

**DOCKET**

**07-AFC-5**

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August 30, 2010

California Energy Commission [Docket No. 07-AFC-5]  
docket@energy.state.ca.us

Re: Docket No. 07-AFC-5: Comment on the Presiding Members Proposed Decision (PMPD) on the BrightSource Energy application for the Ivanpah Solar Electric Generating System (ISEGS)

Gentlemen:

I am deeply disturbed by the present proposal for the Ivanpah Solar Electric Generating System (ISEGS).

Although developing renewable energy resources is an extremely important goal, I think large-scale industrial development on pristine desert lands is absolutely the wrong way to achieve that objective.

The result will be large scale destruction of our national and California's natural heritage. And many species are likely to be put further at peril, including especially the desert tortoise. This peril is especially indicated by the result of translocation of tortoises during March 2008, to December 2009 in the Fort Irwin Expansion, in which 44.3% of the translocated tortoises died soon after translocation and 17.4% of the translocated tortoises were found missing.

That is an extremely high rate of mortality, especially for a species that is supposed to be protected.

Translocated tortoises tend to wander a great deal more than natively resident tortoises, are much more subject to predation by coyotes and ravens, and are much more likely to wander onto highways and be crushed by vehicles. Coyotes are present in the Ivanpah project area. And there are contagious-disease issues arising from translocation of tortoises into areas already occupied by resident tortoises.

At the very least, tortoise fencing is needed along Interstate 15, and BrightSource should at least be made to pay for it.

The decisions made for Ivanpah Valley will tend to create major precedents for all the other renewable energy projects planned for the southern California deserts since the Ivanpah Solar Electric Generating System is one of the first such major large-scale renewable energy projects scheduled for development in the southern California deserts.

If the project proceeds as planned, its extremely cavalier attitude towards our national and California's natural heritage will set a very sad precedent for all the other proposed large-scale renewable energy developments in the southern California deserts. This is an extremely grave matter.

If the project is approved as planned, it appears to me that this precedent and the federal financial incentives for fast-track renewable energy projects are going to have the consequence of a huge, vast, rapid, mega-industrialization of southwest deserts, including especially the southern California deserts, and especially because of the extreme priority that California state has also placed on rapid development of renewable energy projects. Much of the impact to pristine desert lands will result from rapidly expanding secondary development and the consequential human population explosion.

Moreover, much of the motivation for this large-scale industrialization on pristine desert lands seems to stem from the perception by many (especially city dwellers) that the deserts are a vast "wasteland" that, in their view, is very appropriate for large-scale industrialization.

This is a very sad, sickening development!

But the Energy Commission can avoid this outcome and nevertheless quickly advance California and the nation towards very substantial development of renewable energy resources.

The realistic alternatives are these:

First of all, the very large mitigation moneys planned for Ivanpah Solar could be put to much better use by very quickly buying up already disturbed private land on which to locate the project. The land sales would be very lucrative for the private land owners, but the result is that the project would be put on already disturbed land and our national and California's natural heritage in Ivanpah Valley would be spared. That sounds like a win, win, win proposition all the way around.

Second, the Commission should strongly consider placing the Ivanpah Solar project on already disturbed federal public land. Using already disturbed land is far preferable to using the presently proposed pristine land, which is a part of our national and California's valuable natural heritage.

Third, a great deal more needs to be invested in distributed roof-top solar power generation right near the areas where the power will be used. The result is likely to be a great deal more efficient use of power because of the otherwise large losses in transmission lines. The reduced need for transmission lines will also reduce impacts to pristine desert lands and reduce energy costs as well.

Fourth, California and the nation needs to do a great deal more about making much more efficient use of the power that is available already. Energy experts tell us that efficiency measures have a great compounding effect. It is far cheaper to make energy usage more efficient than it is to build more generating plants to feed that waste resulting from inefficiency.

Now I realize that some of these alternatives may need a little "wiggle room" for planning purposes. In particular, Congress may need to permit some emergency flexibility in schedules for federal financial incentives in order to allow for the best allocation of resources.

Consequently, I am also sending copies of this letter to Senators Barbara Boxer and Dianne Feinstein as well as to Congressman Jerry Lewis.

However, there is much that the California Energy Commission can do even without additional flexibility from Congress. In particular, I urge the Commission to take a much less cavalier attitude towards our national and

California's natural heritage than is present in the proposed plans.

Sincerely,

Richard Haney

cc: Docket Unit, California Energy Commission, 1516 Ninth Street, MS-4, Sacramento, CA 95814;

Senator Barbara Boxer;  
Senator Dianne Feinstein;  
Congressman Jerry Lewis