

DOCKETED

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Comments re the proceedings of BrightSource Energy's Palen Solar Electric Generating System (PSEGS) at the California Energy Commission (CEC).

Additional submitted attachment is included below.

California Energy Commission Dockets Unit, MS-14
Docket No. 09-AFC-7C
1516 Ninth Street
Sacramento, CA 95814-5512

To Whom It May Concern:

Please consider the following comments in the proceedings of BrightSource Energy's Palen Solar Electric Generating System (PSEGS) at the California Energy Commission (CEC).

After reviewing the Preliminary Staff Assessment, I am concerned that several significant impacts of the PSEGS application have not been given adequate consideration in the certification process.

Avian Impacts

According to a review of the monthly compliance reports for both the Desert Sunlight and Genesis Solar power project by KCET ReWire, at least 37 birds have been found dead or injured at the two project sites located near the proposed PSEGS site; the majority of the birds were water birds. One of the dead birds was an endangered Yuma clapper rail found at the Desert Sunlight facility near Desert Center. The U.S. Fish and Wildlife (USFWS) Service Draft Revised Recovery Plan for the Yuma clapper rail (2010) indicates that the species mostly inhabits the Colorado River corridor, while USFWS websites also indicate the species has been spotted at the Salton Sea. Assuming the bird was attracted to the site from its habitat along the Colorado River or Salton Sea, the bird may have flown over 35 miles to reach the project where it perished.

The PSEGS Final Staff Assessment should include analysis to determine 1.) from what distance birds may spot a facility projecting "lake effect" and fly off course, 2.) what species of birds are most prone to collision and "lake effect" distraction, and 3.) if/how the lake effect can be reduced or eliminated. The mortality of water birds should be given significant consideration in analysis of the project's impacts.

Local birds also seem to be at high risk, and I support the Center for Biological Diversity's data request for a review of wildlife impacts at the Ivanpah Solar Electric Generating System site (ISEGS). According to at least one monitoring and compliance report for ISEGS certified by CEC, a female cooper's hawk was found dead at the site. It is not clear how many other birds have been found at the site, or if current monitoring at the 5+ square mile project site is sufficient to detect all incidents of mortality.

Kit Fox

What methods will PSEGS use to evict kit foxes from their dens on the site? It seems quite likely that the methods used by NextEra at the Genesis Solar power project caused a canine distemper outbreak among kit foxes in the local area. One beacons collar previously worn by a kit fox being monitored by wildlife officials was also tracked to a worker's locked toolbox, raising further questions about solar

developers' compliance with conditions of certification, and the unexpectedly high toll taken on wildlife in the region. It is not clear that California Department of Fish and Wildlife officials determined the cause of that outbreak, or the reason a collar was likely taken by one of the project's workers.

Public Safety

The PSEGS site is roughly located beneath aviation routes, including routes previously identified by the Department of Defense (DoD) as military training routes (MTR) where aircraft fly at least one segment at or below 1500 feet above ground level. CEC's PSA notes that the DoD's Siting Clearinghouse assesses the impacts of PSEGS' can be mitigated, but it is not yet clear how DoD considered the use of power tower technology, or whether it conducted analysis on the potential impacts of glare and heat flux-induced turbulence on military aircraft using the routes above the proposed project site. The FAA has acknowledged the potential for heated air to cause severe turbulence over other types of power plants located under flight paths. The CEC should investigate, and explain in detail how the military plans to mitigate this impact.

Visual Impacts

The CEC should reject BrightSource's application for a power tower design at the site, and review other alternatives that are significantly less disruptive, such as photovoltaic solar, or solar trough with storage. The potential visual impacts of BrightSource's planned 750 foot tall power towers at PSEGS will transform the way the desert is enjoyed by millions of visitors for at least the life of the project, and certifying such impacts with an overriding consideration would set a bad precedent that could eventually affect the wild characteristics of much more of California's desert region by encouraging other permitting authorities, in addition to the CEC, to approve projects with tremendous impacts on visual resources that last well beyond the life of the PSEGS project. The CEC should reject BrightSource's application for a power tower design at the site, and encourage another alternative that is significantly less disruptive.

I frequently visit the desert to hike, camp and photograph landscapes. Structures as tall as BrightSource Energy's proposed power towers would impact the wild characteristics of public lands, some designated for their wilderness characteristics. I have visited the Ivanpah Valley since the three ISEGS towers have been constructed, and the visual impacts of the field of mirrors, and towers are significantly disruptive for people trying to enjoy nearby Mojave National Preserve and South McCullough Wilderness Area. The ISEGS project is much more damaging to visual resources than the transmission lines, golf course, and town of Primm combined. The ISEGS towers' impacts are significant, yet the PSEGS towers will be much taller.

Please let me know if you have any questions.

Sincerely,
Shaun Gonzales