



SAN GORGONIO CHAPTER

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*Regional Groups Serving Riverside and San Bernardino Counties: Big Bear,
Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz.*

January 25, 2008

George R. Meckfessel
Planning and Environmental Coordinator
Needles Field Office, Bureau of Land Management
1303 South U.S. Highway 95
Needles, CA, 92363-4228,

Attention: Ivanpah SEGS

Dear Sirs:

The San Gorgonio Chapter of the Sierra Club – with more than 6,000 members – welcomes the opportunity to assist the Bureau of Land Management (BLM) in evaluating the environmental effects of the proposed Ivanpah Solar Electric Generating System (Ivanpah SEGS) and to identify the issues that should be addressed in the scheduled Environmental Impact Statement.

The San Gorgonio Chapter is concerned about four aspects of Ivanpah SEGS and urges that the BLM fully address each of these in the EIS: (1) at least 3,400 acres of prime desert tortoise habitat will be permanently destroyed by the facility, (2) the land acquisition mitigation ratio suggested by the Applicant is significantly lower than what is appropriate and adequate given that the site is prime desert tortoise habitat, (3) the proposed relocation of threatened desert tortoises from the site may pose a risk to these animals, and (4) Ivanpah SEGS is being evaluated in isolation rather than as part of an assessment of the cumulative effects of the multiple power-generation projects proposed for lands administered by the BLM.

The proposed site of Ivanpah SEGS is prime desert tortoise habitat, and the 3,400 acre facility will completely transform this habitat. The Alden Sievers BLM Report of 1988 recommended that this area be managed for the long term viability of the species and, until NEMO was certified, the proposed site of Ivanpah SEGS was Category I habitat for the desert tortoise. The area is biologically excellent for the tortoise. Although NEMO changed the Desert Wildlife Management Area (DWMA) lines and designated lands outside the DWMA (including the Ivanpah SEGS site) as Category 3, that administrative action does not alter the biological fact that the site remains excellent tortoise habitat. The Application For Certification (AFC) reports a sizeable desert tortoise population and other evidence of desert tortoise within the site boundaries. Protecting such higher-elevation tortoise habitat as Ivanpah should be considered even more important in the context of global warming. Eliminating higher-elevation tortoise habitat could have drastic consequences when lower areas become less suitable for the species.

If the project is approved, we believe that the Applicant must be required to mitigate the environmental effects of Ivanpah SEGS through acquisition of additional tortoise habitat. Appropriate and adequate mitigation would be at a ratio of 5:1, not the 1:1 ratio suggested by the Applicant. Adequate mitigation in cases where human projects or activities adversely affect habitat cannot be avoided or minimized. As you are aware, the California Endangered Species

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Act's requirements for mitigation are more stringent than federal requirements. Indeed, the California Department of Fish and Game frequently requires 5:1 mitigation in the Mojave Desert, especially in good tortoise habitat. It would be wise, therefore, to require full mitigation at an appropriate and adequate ratio in the EIS to conform to the requirements of the California Endangered Species Act.

The San Gorgonio Chapter is concerned that the proposed relocation of desert tortoises from the proposed Ivanpah SEGS site may pose a significant risk to these animals. The single study to date of desert tortoise translocation was based on a small sample of 40 tortoises, involved the manipulation of the sample by giving water to some tortoises but not others, and only monitored the relocated population for a relatively brief, two-year period (Field, et. al. "Return to the Wild..." 2007). In this study, 21.4 percent of the relocated tortoises died. Given this rate of mortality and the absence of large-scale, long-term research, the San Gorgonio Chapter strongly believes that the BLM must develop a detailed plan if it authorizes the translocation of the tortoises from the Ivanpah SEGS site. That plan should carefully evaluate the habitat to which the population might be moved, ensure that no diseased animals are joined with healthy animals, consider the added stress on the animals resulting from the concentration of more tortoises in a single area, and guarantee that the relocated population will be monitored over an extended period of time.

Ivanpah SEGS will permanently remove a relatively large and undisturbed portion of the desert, yet it is only one of many proposed projects that will transform the California desert. Therefore, the San Gorgonio Chapter strongly urges the BLM to undertake an assessment of the cumulative effects of the many power-generation projects proposed for lands administered by the Agency.

Decisions about the siting of energy-generating facilities can only be made in the context of sound overall land-use planning. If the BLM does not consider the cumulative effects of multiple projects, there is a real risk of losing the California desert as a viable and valued ecosystem. To cite just one example, approximately 34 percent of the known acreage of creosote bush-white bursage-barrel cactus vegetation in California will be destroyed by the construction of the Ivanpah SEGS facility (AFC, Section 5.2.9.2.4). This is obviously of significant concern. Yet without consideration of the cumulative effects of all proposed energy projects, there is the risk that this rare plant community might be completely eliminated. The need for a cumulative impact assessment is further highlighted in this instance because the area will be affected, as well, by the GEN 3 Solar project (CACA 48669) proposed for a site immediately adjacent to Ivanpah SEGS.

The San Gorgonio Chapter recognizes that undertaking a cumulative impact assessment is a difficult charge. However, we risk losing not only the habitat at Ivanpah but the desert as a viable ecosystem if the Bureau of Land Management maintains its focus on individual projects rather than on the cumulative effects of multiple projects.

Sincerely,



Sidney Silliman, Ph.D.
San Gorgonio Chapter, Sierra Club