



TETRA TECH EC, INC.

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|--------------------------------------------------------------------|
| California Energy Commission<br><b>DOCKETED</b><br><b>11-AFC-3</b> |
| TN # 68282<br>OCT 31 2012                                          |

October 31, 2012

Eric Solorio, Project Manager  
California Energy Commission  
Docket No. 11-AFC-3  
1516 9<sup>th</sup> St.  
Sacramento, CA 95814

**Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-03: Brush Management Plan**

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulations, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the *Brush Management Plan*. The Quail Brush Generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California.

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980-3653.

Sincerely,

A handwritten signature in blue ink that reads "Constance E. Farmer".

Constance E. Farmer  
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix  
John Collins, Cogentrix  
Rick Neff, Cogentrix  
Proof of Service List

TETRA TECH EC, INC.



**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  
QUAIL BRUSH GENERATION PROJECT***

**DOCKET NO. 11-AFC-03  
PROOF OF SERVICE  
(Revised 10/29/2012)**

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DECLARATION OF SERVICE

I, Constance Farmer, declare that on October 31, 2012, I served and filed copies of the attached Brush Management Plan, dated August 27, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/quailbrush/index.html>.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

*(Check all that Apply)*

**For service to all other parties:**

- Served electronically to all e-mail addresses on the Proof of Service list;
- Served by delivering on this date, either personally, or for mailing with the U.S. 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 marked **"hard copy required"** or where no e-mail address is provided.

**AND**

**For filing with the Docket Unit at the Energy Commission:**

- by sending an electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT  
Attn: Docket No. 11-AFC-03  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:**

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission  
Michael J. Levy, Chief Counsel  
1516 Ninth Street MS-14  
Sacramento, CA 95814  
[michael.levy@energy.ca.gov](mailto:michael.levy@energy.ca.gov)

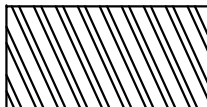


I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

*Constance C. Farmer*



# BRUSH MANAGEMENT PLAN

## BRUSH MANAGEMENT ZONE LEGEND

| CRITERIA                                                                                           | Zone Widths |
|----------------------------------------------------------------------------------------------------|-------------|
|  Zone One Width | 35 ft.      |
|  Zone Two Width | 65 ft.      |
|  100' BUFFER    | 100 ft.     |

## BRUSH MANAGEMENT ZONE IMPLEMENTATION

**ZONE 1:**

- NO PLANTING IS PROPOSED WITHIN ZONE 1
- ALL BUILT MATERIAL IN ZONE 1 SHALL BE NON-COMBUSTIBLE AND FIRE-RESISTANT

**ZONE 2**

- NEW PLANT MATERIAL WILL BE NATIVE NON-IRRIGATED, LOW-FUEL, AND FIRE RESISTIVE.
- NEW PLANTS WILL BE LOW-GROWING WITH A MAXIMUM HT. OF 24" NATIVE TREE AND TREE SHRUB FORM SHRUBS WILL BE LOCATED TO REDUCE THE POSSIBILITY OF TRANSMITTING FIRE.
- ZONE TWO PLANTINGS WILL BE IRRIGATED TEMPORARILY UNTIL ESTABLISHED; ONLY LOW-FLOW, LOW GALLONAGE SPRAY HEADS WILL BE USED IN ZONE TWO.
- ZONE TWO WILL MAINTAINED ON A REGULAR BASIS BY PRUNING AND THINNING PLANTS AND CONTROLLING WEEDS.
- IRRIGATION SHALL BE DESIGNED TO SUPPLEMENT NATIVE VEGETATION, AND ESTABLISH AND MAINTAIN PLANTED NATIVES AND ORNAMENTALS..
- TREE-FORM SHRUBS AND OTHER SHRUBS SHALL BE SPACED SUCH THAT THEY DO NOT CREATE AN EXCESSIVE FUEL MASS AND CAN BE MAINTAINED IN ACCORDANCE WITH SPECIFIED SPACING AS INDICATED ON THE PLAN.

