

## DOCKETED

<b>Docket Number:</b>	09-AFC-07C
<b>Project Title:</b>	Palen Solar Power Project - Compliance
<b>TN #:</b>	205977
<b>Document Title:</b>	Comments: Oppose Extension On Palen Construction Permit
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Desert Organizations
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	9/1/2015 1:16:47 PM
<b>Docketed Date:</b>	9/1/2015

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*Submitted On: 9/1/2015*

*Docket Number: 09-AFC-07C*

**California Desert Organizations Oppose Extension On Palen Construction Permit**

*Additional submitted attachment is included below.*

September 1, 2015

Karen Douglas, Commissioner  
California Energy Commission  
Dockets Unit, MS-4  
Docket No. 09-AFC-7C  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket No. 09-AFC-7C-California Desert Organizations Oppose Extending the Construction Deadline for the Palen Solar Power Project**

Dear Commissioner Douglas and Fellow California Energy Commissioners:

The undersigned organizations oppose extending the deadline for the construction on the existing Palen Solar Power Plant permit and urge the California Energy Commission (CEC) to deny Abengoa's petition for a one year extension. Our organizations represent a broad base of constituents in the California desert and we have worked on renewable energy issues for close to a decade. We understand that the project proponent is now pursuing a project with solar trough and energy storage technology. However, we maintain that this new project concept is fundamentally different from the original project for which the 2010 construction permit was granted.

Despite the change in technology, the Palen Solar Power Project continues to have the potential to adversely impact resident, rare and migratory birds; bats; rare plants and animals; Joshua Tree National Park and cultural resources. Because of these considerations, we stand united in requesting that the CEC require the project proponent to obtain a new construction permit and to undergo a new environmental review as additional information has come to light since the granting of the original permit about natural resource topics such as how renewable energy projects impact avian species.

The location of the Palen Project is of special concern due to its proximity to Joshua Tree National Park. Joshua Tree National Park has 250 recorded species of birds and lies under the inland portion of the Pacific Flyway. The proposed Palen Solar Power Project could adversely impact birds migrating through and foraging within its vicinity. Species that could be harmed or killed by the proposed project include fully protected species such as golden eagles, peregrine falcon, Yuma clapper rail and special status avian species such as the gilded flicker, elf owl, osprey, ferruginous hawk, burrowing owl, Cooper's hawk, sharp shinned hawk, northern harrier, prairie falcon, Swainson's hawk, Harris hawk and short eared owl .

Additionally, the new project footprint could still constitute a threat to the scenic viewsheds of Joshua Tree National Park. Such impacts are reasons for special concern as the 2010 Joshua Tree National Park Visitor Survey found that 90% of groups surveyed thought that Joshua Tree National Park's views without development were very or extremely important to their visitor experience; the park is an important economic driver in the region; a recreational haven; and will attract two million visitors this year from around the globe.

Sincerely,

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