San Luis West Solar Project



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Pest Management Plan

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Figure 1, Site Location

List of Abbreviations and Acronyms

BESS	battery energy storage system
kV	kilovolt
NAD	North American Datum
mW	megawatt
PG&E	Pacific Gas & Electric
pests	weeds, insects, disease, and vertebrate pests
PMP	Pest Management Plan
PPE	Personal Protective Equipment
Project	San Luis West Solar Project
Project Applicant	San Luis West Solar, LLC
PV	photovoltaic
UCUP	Unclassified Conditional-Use Permit
UTM	Universal Transverse Mercator
WDB	Arroyo Pasajero Westside Detention Basin

1. INTRODUCTION

San Luis West Solar, LLC (Project Applicant) proposes to construct and operate the San Luis West (SLW) Solar Project (Facility, Project). The Project will consist of a 125-megawatt (mW) solar photovoltaic (PV) electric generation facility coupled with an estimated 30 mW battery energy storage system (BESS). The PV portion of the Facility will produce electricity by way of the photovoltaic effect, which uses a semi-conductor material to convert photons from the Sun into electrons, for injection into the electrical grid operated by Pacific Gas & Electric (PG&E). The BESS portion of the Facility will store electricity either generated by the PV arrays or absorbed from the PG&E grid. In either case, the BESS will make the stored energy available for discharge during periods of peak electrical load.

The Project site will be located within the Fresno County "AE-20" and "AE-40" (Exclusive Agriculture) zoning districts. Within these zoning districts, Fresno County permits utility-scale solar energy uses with an Unclassified Conditional-Use Permit (UCUP). Upon approval, the UCUP is subject to the Conditions of Approval and Mitigation Measures set forth in the Fresno County Board of Supervisor's Resolution in accordance with the California Environmental Quality Act.

As part of the application review process, applicants for solar projects must develop and submit to the County a project site Pest Management Plan (PMP) to identify methods and frequency to manage weeds, insects, disease, and vertebrate pests that may impact adjacent sites. For this report, these resources are collectively referred to as "pests." The pest management program described within this PMP has been developed to meet the requirements of the County and the UCUP.

Pest-control measures were developed for the purpose of controlling and preventing the spread of pests due to construction and operation activities at the Project site. The purpose of this PMP is to describe the proposed pest management program including goals and objectives, existing site conditions, monitoring, scheduling, and management of pests. The Project Applicant will be the responsible party for the pest management program described within this report.

1.1 PROJECT SITE LOCATION

The Project is located approximately 3 miles south of the City of Huron in rural unincorporated southwestern Fresno County, California. The Project site is located south of West Tractor Avenue, west of the California Aqueduct, and east of Interstate 5, with agricultural land and a network of unnamed agricultural roads to the south (Figure 1). The Project site extends to the south and approximately 3 miles due east of PG&E's Gates Substation, which is located at the intersection of South Trinity Avenue and West Jayne Avenue.

The Project is located within the San Joaquin Valley subsection of the Central Valley in Central California and within the Huron and Guijarral Hills U.S. Geological Survey 7.5-minute topographic quadrangles. The center point of the Project site is located at approximately latitude/longitude 36° 8'17.02"N/ 120° 5'23.29"W. The Project property is made up of ten parcels with the following Assessor's Parcel Numbers:

- 075-070-54S
- 078-060-39S

- 078-060-80S
- 078-060-85S
- 078-060-86S
- 078-080-55
- 085-050-01S
- 085-050-47S
- 085-050-48S
- 085-050-84S

The Project site consists of three separate Subareas, herein referred to as Subareas A, B, and C (Figure 2):

