

August 16, 2010

Mr. Christopher Meyer
CEC Project Manager
Attn: Docket No. 08-AFC-13
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

08-AFC-13

DATE AUG 16 2010

RECD. AUG 16 2010

RE: Calico Solar (formerly Solar One) Project (08-AFC-13)
Applicant's Provision of References Cited in the Draft Desert Tortoise Translocation Plan

Dear Mr. Meyer:

Tessera Solar hereby submits the requested links to references cited in the Draft Desert Tortoise Translocation Plan:

AMEC. 2008. *Victorville 2 Hybrid Power Project Desert Tortoise (Gopherus agassizii) Translocation Plan*. Prepared for: City of Victorville on behalf of Inland Energy and ENSR Corporation. May 2008.

http://www.energy.ca.gov/sitingcases/victorville2/documents/others/2008-03-21_TRANSLOCATION_PLAN_TN-45554.PDF

Berry, K.H., E.K. Spangenberg, B.L. Homer, and E.R. Jacobson. 2002. Deaths of desert tortoises following periods of drought and research manipulation. *Chelonian Conservation and Biology* 4:436-448.

http://www.vetmed.ufl.edu/college/departments/sacs/research/documents/02Berryetal_starvation_dehydration.pdf

Morafka, D.J., K.H. Berry, and E.K. Spangenberg. 1997. Predator-proof field enclosures for enhancing hatching success and survivorship of juvenile tortoises: a critical evaluation. Pp. 147-165 in the *New York Turtle and Tortoise Society, Proceedings: Conservation, Restoration, and Management of Tortoises and Turtles – an International Conference*.

<http://nytts.org/proceedings/morafka.htm>

Nussear, K. E. 2004. Mechanistic investigation of the distributional limits of the desert tortoise *Gopherus agassizii*. Dissertation. University of Nevada, Reno.

<http://homepage.mac.com/knussear/docs/Nussear%20Dissertation%202004.pdf>

The following reference is attached:

University of Florida, Department of Pathobiology. No date. Serologic test for tortoise exposure to *Mycoplasma*. Unpub. Doc. 5 pp.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Sincerely,

A handwritten signature in black ink, appearing to read "Felicia Bellows". The signature is fluid and cursive, with the first name "Felicia" being more prominent and the last name "Bellows" following in a similar style.

Felicia L. Bellows

Vice President of Development

Appendix J: Sample Processing, Diagnostic Laboratories, and Supplies

This appendix describes how to calculate an appropriate volume of blood that may be collected from an individual tortoise based on body weight, proper sample handling and storage to ensure high quality samples, and a list of laboratories that have experience analyzing reptilian samples. For specific diagnostic tests, such as aerobic/anaerobic bacterial cultures or virus isolation, the reader is referred directly to the laboratory performing the analyses for more detailed information. Additionally, the appendix includes sample supply lists for materials that may be used when conducting tortoise health monitoring. Supply lists have been broken down into specific tasks so that land managers wishing to implement a monitoring plan can develop a draft budget based on this information.

Volume of blood that can be safely drawn

Calculations should be performed for all tortoises under 500 g in body weight to ensure that the sample volume collected is appropriate. The blood volume of a tortoise ranges from 5 – 8 percent of the animal's body weight in grams. The maximum amount of blood that can be collected at one time is up to 10 percent of the tortoise's blood volume (Mader 2006). For example, the amount of blood that can be safely collected from a 3.0 kg tortoise is calculated as follows:

$$\begin{aligned} 3.0 \text{ kg} \times 1000\text{g/kg} &= 3000 \text{ g body weight} \\ 3000 \text{ g} \times 0.05 &= 150 \text{ ml approximate blood volume} \\ 150 \text{ ml} \times 0.10 &= 15 \text{ ml MAXIMUM blood draw} \end{aligned}$$

However, 15 ml is well beyond the volume normally collected from adult tortoises. Generally 1.5 – 3 ml of whole blood will provide adequate volume for a wide range of analyses. This calculation becomes of critical importance when hatchling or juvenile tortoises are sampled.

