



Eastern Kern County Resource Conservation District  
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**DOCKET**

**09-AFC-9**

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May 12, 2010

Eric Solario, Project Manager  
Siting, Transmission and Environmental Protection Division  
California Energy Commission  
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Sacramento, California 95814-5504  
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Subject: Comments on Docket Number 09-AFC-0, "Solar Millennium, Ridgecrest Solar Power Project"

Dear Sir,

The Eastern Kern County Resource Conservation District (EKCRCD) would like to take this opportunity to comment on the Solar Millennium Project. We are a division of local government operating under Division 9 of the Resources Code of the State of California. The proposed project lies within the boundaries of our district and we believe that it is important to address the impacts of this project upon the soil, water, air quality, plants, habitat, and wildlife resources of the area, as well as land use issues.

The facility footprint is proposed to be 1,448 acres. The land disturbance during construction and operation of the Project is of great concern not only for loss of habitat and impacts to plant and wildlife endangered and threatened federally and state listed species, but also for health issues for people living in the area.

These health issues, including the incidence of Valley Fever and other dust related conditions need to be addressed both during and after construction.

The loss of prime habitat for the desert tortoise is a major concern. The area proposed for the project consists of some of the best habitat for tortoises, supporting greater numbers of tortoises than even the Desert Tortoise Natural Area which has been set aside for their protection. EKCRCD recommends that conservation easements be established within the proposed project area and that a fund be set aside for management of the conservation easements in perpetuity. However, the impacts to the connectivity corridor for the Mojave ground squirrel may not be able to be mitigated.

The purchase of private land for mitigation purposes poses its own problems as it removes land from the tax rolls and has long term effects upon the economy of Kern County. Sacramento receives the tax dollars, not Kern County. Using BLM land for the project means financial benefit to the project proponent, but there is a long term financial impact on the county for fire, police, schools, roads, all infrastructure issues. In reviewing the land use maps for the area, we believe that there may not be enough private land available long term for purchase for mitigation for this project and other proposed projects. In addition there is no mitigation for loss of

recreational use and open space for people. Looking at the BLM land use maps, it is readily apparent that open space is at a premium in the Indian Wells Valley.

We recommend siting projects such as this on fallow agricultural land or other sites where land disturbance is not of such great significance.

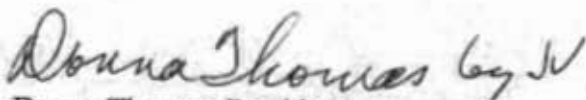
We recommend the use of best management practices prescribed by the Natural Resources Conservation Service and other EKCRCD partners such as the Dustbusters Group in Antelope Valley be put in place to help prevent soil erosion by wind and water.

The El Paso Wash is a major flood channel carrying floodwaters toward the city of Ridgecrest during storm events. We recommend that the project address flood related issues on site as well as impacts that may be caused by stream flow diversions.

The project may have potential significant impacts to groundwater supplies and effects upon pre-existing groundwater wells that are nearby. Any drops in water levels in nearby wells would not support existing land uses or planned uses for which permits have been given. At a minimum the project should put in place monitoring wells and groundwater monitoring provisions and provide data to the Indian Wells Valley Cooperative Groundwater Management Group (IWVCGWMG).

Thank you for the opportunity to comment. Please notify the Eastern Kern County RCD of any meetings which will be concerned with this project.

Sincerely,



Donna Thomas, President  
Eastern Kern County Resource Conservation District

DT:jv

CC: BLM California Desert District Office  
Attn: Janet Eubanks, Project Manager