

Sep. 1, 2010

California Energy Commission Docket Unit
1516 Ninth Street, MS-4,
Sacramento, CA 95814
Docket No. 07-AFC-5

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To Whom It May Concern:

I am writing in reference to the "Presiding Member's Proposed Decision on the BrightSource Energy application for the Ivanpah Solar Electric Generating System."

The ISEGS may or may not be a beneficial project in terms of reducing global warming, but it is definitely sited in the wrong place. Destroying biologically in-tact desert habitat that is home to several endangered or threatened species in the name of "renewable energy" simply makes no sense. The often-repeated argument that the greenhouse gas reduction benefits of these projects will outweigh impacts to desert landscapes has never been scientifically analyzed, let alone proven. Habitat destruction remains the largest threat to species in the desert and elsewhere; at the same time, these desert habitats have been shown to store carbon at rates similar to those of some temperate forests. Scraping thousands of acres of desert will only exacerbate global warming.

The best science available on the question of siting renewable energy projects in the desert is contained in the just-released draft of the "Recommendations of Independent Science Advisors for the Desert Renewable Energy Conservation Plan." One of the report's principal recommendations is to "site all renewable energy projects on previously disturbed land." This is exactly what desert conservationists have been advocating for years, and what we've called for specifically with the ISEGS.

While BrightSource has claimed that Ivanpah counts as disturbed land, previous impacts to this area are actually light, and do not meet the science advisors' definition of "areas where grading, grubbing, agriculture or other actions have substantially altered vegetation or broken the soil surface." Alternative sites -- such as old ag land near Daggett -- have been suggested, but inappropriately rejected by the California Energy Commission.

Rather than approving this misplaced project, the California Energy Commission should heed the best science currently available and move this project to one of the many previously degraded areas of the desert. Other companies, such as Abengoa, are siting their projects largely on disturbed public and private lands, and there is no reason BrightSource can't do the same.

Respectfully submitted,

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