Quality control for blood samples

After collection of the sample, tortoise blood should immediately be placed into a tube containing lithium heparin as the anticoagulant (green top tube, see supplies listed below). Certain blood parameters can be substantially affected by contamination of the sample with lymph, and also by

sample clotting or hemolysis (rupture of the red blood cells resulting in red or pink plasma). Such samples must be clearly labeled and notes should be written on the data sheets so that the results can be interpreted appropriately. While in the field, samples should be stored on wet ice or ice packs and transferred to a refrigerator as soon as possible. Certain diagnostic tests require unspun, whole blood, and must be submitted to the laboratory within 24 hours of sample collection. For those that require plasma, the samples should be centrifuged as soon as possible to separate the red and white blood cells from the clear, plasma component of the blood. If a centrifuge is not available, samples to be submitted for serology can be left sitting upright in a refrigerator overnight to separate the blood components. Plasma (the clear component of blood) is transferred into an appropriate, screw-capped polypropylene tube for storage. The plastic that the tube is made of is an important consideration because certain plastics may bind antibodies and affect your results. Polypropylene is strongly recommended for this reason. Screw-capped tubes are also strongly recommended because plasma may evaporate if stored in snap-topped containers.

If plasma is to be stored for 1 week, it can be kept in a refrigerator. However, if samples will be stored for >1 week, the samples should be frozen in a standard, non-defrosting freezer (set at -20 °C) or a deep freezer (set at -80 °C). Importantly, samples stored in a freezer with an automatic defroster may degrade over time as the temperature will vary to prevent frost accumulation.

Diagnostic laboratories

The laboratories listed below provide a variety of diagnostic tests for reptiles. If diagnostic tests will be performed as part of your study, please contact the laboratories well in advance to determine if they have expertise performing the specific diagnostic tests you need, if they can accommodate your samples, and how they would like the samples to be collected, stored, and shipped.

General full-service laboratories

Antech Diagnostics

Eastern Region

Phone: (800) 872-1001

Auburn University, College of Veterinary Medicine

Clinical Pathology Service

166 Greene Hall

Auburn University, AL 36849-5519
Phone: (334) 844-2653

Louisiana State University

Veterinary Teaching Hospital and Clinics
Baton Rouge, Louisiana 70803
Contact: Dr. Javier G. Nevarez, Director of the Wildlife Hospital of Louisiana
Phone: (225) 578-9600

Mississippi State University, College of Veterinary Medicine

Diagnostic Laboratory Services
Mississippi State, MS 39762
Phone: (662) 325-1375

University of Florida Veterinary Medical Center

Clinical Pathology Service
2015 SW 16th Avenue, Rm VS-50
Gainesville, FL 32608
Phone: (352) 392 - 2235 ext. 4400
Fax: (352) 392 - 2938

University of Georgia, College of Veterinary Medicine

Southeastern Cooperative Wildlife Disease Study
589 D.W. Brooks Drive
Wildlife Health Building
Athens, GA 30602-7393
Phone: (706) 542-1741
Fax: 706-542-5865

University of Miami, Avian and Wildlife Laboratory

Comparative Pathology
1600 NW 10 Avenue, RMSB 7101A
Miami, FL 33136
Phone: (800) 596-7390 or (305) 243-6700
Fax: (305) 243-5662

Specific tests

Herpesvirus and iridovirus serology; PCR: Herpesvirus, iridovirus, papillomavirus, adenovirus, chlamydiales, coccidia, and cryptosporidium

Dr. Elliott Jacobson
University of Florida, College of Veterinary Medicine
2015 SW 16th Ave, Rm V2-238
Gainesville, FL 32608
352-392-2226 x 5775

Mycoplasma serology, culture, and PCR

Dr. Mary Brown
University of Florida, College of Veterinary Medicine
1600 SW Archer Rd, BSB3-50
Gainesville, FL 32611
Phone: (352) 392-2239 ext. 3986

Supply lists

Tortoise handling supplies

- *Plastic storage boxes*
Use to hold individual tortoises temporarily to prevent co-mingling of tortoises and cross-contamination between tortoises. Bin should be large enough for the tortoise to turn around in. Rec. minimum dimensions for adults: L- 1 ft 9 in., W- 1 ft 3 in., H-1 in.
- *Regular bleach (e.g., Clorox®)*
Use 1 part bleach/19 parts water solution to disinfect all equipment and surfaces after each tortoise. See disinfection guidelines.
- *Other non-corrosive disinfectant*
Use to clean metal equipment and surfaces as per label recommendations. Example product: Nolvasan®, Fort Dodge. See disinfection guidelines.
- *Hand sanitizer*
Use to sanitize hands between every tortoise. Example product: Al-care® foamed alcohol hand scrub, Steris Corp. See disinfection guidelines.
- *Disposable gloves (latex or nitrile)*

