

**DOCKET**  
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April 16, 2010

Mr. Fred Redell  
Abengoa Solar  
11500 West 13<sup>th</sup> Avenue  
Lakewood, CO 80215-4406**Subject: Abengoa Mojave Solar Project Compensatory Mitigation Site Details**

Mr. Redell:

In response to the California Energy Commission (CEC) memorandum, dated February 5, 2010, AECOM has prepared this letter report addressing the CEC's request for additional information on the proposed Abengoa Mojave Solar Project compensatory mitigation site. The February 5, 2010 memorandum requested the following information:

- Identification of which 118.2 acre portion of the 233 acre applicant-owned parcel is proposed for mitigation (**Item 1**);
- Evaluation of the degree of disturbance, dumping, historical structures, etc. that may require cleaning, fencing, repairs, demolition, etc. (**Item 2**); and
- Determination of whether the applicant would conduct the aforementioned work (if required) prior to conserving the land or if additional lands or monies will be required to off-set the aforementioned impediments (**Item 3**).

Subsequent to the CEC memorandum, an additional request was made to provide an assessment of the burrowing owl habitat features associated with the site (**Item 4**).

**Item 1: Identification of the 118.2 acre Mitigation Site**

The enclosed figure, titled "Mitigation Site Assessment Results," shows the proposed 118.2 acre proposed compensatory mitigation site ("Site"), located northwest of the Project site. The figure also depicts the biological resources documented within and adjacent to the Site, as well as the location of existing abandoned structures and debris piles. The pertinent items are discussed in the following sections relating to the remaining three items requested by the CEC.

The majority of the Site is composed of desert saltbush scrub, with a section of Mojave creosote bush scrub located in the northern part of the Site. A small amount of Mojave desert wash scrub traverses the middle portion of the Site (see the "Mitigation Site Assessment Results" figure). Generally the topography across the Site is very flat, with an average elevation of 2,100 feet above mean sea level. There is a small hill located in the northern portion of the Site with small ravines, dry washes, and rocky outcrops. One main

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dirt road runs along the eastern boundary of the Site in a north to south direction, with two smaller spur roads running east to west across the Site.

### **Item 2: Evaluation of the Degree of Disturbance, Dumping, and Historical Structures**

Overall disturbance of the Site is very low. There are few dirt roads (two small narrow roads traverse the Site east to west) and no large berms, ditches, or other signs of site disturbance. There are five partially or almost completely demolished structures (each consisting of a foundation and portions of standing walls) located entirely within the flood runoff easement lands to the east of the Site. The locations of these structures are depicted on the enclosed "Mitigation Site Assessment Results" figure. The structures are all made of stone and cement and appear to have been store houses or buildings used during historical sheep ranching, adjacent on the eastern side of the Site. Old sheep bones are scattered throughout the Site, indicating the historical presence of sheep. One main barbed wire fence is located along the eastern border of the flood control easement. One additional barbed wire fence exists within the Site and runs east to west along one of the dirt access roads. This fence is very old and does not appear to be hindering the movements of any wildlife. There are two debris piles located within the flood runoff easement to the east of the Site. One debris pile is located next to some of the old structures in the northern section of the Site, and the other debris pile is located in the southern section of the Site adjacent to an old irrigation platform (see the "Mitigation Site Assessment Results" figure). Both of these debris piles consist of old tires, plywood boards, and various metal scraps.

None of the abandoned structures or debris piles within the flood control easement are on the Site and removal of the abandoned structures and debris piles would not directly benefit or enhance the Site. Additionally, these offsite features have the potential to provide burrow substrate to the western burrowing owl. The species has been documented as being able to use openings at the edge of concrete foundations, as well as within debris piles of fallen concrete, old tires, pipes, etc., as opportunistic burrows (CBOC 1993).

### **Item 3: Determination if Additional Work is Required to Remove Impediments**

As noted in the discussion of Item 2, above, the disturbance of the Site is relatively low. No structures or debris piles are present on the Site. Therefore, no additional work is required to remove any impediments to having the Site provide compensation for Project impacts to biological resources, prior to conserving the land.

### **Item 4: Assessment of Burrowing Owl Habitat Features**

Habitat conditions on the Site include factors favorable to the western burrowing owl. The site has existing animal burrows favorable to occupation by burrowing owls; friable soils, washes, and drainages into which fossorial animals can excavate burrows which burrowing

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owls could later occupy; and rocky outcrops on the north end of the Site from which burrowing owls could hunt.

Generally, the frequency of animal burrows increased from the south to the north. A low hill on the northern portion of the Site contains friable soils adequate for fossorial mammals to excavate additional burrows. Existing and future burrows on the Site could be opportunistically occupied by burrowing owls. The hillside contains small washes and ravines with exfoliating rock and soil that provide good burrowing opportunities.

