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January 12, 2010

California Energy Commission
Attn: Eric K. Solorio, Project Manager
1516 Ninth Street, MS-15
Sacramento CA 95814-5512

Re: Ridgecrest Solar Power Project (09-AFC-9)

I attended the CEC/BLM Public Workshops December 15, 2009, and January 5-6, 2010 in Ridgecrest. I made public comments which I am summarizing with additional supportive thoughts and observations.

It is difficult to briefly summarize this complex matter. We are not opposed to solar power. We are opposed to this project in this location. Projects such as this need to be sited in already severely degraded desert habitat, not areas like this particular place which has "abundant natural resources" (Dick Anderson, CEC) and is fragile desert land. They also need to have more time to be adequately researched, designed and completed. Fast-tracking is circumventing proper procedure that insures protection of natural resources.

Terry O'Brien of the CEC, made a rare appearance and also gave rare testimony. He discussed how the agencies are overwhelmed. Their workload is unprecedented. Biological issues are naturally difficult to resolve in a timely manner. We heard from CEC and BLM how they are working long hours and getting paid for only about ½. CEC employees work on furlough days. BLM offices are working with very short staff, so that each employee may be wearing up to 8 different hats. The driving force on this, and other projects, is fast tracking and economic incentive tax credits.

We can appreciate the objective of fast-tracking. However, our leaders need to know what the on-the-ground and long-term effects are for local people and their environment. We will be sharing our comments with those people. This project is on our public land for a profit company. Albeit helping with energy self-sufficiency, this is short-sighted in the long term.

The evidence, testimony and roadblocks presented in these 3 days has us all asking – "Why Here?" Why even going forward when there are so many large issues, with some of them unsolvable?

Kerncrest Audubon believes that location is critical. This site will obliterate mostly pristine fragile desert land with its richness of biological life- "a healthy ecosystem" (Shelley Ellis, BLM). Cumulative effects and fragmentation of habitat come into play here

as land is steadily degraded in the valley. There are more fast-tracking projects in the works which is alarming.

Biologist Dick Anderson reported on the incredible density of Desert Tortoises found in the site area. The tortoise numbers are the highest, by far, of other site samples in Nevada, Utah, California and Colorado. The protocol for moving tortoises still results in 60% mortality. How can we continue to kill this highly endangered animal and remove rich desert land where it is thriving? This productive area needs to be saved, not lost.

Mojave Ground Squirrels are also listed. BLM has designated this land as MGS Conservation Habitat. The mitigation for them will be to bulldoze them in their burrows, as there is no time to relocate them. Additionally, El Paso Wash, right through the project, is an all important genetic linkage corridor between north and south populations. Even with the re-designed project to avoid the wash, it is unknown whether the MGS will continue to thrive. The cost to mitigate per the CDF formula is large enough at \$26 million for Solar Millenium to go buy already denuded farm land. The specious argument that was offered at the hearing was about only one difficult land transaction. That doesn't mean they all have to be that way. We don't believe that the loss of DT/ MGS and the habitat is mitigable. Mitigation has to be effective.

There are also other declining species. Kit Foxes, Loggerhead Shrikes, LeConte's Thrashers, Burrowing Owls, migrating neo-tropical songbirds, hawk species and others are found here. Plants species were not mentioned, nor invertebrates other than the summary of them as a whole. These species also have merit. Several are not yet listed as threatened or endangered, but with losses of habitat like this, they will be.

The "new layout" of the solar field conceived between the Dec. 15 and Jan. 5 meeting to avoid the El Paso Wash flooding problem has its merits. However, we still believe that the Desert Tortoises and Mojave Ground Squirrels will be severely impacted as well as loss of this rich habitat.

We have major concerns with this new water user in this already over-drafted aquifer. Their water uses will only hasten the time when degradation of the Indian Wells Valley aquifer will threaten the viability of this nation's premier weapons development and testing center, located here at the Naval Air Weapons Station.

The problems posed by Cal Trans will require new road building. These will incur more disturbances to the area. The re-siting of the existing transmission lines is another disturbance.

Visually, there will be "new intrusions" on the landscape. Not necessarily a bad thing, except for the current siting which is a scenic part of the valley viewscape.

Light pollution is a major concern for any place and especially for this still mostly dark-sky valley. This issue is being addressed not only in California, but nationally and internationally. It has become a health issue for humans as well as migrating birds and other animals. International Dark-Sky Association has information on this.

We would be more supportive of this project if it were sited on already degraded land, such as abandoned alfalfa fields. The public offered the suggestion of looking into the fallow and non-fallow alfalfa lands in the north west part of the valley as better situations. Willing sellers would be needed for currently farmed land. The fields are contiguous and/or across narrow Brown Rd. While water is still problematic in this valley: this cleared land offers no washes that flood; no, or few, endangered and non-endangered species to mitigate for; no rich plant life with its attendant wildlife to be lost forever; and on and on. There are high power transmission lines to the west and the east, as well as Hwy 395 for access.

With other projects proposed for the valley, we are looking at major cumulative effects as our valley is further degraded project by project. This is very significant.

The obstacles to this project, biological, hydraulic and supportive are huge. We favor No Project at this important natural site.

Thank you for your attention to our comments.

Sincerely,

Terri Middlemiss, Conservation Chair

Cc: Hector Villalobos and Greg Miller, BLM; President Barack Obama; Senator Barbara Boxer; Senator Diane Feinstein; Governor Arnold Schwarzenegger; Representative Kevin McCarthy; Assemblywoman Jean Fuller; Senator Roy Ashburn; Supervisor Jon McQuiston; Graham Chisholm, Audubon California; Defenders of Wildlife