From: Lou Hamby <lou_hamby@sbcglobal.net>
To: <mediaoffice@energy.state.ca.us>, <cmeyer@energy.state.ca.us>
CC: <Donna_Clinton@blm.gov>, Richard Montanucci <rrmnt@CLEMSON.EDU>
Date: 9/3/2010 8:14 AM
Subject: Imperial Valley Solar/SES Solar Two environmental impact

http://www.signonsandiego.com/news/2010/sep/02/deserts-at-risk-in-push-for-green-energy/

To whomever this may concern:
I am writing as a reptile and southwest desert enthusiast, I have been studying reptiles specifically lizards for over 40 + years, and as a citizen I have spent the last three days reading though all of this as my interest was pricked when I read this article published by one if the San Diego Papers, being a friend of Dr. Montanucci's I also aware of his efforts to contact the Governor and also your organizations with respect to the issue of the desert fauna (which I see his comments are included in your documentation posted on the internet project site). Dr. Montanucci's suggestions that alternative areas such as dry lakebeds (which we have several in these areas) and fallow ground as obvious better choices than putting the bulldozers to this pristine area, which has a robust animal population, and many endangered and federally protected species.

It is my greatest hope that one or all of your agencies receiving this email will consider contacting and consulting Dr. Montanucci, one of the foremost experts on reptiles, southwest deserts, and an expert on cactus and as a professor emeritus his understanding and experience is exemplary by all standards of academia and his understanding of the specific dynamics involved and the probable effects of this project with respect to the fauna that will be adversely affected.

It is unfortunately there are many projects that have attempted to relocate tortoise populations with dismal results (one only need to Google these in the internet) and the flat tail horned lizards can not be relocated into an area that doesn¹t have large ant populations and not affect the existing populations???? I know that the biologists involved in the impact study for this must know this....? I have grave concern about this as a private citizen and one who loves California... especially when there are alternative locations.

As a former resident of California for 52 years, this pristine desert area is visited by thousands every year and lets face it, if this project is done at this site without consideration of alternative¹s which there are many, it is permanent. You cannot go back. It would be great if conservation and energy could work together for a thoughtful protocol and using the wisdom of all the players to promote great stewardship of our resources in a way that will not be harmful. Isn¹t this doable???? This could put a positive face on our green technology projects.

Hardly anyone knows about this project, certainly you¹ve been up front about it....but now that this has been published and is coming to the attention others such as myself -- most all of the people I know are supporters of green energy and becoming energy efficient and not dependent on other countries for energy resources.

As a human being‹you all certainly know academically the dynamics of a

bulldozer to pristine land and its inhabitants.

What I don¹t understand in your report and I may have missed it; are all ³the other animals² completely left out of consideration when looking at the whole project, its not just the endangered and threatened or federally protected species being affected??? I am compelled because of my own personal concerns to forward this.

I thank you for your time, and ask you humbly to consider consulting one of the foremost experts in this field.

I have included Dr. Montanucci¹s contact information:

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DESERTS AT RISK IN PUSH FOR GREEN ENERGY

BY RICHARD R. MONTANUCCI

THURSDAY, SEPTEMBER 2, 2010 AT MIDNIGHT

What is about to unfold in California's deserts is nothing less than wholesale destruction of the environment. Utility-scale solar energy plants are about to be approved that will erase wildlife habitat over immense areas, consuming thousands or tens of thousands of acres for each project.

It is an unmitigated assault on our public lands.

This solar energy development, touted by politicians, environmental organizations and state energy officials as "green energy," a term having benign connotations, is being justified in order to meet California's goals of AB 32 greenhouse gas emissions reduction and a renewable portfolio standard of 33 percent by year 2020. Ultimately, a cumulative area the size of Rhode Island, about 1,200 square miles of desert, could be destroyed in California alone.

The far-reaching and irreversible negative consequences of these projects are now apparent to many environmentalists, scientists, state energy officials and industry representatives, but little is being said publicly. The predicted impacts include the fragmentation of wildlife habitat and loss of essential habitat corridors. Plant and animal populations will be extirpated as land is scraped bare and rendered biologically sterile. In many cases, localized, threatened and endangered species populations will be further imperiled.

Additionally, desert landscapes will be permanently disfigured, with consequential loss of their intrinsic aesthetic value for tourism and outdoor recreation.

The Chuckwalla Valley west of Blythe, an area rich in biological, archaeological and aesthetic resources and certainly qualifying for national park status, is threatened by dozens of renewable energy projects. There is tremendous pressure to develop the Chuckwalla Valley due to its proximity to transmission lines that feed into Los Angeles and Phoenix, but approval of these projects would be a tragic loss for wildlife conservation. The valley supports an array of unique, rare and sensitive species, including the desert pupfish, Alverson's pincushion cactus and the desert tortoise, a federally threatened species. Chuckwalla Valley supports one of the finest stands of ironwood trees in the entire Sonoran Desert region. Some trees were growing along the McCoy Wash before Christopher Columbus landed in America. They have survived the hottest climatic periods and droughts, but they will not stand against the bulldozer.

In the Imperial Valley, another project will destroy foraging habitat for the peninsular desert bighorn sheep, a federally endangered species, and habitat for the flat-tailed horned lizard, a candidate for threatened species status. Thousands of these lizards, other reptiles and small mammals will be killed or displaced during project construction, including sensitive species such as the kit fox, badger, burrowing owl and golden eagle. The aesthetics of the Anza Trail, managed by the National Park Service, will be impacted, and Native American cultural resources, including sacred sites, will be lost as well.

What is the alternative?

The use of "brownfields" – decommissioned landfills, abandoned mines and other degraded lands – should be the first priority. According to the Environmental Protection Agency, at least 11,000 suitable sites exist nationwide. There are many such sites in Southern California.

Desert playas also could serve as project sites with minimal impacts on wildlife habitat. These dry lake beds are "abiotic zones," devoid of living organisms. During seasonal rains, they fill with several inches to several feet of water that eventually evaporates. Some engineering tinkering would be required, such as trenching the perimeter of the lake bed to capture water inflow from surrounding higher ground. Also, access roads and buildings would need elevated foundations, but "sun-catcher" dishes mounted on columns would be unaffected by standing water.

Another option is converting fallow agricultural land for solar collection, as private landowners in many areas are willing to sell their acreage.

The most environmentally friendly option for site placement would be the unused rooftops of homes and office buildings that can be used for distributed photovoltaic energy generation. There are thousands of acres of rooftops in Albuquerque , Las

Vegas, Los Angeles, Phoenix and Salt Lake City. It can be argued that this is the low-cost, high-value way for California to achieve its goal of 33 percent renewable energy use by 2020. Promoting these installations would create a growth industry.

Many destructive projects are being fast-tracked so they can meet the December deadline to qualify for federal stimulus dollars. In the end, significant parts of our natural heritage will be lost forever.

Montanucci is associate professor emeritus of the Department of Biological Sciences at Clemson University in Clemson, S.C.