

DOCKETED

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Audubon California comments on Palen Solar Power Project

Additional submitted attachment is included below.



July 30, 2014

California Energy Commission
Docket Unit
Docket number 09-AFC-07C
1516 Ninth Street, MS-4
Sacramento, CA 95614
via email: docket@energy.ca.gov

Re; Docket No. 009-AFC-07C; Palen Solar Electric Generating System
("PSEGS")

Dear Commissioners:

Audubon California has commented previously in support of the Presiding Members Proposed Decision (PMPD) to deny the petition to amend the Palen Solar Electricity Generating System.

After careful consideration of all the evidence presented in the proceedings since then, we write once again to support denial of the petition by the Energy Commission.

The evidence presented in the proceedings, including the less than one year data of avian mortality from ISEGS, and the Final Staff Assessment, make it clear to us that the significance of the impacts of the project on birds – especially migratory birds protected under the Migratory Bird Treaty Act and treaties with other countries - promises to be not only significant and cannot be mitigated, but it may set a new undesirable precedent for impacts from an energy generation facility, surpassing Altamont. The impacts from this project could contribute to a cumulative effect that will make siting of future renewable energy projects more difficult, and, more

importantly, could have a major affect on populations of migratory birds. The cumulative effect of this project and ISEGS could undermine the BLM Solar PEIS. There is no environmental co-benefit to this project other than megawatts of renewable energy, and no proven avoidance measure or mitigation that could compensate for the predicted impacts, which are still undetermined but clearly advancing in magnitude with each report from the Ivanpah Solar Energy Generating System (ISEGS).

We, and our 48 chapters, have supported the responsible siting of renewable energy projects in California, and will continue to do so. Our renewable energy future depends on our ability to site and expedite projects and technologies in the right places to avoid and minimize the impacts on biological and other resources.

In our opinion, this project with this technology does not even come close to meeting this very important standard, and there are many other alternatives and technologies of well-sited renewable energy in the Riverside Solar Energy Zone that will not have the same impacts on birds as PSEGS with which we can meet our renewable energy goals.

Thank you for the opportunity to comment on this project and these proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Garry George", followed by a horizontal line extending to the right.

Garry George
Renewable Energy Director
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