



"PROTECTING OUR GREAT NATIONAL HERITAGE"
THE KERN AUDUBON SOCIETY
P. O. Box 3581 Bakersfield, CA 93385

January 6, 2010

**RE: Proposed Ridgecrest Solar Power Project Site Visit & Informational
Hearing/Scoping Meeting (Docket No. 09-AFC-9)**

Dear Mr. Soloria:

Because of scheduling conflicts, I was unable to attend the informational meeting in Ridgecrest on January 5. However, the Kern Audubon Society wishes to offer the following recommendations as to what issues need to be addressed in the environmental documents.

1) **Desert tortoise**: the proposed site is prime habitat for the endangered Mojave desert tortoise. Therefore there must be data on the following issues related to the species: a) current populations b) historic population levels and location of populations c) past human activity that has affected negatively the populations d) proposed and present plans to increase the population to establish a sustainable level. This data needs to be presented in the following formats: narrative description, graphs, charts, and maps. Conflicts between the proposed power plant and proposed/present plans to increase the population of the desert tortoise need to be addressed in the document. Mitigation proposals must be offered in a sincere desire to both preserve and increase the habitat of the species. Desert tortoise specialists along with representatives from the Desert Tortoise Preserve near California City must be consultants on the viability of the project in relationship to the tortoise.

2) **Aviary issues**: Desert bird populations, both migratory and native, must be calculated and locations of nesting and flyways must be identified in relationship to the proposed site. Because of the intense heat generated by the mirrors, accidental 'kills' of birds of prey hunting for food is highly likely. All steps feasible to prevent this from occurring need to be addressed in the document. The site must not be located in thy flyways of birds that might be susceptible to such an occurrence.

Near the town of Daggett, CA, a similar, if not identical power plant, has been in operation for over a decade and is now decommissioned. The history of this plant, from birth to death, including its effect on the environment must be the seminal basis of your evaluation. It offers you an opportunity to evaluate not just theoretical issues but actual usage issues. It will provide the litmus test for desert siting of solar power plants.

3) **Mitigation issues:** Since all human activity has a negative effect on the environment, it is the role of the Commission to reduce those effects to acceptable levels. One of the mitigation tools that must be applied to this project is for the applicant to purchase similar habitat in the area and place it in a perpetual conservation district. This means that it will never be developed in the future. The district can be monitored and administered by a non-profit organization established for this purpose. Several already exist in the state. The amount of land purchased and dedicated should be the equivalent to the land needed for the site in both acreage and quality of flora and fauna.

4) **Alternative sites:** The document must fully address all other sites in the area that have a less detrimental environmental effect. It must be noted that current ownership of the proposed site by the applicant should have no bearing on the merits of the proposal. It is the Commission responsibility to consider the merits of the proposal solely on the topics required by CEQA and NEPA.

Please include Kern Audubon in your mailings and communications. We wish to have continual input on this project.

Sincerely,

Harry Love, Conservation Chair
13500 Powder River Ave.
Bakersfield, CA 93314
(661) 589-6245
love3@bak.rr.com