

DESERT PROTECTIVE COUNCIL

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Christopher Meyer
Project Manager
California Energy Commission
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December 30 2008

Re: Stirling Two Scoping Comments

Dear Mr. Meyer,

On behalf of the Desert Protective Council, I would like to submit these scoping comments for your consideration as an addition to the verbal comments I made in person at the December 18 2008 El Centro Public Scoping meeting.

The Desert Protective Council (DPC) is a 54-year-old non-profit membership organization whose mission is to preserve the unique natural, cultural, historic, recreational, scientific and visual resources of the American southwest deserts; and to educate children and adults to the wonder of the deserts.

The DPC represents members in San Diego and Imperial Counties who are knowledgeable about the area of BLM public lands in western Imperial County on which this proposed Solar Two project is located. We are concerned about the potential mitigable and immitigable impacts from this massive project.

- Cultural Resource Impacts- complete surveys of cultural artifacts, sites and areas within the project area are needed. Archaeologists who have experience in the Imperial County area should be employed. Consultation with local Native American Tribes, including representatives of the Quechan and Kumeyyay Tribes should be done as well as consultation with the Native American Lands Conservancy. Cumulative impacts to the cultural heritage of the entire Yuha Desert Cultural area must be analyzed. Local archaeologist Jay Von Werlhof of Ocotillo should be consulted as well as Russell Kaldenburg.
- Land Use Impacts- the loss of 6,500 acres of public land to other uses must be analyzed in the context of cumulative losses of Imperial County public land to other energy-development-related projects, including the loss of land to proposed transmission lines

- Impacts to sensitive plant and animal species- surveys of the Flat-Tailed Horned Lizard must be conducted during the summer months and surveys of burrowing owls must be conducted during the appropriate season as well so as not to disturb the nesting activities.
 - Efforts to relocate burrowing owl nests have been met with limited success- this is impact must be considered.
- Impacts to Soils- The scraping of the desert for construction roads will not only cause soils to become airborne, it will also allow for introduction of invasive non-native plants such as Brassica tournefortii. Watering the soil during springtime construction, will also promote the propagation and proliferation of this deadly plant. How will the germination and propagation of this deadly, prolific non-native plant be prevented?
 - The scraping of the ground for 500 or so miles of roads has the potential for obliterating habitat for the sensitive and rare plant and animal species
- Imperial County is in non-attainment for particulates (PM10) and for ozone. How will the developers of this project prevent additional particulates from vehicles being added to the already impaired air quality during construction and during operations?
- The Ocotillo/Nomirage aquifer is a sole-source federally protected aquifer and must not be employed for industrial uses. The Colorado River is already over-allocated. This is an issue that must be thoroughly vetted with all appropriate agencies. What will be the impacts of taking water from an already hard-pressed source?
- Impacts to the Community Character of the Ocotillo/Nomirage communities, including impacts to dark skies and quiet must be addressed. How will this affect property values as well as the impairment of the desert character which many folks moved there to enjoy?
- Impacts to the air space must be analyzed. What kind of glare will the Sun Catchers send into the flight paths above the proposed project area?
- Impacts to the recreational quality and experience of nearby Plaster City Open Area, the Superstition Hills recreation area and to Painted Gorge Recreation Area must be analyzed.
- Impacts to the resources and recreational experience of Anza-Borrego Desert State Park must be analyzed.

There are many more issues involved in this massive solar project that the Desert Protective Council does not have the expertise to address, but we are confident that the Project managers, the CEC and the BLM have taken pains to inform all possible concerned agencies, local citizens, Anza-Borrego State Park officials, wildlife biologists and soil scientists of this project in order to receive the most complete list of issues possible.

Thank you very much for this opportunity to comment and participate in the public process for the Stirling Energy Systems Solar Two project.

Happy New Year!

Sincerely,

Terry Weiner
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