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07-AFC-5

DATE SEP 21 2010

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California Energy Commission
Energy Commission's Docket Unit
1516 Ninth Street
MS-4, Sacramento, CA 95814
September 21 2010

RE: Docket No. 07-AFC-5

Dear Commissioners,

Thank you for this opportunity to submit comments on the proposed Ivanpah Solar Electric Generating System project in the Mojave Desert in Ivanpah Valley.

I am writing on behalf of the Desert Protective Council (DPC), a 56 year-old 501(c)(3) non-profit desert education and preservation organization. The DPC has members throughout the United States and in Canada.

The DPC is opposed to the Ivanpah Solar Project because of the potential myriad irreversible impacts to a large swath of old-growth Mojave Desert. This chosen site of 3,600 acres in the Ivanpah Valley does not qualify in any sense of the word as “disturbed” or “degraded” public land.

Desert Tortoise

The Ivanpah Solar site has been documented to harbor around sixty desert tortoises. Since tortoises spend 80-90% of their lives in their burrows, it is exceedingly difficult to count each and every tortoise on 3600 acres. You have heard abundant testimony on the current precarious condition of our California state reptile. We do not want it to go the way of our California state mammal but that is where it is headed. One of the main causes of the downward spiraling numbers of the desert tortoise is loss of habitat. All remaining good habitat for desert tortoise must be protected. The Ivanpah Solar project grading would utterly destroy this rich and diverse habitat for tortoise and for the hundreds of other species of plants and mammals on site.

You have heard plenty about the controversy around translocating tortoises. There is disagreement on percentage of mortality of translocated tortoises but there is no dispute that tortoises die when they are moved from their home habitat. The Desert Protective Council's position is that this proposed project should be translocated to private, disturbed land or fallowed agricultural land.

Water Resources

Even though the groundwater basin from which the Ivanpah project would draw is not yet overdrawn, this project could have significant impacts by pumping from a new well in order to obtain wash water for the heliostats and mirrors and for water lost in the dry-cooling process.

Drawing down the groundwater basin will impact the desert beyond the footprint of the project itself.

Impacts Beyond the Project Footprint

The impacts of the proposed Ivanpah Solar Electric project will extend beyond the actual project footprint in the additional mechanical disturbance of soil in the upgrading of the connecting transmission lines and in the inevitable particulate and other air pollution that will produce air-borne dust and PM 10 pollution in and beyond the Ivanpah Valley. This fugitive dust impact will adversely impact the air quality of the Mojave National Preserve. To control fugitive dust, large amounts of water must be used on roads and scraped areas.

You have received detailed comments on the adverse impacts from this project to the biological resources, the regional air quality, to the soils, impacts to the Mojave National Preserve from a number of wildlife biologists and other experts.

The Desert Protective Council incorporates by reference the comments of Kevin Emmerich and Laura Cunningham.

Thank you for your incorporation of these comments into the public record for the Ivanpah Solar Electric Generating Project and for your deep consideration of the irreversible impacts from this project to an intact, important area of our one and only Mojave Desert, which is an integral and beleaguered part of America's national natural heritage.

Sincerely,

Terry Weiner
Imperial County Projects and Conservation Coordinator
Desert Protective Council
P.O. Box 3635
San Diego CA. 92163
(619) 342-5524 cell (office)
(858) 273-7801 FAX
terryweiner@sbcglobal.net
www.dpcinc.org
www.desertblog.net