

**DOCKETED**

<b>Docket Number:</b>	21-AFC-02
<b>Project Title:</b>	Willow Rock Energy Storage Center
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<b>Document Title:</b>	Letter to CEC from California Department of Fish and Wildlife
<b>Description:</b>	N/A
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State of California – Natural Resources Agency  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



August 30, 2024

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California Energy Commission  
Biological Resources Unit  
715 P Street  
Sacramento, California 95814  
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**Subject: Willow Rock Energy Storage Center  
Docket Number 21-AFC-02  
California Department of Fish and Wildlife – Draft Data Request for CEC  
Incorporation**

Dear Andrea Stroud:

The California Department of Fish and Wildlife (CDFW) has reviewed the Applicant's Supplemental Application and Appendices filed with the California Energy Commission (CEC) on August 5, 2024. We appreciate the opportunity to coordinate with CEC staff regarding the activities stemming from the Willow Rock Energy Storage Center (WRESC; Project) proposed by Gem A-CAES, LLC. The WRESC and related activities may affect California fish and wildlife resources, and CDFW may be required to provide measures to the CEC to incorporate as Conditions of Certification for the Project. We offer our comments and data requests to assist the CEC in adequately identifying and mitigating the significant, or potentially significant, direct, indirect, and cumulative impacts on fish and wildlife (biological) resources.

### **Streambed Alteration**

The Hydrological Mapping provided in Supplemental Notification Attachment 20240805T165549 and All Jurisdictional Delineations Map Book provided in Supplemental Notification Attachment 20240805T65524 does not appear to include all project components or fully delineate all streams within and adjacent to the Project Area. In addition, the mapping provided is not sufficient in scale or transparency to allow for adequate analysis of the project in relation to the hydrological features that are located within and adjacent to the Project Area.

Please provide updated aerial imagery and mapping that includes all project components if available, for example locations of pole installation. Mapping should utilize an optimal zoom level and transparency ratio, providing imagery that is sufficient

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in scale and clarity. In addition, please provide a kmz or shape file depicting the Project footprint.

1. CDFW is concerned that the full extent of the streams within and adjacent to the Project Area have not been sufficiently identified. In order to fully evaluate all potential impacts resulting from project activities CDFW reiterates the importance providing detailed and comprehensive hydrological mapping containing all Project components.

### **Western Joshua Tree**

The Western Joshua tree (WJT) census data included in Supplemental Notification Attachment 20240805T162134 did not include a WJT census map or a completed WJT census data sheet spreadsheet as required in the WJT Conservation Act (WJTCA) Census instructions.

1. Please provide a WJT census map and completed WJT census data sheet spreadsheet for the Project.
2. As outlined in the WJTCA, relocation of Western Joshua Trees removed as a result of Project Activities may be a requirement of the Take Authorization for the species. CDFW recommends that a WJT Relocation Plan be prepared for the Project following the Western Joshua Tree Relocation Guidelines and Protocols document.

### **Noise and Vibration**


The Project materials indicate that blasting will be used to facilitate the construction of an underground cavern; however, an analysis of impacts to biological resources resulting from blasting was not included.

1. Please provide a detailed description of all activities that will utilize blasting. This should include the method of blasting, type and size of charges, and depths of blasting. Please also describe how blasting and any subsequent debris will be contained.
2. CDFW also recommends that the environmental analysis for the Project include a detailed analysis of noise and vibration resulting from blasting, as it relates to biological resources. This analysis should include an assessment of the concussive and acoustic outputs generated by blasting at various depths, as well as an analysis on the potential for impacts to species known to be present within and adjacent to the Project area. CDFW also recommends that enforceable mitigation measures be incorporated to decrease the impacts of noise and vibration on biological resources.

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CDFW appreciates the opportunity to provide comments and recommendations to assist the CEC in identifying and mitigating the impacts on biological resources. More information on Western Joshua Tree Conservation can be found at CDFW's website <https://wildlife.ca.gov/Conservation/Environmental-Review/WJT>. If you have any questions, please contact Bonna Newell, Senior Environmental Scientist (Specialist), at the address provided on the letterhead or by electronic mail at [Bonna.Newell@wildlife.ca.gov](mailto:Bonna.Newell@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
C40C627EA3024DF...

Jeremy Pohlman  
Senior Environmental Scientist (Supervisor)

ec: **California Energy Commission:**  
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