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Thursday, February 11, 20t0 CD. 08/05/10

re: Ivanpah SEGS Public Comment

To Whom It May Concern:

Of other public comments arriving with regard to the proposed Ivanpah Solar Electric Generating Station south of Primm, NV, I am confident many will address the abundant technical, hydrological, and wildliferelated problems contained in the proposal to bulldoze a broad swath of publicly owned ancient desert habitat for private industrial development. It is on these details that projects such as the Ivanpah SEGS are either approved or denied, and I am grateful that others can speak to those details more authoritatively than I.

What I can address with confidence and authority, however, is the fact that the Brightsource project threatens one of the most beautiful places in the United States. True, that beauty may not be apparent to the casual traveler on I-15 speeding through the desert with the airconditioning cranked up as they peer through tinted safety glass. It takes a few moments of quiet for the Ivanpah Valley's beauty to sink in fully.

I lived in the Ivanpah Valley for much of 2008. I have been spending time there and in neighboring places in the desert for much of my life. The Ivanpah Valley is not wilderness, at least not that part of it outside the Preserve. There are many visible human intrusions there. Freight trains roar through the valley sounding loud horns, engines on both ends straining to build up momentum for the long climb to Cima. Off I-15 there is traffic on Nipton Road, long-haul truckers heading for Searchlight, vacationers in RVs and motorcycles heading for the Colorado River. One can in fact hear them from several miles away. They approach. They grow

louder. They pass. The noise recedes.

And then the noise ebbs, and the cricket song swells, and the coyotes' song, the breeze, the sound of blood in your veins. In the south end of the Ivanpah Valley, at least, human influence is limited and inconstant. From the Mojave National Preserve even Interstate 15 recedes in significance, becoming not much more than a pretty string of far head- and taillights in the distance, and that only at night. The sere backdrop of Clark Mountain, the McCulloghs and Lucy Grays in the east, and the protected peaks of the New York and Ivanpah mountain ranges contain between them a vast, largely wild piece of the Mojave. The Ivanpah Valley contains nearly all the Mojave's landscapes in its boundaries — alkali flat, old-growth creosote and ancient Mojave yucca, Joshua tree woodland, piñon-juniper forests on the slopes of the fringing ranges. There is even an alpine sky-island overlooking the Ivanpah Valley, white firs clinging to the higher slopes of Clark Mountain, directly above the project site. The Valley is the Mojave in microcosm.

Paving thousands of acres of the Ivanpah Valley with mirrors would utterly destroy the wild character of the place. It would be an encroachment on the peace of the Preserve and the lands around it, with the noise and dust of construction and the subsequent blinding glare of the completed facility an intrusion into a peace I have found nowhere else on earth.

Others will question the actual carbon reduction benefit provided by building this plant, and rightly so. They will question the validity of tortoise relocation and mitigation, the additional demand on the 12,000-year-old water in the Ivanpah Valley's aquifer, the loss of Mojave milkweed habitat.

These are all crucial questions that absolutely must be answered. Neither Brightsource nor Interior have done so.

The loss I want to question, however, is the loss of our soul.

Are we really so bereft of wisdom that we see this beleaguered but beautiful stretch of ancient desert as nothing more than a blank spot on a map? Are we really so callous that we can consider the improbably old creosote, Mojave yucca and barrel cacti on the Ivanpah site less valuable than leaving our closet lights on when the door is closed? Many of the plants growing there are older than this nation. Some may pre-date European presence on the continent. We may as well raze the Parthenon to build a strip mall, knock down Stonehenge for use as highway berms. There is something very wrong in us if we value this place not for its beauty but for its square footage. There is something broken in us if we look at the Ivanpah Valley and see not peace, but merely a way to increase our power and the profit we derive from it.

In 2008, just before sunset after a day of scattered small rainstorms, a friend and I got out of her car near the abandoned railroad siding known as "Ivanpah," in the southern Ivanpah Valley well within the Preserve. We had a clear and unobstructed view of the whole valley there at the end of the paved section of Ivanpah Road. A desert tortoise stood at roadside. We'd stopped to make sure no passing cars hit her as she tried to cross but there were no passing cars, and she had no apparent intent to cross. Unperturbed by our presence, she fell asleep as we watched. A band of coyotes began singing somewhere off toward Morning Star Mine Road. It was hard not to feel very small. The valley held an immensity of space and

of time as well, humbling both in the sense of personal insignificance it conveyed and in the realization of our frightening capacity to do unintended harm.

It was one of those moments I have found surprisingly common in the Ivanpah Valley, a place that though altered by human hands is still precious, still wild in essence, well worth being defended from further unnecessary and destructive change.

I urge you to halt this project.

Chris Clarke

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