



January 7, 2007

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Attn: Ivanpah SEGS

DOCKET
07-AFC-5

DATE JAN 07 2008

RECD. JAN 08 2008

BY EMAIL, FAX TO: (760) 326-7099, HARDCOPY BY MAIL

Re: Notice of Intent ("NOI") to prepare an Environmental Impact Statement/Final Staff Assessment (EIS/FSA) for the Ivanpah Solar Electric Generating System ("Ivanpah SEGS")

Dear Mr. Meckfessel,

Please accept the following comments regarding the Ivanpah SEGS EIS/FSA on behalf of the California/Nevada Desert Committee of Sierra Club.

The scope of existing applications for concentrated solar energy projects -- over forty projects totaling over 500,000 acres of BLM lands in California and an undetermined number of applications in Nevada with 160,000 acres involved in the Las Vegas District alone -- has potential direct, indirect and cumulative impacts of unprecedented proportions to BLM California Desert Conservation Area (CDCA) and Nevada BLM lands.

BLM has an obligation to review the projects comprehensively with one programmatic EIS, just as is being done for geothermal energy proposals and has been done for wind energy proposals. To conduct a piecemeal review of these projects individually (as is proposed in the instant case) would contravene the intent of the National Environmental Policy Act and other federal laws and regulations.



CALIFORNIA / NEVADA REGIONAL CONSERVATION DESERT COMMITTEE
Protecting the Desert

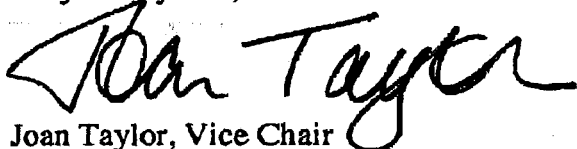
The following comments are meant to apply both to the Ivanpah NOI and to the above-requested programmatic EIS for all solar projects being proposed on BLM lands in California and Nevada.

- Cumulative impacts to public and private lands caused by geothermal, wind, and other development should be considered.
- The potential for solar, wind and geothermal energy projects to cause indirect impacts resulting from proposed new transmission lines and corridors should be part of the environmental review.
- The Plan Amendment process for the CDCA, Las Vegas District and other Nevada Districts affected by these projects must not be considered in a piecemeal project-by-project way. All projects and ancillary facilities such as transmission lines should be rolled into comprehensive Plan Amendments in order to properly consider the impact on the affected Plans.
- Likewise, the requisite consultation with trustee agencies should be on a comprehensive basis, inclusive of all energy projects/plan amendments.
- The BLM should employ best management practices standards for all concentrated solar energy generating projects in the CDCA and Nevada. This would include, but not be limited to, best available technology for solar mirrors, heat mediums that reduce water consumption and/or store heat energy, best available transmission technology, etc.
- The EIS should analyze a meaningful and inclusive range of alternatives. In addition to the no project alternative, there should be a reduced project alternative which considers increased conservation, demand reduction, and local distributed renewable energy. Equally importantly, there should be an alternative that (1) limits concentrated solar power generating facilities to sites within a few miles of existing electrical transmission corridors and (2) avoids critical habitat for endangered species, wilderness, wilderness study areas and important areas for habitat connectivity and cultural resource protection.

Please see attached article on solar parabolic mirror technology as an example of using best available solar technology.

Thank you for the opportunity to comment.

Very truly yours,



Joan Taylor, Vice Chair
CNRCC Desert Committee

cc: USFWS

Enclosure

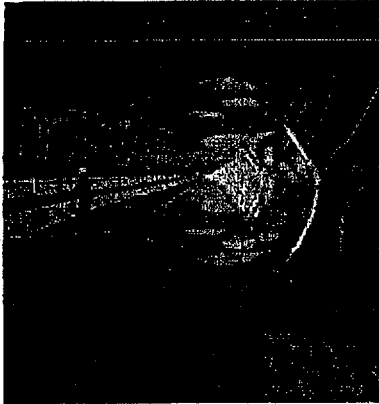
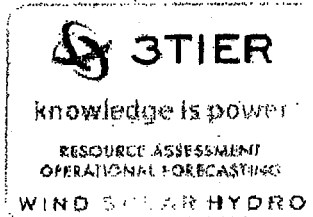


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September 27, 2007

Germany Looks to North Africa's Untapped Solar Thermal Potential

Flabeg has recently developed a mirror that can reflect 93 percent of the sun's rays.

by Jane Burgermeister, Contributing Writer

Vienna, Austria [RenewableEnergyAccess.com]

A study by the German Aerospace Center estimated that harnessing the sun's energy falling on just 6,000 square kilometers of desert in North Africa would supply energy equivalent to the entire oil production of the Middle East of 9 billion barrels a year.

"We increased the reflectivity of our mirrors by using better raw glass quality. The more transparent the glass, the higher the reflectivity value. We use an extremely transparent, white type of glass."

Thomas Deinlein, Flabeg

The study calculated that solar thermal power plants could supply 68 percent of North Africa's as well as Europe's electricity by 2050.

One company planning to take advantage of this untapped potential is Flabeg, a German-based manufacturer of parabolic trough mirrors for solar thermal power plants. The company recently developed a mirror that can reflect 93 percent of the sun's rays.

The improved mirror can concentrate 99% of the sun's radiation onto an absorber tube with a diameter of 70 mm or less.

Flabeg said that it expects to sell its high precision mirrors in Spain and North Africa as the solar thermal power plant market starts to take off in

Europe.

The company is set to deliver 210,000 of the high precision mirrors to the 50 megawatt (MW) solar thermal power plant Andasol II, in Spain—the biggest in Europe—by the end of June 2008.

Flabeg has already equipped the 50 MW Andasol I solar thermal plant with 210,000 RP 3 mirrors.

"We increased the reflectivity of our mirrors by using better raw glass quality," Thomas Deinlein from Flabeg told RenewableEnergyAccess.com. "The more transparent the glass, the higher the reflectivity value. We use an extremely transparent, white type of glass."

It is estimated that a 50 MW solar power plant can generate 5 million kilowatt-hours more of electricity for every extra 1 percent of sunlight that is collected by solar mirrors.

Europe's first commercially operating solar thermal tower plant went into operation in Sevilla, Spain generating 11 MW of electricity in April. Plans are in place for building more solar power plants able to generate a total of 300 MW of electricity, enough to supply the city of Sevilla.

Also, European research organizations, including the German Aerospace Center, are testing different types of solar thermal technology at an experimental solar thermal plant called the Plataforma Solar de Almeria in Spain.

In addition, the German Aerospace Center has built an experimental solar thermal tower power plant in Julich, Germany, that is due to come into operation in 2008 and that will be able to generate 1.5 MW of electricity.

In Julich, 16,000 m² of mirrors will track the sun and concentrate solar radiation onto a tower to heat up the air, generate steam and drive a turbine.

The Julich plant will be used to test solar thermal tower power plant technology with a view to developing prototypes for 10 to 50 MW power plants that can be built in South Europe and North Africa.

The German Aerospace Center plan envisages building solar thermal power plants of between 50 and 200 MW in size in different locations across North Africa. Cables to transmit electricity from North Africa to Europe have already been built under the sea.

If this vision becomes a reality, it is estimated that North Africa can produce 2 to 3 times more solar thermal electricity than Europe.

Jane Burgermeister is a freelance writer based in Vienna, Austria.