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February 27, 2012

Mike Monosmith, Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5112

**DOCKET**

**11-AFC-2**

DATE FEB 27 2012

RECD. FEB 27 2012

Re: Hidden Hills Solar Electric Generating Systems, Application for Certification (11-AFC-2)  
Reclamation Plan

Dear Mr. Monosmith:

During the County's review of the California Energy Commission's (CEC) status report, I noted that there is no mention of a proposed reclamation plan for the proposed Hidden Hills Solar Electric Generating Systems (HHSEGS). I understand from our past conversations that Commission staff has encouraged the County to work with the applicant to establish a reclamation plan acceptable to both parties. Unfortunately, the applicant has not discussed this, or other pressing land use issues with County staff in over a month. For this reason, the County believes it will be necessary for the Commission to determine the terms and conditions of the reclamation plan. To that end, the County is requesting that Commission staff consult with and include the County in creating the recommended plan.

Section 21.20.030 of Title 21 of the Inyo County Code, which would apply to this project but for the CEC's exclusive jurisdiction, requires a reclamation/revegetation plan for the project site. The specifics of the reclamation plan are to be based on the "character of the surrounding area and such characteristics of the property as type of native vegetation, soil type, habitat, climate, water resources, and the existence of public trust resources." Based on the County's evaluation of the proposed project, County staff recommends that any reclamation plan include, at a minimum, the following:


1. Requirement for the removal and, to the extent possible, recycling of all equipment, structures, fencing and other fixtures or personal property placed on the project site. Recycling shall be coordinated with Inyo County to assure proper reporting is made to required State or Federal agencies.
2. Requirement that the project site be restored to its pre-project condition, including the requirement to revegetate the site with native plants. It is recommended that a native plant nursery be established to test native plants to be utilized in order to assure revegetation of the project site.
3. Establishment of a nonwasting Decommissioning Fund, which fund shall be fully secured by a letter of credit or the Power Purchase Agreement to assure sufficient financial resources are available at the end of the project's life to fund the reclamation plan.
4. Approval by the land owners of the reclamation plan.

5. Post-closure groundwater monitoring.

The County would appreciate discussing the mechanics for formulating a reclamation plan with Commission staff. Your assistance in providing that contact person or persons would be greatly appreciated.

Thank you. Please contact me at (760) 878-0268 or [jhart@inyocounty.us](mailto:jhart@inyocounty.us) at your earliest convenience to discuss these issues further. I look forward to hearing from you.

Sincerely,



Joshua Hart, AICP  
Planning Director

cc: Board of Supervisors  
CAO  
County Counsel  
BrightSource Energy