

DOCKETED

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Comment Received From: ANN HARRELL-ALDRICH

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**The Singeing and Killing of Birds at Applicant BrightSource Energy, Inc.'s
Ivanpah California Solar Project (Ivanpah SEGS)**

Additional submitted attachment is included below.

STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND
DEVELOPMENT COMMISSION

TO: All interested parties in the Hidden Hills Solar Electric
Generating System (11-AFC-02)

FROM: Ann Harrell-Aldrich, Local Landowner in Spring Valley
Ranches – Charleston View, California

SUBJECT: The Singeing and Killing of Birds at Applicant BrightSource
Energy, Inc.'s Ivanpah California Solar Project (Ivanpah
SEGS)

DATE: 21 APRIL 2014

There are quite a number of stories that have come out since last year regarding the singeing, and killing of birds at the BrightSource Energy, Inc.'s solar project in Ivanpah, California (Ivanpah SEGS), which is similar in design to the proposed Hidden Hills Solar Electric Generating System project (HHSEGS) by same Applicant, through its subsidiaries Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC. I am aware that the proceedings for certification for the HHSEGS project are currently suspended by the Applicant since 4 April 2013, but I think that this is a critical issue, and something that the Commission should take a closer look into. I have included several quotes from these various stories that I found of interest.

"K. Kaufmann, a reporter for the Desert Sun in Palm Springs, Calif., cited a U.S. Fish & Wildlife Service report earlier this month that labeled BrightSource Energy's Ivanpah plant a "mega-trap" for birds and insects. Some birds literally burst into flames and are burned to death while flying through the intense solar radiation reflecting off thousands of mirrors at the plant in San Bernardino County, Calif., about 40 miles southwest of Las Vegas.

The birds are apparently attracted by solar flux, which Ms. Kaufmann described as the intense radiation coming off the mirrors, creating what appear to be small clouds around the boilers at the top of the project's three 459-foot-tall solar towers. Ivanpah employees and Fish & Wildlife Office of Law Enforcement officials observed the problem for three days last October, and in their report — bureaucratically titled "Avian Mortality at Solar Energy Facilities in Southern California" — stated that "OLE staff observed birds entering the solar flux and igniting, consequently becoming a streamer. OLE staff observed an average of one streamer event every two minutes." "(b)

In an interview on NPR, Ms. Julie Cast stated that many birds are attracted by the vapor steam plume from the boilers, and that by flying through that 1,000 degree hot steam, are losing their lives.

"Julie Cast: Well, you asked what the field looks like. You could walk through the field, and there's no heat at all, other than the tremendous heat you have for the Mojave Desert. Unlike PV, which absorbs heat, these things reflect it. And each one is controlled by individual GPS and computers, it's highly technical, super sophisticated. So all of these mirrors are focused in a place, which is this boiler. Some, however, are in a kind of holding pattern, they don't need all of that reflective energy all the time. So they focus at a point in space, a safe point, a little reflective halo, that's what the birds fly through. There's a vapor steam plume that comes off of these boilers, its a thousand degrees and more that this steam is, so they fly through that. There are birds that perceive this field of mirrors as a lake and they try to land on it. That's a fatal error. Most of these birds are protected by a number of environmental laws, and that's being investigated. It happens to be a plant that people say, 'Oh it's in the middle

in the desert!’ Well, there’s a number of protected, endangered and threatened species, plants and animals out there, and this company had to build a \$50 million fence to protect the desert tortoise that lives out there. So they put themselves in a pretty environmentally sensitive spot. It’s also the best spot, these companies believe, to generate that energy.” (c)

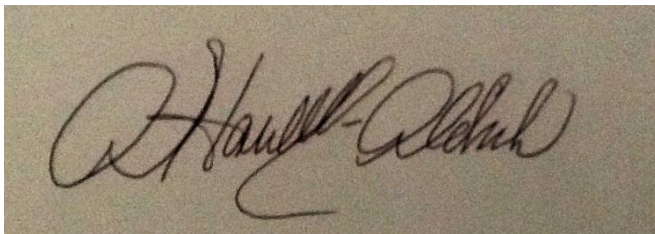
"While concerns about avian mortality were raised during the permitting process for Genesis, Desert Sunlight, and Ivanpah, these were largely swept under the rug and written off as incidental." (a) Lets NOT let this happen during the permitting process for the HHSEGS project. In the story "California solar power plants singeing bird feathers", dated November 2013 in USA Today, ***"BrightSource declined to comment for this story, and company representatives consistently have avoided discussing bird mortality." (e)***

In conclusion, I would like to stress that the issue of bird mortality is important, and the injuring and/or death of birds at the similarly designed Ivanpah Solar Plant is a big problem. If the fate of birds in, and flying through the Pahrump Valley are to be the same, I ask the

Commission to seriously consider this during deliberations. I had one more thought while doing my research. Is the building the HHSEGS project cost effective? It was brought up in an article in the *Wall Street Journal* that the Ivanpah solar project cost more to build than power plant projects using solar panels. ***"The plant was more expensive to build than a similar-size conventional solar-power plant would be today, particularly as prices for solar panels, a rival technology, have fallen over the past few years. Many of the solar power facilities currently being developed are smaller than the Ivanpah plant, such as rooftop solar panel installations and solar farms built near cities and towns where there is less space available."*** (d)

Thank you for your time.

Sincerely,

A handwritten signature in dark ink on a light-colored background. The signature is cursive and appears to read "Ann Harrell-Aldrich".

Ann Harrell-Aldrich

P O BOX 185
SHOSHONE, CA 92384

ON-LINE NEWS STORY SOURCES

(a) BIG SOLAR AND AVIAN MORTALITY

30 September 2013

By Patrick Donnelly-Shores, BERC

<http://berc.berkeley.edu/big-solar-and-avian-mortality/>

(b) Posted April 17, 2014 - 3:13pm

EDITORIAL: It's a dead birds' party at Ivanpah solar plant

LAS VEGAS REVIEW-JOURNAL

<http://www.reviewjournal.com/opinion/editorial-it-s-dead-birds-party-ivanpah-solar-plant>

This Solar Plant Has Been Burning Some Birds To Death

The Huffington Post | by Tyler McCarthy

Posted: 02/19/2014 3:14 pm EST

http://www.huffingtonpost.com/2014/02/19/solar-panel-bird-deaths-ivanpah-brightsource-mojave_n_4809808.html

(c) Why The Ivanpah Solar Power Facility Only Kind Of Burns Birds,
And Other Thoughts

Interview by Tom Ashbrook of Julie Cart, environmental reporter for
the Los Angeles Times

Wednesday, February 19, 2014

<http://onpoint.wbur.org/2014/02/19/ivanpah-birds-explainer>

(d) WSJ BUSINESS

The \$2.2 Billion Bird-Scorching Solar Project
At California's Ivanpah Plant, Mirrors Produce Heat and Electricity—And
Kill Wildlife

By CASSANDRA SWEET CONNECT
Feb. 12, 2014 8:17 p.m. ET

<http://online.wsj.com/news/articles/SB10001424052702304703804579379230641329484>

(e) California solar power plants singeing bird feathers

The largest solar thermal plant in the world, a Google-backed project
in the California desert, is set to go online at the end of the year.
Powered by NewsLook.com

K. Kaufmann, The Desert Sun 9:43 p.m. EST November 10, 2013

<http://www.usatoday.com/story/news/nation/2013/11/10/bird-feathers-singed-solar-power/3491617/>