

DOCKETED

Docket Number:	09-AFC-07C
Project Title:	Palen Solar Power Project - Compliance
TN #:	201518
Document Title:	Sarah Friedman Comments: Docket No. 09-AFC-07C: Palen Solar Power Project â€œ Compliance, Comments of Sierra Club on Presiding Memberâ€™s Proposed Decision
Description:	N/A
Filer:	System
Organization:	Sarah Friedman
Submitter Role:	Public
Submission Date:	1/8/2014 9:31:35 AM
Docketed Date:	1/8/2014

Comment Received From: Sarah Friedman

Submitted On: 1/8/2014

Docket Number: 09-AFC-07C

Docket No. 09-AFC-07C: Palen Solar Power Project â€“ Compliance, Comments of Sierra Club on Presiding Memberâ€™s Proposed Decision

Additional submitted attachment is included below.



California Energy Commission
Docket Unit
Docket number: 09-AFC-07C
1516 Ninth Street, MS-4
Sacramento, CA 95614
Via email: docket@energy.ca.gov

January 7, 2013

Re: Docket No. 09-AFC-07C: Palen Solar Power Project – Compliance, Comments of Sierra Club on Presiding Member’s Proposed Decision

Dear Commissioners;

Sierra Club writes to support the Presiding Member’s Proposed Decision (PMPD) denying the Petition for Amendment of the December 15, 2010 Commission Decision approving the Application for Certification for the Palen Solar Electric Generating System (PSEGS). We thank Commissioners Karen Douglas and David Hochschild, as well as the staff of the California Energy Commission, for their environmental leadership in following the precautionary approach. Prudence is essential when considering a facility that could very likely result in significant and unmitigable biological impacts of an unknown magnitude.

Sierra Club is a national nonprofit organization of approximately 1.3 million members and supporters (over 250,000 of whom live in California). Sierra Club’s goals include rapidly increasing our use of renewable energy to reduce climate disruption and displace fossil fuels. It is our belief that energy development in California can and should occur thoughtfully and sustainably to avoid or minimize impacts to sensitive plants and wildlife. Members of Sierra Club care deeply about the unique wildlife of the California Desert, including sensitive avian species.

We agree that the PSEGS project would very likely result in significant and unmitigable impacts to biological resources, mainly due to the solar power tower technology’s introduction of solar flux danger to avian species. Specifically, we agree with the finding in the PMPD that it is foreseeable and non-speculative that the PSEGS facility could cause serious, population-level impacts to certain avian species, including migratory species, particularly in light of evidence that the facility and surrounding area may have the potential to attract birds. We also agree with the finding that the effects to golden eagles and burrowing owls from the operation of the PSEGS project would be

cumulatively considerable even with the implementation of conditions of certification, based on risk from exposure to elevated levels of solar flux.

Given these findings regarding avian injury and mortality, we agree that there are other alternatives which would achieve the same benefits as PSEGS in a much more environmentally protective manner. For this reason, we strongly recommend the Commissioners adopt the PMPD and that the final decision is to deny the petition to amend.

Thank you for opportunity to submit these comments.

A handwritten signature in cursive script that reads "Sarah K. Friedman".

Sarah K. Friedman
Senior Campaign Representative
Sierra Club