

## DOCKETED

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*Comment Received From: Scott Connelly*

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## **Adverse impacts of Palen Project**

I call on the California Energy Commission to rethink and reverse its preliminary decision and deny approval of the Palen project due to its harmful impacts to our national heritage and to Joshua Tree National Park's biological, cultural and scenic resources. This project will have long term devastating impacts on the environment.

*Additional submitted attachment is included below.*

Scott Connelly  
2071 Marguerite St  
Palm Springs CA 92264

September 14, 2014

To: California Energy Commission

Subject: Opposition to the Palen Project

The environmental impacts of this project will have long term devastating consequences.

The California Energy Commission's Final Staff Assessment states that the Palen project will have a "substantial adverse impact" to scenic resources in Joshua Tree National Park's federally designated wilderness and backcountry areas close to the project site. This is of grave concern for the National Park Service whose August 2013 [Call to Action](#) directs the agency to "protect clean air and spectacular scenery now and for future generations."

The destruction of Joshua Tree's spectacular vistas will be a direct negative impact to the visitor experience, one that cannot be measured by merely counting the number of visitors to the southeastern section of the park, which is near the Palen project. In fact, the NPS report National Park Service Visitor Values and Perceptions of Clean Air, Scenic Views and Dark Night Skies discovered that many visitors come to the national parks to experience undeveloped vistas.

The Palen project stands to harm or kill eagles and other migrating birds that travel through Joshua Tree National Park, as the project and Joshua Tree National Park are within an inland portion of the Pacific Flyway. Avian death and injury would inevitably result from exposure to "solar flux," an intense heat given off by the solar reflective heliostats. The California Energy Commission acknowledges that protected species, such as the bald and golden eagles, the peregrine falcon and the endangered Yuma clapper rail would be affected.

Finally, the U.S. Fish and Wildlife Service analyzed bird deaths at the similar Ivanpah project. Although Ivanpah's towers are 300 feet shorter, numerous burn-related bird deaths were recorded and scientists found that the site functions as a "mega" ecological trap whose heat and light would attract many different species in the food web. It is likely that Palen would also become a mega trap, harming birds, insects, bats and predators that live in and around Joshua Tree National Park.

I call on the California Energy Commission to rethink and reverse its preliminary decision and deny approval of the Palen project due to its harmful impacts to our national heritage and to Joshua Tree National Park's biological, cultural and scenic resources.

Sincerely,

Scott Connelly