A relatively large desert wash, and several smaller washes and ravines, cross the Site in a west-east direction. The vegetation cover in the washes and ravines is relatively sparse and open, and is conducive to western burrowing owl use as foraging/hunting areas, and potentially for opportunistic burrows. As previously described, the vegetation on the Site consists of saltbush scrub, desert wash scrub, and creosote bush scrub. The relative density of the vegetation is a mosaic, with areas of dense vegetation, along with areas that are sparsely vegetated, and areas where no shrub vegetation occurs.

Overall, the Site provides habitat variables that are conducive to use by the western burrowing owl, including existing burrows, potential for future burrows, topography conducive to providing hunting perches, areas of sparse or open vegetation as foraging areas, and the presence of a prey base (small reptiles, rodents, etc.).

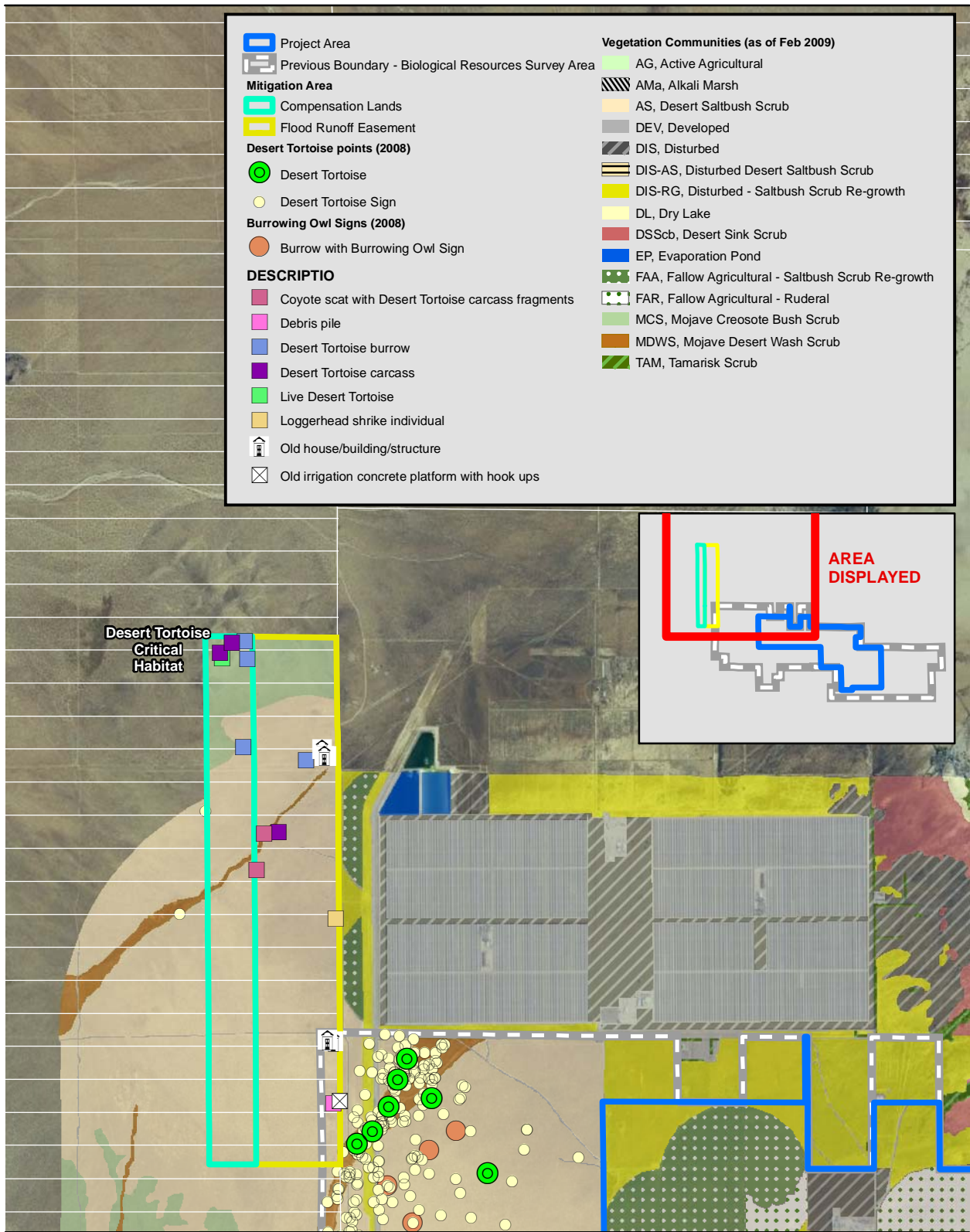
If you have any questions or comments, please contact me at (619) 233-1454, or at Lyndon.Quon@aecom.com

Sincerely,



Lyndon Quon  
Senior Wildlife Biologist

Enclosure: "Mitigation Site Assessment Results" figure



## Mitigation Site Assessment Results

### Mojave Solar Mitigation Site Assessment

Path: P:\2008\08080191 Harper Lake Abengoa AFC\6.0 GIS\6.2 Project Directory\6.2.5 Layout\Mitigation\mitigation\_site\_20100304.mxd, 03/11/10, LeeJ