

DOCKET 07-AFC-5
DATE AUG 28 2010
RECD. AUG 30 2010

Docket No. 07-AFC-5

August 28, 2010

California Energy Commission Docket Unit
1516 Ninth Street, MS-4
Sacramento, CA 95814

Comments on Presiding Members Proposed Decision (PMPD) for the Ivanpah Solar Electric Generating System (ISEGS):

Sir:

I am greatly concerned by the PMPD for the ISEGS project which acknowledges a number of significant impacts which could not be mitigated but then cites overriding concerns in granting approval. There are two flaws in the decision which I would like to address.

Impacts upon desert tortoise were considered capable of mitigation through a plan for relocation and translocation along with a 3:1 plan for compensation in land acquisition. The Ivanpah site is within the Northeastern Recovery Unit for the tortoise. This population is genetically unique and may well merit designation as an endangered species in its own right. Translocation of tortoises or land designation for mitigation outside this area is not adequate for protection of the species. This situation was simply not acknowledged or addressed.

Beyond this, relocation of tortoises in areas neighboring the ISEGS site can hardly be considered mitigation either. Experience with tortoise relocation for the Fort Irwin expansion indicates the level of damage that is possible. A great variety of causes for mortality of tortoises can be sited, but the fact remains that nearly 50 percent of the relocated reptiles from Fort Irwin did not survive. A plan with this prospect can hardly be considered sufficient for an endangered species. Although a Desert Tortoise Relocation/Translocation Plan has been prepared and approved by several agencies, it is not yet available to the public. Outside scrutiny is imperative, and there must be sufficient time for the public to examine the plan and comment. A promise that "it will be adequate" is not appropriate. The PMPD has failed in a major category.

My second concern is perhaps a personal one. I travel widely in the desert camping, hiking, and photographing. The Mojave National Preserve in particular and the eastern

California deserts in general are important escapes from urban Los Angeles where I live. Open space and undisturbed views are healing. The Ivanpah Valley site is outstanding in these characteristics, and in my opinion have been undervalued in the PMPD document.

In view of these issues I believe the PMPD needs to be revisited and the alternatives need to be re-examined.

Sincerely,

A handwritten signature in cursive script that reads "Craig Deutsche".

Craig Deutsche

Craig Deutsche
2231 Kelton Ave
Los Angeles, CA90064
310-477-6670
craig.deutsche@gmail.com