- **Subarea A** would include approximately 340 acres of solar arrays and associated infrastructure (i.e., internal roads, medium voltage collection lines, substation, BESS and project O&M building) located on four parcels totaling approximately 800 acres, of which approximately 650 acres are currently leased by the Project and approximately 150 acres are owned by the Project. Subarea A is located southeast of the existing PG&E Gates Substation, immediately south of West Jayne Avenue and approximately 0.5-mile due west of SR-269. The Substation will also be located within Subarea A and it is anticipated that the BESS will be co-located with the Substation in Subarea A.
- **Subarea B** would include approximately 270 acres of solar arrays and associated infrastructure (i.e., internal roads and medium voltage collection lines) on one parcel, consisting of approximately 295 acres of fully leased land. Subarea B is bordered by SR-269 to the west, West Jayne Avenue to the south, and active row crops to the east. A temporary, approximately 20-acre Project laydown area would be located in the northwest corner of this Subarea.
- **Subarea C** would include approximately 315 acres solar arrays associated infrastructure (i.e., internal roads and medium voltage collection lines) on approximately 675 acres of land leased by the Project. Subarea C consists of a swath of five parcels located just west of the California Aqueduct. West Jayne Avenue bisects the bottom half of Subarea C.

Energy from the various solar arrays transmitted to the Substation via a series of 34.5 kilovolt (kV) “collection lines”. The collection line route is approximately 1,300 feet and begins in the middle section of Subarea C, running north-south for approximately 0.25-mile to connect the northern and southern parts of Subarea C. The collection line system then runs west along an agricultural road parallel to West Jayne Avenue for approximately 1.5 miles to connect to Subarea B. It then runs south on SR-269 from the west side of Subarea B for approximately 0.5-mile to West Jayne Avenue, where it turns west for approximately 0.5 mile to reach Subarea A. The collection line system connects to the BESS and Substation in Subarea A, then a 230 kV gen-tie line will connect from Subarea A to the Point of Interconnection at the PG&E Gates substation.

1.2 PROJECT DESCRIPTION

The Project facility includes approximately 920 acres of solar panels and associated infrastructure, including the Project substation, BESS operations and maintenance (O&M) building, and other associated equipment such as overhead and underground medium voltage collection lines. The Project will be located on ten parcels totaling approximately 1,700 acres within the "AE-20" and "AE-40" zoning districts of unincorporated Fresno County (County). Project infrastructure will also include approximately 10 additional acres of underground and overhead medium voltage collection lines located within transmission easement areas situated along and within existing farm roads. The Project site, which encompasses all areas of temporary and permanent impacts, is approximately 1,400 acres.

The Project Applicant proposes to construct and operate the Project, which will consist of a 125-mW solar PV electric generation facility coupled with an estimated 125 MWh BESS, and associated infrastructure. The PV portion of the facility will produce electricity for injection into the electrical grid operated by PG&E. The BESS portion of the facility will store electricity either generated by the PV arrays or absorbed from the PG&E grid. In either case, the BESS will make the stored energy available for discharge during periods of peak electrical load or otherwise as needed.

The key Project components consist of the following:

- PV modules
- Collection and interconnection line systems
- BESS components
- Project substation
- Gen-tie line
- Access roads
- Other minor components, including fencing and lighting.

The PV modules (also known as panels) will be grouped into arrays and mounted on metal racks affixed to the ground using either driven posts or helical screws. The racks will rotate the panels from east to west during the day. The direct current output from the PV modules will be joined into combiner boxes and, from the combiner boxes, converted into alternating current via the inverters, the output of which will be fed into transformers that step up from voltage to match that of the grid. Excess energy not discharged into the grid, or energy absorbed directly from the grid, will then be converted back to direct current by a separate inverter for battery storage, then converted to alternating current again when called upon to discharge into the grid. The battery-based inverters can charge and discharge the batteries independently of the PV arrays, allowing the batteries to be charged directly from the grid. The batteries are typically housed in shipping containers with integrated heating, cooling, ventilation, and fire suppression systems. The Project will interconnect with PG&E's electrical system at the Gates Substation via a 230 kV gen-tie line.

The estimated commercial operation date for the facility is December 31, 2025, with construction anticipated to commence in early 2025. The anticipated operational lifespan of the facility is a minimum of 35 years.

1.3 EXISTING CONDITIONS

The Project site is located on privately-owned lands historically used for agriculture. The Project site can be characterized as relatively flat with an elevation range of approximately 325 to 340 feet above mean sea level.

A majority of the Project site is comprised of agricultural lands. Ruderal, weedy vegetation is found along the field edges of the Project site and access roads. The Project also includes ruderal/disturbed areas that are heavily to sparsely vegetated by non-native, ruderal species or they lack vegetation completely. These areas are persistent where habitat has been physically disturbed by human activities, resulting in compacted soils and a dominance of ruderal plants. Bare areas include dirt access roads and other maintained areas.

