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February 5, 2010

Dear Mr. Meckfessel,

I wish to submit my comments on the Ivanpah Solar Electric Generating System.

I oppose the Ivanpah Solar Electric Generating System, it is a plan that does not fit the desert for three main reasons, the impacts to the fragile natural resources are too great, the amount of water needed is too great and a mitigation plan is not in place to address translocation, water depletion, and loss of public space.

The project will have significant impacts on the Mojave Desert. Addressing these impacts is vague language that speaks to "protect and enhance offsite populations or some other form of compensatory mitigation". The Desert Tortoise is an example of a population that will have to be "translocated" when the 4000 acres is scraped to clear all existing plants, and then regularly sprayed to keep anything from growing. Removing the Desert Tortoise is a complex undertaking, if they are to survive. The Fort Irwin translocation showed how difficult, high mortality rates and high predation rates. The translocation rate from Las Vegas to Primm had a mortality rate close to 50%. And yet with previous problems, there is no plan, only language that says, "The applicant will develop a Desert Tortoise Translocation Plan". All the planning needs to be done first, which includes predation reduction details so the conditions of the Fort Irwin translocation are not repeated.

Water usage is of great concern. The Mojave Desert gets 2=10" of rain per year. The ground water will not recharge. The amount of water needed for this project will come by depleting ground water. The project consumes far more than a desert can support.

During construction and later (all ground cover will be scraped away) dust will be a problem, even greater than it is now. I have seen walls of dust for hours in that area without any surface disturbance projects. This project will make it worse. And the wind does blow, hence all the wind turbines plan in the area

The current proposal is not adequate, a mitigation plan should be stated and have public review before any project is granted the use of 4000 public acres.

A better solution for responsible energy policies would be to have localized renewable energy sources such as roof top solar. I have spent a great deal of time in this area and have found only a handful of private solar applications. I have a Photovoltaic system on my house in Montana, and I know how effective it is. At my northern latitude I produce enough electricity for nine months of the year.

There are better ways.

Thank you for your consideration.

Nancy Schultz 420 N. 10th Ave. Bozeman, MT 59715