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Subject: Comments on Tessera's Imperial Valley Solar (Solar Two)

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To Whom It May Concern:

My name is Brendan Hughes and I would like to comment on the Tessera Solar Two project in Imperial County. Contrary to the CEC staff's assessment, this project has unmitigable impacts on biological, cultural, and visual resources, and therefore should not be approved. Also, a CDCA plan amendment should be made to place this area off-limits to development.

First, impacts to biological resources would be severe. This area is important habitat for the flat-tail horned lizard (FTHL), a BLM sensitive species. The FTHL will probably be listed as a threatened species soon, and this project would certainly push the FTHL over the brink into that status. BLM should not allow further destruction of this animal's habitat. Other sensitive species have been observed on this site as well, including burrowing owls, kit foxes, and endangered peninsular bighorn sheep. The dismissal of the presence of peninsular bighorn sheep as "a transient occurrence" does not excuse the fact that the construction of this project could take away migratory and foraging habitat for bighorn sheep in the future. Additionally, the executive summary indicates that BLM declared special-status plant surveys to be inadequate. This is unacceptable for inclusion into a Draft Environmental Impact Statement. How can decisions be made by land managers and interested parties if the information provided is inadequate? This Draft EIS should not be allowed to move forward until complete information is provided by qualified individuals in the field.

Also, cultural resources would be damaged or destroyed by this project. Numerous sites that are sacred to local Indian tribes have been discovered in the project area, including trails and cremation sites. These sites will be permanently altered by this project. Additionally, the project will restrict access to the sites not destroyed by the 30,000 proposed Sun Catchers.

Moreover, impacts to the visual resources of the area cannot be mitigated, as the DEIS declares. This is another problem for local Indian tribes, whose religious ceremonies and practices will be disrupted by this visual disturbance to their cultural landscape. In addition, those who enjoy the landscape of the Yuha Desert for aesthetic purposes will have lost this precious resource and will have no recourse for its return.

Finally, the Sun Catcher technology is wholly untested on a large scale. The maintenance of 30,000 individual Stirling engines will require an army of attendants to keep them in working order. Also, no one knows how these Sun Catchers will hold up to the extreme winds and potentially strong earthquakes that occur in the area. For instance, did Tessera determine how the recent 7.2 magnitude earthquake near Mexicali would have affected 30,000 Sun Catchers? Would all of them have fallen over, or just half of them? Would all of them have lost portions of their mirrors, or just half of them? This type of technology may be appropriate and functional on a small scale, but the sheer number of engines that would be built for this project leaves many questions unanswered.

BLM should choose the No Action Alternative with a CDCA plan amendment disallowing industrial development of this important area. Additionally, BLM and CEC should do more to promote rooftop solar and other forms of distributed energy, rather than enabling the destruction of our precious open landscapes.

Thank you for your consideration.

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