The frequent disturbances related to tilling and farming have removed all naturally occurring plant communities and habitats from the Project site. In addition, the Project site is not connected to any natural habitats.

2. WEED AND PEST MANAGEMENT PROGRAM

2.1 GOALS AND OBJECTIVES

The main goal of the pest management program is to keep the Project area's pest population under control so that they do not migrate to adjacent areas, during Project construction and operation. The objective of the program is to assist federal, state, and local agencies' pest control efforts in the region.

2.2 RESPONSIBLE PARTIES

The following outlines the various functions of the key parties responsible for ensuring the successful implementation of the pest management program. Successful implementation of the program is dependent upon cooperative efforts of three parties: 1) Project Applicant, 2) Operations Manager, and 3) pest control contractor. Specific roles of the responsible parties are described below and within the rest of the PMP.

Because the Project will be surrounded by active farming, the Operations Manager may coordinate with farm managers to assure that measures taken on the Project are compatible with common agricultural activities occurring adjacent to the Project.

2.2.1 Project Applicant

The Project Applicant will be responsible for implementing and funding the pest management program pursuant to the UCUP. The Project Applicant may assign this responsibility to appropriate people and/or contractors but will retain ultimate responsibility for pest management success and supervision of all onsite workers and contractors.

2.2.2 Operations Manager

The Project Applicant will designate an Operations Manager (or responsible designee) who will oversee the entire pest management program and who will ensure compliance with conditions of the UCUP and

the PMP. The Operations Manager (or responsible designee) will work with the pest control contractor to identify weeds, insects, disease, and vertebrate pests that may occur on the Project and develop monitoring protocols to assure that pests do not proliferate on the Project site. The Operations Manager (or responsible designee) will work with the pest control contractor to develop appropriate control activities.

2.2.3 Pest Control Contractor

The Project Applicant will be responsible for retaining an approved pest control contractor or other approved entity experienced in insect and vertebrate pest control. The pest control contractor will be responsible for performing all site pest control activities under the direction of the Operations Manager (or responsible designee).

2.3 SCHEDULE

The pest management program will begin immediately before Project installation. Pest control activities will be undertaken following recommendations developed as a result of implementing the monitoring program. Schedules of pest control activities are described within their respective sections.

3. WEED CONTROL

The Applicant proposes to use beneficial pollinator plant species across the Project if they are approved by property owners and other involved entities. These plant species would not be considered weeds. For this purposes of this report, a weed is defined as any non-native plant or native plant that negatively impacts the construction or operation of the Project. Some non-native plant species are considered invasive or noxious weeds, which include taxa that spreads rapidly once established and have the potential to cause environmental and/or economic harm. Due to the rapid and prolific growth of non-native vegetation, the most important aspect of preventing weed spread and establishment is weed control.

The Project Applicant will be responsible for ensuring the removal and/or treatment of problematic non-native weed species from the Project site. The pest control contractor will advise the Project Operations Manager (or responsible designee) on issues including, but not limited to, the selection of target noxious weed species, their location, methods of weed removal, and the timing of weed control activities. Onsite workers (i.e., designated O&M staff, contractors, farmland managers) will be responsible for performing Project site weed control activities and Project site monitoring under the direction of the Operations Manager (or responsible designee) with guidance from the pest control contractor. Minor weed infestations will be tolerated as long as vegetation and wildlife occurring in the vicinity of the Project are not compromised.

3.1 SCHEDULE

Noxious weeds will be removed and/or treated from the Project site before Project installation and on a regular as-needed basis. Appropriate surveillance is necessary to ensure that weeds do not become an issue, and preventing migration of noxious weeds to areas outside of the Project is the objective.

Timing of noxious weed control is critical. Most exotic species will germinate with late winter rains and begin to flower in early to mid-spring; therefore, the majority of the weed control effort will be conducted during late winter through early summer. The best time to treat noxious weeds, mechanically or chemically, is when the plants are bolting/flowering (in their active reproduction mode), typically in March and April. Regular inspections of the Project site will be made to identify weeds before they go to seed. Select grasses and herbs (such as Saharan mustard [*Brassica tournefortii*]) may need to be treated or removed during winter in order to be efficiently controlled. Reducing the seed source during the first-year post Project installation will reduce the need for weed control over the life of the Project.

