



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

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This letter of concern is intended to discuss and comment on the Ivanpah Solar Electric Generating System (docket # 07-AFC-05) scheduled to be built west of Ivanpah Dry Lake in Eastern San Bernardino County, California.

Dear George Meckfessel,

Thank you for taking the time to discuss Ivanpah Solar Electric Generating System (ISEGS) with me on April 24, 2008. I understand that the initial commenting period has closed and the National Parks Conservation Association (NPCA) acknowledges and appreciates the time you are taking in order to review this letter.

NPCA is a non-profit organization dedicated to the protection and enhancement of National Parks for future generations. NPCA currently has a membership of more than 340,000 individuals including over 45,000 individuals in California

The development of renewable energy is a critical component of efforts to reduce greenhouse gas emissions, avoid the worst consequences of global warming, and to assist California in meeting emission reductions set by AB 32 and Executive Order S-03-05. NPCA supports the development of renewable energy production. However, like any project, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitat, and the site should not compromise the integrity of National Park Service units, such as Mojave National Preserve, that Congress and the American people have identified as crucial for the preservation of our natural and cultural heritage.

In reviewing available information relating to ISEGS, NPCA has identified many of the processes associated with the construction and the operation of a solar electric generating system as incongruous with the protections awarded to Mojave National Preserve (Preserve) under the California Desert Protection Act of 1994.¹ These include ISEGS disrupting the Preserve's scenic viewshed, the import of light pollution, disruption of the natural soundscape, the potential for blocking or limiting access to recreation in Clark Mountain designated

¹ 16 U.S.C. §§ 410aaa through 410aaa-83, October 31, 1994.

wilderness by performing construction activities to the entrance road, negative impacts to federally listed wildlife species and to critical wildlife habitat, negative impacts to air quality, continued water draw down in the Ivanpah Valley, and the potential for induced development in the immediate vicinity causing significant cumulative impacts to Mojave National Preserve. NPCA is aware that the EIS has not yet been released for the ISEGS, and that its release is scheduled for September 2008. NPCA requests that the following issues be considered and addressed through the EIS process:

- **Viewshed impacts.** The construction of a large solar plant will cause negative impacts to the scenic view from atop Clark Mountain into the Ivanpah Valley. The scenic viewshed of Clark Mountain and the Ivanpah Valley will also be negatively affected as it is seen from higher elevations of northern Mojave National Preserve. Clark Mountain is the highest elevation within Mojave National Preserve (7929 feet) and currently provides expansive views of protected land and designated wilderness in all directions.
- **The usage of the Ivanpah Valley as a lambing area for the Preserve's Desert bighorn sheep (*Ovis canadensis*).** NPCA requests that a thorough impacts analysis regarding this iconic wildlife species be conducted and appropriate mitigation proposed and adopted. This is an area of particular concern, as the Preserve's Clark Mountain Desert bighorn sheep herd uses the Ivanpah Valley area as lambing site, and increased noise, construction, and human activity have documented negative impacts to the Desert bighorn's ecological health ².
- **The usage of the proposed project area by the federally threatened Desert tortoise (*Gopherus agassizii*).** The Desert tortoise has been documented in the planning process at relatively high levels in the proposed project site.³ The EIS must clearly address a proposal for avoiding, minimizing and mitigating the impacts to the Desert tortoise and its occupied habitat. The BLM must first look at ways to avoid impacts to the Desert tortoise, for example, by identifying and analyzing alternative sites outside of Desert tortoise-occupied habitat or in areas that have already been severely disturbed by other prior land use. If impacts are unavoidable, multiple mitigation strategies must be identified. If translocation is to be a part of the mitigation strategy, a detailed plan must be included as a part of the EIS on the methodology for

² Tesky, Julie L. 1993. *Ovis canadensis*. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: <http://www.fs.fed.us/database/feis/> [2008, May 27].

³ Ivanpah Solar Electric Generating System (ISEGS) #07-AFC-05. 2007. Application for Certification available at <http://www.energy.ca.gov/sitingcases/ivanpah/documents/index.html>



determining appropriate conservation areas where tortoises may be translocated, impacts to existing “host” tortoise populations that occur on the translocation site, when/how the tortoise are to be translocated, how tortoise diseases will be addressed, and requisite monitoring of host and translocated tortoises. NPCA is concerned that without these analyses, desert tortoises could simply be shuffled into the adjacent Preserve, with potentially severe ecological consequences to a federally threatened species and to the biotic systems of the Preserve.


