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May 18, 2010

Eric Solorio, Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, California 95814-5512

Docket Number: 09-AFC-9
Ridgecrest Solar Power Project
Comment on SA/DEIS

I am submitting my comments on the Ridgecrest Solar Power Project SA/DEIS.
Areas of concern include:

AIR QUALITY I don't believe that the applicant has a plan that will prevent dust and Coccidiomycosis spores, the cause of Valley Fever, from being blown. The applicant says that they will apply water and other palliatives and shut down work if these do not work after 30 minutes. If they haven't worked for 30 minutes, why would they work for minutes, hours and DAYS afterward? Ridgecrest is downwind and directly in the path of the prevailing winds from the project site. Will there be someone from the Kern County Air Quality Control Board on the site after hours and on the weekend? Who will be applying water after the project is shut down and on the weekends?

WATER I do not believe the applicant has adequately projected their water needs, based on the projected needs used by similar sites, specifically the Beacon project. Even by extending the construction period and building in phases to ration the water, there will not be an adequate amount of water. The Indian Wells Valley Water District cannot deliver more water.

Amortizing the water to be used over the life of the project when calculating mitigation implies that water used at the beginning of the project is of the same quality as that used at the end. Experience in our valley shows that water is gradually degrading as levels in wells are dropping. The proposed "Cash for Grass" will take at least a couple years to begin the mitigation. Meanwhile, the best water will have been used. One to one mitigation is not sufficient to account for the degraded water quality the residents will be left with. Any water that is conserved should be used to mitigate our overdraft. Has there been an accounting of the how much water will be used during decommissioning?

TRAFFIC MANAGEMENT Until the water pipeline is built, trucks will have to transport water to the site. Since the CalTrans widening will not be completed and no special

access road to the site is planned, this will require the trucks to cross Hwy 395. There is a rise in the highway south of the intersection. Much of the traffic is through traffic traveling at or above the speed limit. I am concerned that cross-traffic will increase the risk of accidents. Other traffic will include workers coming to and from the site on a staggered schedule, delivery of materials, as well as the actual equipment on the site. The intersection cannot withstand this increased traffic.

PROPANE I did not see how the amount of propane was calculated. Janet Westbrook sent a letter to Billy Owens of Solar Millennium dated May 6, 2010. She referenced <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca4278> and said, "**the Average Min. Temperature ... is 30.7°F and 30.2°F.** Please note that Jan, Feb, Mar, Apr, and May, and Oct, Nov, Dec. all have average MIN temps below the desired 55°F. Note also that we can get snow in January and March. This January we had snow on the ground for most of a day twice." Given the low temperatures we have at night and, sometimes for extended periods, it appears that the amount of propane needed is significantly underestimated. The SA/DEIS says that propane will be obtained locally. What range constitutes locally? Bakersfield about 110 miles away? Has the amount of fuel needed to deliver the propane and the exhaust delivering the fuel been calculated in determining the amount of air pollution from exhaust and the carbon footprint?

In addition, I am concerned about the amounts of propane and flammable HTF stored on the site. If there were an accident, prevailing winds would blow toxic, hazardous fumes directly to our homes and schools. I am also concerned that Kern County has only one HAZMAT unit to address such an accident and it is two hours away.

BIOLOGICAL I agree with the findings of the experts that the biological concerns for protecting desert tortoise, Mojave ground squirrel, burrowing owls, other birds, lizards, other animals and plants, and maintaining connectivity for the animals can not be mitigated.

ALTERNATIVES The SA/DEIS does not adequately address the alternatives. The discussion is superficial.

While I support solar power, I do not think this is the right location for this project. In my opinion, the project's impacted resources have not been fully disclosed, evaluated, and can't be reasonably mitigated to the level of insignificance.

Sincerely,

Penelope LePome

cc: Janet Eubanks
BLM California Desert District Office
c/o Ridgecrest Solar Power Project
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