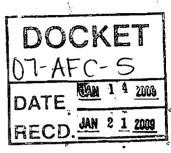
January 14, 2009 2231 Kelton Ave Los Angeles, CA 90064

Che McFarlin, Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814



RE: Ivanpah Solar Electric Generation System - PSA

Dear Mr. McFarlin:

I thank you for the opportunity to comment on the Preliminary Staff Assessment (PSA) of the Ivanpah Solar Electric Generating System (ISEGS). As your report has recognized, there are many factors involved in evaluating the proposal, and the impacts to be anticipated from the project are serious and may, or may not, be mitigable. I am a frequent traveller in the eastern Mojave Desert and place a high value on the natural resources of the area under consideration. This leads to several concerns which I have as a result of your assessment.

While I acknowledge the potential value, perhaps even the necessity, of providing energy from renewable resources in the Mojave Desert, this must be done only after considering the circumstance surrounding each proposal and each site. The projects must be pursued in an environmentally responsible way, and if this is not possible, then permits should not be granted.

The preliminary assessment acknowledges that it is not currently possible to determine if impacts to Air Quality, Biological Resources, Cultural Resources, Land Use, Soils and Water Resources, Traffic, and Transmission System Engineering can be satisfactorily mitigated. Of course it is difficult to obtain all the data that one would wish, but the suggestion that a project could be approved without knowing what the consequences might be seems unsupportable. Every effort **must be made to resolve these uncertainties**.

I am particularly concerned about impacts which the ISEGS would have upon habitat, plans, and wildlife. The site of the project is outstanding desert tortoise habitat, and as these are a threatened species they need special consideration. The plan suggests that a number of tortoise would be removed. The experience which the US Army has had in the translocation of tortoise to accommodate expansion of the Fort Irwin military complex has been disastrous. There must be assurances that there will be no similar result if the Ivanpah project were to go ahead.

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If ultimately it is determined that impacts to the biological resources at the site can not be suitably mitigated, and if permits for the project are nevertheless granted, then the applicant, Bright Source, must be required to provide substantial compensation for the negative impacts that result.

I trust that you will consider all the factors that are relevant to the proposal: legal, environmental, as well as economic. I urge you to particularly note the concerns and suggestions which I have made above.

Sincerely,

Craig D'entsche

...

Craig Deutsche



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA 1516 NINTH STREET, SACRAMENTO, CA 95814 1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE IVANPAH SOLAR ELECTRIC GENERATING SYSTEM DOCKET NO. 07-AFC-5

PROOF OF SERVICE (Revised 12/22/08)

<u>INSTRUCTIONS:</u> All parties shall 1) send an original signed document plus 12 copies <u>OR</u> 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed <u>OR</u> electronic copy of the documents that <u>shall include a proof of service declaration</u> to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION Attn: Docket No. 07-AFC-5 1516 Ninth Street, MS-15 Sacramento, CA 95814-5512 docket@energy.state.ca.us

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DECLARATION OF SERVICE

I, <u>Teraja Golston</u>, declare that on <u>January 21, 2009</u>, I deposited copies of the attached <u>PSA Comment Letter from</u> <u>Craig Deutsche (07-AFC-5)</u> in the United States mail at <u>Sacramento, California</u> with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

<u>OR</u>

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Docket Teraja Golston

Attachments