



From the Desk of Dayan Anderson

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<b>DOCKET</b>	
07-AFC-5	
DATE	JAN 30 2008
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Re: **Application for Certification for the Ivanpah Solar Electric Generating System (Docket No. 07-AFC-5)**  
Issue: **Potential Impacts to Desert Bighorn Sheep**

I am writing in reference to the Application for Certification for the Ivanpah Solar Electric Generating System (Docket No. 07-AFC-5). As I was unable to attend the public hearing held in Primm, Nevada last week, please accept my following statements for inclusion in the public record during this scoping phase of the project; these concerns focus primarily on the future viability of Desert Bighorn Sheep on Public Lands in the mountain ranges adjacent to the proposed project area.

It is my understanding that this project is one of over 40 additional solar projects currently under consideration for approval on public lands throughout the Mojave Desert, accompanied by additional wind power projects as well. The cumulative impact of all these projects raises considerable concern as to the viability of the Desert Bighorn Sheep meta-population known to exist in the mountain ranges adjacent to the Bright Source project, not to mention populations in other mountain ranges within the remainder of this Mojave Desert region that could experience indirect impacts to such development.

There is an established meta-population linkage between the Clark Mountains and the Spring Mountains that could be directly impacted by this proposed project; the environmental impact analyses that must accompany this application cannot overlook this fact. Furthermore, a proper environmental assessment must not overlook the cumulative impacts that additional expansions or companion projects will have on Desert Bighorn Sheep. Should additional solar energy projects begin to appear near the vicinity of this project and along proposed valley floors of other aforementioned sheep habitat, these projects coupled with proposed wind power projects that will create disturbance directly on the peaks of known sheep habitat and migration corridors, have the potential to create cumulative impacts in a very short time period, effectively eliminating habitat linkages between bighorn sheep populations at an alarming rate to which the sheep will have less ability to adapt.

According to the Society for the Conservation of Bighorn Sheep, over 60% of the desert mountain ranges that have either served as historic sheep habitat, or have the potential to become viable habitat in the near future have not even been surveyed by the California Department of Fish & Game in the past 35 years, due to lack of funding. It would be irresponsible and short-sighted to begin approving projects such as those proposed, on a piece-meal basis, without establishing a more accurate baseline meta-population of Desert Bighorn Sheep in the entire area. This new information would provide land agencies and wildlife managers more complete information upon which to evaluate these plans, providing an opportunity to modify their orientation and density to minimize detrimental impacts to wildlife. Any mitigation measures that may be considered for this and additional projects should attempt to address this funding shortfall of these agencies and provide them with the resources they need to fully assess the extent and viability of the Desert Bighorn Sheep populations in the Southern California Deserts, and from that basis alone develop a more complete assessment of the cumulative impacts of man-made construction and energy projects within the Mojave Desert.

Respectfully Submitted,

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