3.2 METHODS

Methods of weed control include weed prevention, manual or mechanical removal, controlled grazing, or chemical removal. The type and level of noxious weed control will depend on the type of noxious weeds present and current/and or approved practices for those species. Because of the agricultural nature of the project area, emphasis will be placed on appropriate practices that may be used by farm managers and associated agricultural operations in the area.

3.2.1 Weed Prevention

Preventative strategies to control the spread of weed seed within the Project site include the following:

- Employ appropriate methods for removal of debris from vehicles before entering the site during the construction and site reclamation periods to prevent weeds from being established in disturbed areas and before the land is recovered.
- If disturbed ground is not otherwise stabilized, revegetation may be used on portions of the disturbed ground with a County-approved native perennial seed mix that is certified as a weed free seed by the vendor. This will help prevent any windblown weed seed from landing on bare soil and germinating. If a controlled grazing program is used, a County approved groundcover may be used for revegetation.
- Limit ground disturbance to reduce the amount of bare soil and potential for the weed seed to germinate.
- Site inspections will take place quarterly in the first two years. After this period, location and frequency of site visits will be adjusted based on site conditions and the need to respond to seasonal growth patterns of invasive weeds. This will serve to provide flexibility and efficiency in potential weed control efforts.

3.2.2 Hand Weeding

Although labor intensive, hand pulling removal is a method of removing weeds from the Project site that minimizes ground disturbance.

3.2.3 Weed Whackers and Mowing

Mechanical methods of weed removal, such as the use of weed whackers can be used to clear areas inaccessible to larger machinery. Mowing is the most effective strategy for clearing exotic vegetation in

large open spaces. A mowing attachment can be attached to a bobcat, skip-loader, or tractor to address large weed infested areas. If target non-native plants have already produced fruits and/or seeds then a mower with a catchment box or bag can be employed to reduce spreading non-native propagules in the area that is mowed.

3.2.4 Controlled Grazing

Grazing by sheep may be used within the Project site to control weeds and other vegetation. A number of grazing strategies can be implemented, such as optimized, short-term or long-term deferred grazing or timed grazing. The strategy to be implemented will depend on the condition and composition of the vegetation at the time and should be informed by a professional agronomist.

3.2.5 Herbicides

Chemical herbicides may be necessary to control problematic noxious weed localities within the Project. Herbicides will be applied by foliar spray or by cut and spray. Chemical herbicides will be used after non-chemical options have been exhausted, with a preference for use of a low-risk herbicide that is not toxic to animals, including aquatic organisms. Anyone that applies herbicide per this PMP will hold a Qualified Applicator License issued by the California Department of Pesticide Regulation. Those workers with a Qualified Applicator Certificate that apply herbicide must do so under the supervision of a Licensed Applicator.

Herbicide application will consist of either 1) spot application to individual plants in areas of sparse noxious weed coverage; 2) broadcast application to dense patches of noxious weeds; or 3) cut stump treatment of individual woody vegetation. Application will use either squirt bottles, back-pack sprayers, or pressure sprayers.

4. INSECT AND VERTEBRATE PEST MANAGEMENT

The Project Applicant will be responsible for ensuring the removal and/or treatment of problematic insect and vertebrate pests from the Project site. The first line of defense is to implement the weed control plan presented above, which will significantly reduce habitat for insects and vertebrate pests on the Project site.

The pest control contractor will advise the Project Operations Manager (or responsible designee) on issues including but not limited to, the selection of target animal pests, their location, methods of control, and timing of control activities. The pest control contractor or other qualified personnel will conduct the insect and vertebrate pest control activities under the direction of the Operations Manager (or responsible designee). Onsite workers (designated O&M staff, contractors, farmland managers) will be responsible for performing all animal pest site monitoring with guidance from the pest control contractor. Animal pest control activities will be implemented only if necessary.

