

DOCKETED

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Project Title:	COMPLIANCE-Luz Solar Electric Generating System Cogeneration AFC (150 MW) Units III-VII.
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Document Title:	SEGS III-VII Wildlife Fencing Memorandum
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To: Ann Crisp, California Energy Commission
Eric Knight, California Energy Commission

From: Jennifer Merrick, Tetra Tech

Date: April 14, 2021

Subject: SEGS III-VII Decommissioning Plan, San Bernardino County, California
Wildlife Fencing

This memorandum was composed to address the request received via email and discussed during the public workshop for the Solar Energy Generating System (SEGS) III-VII Facility Decommissioning Plan on March 30, 2021. California Energy Commission (CEC) staff directed the Project Owner, Luz Solar Partners III-VII (Luz Solar III-VII) to provide a complete explanation of why desert tortoise fencing cannot be installed at the SEGS III-VII site and to include a figure and description of the gaps in the existing fence, including those caused by erosional features, and proposed methods to close them.

As discussed with CEC staff on March 26, 2021, the SEGS III-VII site does not currently include desert tortoise fencing. The site perimeter is completely enclosed by 8-foot-tall, chain-link, security fencing. The fencing is built on berms in many locations (photos are provided as Appendix A) and includes cement footings that extend several feet underground and up to 3 feet laterally on either side of the fence panels. Additionally, the ground surface at the perimeter fence is highly compacted, inhibiting trenching equipment and also inhibiting desert tortoise and other wildlife from burrowing under the fence.

The United States Fish and Wildlife (USFWS) *Recommended Specifications for Desert Tortoise Fencing* (USFWS 2005) suggests that fence material be buried 6-12 inches below the ground surface. Due to the presence of existing, concrete fence footings at the SEGS III-VII site, trenching to install additional fencing directly adjacent to the existing fence is infeasible.

Trenching for installation of additional fencing at a depth of 6-12 inches would require the fencing to be installed outside of the lateral extent of the footings and at the foot of the perimeter berm. CEC staff identified environmental concerns with the ground disturbance within native habitats outside of the SEGS III-VII fenceline that installation at the foot of the berms would require. To minimize disturbance of native habitats outside of the fence while preventing desert tortoise and other wildlife from entering the Project site prior to and during decommissioning activities, Luz Solar III-VII proposes design measure **D-BIO-2** in the SEGS III-VII Facility Decommissioning Plan:

D-BIO-2 *The Project Owner shall inspect the existing perimeter fencing and repair any gaps or holes to prevent desert tortoise or other wildlife from entering the site. Repairs will extend to existing grade and will not require ground disturbance of previously un-disturbed areas outside of the Project site.*