Blood collection supplies

- *Gauze sponges*
2 x 2; Use to prepare blood collection site.
- *Skin cleanser*
Use to prepare blood collection site (before alcohol) to remove dirt/debris. Example product: ChlorhexiDerm® Scrub, DVM Pharmaceuticals, Inc.
- *Isopropyl alcohol*
Use to prepare blood collection site after skin cleanser.
- *1 CC and/or 3 CC syringes*
Smaller sized syringes used for juvenile tortoises.
- *Poly hub needles*
25 X 5/8 GAUGE; 22 X 1 GA.; 22 X 2 GA.
- *Heparin*
(hep. sodium, 10,000 U/ml); Coat syringes to prevent clotting, if needed.
- *Microtainer plasma separator tubes with lithium heparin (green top)*
Tubes have a clay substance that separates the red blood cells from the plasma when the tube is spun. Convenient for removing the plasma.

- *Microtainer plasma tubes with lithium heparin (green top/ no separator)*
Tubes lack the clay separator. Best for small sample volumes or when whole blood is being submitted for a complete blood count.
- *Microhematocrit tubes (nonheparinized) and tube sealant*
(If PCV/TP being performed)
- *Microscope slides*
Best to use cytology grade for blood smears, and lower quality slides for fecal analyses.
- *Five-slide microscope slide mailer*
Use when slides need to be mailed to a laboratory
- *Transfer pipets, sterile/individually wrapped*
Use to transfer plasma to polypropylene tubes.
- *Polypropylene screw-capped tubes*
Example product: Sarstedt screw cap micro tubes.

Nasal flush supplies

- *Disposable gloves (latex or nitrile)*
- *Gauze sponges (2 X 2 [see above])*
- *Isopropyl alcohol*
- *10 CC syringes*
- *Poly hub needles (20 X 1 GA. [see above])*
- *IV catheter*
Example product: Terumo Surflo 22 GA. X 1 in.
- *Sterile 0.9% NaCl (saline) IV Fluid (250 or 500 ml bag)*
- *Sterile 100 ml urine collection container*
- *SP-4 media aliquots (1 ml)*
(to add to flush) Obtain from Remel Laboratories (te. 800-255-6730)

Tick collection supplies

- *Plastic screw-capped tubes (any plastic material)*
- *70% ethyl alcohol*
- *Tweezers or hemostats to remove ticks (as needed)*

Fecal sample collection supplies

- *Twirl packs or zip-lock bags*

Appendix K: Reptile Health and Disease Researchers

Before initiating a detailed or complex health monitoring program for gopher tortoises, professional consultation with veterinarians or researchers with experience in reptilian health is strongly recommended. Professionals with this expertise may help land management personnel determine the best health monitoring approach given the available resources and status of the population of concern. Sometimes field workers come across circumstances that provide warning signs of potential health problems within a tortoise population. Seeking appropriate guidance is imperative in those cases.

A number of sources for veterinary or wildlife disease assistance are available. Private veterinary practitioners and research veterinarians with reptile experience may be found by visiting the Association for Reptilian and Amphibian Veterinarians (ARAV) website (<http://www.arav.org/USMembers.htm>; members listed by state). Universities with veterinary colleges usually have a wildlife or zoological medicine service and affiliated faculty with this expertise. The nearest university with a veterinary school may be found by visiting the website for the Association of American Veterinary Medical Colleges (AAVMC; http://www.aavmc.org/students_admissions/vet_schools.htm). The website provides links to all of the veterinary colleges, and from there, further contact information may be obtained. An alternate approach is to contact a local zoological park to determine if the veterinary staff is available to conduct collaborative research or help investigate tortoise health in a nearby gopher tortoise population. Some zoos have conservation programs and may be interested in assisting with such projects. Contact information for local zoological parks may be found at the Association of Zoos and Aquariums website (<http://www.aza.org/AboutAZA/>).

This appendix provides a list of several researchers or research veterinarians that occur within the range of the gopher tortoise and have expertise in reptile health, disease and/or pathology. Most of the professionals listed are affiliated with research institutions. The reader is referred to the ARAV website listed above for more information about private veterinary practitioners that may be available to assist with tortoise health studies.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

APPLICATION FOR CERTIFICATION

For the CALICO SOLAR (Formerly SES Solar One)

Docket No. 08-AFC-13

**PROOF OF SERVICE
(Revised 8/9/10)**

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DECLARATION OF SERVICE

I, Jennifer Draper, declare that on August 16, 2010, I served and filed copies of the attached Applicant's References Cited in the Draft Desert Tortoise Translocation Plan. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/solarone].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

- sent electronically to all email addresses on the Proof of Service list;
 by personal delivery;
 by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-13
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Original Signed By
Jennifer Draper