4.1 SCHEDULE

The Operations Manager will work with designated staff and other involved entities (contractors and farm managers in the area) to closely monitor insects and other animal pests that occur within the

Project site on a regular and as-needed basis. Continuous surveillance is necessary to ensure that animal pests do not become an issue and for preventing migration of those pests to nearby areas.

4.2 METHODS

Methods of insect and vertebrate pest control activities are described below. The type and level of control will depend on the type of insect and vertebrate pest present.

4.2.1 Trash and Debris Removal

The most important aspect of animal control is trash management. Good sanitation practices will reduce habitat and food sources for pests. The Project Applicant will be responsible for keeping the Project site clean and removing trash from the Project site. For large dumped foreign debris, the Project Applicant will be responsible for its removal and disposal at an appropriate off-site waste disposal facility.

The Project Applicant will institute a litter control program and all contractors, subcontractors, and employees will adhere to this program. Trash and food-related items will be disposed of promptly in self-closing, sealable containers with lids that latch to prevent wind and wildlife from opening containers. Areas around trash containers will be free of spillage or garbage to prevent the collection of trash or debris on the ground on or around the containers. Trash containers will be kept clean, free of odors, and covered at all times. The contents will be properly disposed at least once a week. Trash removal will reduce the attractiveness of the area to rodents and opportunistic predators, such as common ravens (*Corvus corax*), American crows (*Corvus brachyrhynchos*), northern raccoons (*Procyon lotor*), Virginia opossums (*Didelphis virginiana*), and coyotes (*Canis latrans*).

4.2.2 Animal Prevention into Structures and Equipment

The following practices are designed to help prevent unwanted animals from gaining access to any on-site operations and maintenance buidings :

- Monthly visual inspections of outside and interior walls as well as any attic space.
- Maintain the structure exterior in good repair with no holes or openings larger than 0.25-inch including, but is not limited to, windows, doors, fans, vents, etc., to keep pests from entering the building.
- Address any deficiencies in the structure exterior with corrective measures, i.e., cementing, screening, caulking, installing stripping on door bases, etc.
- Maintain door sweeps on all applicable doors to produce a good seal to the ground.
- Keep grounds free of high weeds, trash, old equipment, and debris, as these conditions create ideal harborage for rodents.

4.2.3 Rodent and Insect Pest Control Practices

Rodent and insect pest populations are not expected to become an issue at the outdoor solar arrays, as there is little in the way of habitat and food for such pests, and natural predators are likely present.

The following practices are designed for rodent and insect pest control:

- Visual surveys will be conducted during regular maintenance inspections to determine if rodent or insect infestations are occurring, the source of the problem, and the conditions that encourage the infestation.
- Remove food sources and eliminate places of refuge.
- Openings in foundations and walls will be closed or screened with wire mesh that has holes not more than 0.25-inch wide. Where pipes enter masonry, force heavy hardware cloth or steel wool into the opening, then fill it with concrete.
- Places where rodents have been gnawing to gain entry to a structure will be sealed with metal flashing.
- Doors and windows of the operations and maintenance trailer will not have gaps at the bottom.
- If the rodent populations need to be actively managed and the infestation is indoors, snap traps or battery-operated traps that generate high voltage electricity once the rat or mouse is inside are the most efficient control method.

If the above methods of rodent control fail, rodenticides may be used. Rodenticide use will be used in accordance with local codes and regulations. Rodenticides will be limited to zinc phosphide because of its proven lower risk to the San Joaquin kit fox (*Vulpes macrotis mutica*). Bait stations will be enclosed so the opening is accessible for the target rodent, but the opening will be at an elevated angle so that the bait stays inside the trap at all times.

The targeted application of a toxic pesticide is allowed only after all other reasonable non-toxic options are exhausted. The use of least-toxic pesticides will be encouraged.

5. CHEMICAL CONTROL GUIDELINES AND PRACTICES

Where the use of chemicals (herbicides, rodenticides, insecticides, or pesticides) is required to control or treat pests, the following guidelines and practices will be followed, as appropriate.

