

DOCKETED

Docket Number:	09-AFC-07C
Project Title:	Palen Solar Power Project - Compliance
TN #:	201170
Document Title:	Brendan Hughes Comments: Comments on Proposed Palen Solar Draft Supplement EIS
Description:	N/A
Filer:	System
Organization:	Brendan Hughes
Submitter Role:	Public
Submission Date:	11/13/2013 8:05:18 AM
Docketed Date:	11/13/2013

Comment Received From: Brendan Hughes

Submitted On: 11/13/2013

Docket Number: 09-AFC-07C

Comments on Proposed Palen Solar Draft Supplement EIS

To whom it may concern:

My name is Brendan Hughes and I would like to comment on the Draft Supplemental EIS for the proposed Palen Solar project. This project will have significant and unacceptable effects on wildlife resources and visual resources in the Chuckwalla Valley and should therefore be rejected by BLM and CEC. I urge you to choose the No Action Alternative.

First, this project will require the displacement and destruction of many desert tortoises. As at Ivanpah, this project is within a Critical Habitat Unit for the desert tortoise, but not within a Desert Wildlife Management Area. Also, as at Ivanpah, the biological surveys indicate a small number of desert tortoises. However, more than 100 subadult and adult tortoises were found during the more thorough pre-construction surveys at Ivanpah, and it was estimated that hundreds more juveniles or tortoise eggs would be destroyed because they were too difficult to detect. There could possibly be a similar situation occurring at the Palen site. Therefore BLM and CEC should require a 100 percent coverage survey for tortoises and other biological resources before evaluating the project further in order to prevent another Ivanpah-style tortoise slaughter.

Additionally, the Ivanpah SEGS and the other solar projects along the I-10 corridor appear to be very good at attracting and killing birds, including endangered species. No proven methods of bird deterrence have been put forth by the applicant. They have only put forth speculation and conjecture for potential methods to reduce or eliminate bird mortalities. Proven methods should be ascertained before this project can move forward.

Finally, this project will have considerable impacts to visual resources in the Chuckwalla Valley. These 750-foot tall power towers will be visible from multiple BLM wilderness areas and Joshua Tree National Park, ruining the relatively unspoiled vista to the south of the Palen-McCoy Wilderness Area. There will be no way to mitigate the impacts to visual resources.

CEC and BLM should do the right thing and choose the No Action Alternative. Furthermore, CEC and BLM should stop encouraging the destruction of intact desert habitats and focus resources into initiatives for rooftop solar within the built environment. It is cheaper, more efficient, and creates more jobs in the local economy than large, remote projects.

Thank you for your consideration.

Brendan Hughes
60444 Onaga Trl.
Joshua Tree, CA 92252