- **Impacts to multiple species and ecosystems.** Clear-cutting and fencing off of 3,400 acres of currently vegetated environment may have detrimental effects to mammals, birds, reptiles and insects, as well as to federally listed plant species. The environment of the proposed project currently serves as prime desert habitat as well as migration routes for numerous species. The effects of the removal of this resource should be quantified by performing in-depth studies of the current residents and seasonal migrants that utilize this resource, twinned with vegetation surveys to determine the impacts to federally listed plant species. Data stating which species currently use this area as a wildlife corridor and the effects of the removal of this resource should be gathered and clearly presented in any EIS..
- (I took this out because CBD didn't list Mojave GS in their table of species)**Air quality impacts.** The clear-cutting of 3,400 acres may result in the decrease of air quality in the area. Without root systems to anchor sand and dirt, it may become airborne and affect the scenic viewshed from Mojave National Preserve, as well as becoming an air quality concern for humans. The EIS should refer to the type and frequency of air quality monitoring to be performed at the site to ensure that ISEGS is not creating air pollution.
- **Light pollution impacts to Mojave National Preserve.** Any activities that would be performed at night, including construction activities, would require that light be used. Mojave National Preserve is a renowned location for having one of the most pristine views of the night sky in the continental United States. Any deterioration of this pristine resource should be quantified and thoroughly examined in the EIS process.

- **Noise pollution impacts to Mojave National Preserve.** Adjacent land in the Preserve is federally designated Wilderness. Part of the wilderness experience is the natural quiet of the non-mechanized world. Any construction activities or energy generation activities that would impact the natural soundscape of the adjacent wilderness areas in and adjacent to the Mojave National Preserve should be quantified in the EIS. This examination should include the impacts to the natural quiet and the wildlife in adjacent properties housing wilderness areas.
- **Threats to groundwater resources.** The Ivanpah Valley is already over-allotted in terms of water usage. Currently, more water is being drawn from the valley than is being recharged. Additionally, studies should be performed to determine whether subsidence could occur due to this continual draw down. The EIS hydrological study should include both the short and long-term effects on any seasonal or perennial springs in the area, as they are of critical importance to wildlife, plant life and recreational users of the Mojave National Preserve. Riparian areas represent some of the most diverse and rare ecosystems in the Mojave Desert and are of critical importance to the health of the environment.
- **Potential restriction of access to recreational opportunities.** Any construction/demolition that may affect entrance or usage of the Clark Mountain exclave of Mojave National Preserve should be discussed in the EIS. Excelsior Mountain road is the main entrance to the Clark Mountain Wilderness area. This road would be utilized for local traffic to and from the ISEGS Solar Plant and construction to, or damage to this road could prevent access to the recreational users of Mojave National Preserve.
- **Cumulative impacts analysis.** According to NEPA law, cumulative impacts must be analyzed in any EIS. Future usage and plans for development in the region should be explored and taken into full consideration. Urban planning research should be utilized in order to quantify the effects of cumulative development on the adjacent area, including whether increased property values as a result of less land and more infrastructure will lead to urbanization of this area. Urbanization could lead to over-utilization of shared resources with Mojave National Preserve, and to development of private in-holdings within the Preserve.



NPCA believes that alternate sites for the location of the 3,400 acre ISEGS should be fully explored. NPCA recognizes that the ISEGS will need to find a location with close proximity to existing electrical and gas utilities. Other, more suitable sites likely exist along the I-15 corridor to the west of the currently identified location. The current site would import a host of permanent and irreversible impacts to Mojave National Preserve and for federally listed species of wildlife. This location is bordered by the Clark Mountain range to the west and the Piute Mountain range to the east. The Piute Mountain range would likely block early morning sunlight while the Clark Mountain range would likely block late afternoon sunlight. A more suitable location would likely be able to harness morning and late afternoon ambient light, while being able to take advantage of existing infrastructure. NPCA firmly supports the development of renewable energy resources and recognizes the many benefits presented by Brightsource's plan for development. NPCA requests that alternative locations for the ISEGS be fully explored to maximize productivity of the ISEGS while not irreparably destroying 3,400 acres of critical wildlife habitat and negatively influencing the migration of wildlife, the scenic viewshed, the water resources, the observation of pristine night sky, the natural quiet, the air quality, the access to, and enjoyment of the adjacent wilderness areas and Mojave National Preserve.

Thank you for your time and consideration of this matter, feel free to contact me if I can be of assistance or if I can answer any questions that you may have.

David Lamfrom 
California Desert Field Representative
NPCA

