

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

DOCKET	
07-AFC-5	
DATE	_____
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I am writing to address the BrightSource Energy application for the Ivanpah Solar Electric Generating System (Ivanpah SEGS), Docket No. 07-AFC-5.

Alternative energy sources such as wind and solar will be increasingly important as we move away from dirtier fuels like coal in the fight against climate change. I am pleased to see that California is showing leadership on this issue. However, movement towards alternative energy sources should not come at the cost of harm to wildlife or degradation to public wild lands. Any project that seeks to use public lands for energy generation should be subjected to careful scrutiny to ensure that the project will not cause serious environmental damage. In the case of the Ivanpah SEGS, I believe the project fails this test.

First, the site hosts a unique population of desert tortoises that would need to be translocated prior to any energy development. Translocation subjects tortoise populations to serious risk. It puts them in contact with nearby tortoises that will not be receptive and may act aggressively towards the newcomers. If that occurs, it will force the translocated tortoises to travel even farther in search of a new home; such movement puts the tortoises at greater risk of predation or being hit on highways. Proposed relocation sites include areas slated for future future energy development or high-speed rail lines.

Past experiences with tortoise translocation have not gone well. In the case of the Fort Irwin Expansion, 44.3% of tortoises died and 17.4 % are missing. Such a high casualty rate is unacceptable in such a vulnerable species.

Second, the project's impact on birds needs to be examined more closely. Past experience indicates that large energy generation towers can be deadly to flying birds, similar to how the wind turbines at Altamont Pass have killed thousands of raptors over the years. Bright lights can disorient migratory birds, since birds rely on the angle of light to navigate. The proposed Ivanpah SEGS will include three such towers and reflective panels. The Ivanpah site lies close to Clark Mountain, which lies within an Important Bird Area (IBA) designated by Audubon for its unique populations of three species, Whippoorwill, Hepatic Tanager, and Gray Vireo. The impacts of the project on these and other migratory species need to be addressed more carefully.

In my opinion the environmental impacts of the project are sufficiently severe that BrightSource and the California Energy Commission should seek a more appropriate location.

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