

Docket Optical System - Ivanpah SEGS public comment**DOCKET****07-AFC-5**DATE AUG 31 2010RECD. SEP 01 2010

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Subject: Ivanpah SEGS public comment

To whom it may concern:

I am opposed to the large scale disturbance of natural areas associated with solar energy development on public land. These proposals cause unmitigatable disruption to the landscape and visual resources. In particular, I am most concerned when rare species and their habitats are involved. Due to the scale of impacts to rare plants and animals and the inadequacy of mitigation measures, in addition to other effects on the environment, the Ivanpah SEGS should not be built.

Species the project will most significantly impact include desert pincushion, Mojave milkweed, Rusby's globemallow, and desert tortoise. The length and width of the project pose a significant barrier to the migration and establishment of new populations of these species as well as many others. Many of the rare plants are located at the extremes of their ranges and the loss of individuals and habitat may diminish genetic diversity in these species. This is particularly true given the threat of effects of climate change this project is supposed to diminish. Genetic diversity is also a concern for desert tortoises.

The proposed mitigation measures of the EIS, while an improvement on the original proposal, are generally inadequate. Mitigation should account for the fact that the site will likely remain developed beyond the projected life-span of the project, since the reasons for selecting this site will remain the same for a replacement project, with the added pull of in-place infrastructure and prior site disturbance. With continuing development on the site, mitigation through avoidance of individual plants is unlikely to be effective because once these plants die, new recruits are unlikely to re-establish within an area so small. This is also likely to occur in many cases during the life-span of the current project. Long-term transplants should be placed in areas away from development so new plants can establish. This is difficult without causing new disturbance which would be necessary to monitor and maintain them.

The purchase of mitigation lands for desert tortoise habitat may be limited by the lack of suitable sites or willing sellers. Also, the relocation of tortoises often has not been very successful. In general, the study and proposed enforcement of mitigation options for most species is not adequate.

More time needs to be allotted to allow further study and development of less destructive alternatives at a different location.

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