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Comments on the SA/EIS for the RIDGECREST SOLAR POWER PROJECT (09-AFC-9)

I would like to highly recommend that the CEC staff stick to the recommendation you made in the Draft SA/EIS

"Energy Commission staff considers the **No Project/No Action Alternative to be superior to the proposed project.** While it would eliminate the potential for 250 MW of additional solar thermal power created using parabolic trough technology at the Ridgecrest Solar Power Project site and thus not meet project objectives, it would eliminate significant immitigable visual and biological resource impacts associated with the proposed project. New renewable resources may be developed to meet the State's Renewables Portfolio Standard (RPS) requirements in the absence of the Ridgecrest Solar Power Project." (bold and underlining mine)

And I am urging (in a separate letter to Janet Eubanks) that BLM issue the following in regard to this project:

"No Action on project and amend the CDCA plan to classify the area as unsuitable for future solar development. The RSPP project is not approved (project denied) and no ROW grant is issued to Solar Millennium, and the CDCA plan is amended to classify the project area as unsuitable for large scale renewable energy development.

Or any other kind of development on that particular piece of land. It needs to be protected for its high biological values, both plant and animal. BLM's management plan for the area should stand, or be amended to further protect, not develop, this particular area."

There should not be any disturbance at this Brown Road site ever because:

1. Biological concerns cannot be completely or even partly mitigated.

Endangered Species- it is well known that translocating tortoises doesn't work very well. Mojave Ground Squirrels can't be moved at all. The ESA is quite specific and was enacted for good reason. The only way to make sure we still have live tortoises and MGS is "no project" at that site.

Everyone else- the laws require that endangered critters be paid attention to, but what about all the other animals and plants at the site? The biological surveys turned up many kit fox dens, burrowing owl pairs, and even a badger! Those are rare around here, and the area between Laurel Mountain and Black Mountain seems to suit them. If there are that many predators there, then the prey population is doing well too - the Antelope Ground Squirrels are common, as must be nocturnal mice and kangaroo rats. The CNPS folks saw an active tortoise burrow and a Mojave Rattlesnake curled up in another. Mojave Rattlesnakes are the most dangerous snake in North America - ours have three venoms (hemotoxin, cardiotoxin, neurotoxin) and a good bite

will be fatal as there is no antivenin produced and the site is too far from the hospital to get a bite victim there before respiration ceases. There will be a fair number of Mojave Rattlesnakes, probably Sidewinders, and many other types of snakes in the project area and washes because the rodent population appears to be quite good. While there are no endangered plants, still there is thriving plant diversity, particularly around the washes. Clearly, as your biologist says, "something is right' to have such a diverse and dense population of tortoises, ground squirrels, fox, coyote, badger, owls, hawks. Plowing under three-square miles of these animals and plants is not warranted. This special place cannot be completely mitigated nor "restored".

"Connectivity" is the major issue which absolutely cannot be mitigated. The animal populations would be separated by the project, fences, roads, increased traffic, and noise. The plant populations likewise, as a lot of seeds blow in the wind and can't necessarily blow over the mirrors to another suitable area. The project runs from Hwy 395 on the east to the base of the hills on the west, once the power lines are moved. That doesn't leave ANY space for plants or animals who can't crawl over hills to get around. The El Paso wash is going to be changed so much in nature by the project that very few animals will choose to go there.

By grading and flattening out 2000 acres of desert, the various washes in the area will be greatly affected and no longer connected. Now, when it rains, the rainwater is absorbed into the undisturbed areas of the desert - there is very little runoff to the washes unless we get a real thunderburst in one area - which can happen. In that case, the entire area "sheet floods". Changes in the drainage pattern will affect the plants, which will affect the animals that are left. Water will run off the surface of the project's compacted dirt and into El Paso wash, so it will become a serious river every time it rains, where before it was not except in very violent local storms. What happens to the runoff waters downstream (north) of the plant site?

The site contains "ancient landscapes", as evidenced by numerous creosote rings, several over 10 feet in diameter, indicating a great age, and well-developed areas of "desert pavement," the parts which look "bare" of bushes. It takes a long time for desert pavement to form, perhaps thousands of years. So that whole alluvial plain leading downhill and northward from the El Paso mountains is a very old, well established set of soils and plants like the Creosote. Such places are rare to find. These cannot be mitigated, nor can they be "restored" if the RSPP closes.

2. We residents keep reminding the project staff that it can be very windy in our valley and that so far no large construction project whether by civilians or the Navy has managed to "keep dust down", or "inside the fence" ever. The biggest problem is that our dust contains Valley Fever spores, and the project is directly upwind of Ridgecrest and China Lake. No one has successfully mitigated "the dust situation" yet.

3. FEMA Flood Zone maps show that the El Paso wash and the other little washlets are in the "100 year Flood zone." But floods can occur more often than that, of course, and the legend indicates a 26% chance of a major flood within the 30-year life span of the project. The last good flood there was in August, 1984. RSPP will alter the wash system. The area is also subject, thanks to the desert pavement, to regular sheet flooding when we get steady rains that last more than a few minutes. Has all that been adequately mitigated?

