

January 30, 2009

Che McFarlin, Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>07-AFC-5</b>	
DATE	JAN 30 2009
RECD.	FEB 04 2009

RE: Ivanpah Solar Electric Generation System Preliminary Staff Assessment

Dear Mr. McFarlin:

Thank you for the opportunity to comment on the Preliminary Staff Assessment (PSA) for the proposed Ivanpah Solar Electric Generating System (ISEGS). I applaud the state of California for setting goals of establishing renewable technologies for energy production, however, I do not approve of achieving these goals through non-sustainable, non-green measures, as is being proposed with the ISEGS. If the State is to achieve sustainable green technologies, the path to this end most certainly does not include destroying pristine habitat.

I have lived and worked as a Biologist in the California Deserts for over 12 years, and after reviewing the PSA I have many concerns, a few of which are listed below:

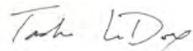
- 1) The impacts discussed in this proposal fail to address the impacts of light pollution to the surrounding desert, much of which is Federal Wilderness and/or National Park Service (NPS) land with specific mandates to protect and conserve their resources, including the "night sky".
- 2) As discussed in the PSA, the negative impacts to desert tortoise are significant. If the project is approved the mitigation ratio should be based on the BLM/USFWS standard mitigation requirement of 5:1. The suggestion that desert tortoise can be moved as a mitigation measure is not taking into account the high death rate (>20%) experienced by Ft. Irwin when employing a similar method. Moving tortoises has proven to be a failed mitigation measure. In addition, the long-term and cumulative negative impacts to the desert tortoise population were not addressed.
- 3) The PSA fails to address the significant loss of *Asclepias nyctaginifolia*; if approved, the ISEGS footprint will eliminate >75% of its known population in the State.
- 4) The PSA fails to address the significant negative impacts of this project to the movement of Desert Bighorn Sheep and Mule Deer between mountain ranges. The PSA states that these animals are "likely" to use the Ivanpah Valley as migration corridors, when the fact is these animals undoubtedly use each and every desert valley in the process of migrating from one mountain range to the next. The long-term and cumulative negative impacts to the native ungulate populations were not addressed in the PSA.
- 5) The PSA fails to address the cumulative and long-term impacts to the tourism industry for the desert region. The deserts of North America are unique bioregions on the planet and bring a significant number of tourists to the area. The negative impacts to the visual,

biological, air quality, soils and water resources will destroy the unique desert habitat that brings people from all over the world to experience.

This project, as with the many others being proposed in the desert regions of California, Arizona, and Nevada, fails to achieve the goal of attaining renewable energies and instead leaves the public with an even greater burden of destroyed habitat. The alternative to develop private or disturbed lands should be the only option. California has an opportunity to develop truly green technologies, much like Germany and the state of Washington have already employed. The companies that are applying for permits to destroy pristine habitat in the California deserts are the same companies that have developed truly green alternative energies on rooftops, parking lots, fallow fields, and other appropriate locations. If the State provides a mechanism to develop in a sustainable fashion, the companies will do so.

Based on the assessment provided by your own staff, ISEGS is a failed project from the start. It is in direct conflict with the goals of the alternative energy initiative as well as the ideals of the American people and the citizens of California. I urge the California Energy Commission to deny all applications that destroy pristine habitat.

Thank you,

A handwritten signature in cursive script that reads "Tasha La Doux".

Tasha La Doux, Ph.D.  
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