

Docket Optical System - Desert Survivor Comments on Rice Solar Project**DOCKET****09-AFC-10**

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To: <DOCKET@energy.state.ca.us>, <publicadvisor@energy.state.ca.us>
Date: 12/2/2010 8:27 PM
Subject: Desert Survivor Comments on Rice Solar Project

COMMENTS ON DOCKET NUMBER 09-AFC-10

Please enter these comments from Desert Survivors into the record for this project.

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CALIFORNIA ENERGY COMMISSION

1516 Ninth Street
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RICE SOLAR PROJECT
 Docket # 09-AFC-10
 Robert B. Weisenmiller, Ph. D
 Presiding Committee Member

RE: Comments on the PMPD for Rice Solar Project - SIGNIFICANT IMPACTS NOT MITIGATED

Dear Sir:

Thank you for the opportunity to make comments on the California Energy Commission's Presiding Members Proposed Decision for the RICE SOLAR PROJECT.

Desert Survivors feels most strongly that the project will cause SIGNIFICANT IMPACTS to which will not be mitigated by this proposal. These impacts are in the areas of VISUAL RESOURCES, CULTURAL RESOURCES, and PUBLIC SAFETY.

Desert Survivors is an environmentally-oriented organization of people interested in the conservation of desert and arid areas in California and Nevada. Our focus is to educate people about desert and arid area protection issues by leading trips, publishing informational materials and working with public land managers and advocates to protect and conserve our rapidly vanishing natural areas.

We have long been involved in California desert protection issues working for passage of the California Desert Protection Act and commenting on numerous management actions in the various BLM resource areas. We have led hikes in the Turtle Mountains Wilderness, the Riverside Mountains Wilderness, the Little Marias and Palen Wilderness. Our members have camped in the Arica Mountains, off the Rice Midland Road and along the Parker-Blythe #2 transmission line road proposed to be linked with the Rice Project. We have visited the abandoned Rice Patton Camp and airport, we have visited the Rice Dunes Wilderness and camped many times at the Iron Mountain Patton Camp. This mostly BLM California Desert landscape is very important to our group. We have walked the ground, we have beheld the views, we have been awed by the vast open spaces of this complex of desert valleys and surrounding mountains. We are an interested party in area management and a staunch defender of its natural values.

Desert Survivors is quite concerned with this proposal. We are astounded that the proposed decision concludes that the project will have NO SIGNIFICANT IMPACTS!

Visual Resources - Your proposed decision says that a 600 foot tower with a 100 foot sun-like brilliant top less than a mile from the well-traveled state highway in a vast mostly natural desert valley with multi-mile sight-lines is NOT a significant impact. You are leaving yourself open to ridicule, if not legal action with this seemingly politically motivated decision. Please at least acknowledge this impact. If you need Secretary Salazar to override the impact, go ahead, but it is surely significant.

A good deal of the enjoyment we as a group have had camping and exploring in this valley is the natural landscape on which this immense shining tower would forcibly intrude. Its visibility from the surrounding wilderness areas which we visit will be especially offensive.

Cultural Resources, Historical - This project is being built directly on top of the Rice Patton Camp and Airport. The Patton Camps are a significant cultural historical resource for the California desert. In the viewscape of this valley are the Granite Mountain and Iron Mountain Camps. Destruction of an entire camp is SIGNIFICANT. It is not sufficient mitigation to dig up and store the artifacts. A large part of the historical value of the Patton camps is the lonesome desert landscape that the young soldiers experienced as they prepared for war. You are the first to authorize the obliteration of a Patton Camp and its replacement with an industrial development; it is a significant loss; please acknowledge it.

Cultural Resources, Native American - This area is a center of native American trails, your document acknowledges that. We don't see any government-to-government consultation documentation with the Chemhuevi Tribe who generally feel that this area is a sacred landscape. Members of our group have participated with Chemhuevi Tribal efforts save sacred sites and trails in the Blythe Solar Project and there are no-doubt similar concerns here at a landscape level.

Public Safety - There are some general aviation aircraft using the Highway 62 corridor or coming north from Blythe and Midland. A new 600 foot tower is definitely a safety hazard no matter how well light. The scale of this structure makes it significant. Again let's acknowledge the facts.

Land Usage - Scenic Highway - This area along Highway 62 has been proposed for Scenic Highway designation. We agree with that assessment and support the designation. It is a favorite desert drive to leave Twenty Nine Palms and drive eastward on Highway 62. Two lane, mostly without powerlines, and always with a landscape view; this is scenic highway defined. A 600 foot shining tower is grotesquely out of place. Big impact from this proposal. Significant.

Biological Resources - You had better expect a greater number of tortoise removals than your survey has uncovered. Recent experience at the Ivanpah Solar has shown that these preliminary surveys are not reliable and under-count the actual tortoises. It may be that the alternate powerline route which will destroy less natural tortoise habitat is a better choice as it uses the existing road.

Powerplant Reliability - This plant is in the path of consistent sand transport corridors. The Rice Valley Dunes are just to the south, and sand flow is coming from the northwest, crossing the northernmost part of the Rice-Midland Road and blowing over the southern project area. Often in the Spring we stop along the road here to look at the sand-loving wild flowers. How long will it take the sand to dull the mirrors and get into the moving mirror towers? Not long. This higher level of maintenance will erode any profitability the project might have. Those of us with pitted windshields well understand this.

Energy Storage - No data is provided with respect to the amount of energy which might be generated from stored heated salt. It is not likely to be very much of the rated capacity or for very long, but we aren't given any data. Part of the justification of this plant is the feature to create off-peak output, but without any more than generalities, its usefulness can't be evaluated.

Project Alternatives - Desert Survivors supports the development of solar projects; First, on the rooftops of urban areas where the power is needed. Secondly, on disturbed lands close to urban areas. While this project uses disturbed private land, most of the disturbance is of a valuable historical nature! Its visual impacts directly intrude on a huge natural landscape surrounding the project. This project is better placed closer to the urban area it is designed to serve.

Solar Land Rush - Boom and Bust! - By agreeing to this project in this place and agreeing to destroy much of the scenic landscape value of this area, you are rushing ahead of the normal deliberative land preservation ethic which has been generally been followed since the federal designation of the California Desert Conservation Area in 1976. Already this rush to build on natural landscapes in the desert is easing off. Political winds are shifting, money for subsidies is getting scarce. Lets wait a bit to see if we really need this project. A better long-term conservation tactic is promotion of reduced energy usage.

Preserve for Future Generations - BLM's mandate is to preserve the land for future generations. Some now argue that the landscape and the natural ecosystem must be sacrificed for those future generations.

"The mission of Desert Survivors is to experience, share and protect the desert, a beautiful, fragile and threatened environment deserving of respect and requiring constant vigilance."
Our remaining natural landscapes don't deserve hurry-up ill-thought treatment.

Thanks for your time and attention. Please keep us informed of any new information about these issues. I would be happy to discuss any questions you have regarding these comments.

Sincerely yours,

Bob Ellis

Rice Valley Solar Issues
Desert Survivors

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Solar on Rooftops - Not On Tortoise Shells!