

## DOCKETED

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<b>Project Title:</b>	Palen Solar Power Project - Compliance
<b>TN #:</b>	200531
<b>Document Title:</b>	Due Diligence Request for Information to Palen Solar Holdings from US Department of the Interior, Bureau of Land Management
<b>Description:</b>	N/A
<b>Filer:</b>	Alicia Campos
<b>Organization:</b>	U.S. Department of the Interior, Bureau of Land Management
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# United States Department of the Interior BUREAU OF LAND MANAGEMENT

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CACA- 048810  
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September 11, 2013

CERTIFIED MAIL No. 7011 3500 0002 7623 1673  
RETURN RECEIPT REQUESTED

### **NOTICE**

Charles Turlinski	:	
Palen Solar Holdings, LLC	:	CACA-048810
1999 Harrison Street	:	Palen Solar Energy Generation System
Oakland, CA 94612	:	

### **DUE DILIGENCE** **REQUEST FOR INFORMATION**

The Bureau of Land Management (BLM) has been working with the other agencies that comprise the Renewable Energy Action Team (REAT), on the proposed Palen Solar Energy Generating System (PSEGS) project. We are concerned that the golden eagle data collected thus far for the proposed project may lack sufficient detail to inform the baseline condition and contribute to a robust risk analysis and risk characterization as outlined in the April 2013 U.S. Fish and Wildlife Service's Eagle Conservation Plan Guidance. Such a risk characterization is needed to develop advanced conservation measures, which are an important part of the Eagle Conservation Plan that Palen Solar Holdings has been asked to prepare. The BLM and the REAT need this raw data to understand the field effort expended, data collected, and inferences gained on golden eagles to avoid and minimize risk resulting from project construction, operations and maintenance, and decommissioning.


It is the BLM's policy to facilitate environmentally responsible development of solar and wind energy projects on the public lands, consistent with the provisions of Secretarial Order 3285A1 dated March 11, 2009, as amended February 22, 2010. Under 43 CFR 2884.11(c)(11), the BLM has the authority to require any information from the applicant considered necessary to process an application. Therefore, we are requiring that you provide the BLM with the raw golden eagle data collected in 2012 - 2013 by Palen Solar Holdings staff, Bloom Biological, Inc. or other contractors, for the proposed PSEGS project. Raw data, in this context, would be any and all field notes, data sheets, video and still photographs from all field staff who worked on any aspect of the golden eagle field effort, including, but not limited to carcass photo-points, breeding season ground and aerial reconnaissance and monitoring, fixed point observations, and long-sit fixed point migration observations.

The recent information submitted to the California Energy Commission regarding golden eagle surveys does not provide a complete characterization of the baseline condition nor does the data provide the presence, abundance and current/projected distribution of all life stages of golden eagles.

We understand that Palen Solar Holdings has committed to continuing avian survey work for the proposed project and has recently changed contractors to complete this work. The BLM is requesting that you submit a study plan and the qualifications of the individuals (resumes or curriculum vitae) who will be conducting the avian surveys.

Palen Solar Holdings is requested to provide the required eagle data to the BLM within 30 days of receipt of this letter. The BLM and the REAT look forward to working with you in developing a robust golden eagle risk analysis for the proposed PSEGS project  
If you have any questions regarding this request, please contact Kim Marsden, Natural Resource Specialist, at [kmarsden@blm.gov](mailto:kmarsden@blm.gov) or 951-697-5223.

Sincerely,



Rebecca Lasell  
Acting Field Manager

cc:  
Andrea Grenier, Centerline  
Greg Miller, BLM  
Renewable Energy Coordination Office