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To whom it may concern:

My name is Brendan Hughes and I would like to comment on the Final Staff Assessment/ Draft Environmental Impact Statement for the Ivanpah Solar Energy Generating System. This project, as proposed, would have serious and unmitigable impacts to biological and visual resources, as the FSA acknowledged. Additionally, alternatives to the project were not adequately considered. Finally, this project sets a bad precedent for the type of location where solar projects may be allowed by CEC and BLM.

First, the Ivanpah SEGS would cause irreparable harm to the threatened desert tortoise and other sensitive animal and plant species. The FSA notes that at least 25 desert tortoises will have to be relocated from the 4,000-acre project site. Some of these tortoises will die from this relocation. Also, this project will hamper the recovery of the desert tortoise because it will destroy more than 4,000 acres of relatively pristine, intact habitat. If this disturbance does occur, Bright Source should be required to mitigate the project at a 5:1 ratio instead of the 3:1 ratio proposed by the FSA. This will not compensate for the tortoises and habitat that will be lost, but it will ensure that the value of intact habitats and landscapes is acknowledged. Moreover, the FSA determines that unmitigable damage will be done to rare plant assemblages and species by this project. If the staff determines that something as important as biological resources cannot be mitigated, then the project should not be allowed to proceed. Additionally, important habitat for the burrowing owl, golden eagle, loggerhead shrike, and badgers will be lost due to this project. All of the biological resources threatened by this project are a signal that it should not proceed.

The FSA notes that impacts to visual resources cannot be mitigated. The largely-pristine Ivanpah Valley will never be the same if this project is constructed. Views from the New York and Clark Mountains in the Mojave National Preserve, and the Stateline and Mesquite Wilderness Areas will be forever altered by the Ivanpah SEGS.

The FSA did not adequately analyze the private land and distributed generation alternatives to the Ivanpah SEGS. There are large blocks of disturbed, private lands in the Antelope, Imperial, Coachella, and Palo Verde Valleys in California, as well as significant acreage in Arizona. Some of these areas could provide adequate acreage for Bright Source's 400 MW. But as many of the other current solar proposals show, 400 MW of generation capacity is not required to be economically feasible. Less generating capacity is possible. Regarding distributed generation, there is vast potential for renewables, up to 2,000 MW in San Bernardino County alone, according to the FSA. A \$2 billion investment (the estimated cost of the Ivanpah SEGS) in rooftop solar could produce at least 400 MW of generation capacity in the same amount of time or less than it will take to construct the Ivanpah SEGS. Therefore the CEC and BLM should favor the combination of these alternatives, and choose the No Action Alternative for the Ivanpah SEGS.

Finally, BLM and CEC approval of this project will create a terrible precedent for future solar projects on public land. There are many thousands of acres of public and private land that are seriously disturbed and degraded, and have virtually no conservation or carbon-sequestration value. It should be a priority for BLM and CEC to get this first project right and place it on such lands. If the Ivanpah SEGS is approved, then more areas with tortoise habitat and rare plant assemblages will be graded for solar farms, and the cumulative impacts of such sitings could cause species decline and perhaps even extinction. BLM and CEC should send a message to solar developers that it is not open season on the desert. Please ensure that only thoroughly-researched, properly sited projects will be approved.

Thank you for your consideration.

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