**LONG-TERM MAINTENANCE PROGRAM:**

THE PROPERTY OWNER IS RESPONSIBLE FOR ALL MAINTENANCE OF THE FUEL MODIFICATION. THE MAINTENANCE OF THE DEFENSIBLE SPACE SHALL BE CONDUCTED ANNUALLY AND WILL INCLUDE THE MODIFICATION OR REMOVAL OF NON-FIRE RESISTIVE OR UNDESIRABLE VEGETATION. THE

**LONG-TERM MAINTENANCE PROGRAM**

- OWNER IS RESPONSIBLE FOR ALL MAINTENANCE AND MONITORING OF BRUSH MANAGEMENT ZONES.
- CONTINUAL REMOVAL AND/OR THINNING OF UNDESIRABLE COMBUSTIBLE VEGETATION.
- REPLACEMENT OF DEAD/DYING FIRE RESISTANT PLANTS.
- MAINTENANCE OF THE OPERATIONAL INTEGRITY AND PROGRAMMING OF THE IRRIGATION SYSTEM.
- IRRIGATED SURFACE FUELS SHALL BE MAINTAINED AT A HEIGHT NOT TO EXCEED 18 INCHES.
- TREES SHALL BE PRUNED TO PROVIDE A MINIMUM OF 10' CLEARANCE FROM THE UNDER STORY.
- DEBRIS AND TRIMMINGS SHALL BE REMOVED FROM THE SITE, OR CHIPPED AND CONVERTED INTO MULCH THEN EVENLY DISPERSED IN THE SAME AREA TO A MAXIMUM DEPTH OF THREE INCHES.







## DESIGN METHOD STATEMENT

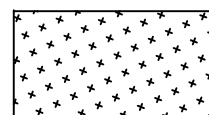
THERE ARE TWO ZONES OF VEGETATION: BRUSH MANAGEMENT ZONE 1 (35' WIDTH) AND BRUSH MANAGEMENT ZONE 2 (65' WIDTH).

ZONE 1 CONTAINS NO PLANT MATERIAL. SURFACES AND STRUCTURES WITHIN THIS ZONE ARE MADE OF NON-COMBUSTIBLE, FIRE-RESISTANT MATERIAL. THE REMAINING AREA IN THIS ZONE IS PAVED.

ZONE 2 IS APPROXIMATELY 49,200 SF TOTAL AREA. APPROXIMATELY 32,900 SF OF ZONE 2 CONTAINS NO PLANT MATERIAL. THESE NON-PLANTED SURFACES ARE MADE OF NON-COMBUSTIBLE, FIRE-RESISTANT MATERIALS AND PAVING. THE REMAINING 16,300 SF OF ZONE 2 WILL BE PLANTED WITH NATIVE, LOW FUEL, FIRE-RESISTANT CONTAINER STOCK SHRUBS IDENTIFIED IN THE LEGEND BELOW. THESE SHRUBS WILL BE LOCATED TO REDUCE THE CHANCE OF TRANSMITTING FIRE FROM THE VEGETATION TO THE ON-SITE STRUCTURE. THE REMAINING AREA OF ZONE 2 WILL BE PLANTED WITH A NATIVE HYDROSEED MIX COMPRISED OF NATIVE LOW FUEL, FIRE-RESISTANT SHRUBS AND GRASSES 24" TALL OR LESS.

## PROPOSED PLANT MATERIAL

-  MALOSMA LAURINA
-  QUERCUS DUMOSA
-  HETEROMELES ARBUTIFOLIA
-  RHUS INTEGRIFOLIA
-  SAMBUCUS MEXICANA
-  PLATANUS RACEMOSA

 HYDROSEED MIX CONTAINING NATIVE FIRE-RESISTANT, LOW FUEL GRASSES AND SHRUBS LESS THAN 24" IN HEIGHT SUCH AS:

- GUITIERREZIA CALIFORNICA
- LASTHENIA CORONARIA
- LUPINUS BICOLOR
- LUPINUS SUCCULENTUS
- TRIFOLIUM TRIDENTATUM
- VIGUIERIA LACINIATA

