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California Energy Commission
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1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 74752

FEB 20 2015

Southern Owens Valley Solar Ranch must be moved. It will have too much impact on the Manzanar National Historic Site

Dear Commission Members and DRECP reviewers:

As a person involved directly in the solar power business, I am concerned about the need for clean energy for not only California, but Earth. I am a lifelong environmentalist with high regard for the desert. I deeply appreciate that our deserts are prime areas to consider for solar power. However, the siting of solar power plants requires consideration of the environment, social, and economic parameters.

Concern for environmental factors such as flora, fauna, and soil integrity, for example, must be balanced by the economic and social factors. In the case of the proposed Southern Owens Valley Solar Ranch (SOVSR) there is reasoned concern that it will damage the viewshed of the Manzanar National Historic Site (MNHS). What is protected at MNHS is a prison site that was selected for its isolation. The MNHS viewscape will be spoiled by a planned solar farm, thereby irreparably damaging one of the important emotional experiences of the historical site.

The proposed SOVSR site is at a lower elevation than MNHS and to the north of MNHS. Please do not allow SOVSR to be placed below NMHS, and particularly to the north of the site. If the site has a tracking system (even if it is only an east-west tracker), it will further exacerbate the impact on the MNHS experience.

Additionally, I have included bulleted points that are of general concern as delineated by the National Parks Conservation Association.

- Protect Mojave National Preserve, adjacent Wilderness Study Areas, and key desert bighorn sheep habitat by not allowing the Soda Mountain Solar project to be sited next door to Mojave NP, as better locations for the project abound.
- Protect the remarkable Silurian Valley adjacent to Death Valley National Park by designating the landscape as National Conservation Lands.
- Better protect Joshua Tree National Park by preventing development in the Eagle Mountain region. We must safeguard public lands in this region from further threats and protect important habitat for desert bighorn sheep, golden eagles, and desert tortoise.

- Do not allow for renewable energy Development Focus Areas (DFA) to be designated in sensitive lands. The Lucerne region, the desert tortoise research natural area, Cadiz dunes area, and the Mountain Pass area should not be considered for DFAs.
- Protect wildlife routes and bird migration areas by supporting the protection of Sonoran Desert Thorn Woodlands, Sand Movement corridors, and important wetlands like the Wild and Scenic Amargosa River, Salt Creek, and Bonanza Spring.
- Analyze how this plan impacts the National Park Service. Despite the significant acreage of our national parks in the plan area, the draft does not include discussion of how renewable energy projects will impact their viewsheds, clear night skies, and wildlife-rich neighboring lands.

On the following page, is one example of a viewshed that will be greatly impaired by a proposed solar farm.

Thank you for protecting our desert resources, including our historic sites.

Sincerely,

A handwritten signature in blue ink, appearing to read "John N. Nishio".

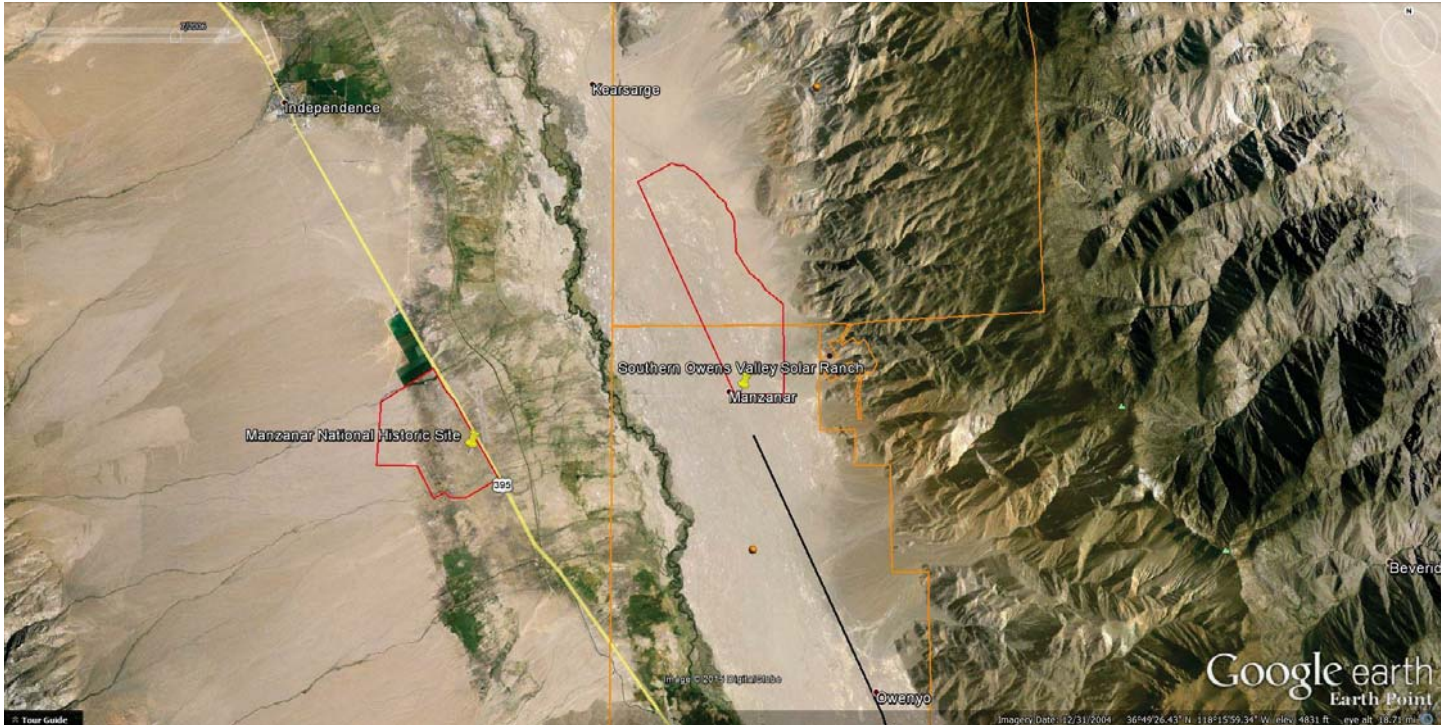
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Manzanar National Historic Site and proposed Southern Owens Valley Solar Ranch (1200 acres)

The estimated boundary of the SOVSR bounds is about 2,240 acres. The area used for solar panels will be approximately 1200 acres. Note that the proposed solar farm site is at an elevation about 3725-3770 ft, whereas the elevation of the historic prison site at MNHS is about 3835- 3950 (the VC is about 3870). The most easterly border is at an elevation of about 4,070 (Note that the boundaries are estimated. They are not legal boundaries and the elevations are estimates based on Google Earth.)



Looking east and north from the guard tower area of the MNHS toward the proposed solar farm, it is easy to see that the panels will be readily visible from the MNHS. The proposed solar farm site is at an elevation below the MNHS. The picture is a Google street view image. --John Nishio