

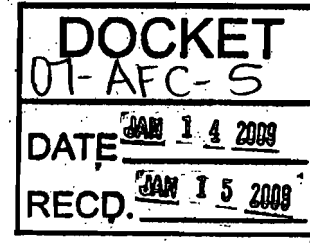
# **Society for the Conservation of Bighorn Sheep**

**P.O. Box 94182**

**Pasadena, California 91109-4182**

January 14, 2009

**SUBJECT: Ivanpah Solar Electric Generation System  
Project 07-AFC-5**



Directed to the distinguished members of the California Energy Commission and the professionals at Bright Source Energy.

On behalf of the Society for the Conservation of Bighorn Sheep, I wish to follow-up on discussions and information that have been exchanged and documented through the workshops that our membership have attended and contributed to as of this date.

For the record, our organization is against any and all loss of bighorn sheep habitat or any loss of habitat in general. However, we understand the unique nature of current needs for alternative energy. The future benefit for the population may outweigh the benefits of a complete and intact ecosystem with all the necessary components. We do feel, however, that a partnership or working relationship can help offset some of the negative effects that most assuredly will occur with the loss of critical habitat in the prescribed areas discussed.

Because mitigation was a topic of discussion at the Primm, Nevada meeting on January 9, 2009, this gives us an opportunity to have an open discussion on base requirements and a starting point for which we can direct our energies for the betterment of the resources. The concern for our environment and the partnership that must be established between the private sector/government agencies/industry and commerce can in time have a positive influence on habitat loss with this and future energy projects. Forming a partnership can and will benefit all concerned for the immediate and long term future of the wildlife. The commitment to the resources and the willingness to improve, enhance and maintain the habitat and its occupants can be an unbelievable opportunity to get it right and do it right.

Our wish is to have a standard that others may learn from and the opportunity presents itself for that purpose. Let's consider working together collectively for the common good.

1. The first item that needs to be considered and factored in would be the need for a baseline to be established as to what we have prior to construction, intensive monitoring during construction, and follow-up on an ongoing basis to assure that there are no undesirable affects that cannot be adjusted for. This should include, but in no way be limited to, air and ground surveys of the desert sheep in the surrounding mountain ranges with perhaps some discussions regarding the bordering sheep with Nevada. We do share a population in some areas, and there may be an influence that needs to be understood.

Capture work, collaring and monitoring the movement of a sampling of the local bighorns before, during and after is crucial information that the Department of Fish & Game most assuredly will be in need of in order for proper management. The baseline is to be established by the Department of Fish & Game professionals.

2. Another item that is absolutely mandatory is the consideration for a one to one and a half mile buffer zone from the toe of the sloping mountain areas that migrate towards I15. This will help with the connectivity of the local population and maintain the metapopulation dynamic at work with this sheep population (population shared by Nevada, their sheep visit ours, our sheep visit theirs). This wildlife corridor is absolutely essential for a healthy and viable population and for a healthy gene pool exchange. This safe zone or buffer zone establishes a guideline or benchmark for any future development and additional loss of habitat.

3. With regard to potential aquifer depletion with the additional use of water for construction and/or maintenance, we are not convinced that this will not have an adverse effect on the surrounding springs and seeps that are so precious to the resident wildlife population, and the importance of water management and conservation that must be applied. The use of soil additives to curtail dust should and must be explored. We will re-emphasize the need for habitat improvement through additional water sources to safeguard any potential depletion and/or lack thereof.

4. The importance of an agreement or a memorandum of understanding from all government agencies, (Department of Fish & Game, Bureau of Land Management, National Park Service, etc.) to assure that habitat improvements can and will take place in and around surrounding areas controlled by these authorities. Habitat work such as water hole improvements, replacement water, new wildlife drinkers, existing spring improvements, or spring development will help offset the negative impact of this and/or other future projects. This is a very important issue, something that we feel strongly about and an issue that must be addressed from the beginning.

5. To have the affected areas be decommissioned or reverted back to natural habitat upon the sunset of the original agreement/viability of current and/or future technology, and that reclamation be full and complete, not unlike mining companies are obliged to do after production and/or usefulness has been achieved. This will offset speculators and future developments that may radiate from this site, as well as others, and that if everybody has an understanding that this will revert back to the critters, all concerned will become better stewards of this or surrounding areas in order to assure the successful transition.

6. One other item that has not much to do with the sheep population, but an area that we are concerned about is the disruption and use of the affected habitat, i.e. plant life, etc. It is our desire to see the full use of this material utilized in conjunction with not only the healing process of the peripheral impacted area, but be inventoried and warehoused for future reclamation needs.

7. Another item that needs to be explored, but by no means needs to have the financial burden placed totally upon Bright Source Corporation, would be a land bridge over state highway I15 that would assure the connectivity that has been tragically compromised by the highway systems, namely I40 and I15. The health and well-being of the large vertebrate population in our desert regions has been clearly influenced (negatively) by being so fragmented, and with a little vision and cooperation with

all the alternative energy resources, windmill, solar, etc, it may help offset the future effects of this fragmentation. We are in the process of fragmenting the fragments, which could be the death nil of particular species, and there is a simple fix that could be shared by a multitude of land use principles. The energy commission should explore this in depth and factor this into any and all mitigation.

This is a short list of some of our concerns, and the Society for the Conservation of Bighorn Sheep wishes to be part of the fix, and not part of the problem. We are in the process of formulating a coalition of like-minded conservation organizations that have a proven track record in regard to wildlife and its habitat. This will help us address this project, as well as other alternative energy projects such as wind and/or additional solar projects collectively.

This is an opportunity, and we are looking forward to a partnership that truly will be beneficial for a concerned.

Sincerely,



George C. Kerr  
Wildlife & Habitat Coordinator  
Society for the Conservation of Bighorn Sheep