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Palen Solar Power Project Comment

Dear Sir or Madam,

Please accept the following comment letter for the Palen Solar Power Project from Los Angeles County Museum of Natural History Ornithology Collections Manager Kimball Garrett.

Respectfully,

Seth Shteir, National Parks Conservation Association

Additional submitted attachment is included below.

21 June 2014

Comments on the proposed Palen Solar Electric Generating System Project

In regard to the Palen Solar Electric Generating System Project proposed for the desert east of Desert Center in Riverside County, California, I appreciate the opportunity to address concerns I have over the impact of the proposed project on wildlife. I acknowledge that there are also substantial and valid concerns about the impact of the project on desert viewsheds, such as those from Joshua Tree National Park, but I would like to restrict my comments to impacts on birds, my primary area of expertise.

My major concerns involve three areas: (1) direct mortality impacts from solar flux and collisions with project infrastructure; (2) unsustainable use of water to allow the solar electric generating plant to operate; and (3) the likely ineffectiveness of proposed mitigation efforts.

First and foremost, there is a developing awareness that avian mortality from solar tower installations can be significant. More importantly, effective procedures for monitoring such mortality have yet to be developed. While some mortalities from solar flux are recovered on-site, it remains entirely unknown how many additional mortalities occur but are not detected because affected individuals are able to continue some distance off-site (or even survive the migration journey but at the price of greatly lowered fitness). It is unwise to erect an additional solar tower, larger than the Ivanpah facility where considerable mortality has been documented, until there is irrefutable evidence that population-level impacts of such towers, individually and in the aggregate, are not significant. The rush to build renewable energy projects should not outpace the development of a vital information base on the ecological impacts of such projects.

The proposed Palen project will use a massive amount of water in its operations. This is the same water that sustains important and unique desert riparian habitats, and drawing that much water from any source, let alone local drainages and water tables, will certainly have environmental consequences. Changes in desert wash hydrology, lowering of water tables, and diversion of water from desert riparian habitats has increasingly put at risk a variety of riparian- and desert wash-obligate bird species, and it seems unavoidable that the water use associated with the Palen project will exacerbate this issue. Related to the water use issue is the potential impact of water impoundments adjacent to the solar plant; the proposed solution to the attractive-nuisance impacts of these impoundments (netting) will certainly result in additional avian mortality, and will not address the contribution of the ponds to insect biomass (“aeroplankton”) that will attract swallows, swifts and other aerial-feeding birds, putting them at risk of solar flux and other impacts.

Finally, I find that the bulk of the proposed mitigation for impacts to migratory birds is in the form of monetary support to various partnerships, joint ventures, and planning groups. I fear that such organizations, while vital to biodiversity conservation, tend to devote most of their funds to meetings, workshops, production of documents and education. Instead, I would urge that mitigation dollars be applied directly to habitat preservation and restoration to the extent possible.

Sincerely,

[signed]

Kimball L. Garrett
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