

Thank you for your comment, Erin Robertson.

The comment tracking number that has been assigned to your comment is SolarM60256.

Comment Date: September 14, 2009 18:55:53PM
Solar Energy Development PEIS
Comment ID: SolarM60256

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Comment Submitted:

Center for Native Ecosystems has submitted extensive comments along with The Wilderness Society and other conservation groups.

We also wish to draw attention to another issue not previously covered in our comments.

Slender spiderwort (*Cleome multicaulis*) is present near one of the study areas, and it is possible that suitable habitat may exist within the study area itself. This wetland and playa lake wildflower appears to be sensitive to water diversions and changes in the local water table. It has been extirpated from much of its former range in the Southwest, and the remaining populations in Colorado will be key to its persistence. The BLM has recognized the spiderwort's imperilment by designating it a Sensitive species in Colorado. The BLM should take the following actions to ensure that the actions the agency permits will not further imperil this wildflower:

1. Avoid any direct disturbance of the spiderwort plus 200 m buffers.
2. Require surveys during the spiderwort's blooming season before authorizing disturbance in potential habitat.
3. Avoid approval of any aspects of the project that could result in changes in hydrology for occupied spiderwort habitat.
4. Apply the Colorado Rare Plant Conservation Initiative's Recommended Best Management Practices for Plants of Concern. Although these recommendations were created with oil and gas drilling in mind, most will also be beneficial in mitigating the impacts of solar development.
5. Attempt to mitigate impacts to spiderwort pollinators as well.

Thank you for considering this comment.

Sincerely,
Erin Robertson
Senior Staff Biologist