



# United States Department of the Interior



NATIONAL PARK SERVICE  
Pacific West Region  
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Mr. Jeffrey D. Byron  
California Energy Commission  
1516 Ninth Street  
Sacramento, California 95814-5512

Re: Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Ivanpah Solar Electric Generating System.

Dear Mr. Byron,

The Pacific West Region (PWR) of the National Park Service (NPS) submits the following initial comments on the Notice of Intent to Prepare an Environmental Impact Statement (EIS), for the proposed Ivanpah Solar Electric Generating System, prepared jointly for the California Energy Commission (CEC) and the Bureau of Land Management (BLM), Department of the Interior (DOI). The NPS is participating in the scoping process because NPS units in the PWR, specifically Mojave National Preserve (MNP), may be impacted by the proposed Ivanpah project (a 3400 acre facility to be located near Primm Nevada), which is less than 3 miles from the MNP boundary.

### General Comments

The NPS recognizes the challenges in providing energy to a rapidly growing population in Southern California, Nevada and to the western United States and is generally supportive of green energy projects to help meet this demand. However, the primary mission of the NPS is to preserve and protect the National Parks, Recreation Areas, and Historic Sites for the American people. In general, energy developments that are in close proximity to NPS units create impacts that are not compatible with the NPS mission. The EIS developed for the Ivanpah Solar Generating System needs to carefully and thoroughly consider impacts and include mitigations and/or Best Management Practices to reduce potential impacts to MNP.

### EIS Alternatives

The EIS should consider alternatives to improve the long-term health of public lands. Towers and over-head facilities need to be minimized to prevent wildlife mortality and impacts to visual resources caused by power line maintenance and construction activities. Bird electrocutions and collisions with power lines, and impacts on special status and wildlife species need to be considered. Undergrounding lines in existing disturbed utility corridors could restore habitats; vegetation resources impacted by decades of line maintenance and ground clearing, and restore visual resources. Additionally, co-locating and undergrounding utilities would be a positive gesture to surrounding communities. Recreational users of the watershed, wildlife enthusiasts and neighbors alike would applaud the vision of those who look to restore our scenic open spaces. The NPS urges CEC and BLM to consider and propose a truly environmentally preferred alternative including co-locating and undergrounding lines where appropriate. Alternative sites away from MNP should be evaluated in the EIS, sites that are not visible from MNP and will not result in any impacts on the preserve.



### Resource Impacts

The proposed project's impact on natural resources, visual resources, and recreation could be significant and permanent. Natural resource impacts should be thoroughly evaluated in the EIS. Construction and operation associated with the action alternatives are likely to impact natural resources including wildlife, geology and soils, hydrologic systems, water quality, and air quality. The EIS will need site-specific detail, particularly for resource topics including vegetation and endangered species. In particular, the location near Primm, Nevada that is considered for the solar project intersects an important California Bighorn sheep herd migration route specifically used for lambing. Bighorn sheep use Clark Mountain most of the year, in the early spring; ewes migrate to the northeast near Primm Nevada, to have their lambs. The EIS should do more than offer boilerplate listings of the varied biological communities surrounding the project. Ground disturbance will have severe and permanent implications for native vegetation communities, the wildlife dependent upon them, and wildlife corridors. Ultimately, no mitigation measures can remedy the permanent clearing of the site identified. Grading will permanently remove many acres of vegetation impacting the mammals, birds, and insects that utilize those native habitats. Furthermore, grading as proposed can favor invasion of non-native vegetation which further threatens the native species adjacent to the cleared areas. In essence, the NPS is concerned that developing this site in combination with other proposed project developments in the Ivanpah Valley will have cumulative effects on many natural and visual resources.

The following are potential impacts to natural resources that should be addressed in the EIS:

- Loss of habitat at the proposed site, construction staging areas, and associated permanent support facilities and infrastructure. This is especially critical for the threatened desert tortoise, which utilizes this site as habitat.
- Impact of construction and earthmoving activities as related to disruption of vegetative cover, introduction of invasive species, compacted soils, access roads, disturbed surfaces, erosion, and hazardous materials.
- Impacts to unique and aesthetically pleasing geologic formations, as well as those of scientific interest and impacts from geohazards such as unstable soils or fault areas.
- Disruption of regional wildlife movement by the site development with the physical nature of the infrastructure including fencing, presenting a barrier to wildlife movement.
- Impacts from light pollution and night sky values, both short term construction impacts and long term operational impacts for permanent facilities.
- Impacts to and from the unique aesthetically pleasing view sheds of Clark Mountain and other areas.
- Impacts to the natural soundscape, including construction and long term operational noise.
- Air quality impacts from clearing of the site will result in large amounts of fugitive dust being blown into the air. Burning of natural gas will also generate greenhouse gas emissions.

In addition to natural resources, construction and operation activities could result in impacts to visual and recreational resources. The EIS should evaluate the indirect impacts to recreation from constructing and maintaining the site adjacent to or visible from recreation areas. In addition, the NPS is directly concerned with the utility site being visible from MNP. This location is likely to impact the outstanding views from Clark Mountain, the tallest peak located in MNP and inside congressionally designated wilderness. One of the important features of many NPS units is the separation from the built environment or the preservation of an historic environment. Utility sites are generally not compatible with the recreation experience in a National Park. Infrastructure removal, consolidation, and new facility development along with increased operation and maintenance have the potential to block access to recreation areas.

### Land Use Planning

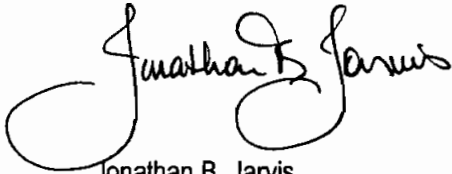
The management of each unit of the NPS is guided by the enabling legislation for that unit along with the General Management Plan. These guiding documents set forth the primary purpose of each unit, identify the types of facilities and uses that are permitted, and provide direction on how the resources shall be managed. The EIS should identify potential conflicts between the proposal and existing MNP General Management Plan.

In addition to any direct impacts to NPS planning, the EIS should evaluate the indirect and cumulative impacts to land use in the vicinity of the MNP unit. It is unclear whether the proposal would lead to growth inducing impacts including the development of new service related developments in areas that were previously unoccupied lands. The EIS should include an evaluation of the corresponding impacts from potential development to infrastructure including roads, airports, water, and sewer utilities in areas adjacent to NPS units.

In summary, the NPS has many concerns with the proposed location adjacent to Mojave National Preserve and we believe that better sites are available. NPS will request development of detailed site specific studies and/or data for the utility development proposal that may impact NPS resources. The MNP staff will work with the project team to provide specific information and data about the NPS resources in the area. If conflicts are unavoidable, the NPS will work with the project team to avoid, lessen, or mitigate impacts to the greatest extent feasible.

Thank you for consideration of these comments. Please direct questions to Dennis Schramm, Superintendent MNP at (760) 252-6103 or by email at [dennis\\_schramm@nps.gov](mailto:dennis_schramm@nps.gov).

Sincerely,



Jonathan B. Jarvis  
Regional Director, Pacific West Region

cc:

Dennis Schramm, Superintendent, Mojave National Preserve  
Sterling White, Needles Field Manager, Bureau of Land Management  
Tom Hurshman, Project Manager, Bureau of Land Management  
Steve Borchard, California Desert District Manager, Bureau of Land Management  
Jack Caswell, Staff Project Manager, California Energy Commission  
Barbara Goodyear, Field Solicitor, SF Field Office