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To: California Energy Commission
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Subj: Comment on Public Review Draft of the Recommendations of Independent Science Advisors for California DRECP and Appendices

The undersigned have carefully read the Draft of the Recommendations of Independent Science Advisors document and would like to offer our appreciation for a thorough and comprehensive report. We all realize the importance of reducing our dependence on foreign oil as an energy source. However, this goal must be approached using technologies that are truly sustainable and affordable and which have a justifiable environmental impact. The Science Advisor's report clearly states what many of us who are following the CEC efforts to meet California alternate energy mandates have been saying from the beginning without a lot of evidence that we have been heard.

Much of the push toward large-scale solar power development is really based on a "feel good" approach. For example, Mr. Scott Galati, Counsel for Solar Millennium (SM), has repeatedly stated that the main reason that SM is so interested in the site for the Ridgecrest Solar power project in the Indian Wells Valley is that the area has the highest insolation of any California Desert area- and perhaps even in the world. However, the Indian Wells Valley groundwater, the only source of water for the Valley, is in critical overdraft. As a result, SM was forced to agree to dry cooling for their proposed plant, which reduces the thermal efficiency of the plant. This reduction quantitatively erases the higher insolation advantage. Does this make any sense as a technical decision? The site also is one of the richest in biological values of the Desert sites. So is the Ridgecrest site a premium or even good site for large scale solar? We think not. A further comment on our "feel good" observation. One aspect that has been ignored by the CEC and by the applicants is an economic analysis showing clearly what advantages will accrue to the public from the construction of these plants. It is very clear from an elementary economic analysis, that without a heavy subsidy of taxpayer and ratepayer money, these projects could not be built and operated. Does any of this actually make any economic or energy sense from a public viewpoint?

The California Desert solar projects, especially the solar thermal projects that are proposed, are in fact consumptive on a grand scale. They are not "green" in any sense. They consume land and in many cases valuable and irreplaceable habitat, scarce and irreplaceable water, they remove the land itself from multiple use activities, and create a multitude of other negative impacts that require mitigation and thus additional energy and attention. We agree 100% that "every effort should be made to avoid and minimize any new disturbance of soil surfaces in the siting, design, construction and maintenance" of large-scale solar power plants. This means that the use of previously disturbed sites should be a condition of approval. We also agree that the conservation plans must be based on the "best available science". One of the areas of great concern in the siting of the proposed Desert power projects are the impacts on endangered species such as the desert tortoise. The "best available science" indicates that translocation is not a viable option for mitigation for the tortoise. The existing desert tortoise translocation experience such as that documented by Dr C. Berry at Ft Irwin can be simply summarized as a disaster.

Since the DRECP guidance is coming out late in the current approval cycle for the California Desert solar power plants, its guidance will have to be taken at the evidentiary hearings or even during the final Commission hearing process. The Commissioners themselves will bear an unusually heavy responsibility here. We can hope that they will realize and appreciate the grand and delicate nature of our Desert ecology and the importance of using good science to guide their decisions.

Signed, Don and Judie Decker