

DOCKETED

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MBCA

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December 6, 2013

Jennifer Martin-Gallardo
California Energy Commission

Sent by email to Janice.Titgen@energy.ca.gov

RE: Palen Solar Energy Generating System Power Tower Dimensions

Dear Ms. Martin-Gallardo:

Thank you for your letter of December 6, 2013 regarding my concerns about conflicting power tower dimensions between the CEC-FSA and the BLM-DEIS. You are correct that the Petition for Amendment states that "The SRSRG located at the top of the solar power tower is approximately 130 feet tall, resulting in an overall tower height of approximately 750 feet (not including regulation lighting appurtenance)." Thank you for clarifying that the CEC analyzed a tower 620-foot tall with a 130-foot tall solar receiver on top, for a total height of 750 feet. We will see that these are not the dimensions the BLM has used in their analysis.

What was amended?

The Petition to Amend was docketed on December 17, 2012. The Final Staff Assessment (FSA) was docketed on September 10, 2013. The FSA amended the project visual description (p. 4.12-4) and I logically assumed this later amendment supersedes the description in the Petition. The FSA amendment specifically states that the two 750-foot towers are topped by 130-foot-tall solar receivers. That equals two 880-foot tall towers, as amended. This appears straight forward enough: we have no way to know that *staff's analysis is correctly based on information provided by the project owner in the Petition to Amend which indicates a tower height of 750 feet...* as you state in your letter.

Difference in described solar receiver height

There is also the problem of the 130-foot tall solar receivers. In the FSA the **Visual Resources Table 1** provides a list of the major project features that would contribute to the apparent visual change of the landscape. (p. A.12-4) In **Table 1** the first item for Power Block #1, is the Solar Tower including Solar Receiver Steam Generators with dimensions of 75 (diameter) 750 (height). The amended description and Table 1 do not match.

BLM-DEIS solar tower and receiver dimensions

The BLM-DEIS describes the project's solar towers exactly as described in the CEC table. The BLM and CEC project component tables are identical. It was while commenting on the DEIS that I became aware of the similarity of the tables and the inconsistency between the two descriptions.

The BLM-DEIS states that the solar receiver included in the tower dimensions is 68-feet tall by 100-feet wide. (DEIS p.4.18-7) **Is the solar receiver 68-feet tall or is it 130-feet tall?**

The difference in the solar tower and receiver dimensions used by the two agencies is significant. If the CEC is correct, the BLM has to begin NEPA all over again with the correct dimensions. If the CEC is correct they must amend the FSA to let the public know what they actually did. If BLM is correct than the CEC must start again.

MBCA eagerly looks forward to the resolution of this significant problem.

Please acknowledge the receipt of this letter Thank you.

Sincerely,



Pat Flanagan, Board Member
Morongo Basin conservation Association
Patflanagan29@gmail.com

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