

## DOCKETED

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## RESPONSE TO CENTER FOR BIOLOGICAL DIVERSITY DATA REQUEST (2:7:14)

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### BACKGROUND IMPACTS TO AVIAN SPECIES

*The Presiding Members' Proposed Decision determined that the Palen Solar Electric Generating System would cause significant and unmitigable impacts to avian species. The project proponent asked for and received additional time to submit additional data to the CEC. The project proponent's status report #4, filed February 2, 2014, states that the proponent is working on "A comparison of avian mortality data reported by projects utilizing various solar technologies" that involves "gathering and compiling publicly available data on reported avian mortality at the Ivanpah, Genesis, and Desert Sunlight projects" as well as recent USFWS "table of information of avian mortality" that will be incorporated into a report.*

**Data Request 1.** Please provide all data on the avian mortality that is being used as a basis for the project proponent's report on avian mortality at solar sites including:

- All the publicly available data;
- The referenced USFWS table of information on avian mortality;
- The methodology used to evaluate the avian species and mortality for each of the solar project sites and how monitoring pre-operation and during-operation will be compared;
- The number and kinds of avian species documented in any studies undertaken before construction, during construction, and after construction/during operations on the project sites and adjacent off-site areas to date including the date of the survey or monitoring and details about sightings of live, injured, or dead birds encountered;
- a map showing the locations of avian species encountered (dead and alive);

### **Data Response 1. Subject: Avian Data at Various Solar Projects**

On February 10, 2014, Palen Solar Holdings, LLC (PSH) e-filed a document entitled "Compilation of Avian Data at Various Solar Projects". This document can be found at the following link: [Palen Solar Holdings, LLC's Compilation of Avian Data at Various Solar Projects](#). The document summarizes in tabular form avian mortality information for the following projects: Genesis Solar Energy Project (parabolic trough), Desert Sunlight Solar Farm (photovoltaic), and the Ivanpah Solar Electric Generating System (solar tower). All of the information shown in the compilation document has been culled from publically available documents that are available for download as noted below:

- Genesis Solar Energy Project: 2012 and 2013 Monthly Compliance Reports submitted to the California Energy Commission and posted on the CEC website at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=09-AFC-08C> and [http://www.energy.ca.gov/sitingcases/genesis\\_solar/compliance/submittals/](http://www.energy.ca.gov/sitingcases/genesis_solar/compliance/submittals/)
- Desert Sunlight Solar Farm: 2012 and 2013 annual and weekly biological monitoring reports available on First Solar's website for the project at <http://www.firstsolar.com/Home/About-Us/Projects/Desert-Sunlight-Solar-Farm>
- Ivanpah Solar Electric Generating System: 2012 and 2013 Monthly Compliance Reports submitted to the California Energy Commission and posted on the CEC website at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=07-AFC-05C> and <http://www.energy.ca.gov/sitingcases/ivanpah/compliance/submittals/>

The compilation document summarizes the "raw data" contained in each of the compliance documents noted above to show the total number of avian mortalities reported by the Project Owner for each month of 2012 and 2013. The document also lists the avian species affected and where the mortality occurred (if that information is available). No analysis of the data is provided – the document simply compiles the reported information for each of the three projects into one comparison chart. It does not include a map of the locations of avian species encountered, as no maps were provided in the above-referenced compliance documents. We understand that the USFWS is preparing a document to provide contextual background for the avian mortality data they have compiled, and prefers to release the data with that information. At the time of preparation of the PSH compilation table, neither the USFWS data nor the accompanying explanation had been officially released, and therefore that information is not reflected in the PSH compilation table.