



# SAN GORGONIO CHAPTER

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

May 7, 2009

## Via Email and Federal Express

California Energy Commission  
Attn: John Kessler, Project Manager  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

<b>DOCKET</b> <b>07-AFC-5</b>
DATE <u>MAY 07 2009</u>
RECD. <u>MAY 07 2009</u>

Re: **Draft Desert Tortoise Translocation/Relocation Plan for the Ivanpah Solar Electric Generating System, 07-AFC- 5**

Dear Mr. Kessler:

On behalf of the Sierra Club's San Gorgonio Chapter, this letter is to comment on the Draft Desert Tortoise Translocation/Relocation Plan submitted on March 19, 2009 for the Ivanpah Solar Electric Generating System (ISEGS) Project in Supplemental Data Response Set 2A.

We concur with the conclusion set forth in your letter of April 29 to Mr. Woolard of Solar Partners that additional information and details are necessary to an adequate Translocation/Relocation Plan. Any take of the State- and Federally-protected desert tortoise at the proposed ISEGS site must be minimized. We likewise support the specific comments on the Draft Translocation/Relocation Plan made by staff, the U.S. Fish and Wildlife Service, and the California Department of Fish and Game. The comments accurately reflect what must be incorporated in the final plan to reduce further threats to the desert tortoise.

We request that staff incorporate into the FSA, not only the specifics of the Translocation/Relocation Plan, but the consensus of the Desert Tortoise Science Advisory Committee (SAC) at its meeting of March 13, 2009 that "...translocation is fraught with long-term uncertainties...and should not be considered lightly as a management option." The SAC recommended that: "When considered, translocation should be part of a strategic population augmentation program, targeted toward depleted populations in areas containing 'good' habitat". The SAC further recommends that any translocations should be accompanied by research "to study the effectiveness or success of the translocation relative to changes in land use, management, or environmental condition." The minutes of the SAC meeting are available on the Desert Tortoise Recovery Office web site at [http://www.fws.gov/nevada/desert\\_tortoise/documents/sac/20090313\\_SAC\\_meeting\\_summary.pdf](http://www.fws.gov/nevada/desert_tortoise/documents/sac/20090313_SAC_meeting_summary.pdf).

Respectfully Submitted,

Sidney Silliman

Sierra Club San Gorgonio Chapter and Desert Committee



**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 4/16/09)**

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**DECLARATION OF SERVICE**

I, Violet Lehrer, declare that on May 7, 2009, I served and filed copies of the attached Letter, dated May 7, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

**[www.energy.ca.gov/sitingcases/ivanpah]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO ALL OTHER PARTIES:**

\_\_\_\_\_ sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at 85 Second St., Second Floor  
San Francisco, CA 94105  
\_\_\_\_\_ with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

**FOR FILING WITH THE ENERGY COMMISSION:**

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (**preferred method**);

**OR**

\_\_\_\_\_ depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 07-AFC-5  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
docket@energy.state.ca.us

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

Violet Lehrer