



DEPARTMENT OF THE NAVY
NAVAL AIR WEAPONS STATION
1 ADMINISTRATION CIRCLE
CHINA LAKE CA 93555-6100

IN REPLY REFER TO:

5090
Ser OPDK/551
July 2, 2010

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DOCKET	
09-AFC-9	
DATE	<u>JUL 02 2010</u>
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Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SOLAR
MILLENNIUM PROJECT

We appreciate the opportunity to provide comments on the Draft Environmental Impact Statement for the Solar Millennium Project submitted under referenced California Energy Commission (CEC) Docket Number 09-AFC-9, and Bureau of Land Management (BLM) CACA-49016 case file. These comments are provided as supplemental information to the Navy's operational concerns submitted under separate serial letter 400000D/2118, dated May 5, 2010. Please add the Naval Air Weapons Station (NAWS), China Lake to the list of Interested Agencies for this project.

As noted in the May 5, 2010 Navy letter, the Solar Millennium project site is located in close proximity to the installation boundary. As such the proposed construction and operation of this facility has the potential to impact both the Navy's operational mission as well as NAWS land use and resource management responsibilities. NAWS staff has reviewed the available project documentation provided by CEC and BLM. This review identified several areas of concern that are addressed in enclosure (1).

As the Commanding Officer of NAWS, China Lake, my staff is committed to actively participating in the review and approval process for this project and we look forward to working with participating agencies, the proponent and the public on this proposed action.

Sincerely,

JEFFREY A. DODSON
Captain, United States Navy
Commanding Officer

Enclosure: (1) Draft Environmental Impact Statement for the Solar Millennium Project

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MILLENNIUM PROJECT

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Naval Air Weapons Station Comments on the Draft Environmental Impact Statement for the Solar Millennium Project, DOCKET Number 09-AFC-9, CACA-49016

1. BIOLOGICAL RESOURCES:

a. NAWS China Lake views with concern the loss of habitat that would be realized with the construction and operation of the Ridgecrest Solar Power Plant (RSPP) project and the potential effects this action would have on recovery efforts for the Desert Tortoise (DT), and habitat conservation efforts currently being pursued by a multi-agency initiative for the Mohave Ground Squirrel (MGS).

b. As noted in the Project SA/DEIS the RSPP site description includes undisturbed, high quality habitat with relatively high DT densities supporting a wide variety of other special status species, and serves as a connectivity corridor for the MGS. Based on current scientific understanding of MGS distribution in the Indian Wells Valley and regional environs, a fair assumption can be made that this habitat also supports a similarly robust MGS population.

c. NAWS principal concern with the habitat loss associated with this project is the potential for this undertaking to increase federal and state requirements for species recovery onto China Lake lands. Increasing species recovery burden onto Navy lands would adversely impact our ability to accommodate the current or future Navy mission. To preclude such an outcome, project mitigation must appropriately compensate for habitat loss to ensure that all applicable recovery requirements are borne by the proponent and the net habitat and species carrying capacity loss does not contribute to the listing of additional species under the Federal or State Endangered Species Acts.

d. NAWS is aware the proponent filed a processing hold on their project application pending the conduct of a multi-year study of MGS behavior and habitat connectivity in this area. It is our understanding this study would be crafted to determine where MGS landscape connections currently exist on or near the project area, the importance of the RSPP site to these connections, and the degree to which project construction and operations could affect these connections.

e. In light of ongoing regional conservation efforts for MGS, NAWS recommends that a Technical Advisory Committee be established to provide oversight and direction to the RSPP MGS Study proposal to ensure the results are consistent with and positively contribute to the draft MGS Conservation Plan being developed by the Desert Managers Mohave Ground Squirrel Working Group and the Mohave Ground Squirrel Technical Advisory Group. NAWS subject matter experts are willing to participant on this technical advisory committee or assist with other technical oversight functions that may be developed as biological mitigation measures for this project.

2. GROUNDWATER RESOURCES: As noted in the May 5, 2010 letter (Ser40000D/2118), Navy is concerned with the amount of potable water being proposed for use for the construction and life-cycle operation of the RSPP and the potential of this use to adversely impact the production capacity or quality of water at wells located on China Lake lands. NAWS staff has reviewed the available information regarding the projected effects of the RSPP and offer the following comments and recommendations to be addressed in the final SA/FEIS.

a. Low Quality / Reclaimed Water. Navy recommends that the proponent should use low quality water (LQW) and/or reclaimed water (RW) for the construction phase of this project at a minimum and for the operational phases if technically feasible. Project documentation (p5.17-8) notes that reclaimed water will not be used but the project will attempt to recycle process makeup water to reduce potable water requirements but no documentation is provided to support this position. A detailed analysis of the technical feasibility and costs related to use of LQW and RC water should be included to justify the use of potable water for construction and operational needs.

b. Water Off-Set Plan. NAWS staff has reviewed this document and recommends the Plan be amended to add language that assures all water offsets secured for this project are quantifiable, verifiable and fully implementable.

c. Water Conservation. NAWS is actively implementing water conservation measures throughout the installation and is interested in the potential for partnering with the IWV Water District, the proponent, the BLM and CEC to identify opportunities for additional conservation solutions.

d. Water Supply Assessment. NAWS will provide staff subject matters experts to support the Water District's task to develop the Water Supply Assessment report for this project.

e. Groundwater Data Sharing. NAWS remains committed to working with participants to share technical data characterizing aquifer structure and function. NAWS requests that any data developed for this project is shared with participants of the IWWWD Technical Advisory Committee for use in modeling and analysis purposes.

3. LAND USE: Project documentation notes that the potable water supply line will be placed near private properties along the delivery route to the RSPP. As noted in the May 5, 2010 letter, any action that promotes residential development in proximity to our flight corridors has the potential to adversely impact our mission. NAWS recommends that all project actions with the potential to promote residential development under Navy Special Use Airspace be appropriately coordinated with the responsible land management agency. The responsible agency (City of Ridgecrest, Kern County, BLM, etc) should coordinate any new land use proposal with NAWS to ensure that proposed action is compatible with the Navy mission.