4. The plant will have dangerous explosive materials (propane and Therminol) so close (upwind) to town. Thinking about the explosion that occurred at Harper Lake, what happens if the 1.3 million gallons of Therminol flashes into fire? Are there adequate safety devices in place?

5. Dark Skies and quiet places are hard to come by, even in the desert, but this site is just uphill and "around the corner" enough that it provides exactly that. That's why the China Lake Astronomical Society uses the place for star parties once a month. That's where town people can go to have a quiet place. Brown road is a great place to jog or bike ride because it is quiet. That can't be mitigated and not easily replaced.

6. Building the plant will cause altered recreation pathways which will cause even more roads to be established in the area. It will be "an attractive nuisance", and will attract more traffic to the area than it now has. This will affect what few plants and animals are still around. Mitigation will involve making trails where there are now none.

7. Cultural resources and old Native American trails will be disturbed and erased, forever. That can't be mitigated.

8. Air quality issues with dust, service trucks on site, propane and other supply delivery trucks - and their emissions which are not now there - all are a concern. Is there adequate mitigation?

9. In the morning when the mirrors face east, there will be a glare created for drivers headed north on Hwy 395 as they are headed west just before reaching the Ridgecrest/Brown Road turnoff. I was just driving by the Kramer Junction site 2 days ago and, while the road is N/S, I did turn my eyes east briefly to see if there was a glare and indeed, it's very bright. The mirrors concentrate the sun on the collecting pipe, but the pipe is smaller than the bright-lighted area, so there IS a bright glare created. The highway heads directly toward the site for some distance. Can a screen-type fence high enough to keep the glare behind the screen so drivers won't be bothered by it mitigate this?

"The RSPP project", using this technology, should not be allowed within the Indian Wells Valley at all because:

1. There should not be any project which needs any groundwater from our depleted basin anywhere within the Indian Wells Valley, unless they come with their own source of water. Even cleaning up the water from the sewer ponds is not necessarily a desirable thing to do, as that water recharges the shallow aquifer under the ponds feeding the wet ditches in the area which have an endangered species in them (Mojave Tui Chub) and many, many migrating and nesting birds have come to depend upon those ponds. The project will be using 3000 acre-feet for construction and 160(?) acre feet every year thereafter. How can that be mitigated for every year? Cash for grass isn't enough.

2. CEC encourages "brownfield" projects, but this would be a "greenfield" project; there are many places both on BLM and private lands which have been disturbed. Such large energy projects should be sited on previously disturbed lands. The EIS should seriously discuss several alternate places to put the RSPP where groundwater is not an issue.

3. The upper Mojave Desert is not well suited for this particular technology. The Heat transfer fluid Solar Millennium has chosen to use, Therminol VP-1, cannot be colder than 54°F. The upper Mojave Desert has many freezing nights depending on location; the Indian Wells Valley has nights below 54°F from October through May. This means the plant would have to use a very large amount of propane just to keep the HTF from turning to wax. That makes the whole idea of "clean green energy" not so clean or green after all. The sun is free, but propane is not. This type of parabolic trough power plant is better sited down in the much warmer parts of the Colorado/Sonoran deserts of California and Arizona. The higher elevations of the Mojave Desert are better suited for photovoltaic panels which do not require groundwater (except to wash them), nor propane, for example. The EIS should seriously discuss alternative ways to use our sun without worrying about cold temperature issues.

4. Our local community will not benefit very much from the finished project. All of the electricity produced will go to "the grid", not specifically to our valley. Only a few people will be needed to run and maintain the plant, and those may or may not choose to live here. There will be a short-term benefit from the construction of the project, both workers staying in the area and some materials being procured from our stores, but mostly the necessary skilled union workers will need to be imported from elsewhere, and most materials will just not be available from local sources. Dust will continue to blow into town for many years until things really stabilize. There will always be the constant threat of dangerous chemicals, the HTF fluids in particular which can burst into flame, upwind of town.

During the 2-3 year construction period Brown road will no longer be the peaceful roadway with little traffic where it is safe to ride a bicycle or do a "5K, 10K run" which groups and weekend joggers do on a regular basis all year. After the plant is there, there will be much increased traffic from the intersection of Hwy 395 to the entrance to the power plant and will be dangerous for bike and jogging traffic.

The one benefit I do see for our community is that CalTrans will have to redo the Brown Rd/China Lake Blvd/Hwy 395 intersection and that will be a major improvement!

Solar power is definitely desirable as the sun's rays keep on shining at least part of every day cycle. There are many ways to take advantage of this resource. Finding a "good location" to match the technology is the challenge. There are disturbed lands in the desert, and there are other ways to collect the sun's energy. This parabolic mirror plant should not be built in the Indian Wells Valley or anywhere where nights get cold. This particular location deserves to be protected from <u>any development</u> because it is so biologically rich.

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