

Comment on Docket No. 07-AFC-5

I am writing to express my concerns about the proposed California Energy Commission's Presiding Member's Proposed Decision on the BrightSource Energy application for the Ivanpah Solar Electric Generating System (ISEGS), primarily about the impact of the proposed ISEGS on the desert environment.

I am commenting as a private citizen who values public lands for their existence as unique, inherently valuable ecosystems and for their recreational use. The risks and dangers to the public land that is associated with the construction of the ISEGS have not been adequately addressed, and it is my hope that the Commission will take this into consideration and deny approval.

In addition to the loss of almost 4000 acres of recreational land, I am deeply concerned about the increase in wildfire potential. As it states in the Decision, the removal and mowing of vegetation to heights that will accommodate the heliostat mirrors "...is likely to promote the proliferation of non-native invasive weeds, in particular cheat grass and red brome, two species of particular concern at the project site."(Biological resources, p. 23) This will increase the risk of wildfire. Again, from the Decision: "The proliferation of non-native annual grasses such as these has dramatically increased the fuel load and frequency of fire in many desert ecosystems." (Biological resources, p. 24) This creates an unacceptable risk of wildfire.

Shading caused by heliostats will also have a negative effect on the vegetation at the site.

Translocation of desert tortoises is problematic at best, and likely to result in the death of a large percentage of the animals. The August 2010 Draft Independent Science Advisors Report for the Desert Renewable Energy Conservation Plan recommends against translocation and relocation of tortoises.

Other wildlife, especially birds will also likely be negatively impacted.

I am urging the Commission to not approve the ISEGS.

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