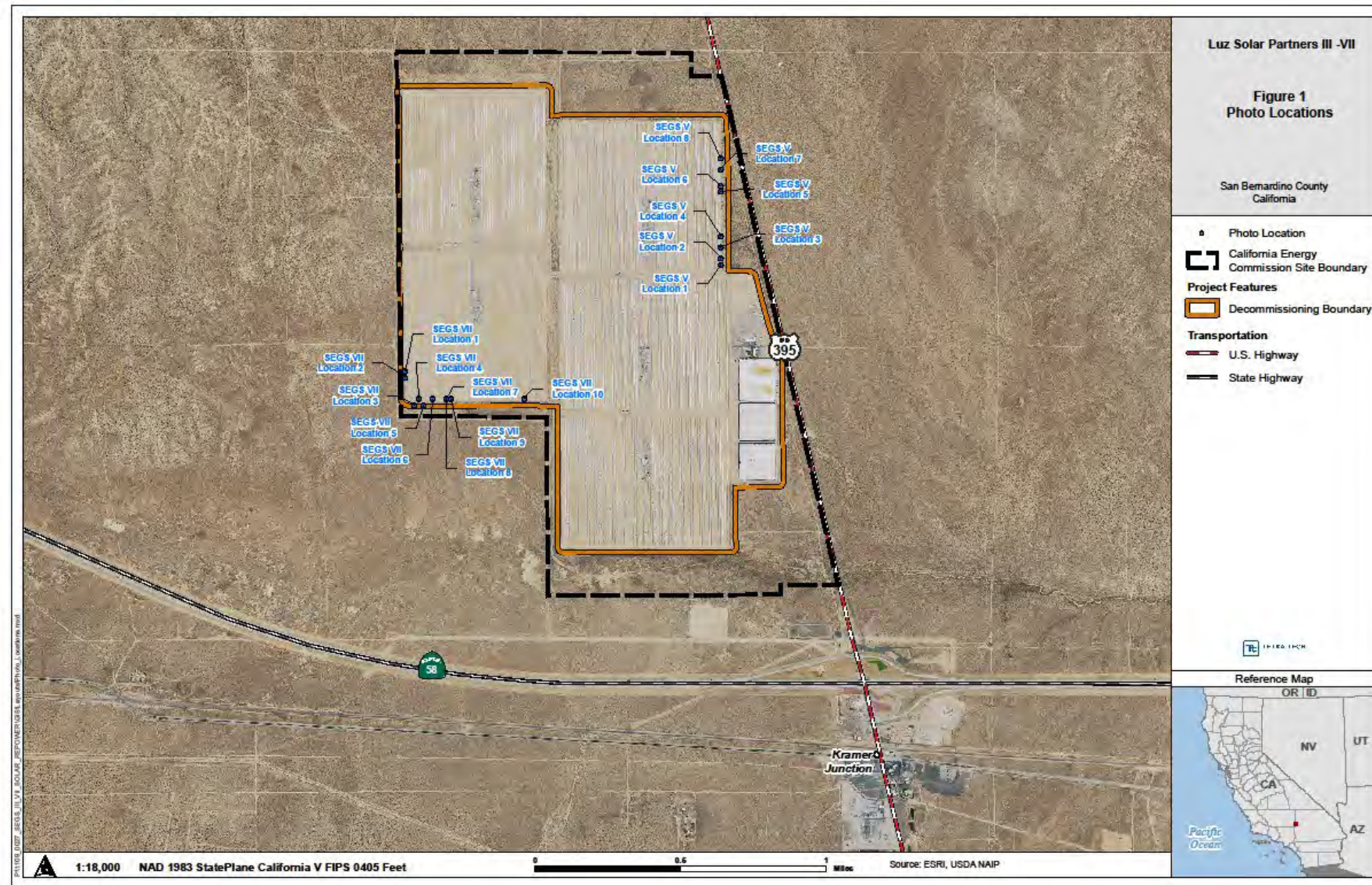
After fence repairs are complete, and prior to the start of decommissioning activities, the Designated Biologist or Biological Monitor shall conduct a survey for desert tortoise, burrowing owls, and desert kit fox to confirm these species are not present on the Project site. If any special status species are found inside the fenceline the Designated Biologist shall contact the CPM, CDFW, and USFWS for further guidance.

To comply with this measure, Luz Solar III-VII has inspected the existing perimeter fencing to identify gaps, or “wash-outs” where erosion under the fence has occurred. These areas are identified on Figure 1 and photo documentation of each gap or wash-out is included in Appendix A. These areas will be repaired in compliance with **D-BIO-2**. Once repairs are complete, follow-up photo-documentation will be provided to CEC staff.

REFERENCES:

United States Fish and Wildlife Service. 2005. USFWS Recommended Specifications for Desert Tortoise Exclusion Fencing. September.

FIGURE



Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California



Photo: 1

SEGS V Location 1
35°1'1" N 117°33'4" W



Photo: 2

SEGS V Location 2
35°1'2" N 117°33'4" W



**Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California**



Photo: 3

SEGS V Location 3
35°1'4" N 117°33'4" W



Photo: 4

SEGS V Location 4
35°1'6" N 117°33'4" W





Photo: 5

SEGS V Location 5
35°1'14" N 117°33'4" W



Photo: 6

SEGS V Location 6
35°1'15" N 117°33'4" W



**Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California**



Photo: 7

SEGS V Location 7
35°1'18" N 117°33'4" W



Photo: 8

SEGS V Location 8
35°1'20" N 117°33'4" W



Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California



Photo: 9

SEGS VII Location 1
35°0'42" N 117°34'13" W



Photo: 10

SEGS VII Location 2
35°0'41" N 117°34'13" W



**Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California**



Photo: 11

SEGS VII Location 3
35°0'36" N 117°34'11" W



Photo: 12

SEGS VII Location 4
35°0'37" N 117°34'10" W



Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California



Photo: 13

SEGS VII Location 5
35°0'36" N 117°34'9" W



Photo: 14

SEGS VII Location 6
35°0'37" N 117°34'7" W



**Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California**



Photo: 15

SEGS VII Location 7
35°0'37" N 117°34'4" W



Photo: 16

SEGS VII Location 8
35°0'37" N 117°34'4" W



**Photographic Documentation
SEGS III-VII Decommissioning
San Bernardino County, California**



Photo: 17

SEGS VII Location 9
35°0'37" N 117°34'3" W



Photo: 18

SEGS VII Location 10
35°0'37" N 117°33'47" W

