

Docket No. 07-AFC-5

RE: the California Energy Commission's Presiding Member's Proposed Decision on the BrightSource Energy application for the Ivanpah Solar Electric Generating System (ISEGS).

August 26, 2010

Dear CEC representative,

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07-AFC-5	
DATE	AUG 26 2010
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I am writing because I am deeply concerned about the proposed Ivanpah Solar Electric Generating System application submitted by BrightSource Energy. I am concerned about the haste with which this application has been processed, and **request further review of the application and project.**

The proposed site is ecologically fragile, with several rare and vulnerable species such as the desert tortoise present. I do not understand how an untested project of this magnitude is even possible in such an environment, but at the very least it seems to me that a lot of careful review of its impact needs to be done before giving the go-ahead.

Yet this does not seem to have been done. It's unclear what mitigation will - or even can - be done to offset the effects of this project on the local species. I've heard that one "solution" is to relocate or translocate the tortoises. This seems strange to me. How do you relocated habitat-dependant animals that are territorial? There aren't that many suitable alternative habitats, and those that exist already have their own tortoise populations, which would be stressed by the arrival of newcomers, endangering both populations. And what's to keep the relocated animals from trying to return to their home grounds? And what about desert plants, which usually cannot be moved at all? This isn't an environment where you can just recreate what's lost in a new location; wouldn't any proposed "mitigation" sites also be facing the same stresses? How does not destroying one stressed area while destroying another "mitigate" anything? How does moving a group of at-risk animals from one at-risk area to another protect them?

I just don't get the logic of this project. The proposed site has clear environmental and recreational value, the very sorts of things "clean energy" is meant to preserve, and this project would damage or destroy it. I grew up hiking and camping in the desert, and I want my children to see the tortoises and the flowers in spring and the mountains, and to see the stars and experience the wildness and the quiet. Those things are increasingly rare today, and I'm terribly concerned that no one seems to be paying any attention to them. I'm a life member of the Sierra Club, and I'm an environmental historian who studies the American West, but primarily I'm a person who grew up in California. What I have seen time and again, personally and professionally, is wild areas being destroyed in the name of "progress" or "the greater good" - and now this company is proposing to do the same in the name of "the environment"? Each time one of these projects has succeeded, it's chipped away a bit more of what makes California such a special place, and why I call myself a Californian, even when not living in the state.

I do understand that we have great demand for power that's not derived from foreign fossil fuels. But it seems that something like this would be cutting off our nose to spite our face. At the very least, it demands careful review of ALL the impacts and the so-called mitigation plans, and not to be rushed just because the applicant is eager to start making money. (If anything, that eagerness suggests we should take special care, because it implies that the applicant is likely to cut corners in the name of keeping costs down.) We hold this land in trust for future generations; surely we can spend a few more months considering whether taking it away from them forever is something we really ought to do. And if we must, surely it deserves the time needed to make sure we can do it right, and not destroy what we claim we're trying to save: their birthright, and ours, as Californians, and as Americans.

Thank you.

Sincerely,

~~Rachel D. Shaw

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