- Any chemicals will be applied or used according to state and federal law and County guidelines.
- Specific chemical application rates and methods will be based on the manufacturer's specifications.
- Chemicals will be applied by workers experienced with and/or certified in chemical application.
- Workers applying chemicals will wear protective clothing, such as Tyvek suits, rubber gloves, rubber, boots, googles, and/or respirator.
- Workers applying chemicals will not work alone and eating, drinking, and smoking will be prohibited when using or handling chemicals.
- Chemicals will not be used in unsuitable weather or when rain is predicted within 24 hours after application.
- Chemical application will be timed to coincide with the presence of pests and only within areas that contain the pests will be treated.
- If necessary, a marker dye, such as Blazon, a blue spray pattern indicator, will be used in conjunction with herbicides to prevent over application.
- To avoid incidental impacts to native plants within the Arroyo Pasajero Westside Detention Basin (WDB), no chemical will be used when wind velocities are above 10 miles per hour.

- Spray equipment will be frequently checked and properly maintained, both for health and safety reasons and to minimize spray drift.
- Application will be controlled so that other workers and neighbors will not be exposed.
- When not in use, chemicals will be stored in containment basins to prevent accidental leakage.
- Adequate drip pans and spill containment and cleanup kits will be maintained onsite and within vehicles for containment and cleanup of unauthorized spills of chemicals.
- Chemical leaks or spills will be contained and cleaned up at the time of occurrence, or as soon as it is safe to do so.
- Spills will not be buried or washed with water.
- If a major spill or inadvertent release of chemicals occurs, the following protocols will be followed:
    - The Operations Manager (or designee) and the appropriate regulatory agencies will be notified immediately.
    - The affected area will be secured by barring pedestrian and vehicle traffic.
    - All spill response personnel will put on the appropriate Personal Protective Equipment (PPE) prior to entering the spill containment area.
    - Personnel, while wearing the appropriate PPE and equipped with the necessary tools and equipment, will stop the chemical leak or release.
    - All materials associated with spill response, including the released chemical, affected soils and plants, absorptive material, clothing, and PPE will be removed and containerized according to appropriate regulations and procedures.
    - Hazardous and non-hazardous materials will be disposed in the manner specified by the manufacturer.
    - All generated spill response containers will be transported, following appropriate regulations, and disposed legally at an approved disposal facility.
    - Spill will be reported in the annual monitoring report.

6. MONITORING PLAN

Implementing a monitoring program will help to detect problems early and rectify the problems, thereby maximizing the success of the pest management program.

6.1 MONITORING SCHEDULE

The monitoring program will be implemented for the life of the Project. Qualitative pest monitoring surveys of the Project site will be conducted monthly.

6.2 MONITORING DOCUMENTATION

6.2.1 Data Sheets

Monitoring the effectiveness of the pest management program over time requires diligent tracking of several items. Routine inspection and monitoring will be performed by designated Project personnel. When conducting qualitative pest monitoring surveys of the Project site, personnel will complete a

standard pest management program data sheet summarizing Project site pest status. Data recorded will include the following information below, as appropriate:

- Establishment of weeds and location of weed population(s).
- Presence and use of the Project site by animal pest species.
- Prevention techniques and other non-chemical methods used to control pests.
- Record of notification to neighbors, especially the WDB, and others who may be affected by chemical control activities.
- Name of the chemical applicator, date, time, equipment, and location of chemical application.
- Type and quantity of chemicals and products used.
- Acres treated or number of animals controlled.
- Presence of trash, debris, and/or dumping on the Project property.
- Outcome of pest management activities.
- Before and after photos.
- Any recommended maintenance or remedial measures deemed necessary to ensure pest management success.

After each monitoring survey, data sheets will be submitted to the Operations Manager. The Operations Manager will maintain the monitoring data sheets in a pest management program logbook. The Operations Manager will meet with Project personnel regularly to discuss the condition of the Project site. The results at the end of each monitoring survey will aid in the modification of pest control activities and remedial actions.

6.2.2 Annual Monitoring Reports

The performance of the pest management program will be analyzed on an annual basis. The Operations Manager will use the monthly data sheets to prepare an annual report summarizing the pest control and monitoring activities conducted within the Project site during the previous year, as appropriate. The annual report will be forwarded to the Project Applicant and then submitted to the County. The first annual report will be submitted one year after Project installation, and every year thereafter.