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From: Eric Solorio
To: Docket Optical System
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>>> Nancy Gooch <goochnl@verizon.net> 5/21/2010 2:37 PM >>>
After reviewing the SA-DEIS, attending most of the Ridgecrest workshops, and reviewing public comments, we would like to make further comments.

1. We agree with the CEC and CADFG biologists that the project site is critical and unique habitat for the Mojave ground squirrel and the desert tortoise. The loss of this habitat cannot be mitigated. The CEC should follow the recommendation, "no project," of its biologist.

2. We agree that the project poses a health threat to workers and the people of Ridgecrest by increasing their exposure to airborne Valley Fever spores and herbicide-tainted dust. As pointed out by Dr. Frisbee, even one new case of Valley Fever is significant from a biological and moral perspective.

3. With respect to water, the IWWVD may be "satisfied," but we assure you that the residents of Ridgecrest are not. This project plans to pump at least 3,000 acre-feet of groundwater over two years and pay us back without interest over a period of 30 years, or potentially much longer. This will cause the water table to drop and water quality to worsen. In reality the water table will probably never rise above this level again due to the growth of Ridgecrest and increasing demand for water. If the pipeline built from Ridgecrest Heights to the project site goes through, it is possible that Ridgecrest Heights will be opened to large-scale development, which will increase the rate of aquifer depletion even more.

We don't believe that swapping "water use credits" mitigates the impact on our water supply. Mitigation would involve SM purifying waste water for its own use.

4. We agree with the Center for Biological Diversity and California Unions for Reliable Energy that the SA-DEIS is incomplete and inadequate. We would like to see some study of how the use of herbicides, which will contaminate the washes and possibly the groundwater, will affect the plants and animals that depend on these water sources and also of how the use of herbicides will affect the succeeding vegetation after the project's end. We don't believe that swapping land will mitigate the impact to below a level of significance.

As we understand it, a BMP for the use of these and other chemicals will be submitted no later than 30 days before commissioning of the plant. The BMP should be approved before the project breaks ground.

5. We agree that cultural resources will be degraded, and these effects will not be mitigated.

In addition to causing irreparable harm to threatened species, the proposed project will decrease the air and water quality of the IWV as well as degrade watersheds and cultural resources near the project site. We believe that the project is being kept alive only because it is seen as a necessary weapon in the war on global warming. If we are to consider the "big picture," we must also ask ourselves whether the same objective (250 MW of production capacity) can be achieved in a cleaner, more efficient way. We believe so.

One of the ways this could be done would be by taking the \$1,000,000 the federal government is granting to SM and grant it instead to LA County or Southern California Edison (SCE), to be used only for installing rooftop PV arrays in the LA area. According to SCE's website, 65,000,000 SF of solar panels can generate 250MW. This breaks down to about 130 large commercial buildings with 500,000 SF of usable roof space.

Edison has already begun a program like this, using rooftops of abandoned commercial buildings; the program could be expanded. Its Million Roofs program, which provides incentives for converting residential rooftops to solar, has received 2,200 applications, which could generate 105 MW of power (or about 5,238 applications to generate 250 MW). If this 105 MW is actual power generated, rather than theoretical generation capacity, as is quoted by SM, even fewer rooftops would have to be converted to balance the equation.

The advantage of rooftop PV cells is that power is not lost through transmission over long distances through the power lines. Similarly, negative effects to flora, fauna, air quality, and cultural resources are avoided. Water use for mirror washing is still a concern, but there is no initial large depletion of water. Green jobs are created but without negative health effects to workers.

The June, 2010, issue of Discover contains an article called "The Power

Plan," in which eight thinkers offer their recommendations on how to create a sustainable energy future. Among them:

1. Embrace radical efficiency. Fifty-seven percent of energy is wasted during generation, transmission, or use, which can be thought of as an untapped energy source.
2. Give the power grid an extreme makeover, including better delivery and storage systems.
3. Support energy R&D as if our national security depends on it (because it does). Currently 57% of the federal R&D budget goes to national defense, while only .2% goes to green buildings. This spending must be reallocated. Of course our national security and that of the rest of the world depends on building a sustainable and equitable energy future.

Finally we would like to thank all of the members of the community, the interveners, the CEC, and the BLM for the hours spent reviewing the application.

Sincerely,

Nancy L. Gooch

Howard E. Schorn

Ridgecrest, CA