

## **SECTION 7 ALTERNATIVES**

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The Commission Decision included a comparison of the Approved Project to the No Project Alternative and a reasonable range of other alternatives that were designed to attain most of the basic Project objectives while avoiding or substantially lessening the Approved Project's significant effects. Approval of the Modified Project would not undermine the reasoning of, or substantially alter, the analysis of alternatives provided in the Commission Decision.

## 7.1 PROJECT OBJECTIVES

Project alternatives were evaluated in light of the objectives of the Modified Project. The objectives of the Modified Project remain as described in the Commission Decision (Alternatives pages 1 and 2). The objectives are summarized below.

- To construct and operate renewable power generating facility in California capable of selling competitively priced renewable energy consistent with the needs of California utilities.
- To locate the facility in areas of high insolation with ground slopes of less than five percent.
- To provide clean, renewable electricity to support California's Renewable Portfolio Standard (RPS) Program.
- To assist in reducing its GHG emissions, as required by the California Global Warming Solutions Act.
- To contribute to the achievement of the 33 percent RPS target set by California's governor and legislature.
- To complete the review process in a timeframe that would allow the Applicant to start construction or meet the economic performance guidelines, by December 31, 2010, to potentially qualify for the 2009 ARRA cash grant in lieu of tax credits for certain renewable energy projects (Ex. 300, p. B.2-9).

At the time of the Commission Decision, the ARRA required that a project start construction or meet economic performance guidelines by December 31, 2010 in order to qualify for funding. On December 17, 2010, a bill was signed into law that extended this deadline to December 31, 2011 (Tax Relief, Unemployment Insurance Reauthorization and Job Creation of 2010, Pub L. No. 111-312, sec 707, 124 Stat. 3296). This would no longer apply to the Modified Project.

The Modified Project would utilize currently available PV technology and would modify phasing identified under the Approved Project to reduce access needs north of the railroad during Phase 1. The Modified Project would also eliminate impacts to the highest quality Desert Tortoise Habitat, create a movement corridor through the center of the Project site, reduce impacts to White-Margined Beardtongue, excludes 69.23 acres of Mojave Fringe-Toed Lizard habitat, and exclude the donated lands in Section 17 from the Project footprint. As a result of these changes, the Modified Project is better positioned to meet these objectives than the Approved Project. As discussed below, the Modified Project would not result in additional significant adverse environmental impacts beyond those discussed for the Approved Project, and would reduce some of the impacts of the Approved Project.

## **7.2 ACTION ALTERNATIVES**

In Alternatives Table 1 of the Commission Decision, potential Project alternatives were summarized and those that were and were not carried forward for detailed analysis were identified. Approval of the Modified Project would not change the evaluation of the site, technology, and other alternatives, or the conclusions drawn in the Commission Decision regarding the alternatives.

One technology alternative evaluated in the Commission Decision and eliminated from detailed consideration was Solar Photovoltaic Technology – Utility Scale. This alternative was not carried forward for detailed analysis because the initial evaluation demonstrated that it would not substantially reduce the impacts of the Approved Project. The Commission Decision’s conclusion is consistent with the current analysis of the Modified Project, which shows that incorporation of solar PV technology into the Approved Project would somewhat reduce, but not substantially reduce, environmental impacts compared to the Approved Project.

The first alternative analyzed in detail in the Commission Decision was a 275 MW Reduced Acreage Alternative. Although this alternative would reduce many of the impacts of the Approved Project, the Commission rejected it because it would also reduce the benefits associated with (1) replacing fossil fuel-fired generation and (2) reducing the associated criteria pollutant and GHG emissions (Alternatives pages 7, 18). This conclusion is equally valid when the Reduced Acreage Alternative is compared to the Modified Project, because the latter would generate the same 663.5 MW of clean renewable energy, with no increase in environmental impacts, compared to the Approved Project.

The second alternative analyzed in detail in the Commission Decision was the Private Land Alternative. The Commission Decision concluded that although the Private Land Alternative would reduce some environmental impacts, it would increase others compared to the Approved Project, would present additional challenges because of the need to acquire many individual parcels from many different landowners, and would not meet the Project objective regarding schedule (Alternatives pages 14, 18). This conclusion is equally valid when the Private Land Alternative is compared to the Modified Project, because the latter would slightly reduce environmental impacts compared to the Approved Project and the Private Land Alternative still would not meet the Project objective regarding schedule.

### **7.2.1 No Project Alternative**

The Commission evaluated the “no project alternative” in the application proceeding. The Commission Decision (page Alternatives 14-15) concluded:

“If the “No Project” alternative were chosen, other solar renewable power plants may be built, and the impacts to the environment would likely be similar to those of the proposed Project because solar renewable technologies require large amounts of land and similar slope and solarity requirements as the proposed CSP Project. The “No Project” alternative may also lead to development of other non-solar renewable technologies to help achieve the California RPS.

Additionally, if the “No Project” alternative were chosen, it is likely that additional gas-fired power plants would be built or that existing gas-fired plants could operate longer. If the Project were not built, California would not benefit from the reduction in greenhouse gases that this facility would provide. [California utilities] would not receive the 663.5 MW contribution to [the] renewable state-mandated energy portfolio (Ex. 300, p. B.2-14).” This conclusion remains valid under the Modified Project.

### 7.3 CONCLUSION

The Modified Project is an Amendment to the Approved Project and as such no additional Alternatives need be evaluated. The final Decision considered a reasonable range of alternatives and when compared to those previously evaluated Alternatives, the Modified Project is either environmentally superior or the other Alternatives, which may achieve some of the Project Objectives, do not further reduce impacts over the Modified Project.