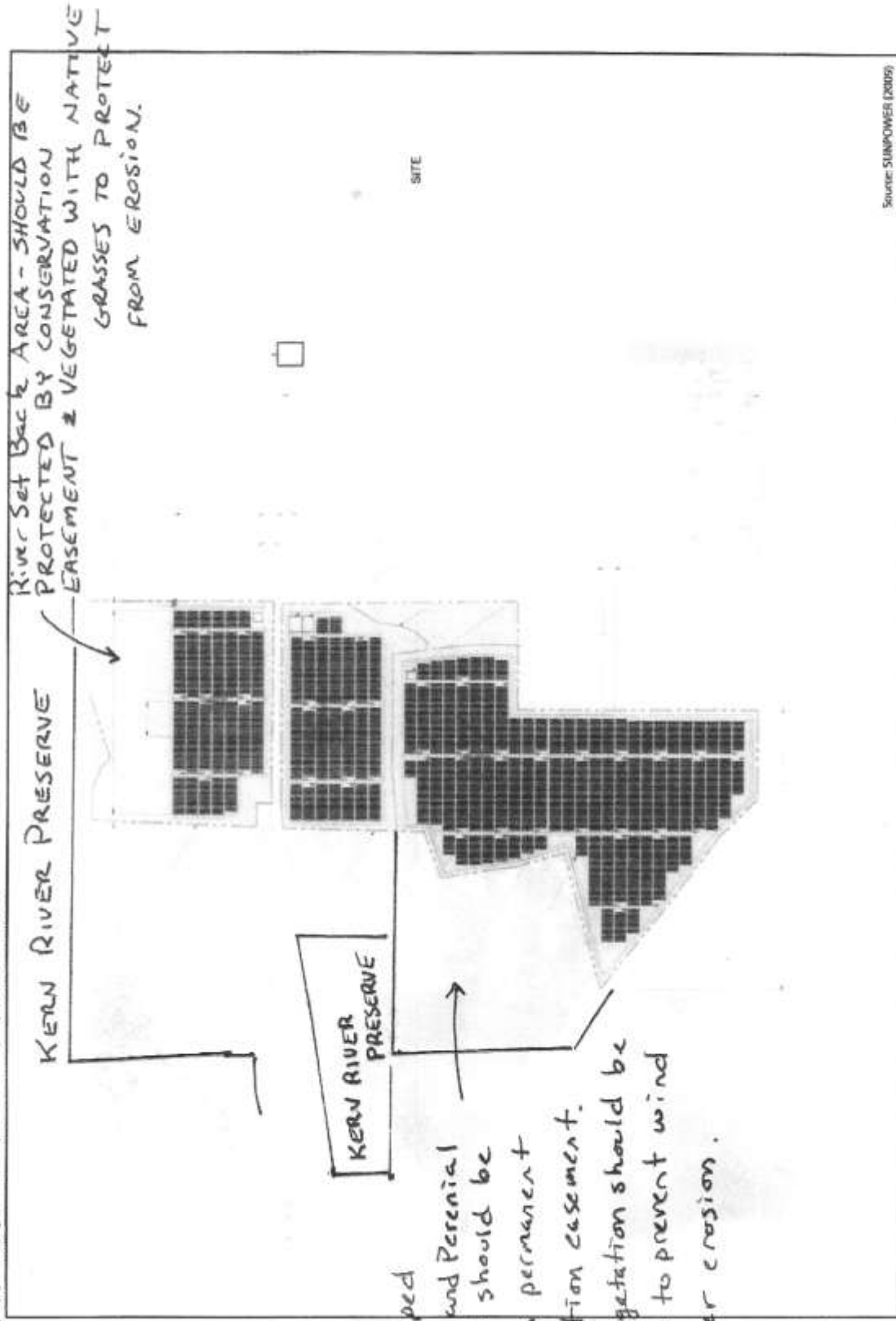
Please refer to map with hand written notations “RE: Weldon Solar Project, Comments by Reed Tollefson. Audubon Kern River Preserve”

Sincerely,

A handwritten signature in cursive script that reads "Reed Tollefson".

Reed Tollefson
Manager Kern River Preserve
Audubon California

RE: WELDON SOLAR PROJECT
COMMENTS BY REED TOLLEFSON
AUGUST 2009 KERN RIVER PRESERVE



ZCC 3, CUP 1, Map 42-13
ZCC 1, CUP 1, Map 42-24

Figure 7
Proposed Site Plan
Weldon Solar Project by Renewable Resources