

From: John Kessler
To: Docket Optical System
CC: Michael Doughton
Date: 8/12/2008 11:24 AM
Subject: Fwd: Carrizo - Need for Bio. Analysis
Attachments: Cumulative Bio Analysis Talking Points (8-8-08)DH.doc

Dear Docket Staff:

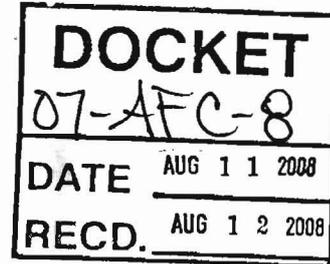
Please docket this email and the attached file as one document to:

Project Name: Carrizo (07-AFC-8)
 Suggested File Name: Bio Analysis Needs for Carrizo & PV Projects

Thank you,

John

John S. Kessler
 CEC - Project Manager
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>>> John Kessler 8/11/2008 4:21 PM >>>
 Hi Angela, Kristen and Perry:

Perry - We hope you are feeling better.

Following our workshop last week , we had a chance to teleconference with CDFG, USFWS and SLO County and discuss how we can perform the Bio. analysis we need to consider project direct and cumulative habitat and migration effects to the 3 species of concern: pronghorn, elk and kit fox. Our desire is to provide a road map as to how we can get the info. we need, and to encourage the 3 solar project developers in the Plains to jointly and proportionately participate.

I have attached some talking points that we four agencies have developed since the workshop as a means to convey our thoughts as a heads-up before we formalize this as a data request. My thought is that this would be more meaningful if I provide this initially in writing, followed by a phone discussion if needed. In parallel with my contact to you as the Carrizo applicant, John McKenzie of SLO County will be contacting the two PV developers soon.

I am available to discuss this over the phone at your convenience.

Thank you for considering this concept as we develop a more formal data request.

Sincerely,

John

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Talking Points to Ausra, Optisolar and Sun Power Communicating Need for Biological Analysis

1. SLO County, CEC, CDFG and USFWS have jointly discussed the Bio. analysis needed to consider direct habitat loss and reduced habitat connectivity in the Carrizo Plains for particularly 3 species of wildlife including Pronghorn, Tule Elk and state and federally-listed San Joaquin Kit Fox.
2. These agencies are promoting a programmatic approach from the 3 currently planned solar projects in the Plains that would encompass an evaluation of direct and cumulative impacts and mitigation.
3. For Kit Fox, the impacts must be fully mitigated meaning that the solar projects must not diminish its population, and its needed habitat and dispersal opportunities below pre-project conditions.
4. For Pronghorn and Tule Elk, the impacts must be mitigated under CEQA to a level that is less than significant.
5. The agencies anticipate that it will be necessary to establish range preserves and wildlife corridors for these species, for which to some extent, habitat compensation lands may be able to serve both purposes.
6. The establishment of wildlife corridors may require dedication of land within and/or outside the proposed project's boundaries, and modification of fencing in consideration of pronghorn and elk.
7. The analysis needed to identify the effects of the projects and the mitigation necessary would likely include the following (the scope of which will be further developed as a formal data request):
 - a) Establishing GIS-based data of existing land uses, habitat, Tule Elk calving areas, and corridors of the 3 animal species in the Carrizo Plains;
 - b) Utilizing aerial photos for documenting and predicting patterns of use under baseline conditions, with the proposed projects, and with proposed mitigation to demonstrate how the potential impacts may be mitigated;
 - c) Identifying boundaries and features of the proposed solar projects;
 - d) Estimating the resistance to animal movements from existing and proposed developments including existing and proposed fencing;
 - e) Identifying potential compensation lands and migration corridors;
 - f) Performing a sensitivity analysis to varying resistance factors;
 - g) Coordination with wildlife experts who understand the species requirements;
8. As an example of the kinds of information and analysis that could be needed in this evaluation, please see the South Coast Wildlands "Proposed Reserve Design for Tejon Ranch" at www.scwildlands.org.
9. The agencies believe it is in the 3 applicant's best interests to perform a bio. analysis in a coordinated fashion, and as soon as possible, to support the processing of the respective applications before SLO County and the CEC;