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Palen Project Amendment Docket 09-AFC-7C

Dear Commissioner Douglas and Commissioner Hochschild,

Palen Project Docket 09-AFC-7C

You must have read about the U.N. Intergovernmental Panel on Climate Change's recent report. It made news in USA Today under the headline Climate report: It's now or never. The report was written by 235 scientists from 57 countries that states in part "A rapid shift to less-polluting energy will be needed to avoid catastrophic global warming . . ." "The world needs to reduce green house gas emissions urgently and by 40% to 70% reductions." We need to do this now. That was the conclusion of the scientists.

As you may or may not know, I have been following the solar project permitting process since 2009, participating as a member of the public by reading extensive AFCs, EISs, attending many workshops, and writing comment letters. I support not just the Palen project, but all the solar projects before the CEC and the PV projects before BLM. It might be responsible to scrutinize sites carefully before approvals, push to build the projects on previously disturbed land, and make roof top solar a larger priority, however, we are quickly running out of time as the U.N. report indicates. Anyone who would propose to spend more time delaying, more time studying, and more time fighting approvals does not, in my opinion, view climate change with the appropriate seriousness and urgency. It is happening now and we need to act now. I heard someone at a workshop say they have lived in 125 degree heat without power. If that type of heat becomes the norm, the plants will start to die, the tortoises will have to move upslope until they run out of upslope, and the migratory birds will find little in the way of forage during their long flights. Doing nothing comes with harsh consequences too.

The Cultural issues surrounding Palen, and by extension other solar projects all over California, are knotty and complex. The more I thought about it, the more it became clear to me that this is not just about the Palen Solar project, or even, as was stated by one tribal member, about "the need to stop all solar projects." This appears to be about the relationship between the various form of government and Native American Tribes. This was apparent in a statement declaring that it was not even possible to decide how to acceptably proceed with a government-to-government consultation. I do not say this lightly, but I don't think the California Energy Commission or Governor Brown can resolve issues dating back to the 1800's. That's my humble opinion. But there are also facts. First, the land under the proposed Palen project is owned by the US Taxpayers. The CRIT reservation encompasses approximately 230,746 acres in Arizona, and 45,873 acres in California. In addition to that, the Bureau of Indian Affairs appears to hold title to 212,000 acre just in the area between Blythe and Desert Center. That totals 488,679 acres or 763 square miles. The Palen project is about 3,800 acres or less than 1% of that total and is not located on reservation or BIA land.

The avian issues are another thorny problem. I love birds, but they seem bent on flying into things, which is a well documented phenomenon. It is certainly responsible to continue adaptive management and try to find solutions that decrease bird mortality. However, striving for perfection is the not the right goal. Stopping Global Climate Change is the right goal. Does 400 avian deaths, or even if it was 4,000 deaths, does that reach significant? When an estimated billion birds a year fly over those projects, if 4,000 birds die in a year that is .0004% of the total. How many birds out of that billion are born in a year and how many die of natural causes? Those answers may come out of the research funded by the solar developers, the same way that science of the desert has multiplied thanks to solar developers. It seems that airports have made inroads toward reducing bird incidents with planes and I have confidence that the solar developers will show success as well.

In conclusion, it seems from these Palen workshops people are very assertive about revealing their feelings, so please allow me to follow that trend. I feel that denying this project a permit is on par with setting off a carbon bomb that blasts about 300,000 metric tons of carbon into the atmosphere. I feel like if those opposed to solar projects were the environmentalists they claim to be, that they would be working with the developer to assure success instead of doing everything in their power to stop these projects. I feel that Palen and the other solar projects under consideration are critical to reduce carbon and the effects of Global Climate Change. It is very responsible to approve this project.

Sincere Thanks,

Kenneth B. Waxlax