



Energy Facilities Siting Division
Compliance Unit

FILE:

PROJECT TITLE: Palen Solar

<input type="checkbox"/> Telephone	Teleconference	<input type="checkbox"/> Meeting Location:	
NAME:	Casey Weaver	DATE:	June 17, 2013
TIME:	2:00 pm		
WITH:	BLM ~ Philip Gensler, Tiffany Thomas		
SUBJECT:	Palen Paleontology Subsurface Characterization		

COMMENTS:

I contacted Tiffany Thomas last Friday to inquire about BLM’s concern with paleontological resources being damaged by the pylon construction method proposed by BrightSource at the Palen Solar Electric Generation System project. She indicated that a pedestrian survey had been conducted and only one fossil fragment was discovered. I indicated to her that the site is mantled by at least 1.5 feet of Holocene deposits expected to have a very low yield of vertebrate fossils, but that Pleistocene sediments considered to have a high probability of containing fossils occur beneath that thin veneer. I mentioned that there have been no subsurface paleontological studies conducted over the nearly 4,000 acre site. Tiffany mentioned that other fossils have been found in the region and that a long bone from a Saber Tooth Cat was recently discovered at the Desert Sunlight project site.

I mentioned that the original project that was approved had conditions of certification that would adequately address paleontological resources with the previously proposed construction method of extensive grading and excavation. The amended project would greatly reduce the amount of grading, so discovery of buried fossils would be proportionately reduced. Furthermore, the method of pylon construction using vibro-insertion methodology would damage any fossils the pylon encountered without knowing what was being damaged. I summarized that the reduction in fossils discovered would reduce the scientific yield of buried fossils and that pylon insertion would destroy an unknown number of unknown species where encountered. I mentioned that in the PSA, I was suggesting that the subsurface of the site be characterized so the significance of impact could be estimated. Tiffany stated that she would like to discuss this issue with their regional paleontologist Philip Gensler.

Tiffany discussed the information I provided her with Philip and she set up a conference call to discuss the issue. In today’s teleconference, we discussed the background as presented above. Philip suggested that the applicant hire a qualified consulting paleontologist familiar with the area to write up a plan that would adequately characterize the subsurface in the area in which heliostat pylons would be inserted. Philip indicated that the plan should contain a map indicating proposed test pit locations. We also agreed that the number of pits should be statistically significant (capable of adequately characterizing the solar field) but cost effective (i.e. not an excessively vigorous academic study). Tiffany stated that she would discuss this with the BLM project manager who would in turn discuss the matter with BrightSource. Tiffany stated that prior to finalization of the plan, she would assure that CEC would have an opportunity to review the plan and provide comment as necessary.

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CC:	Signed:
	Name: Casey Weaver