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SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STARLIGHT SOLAR PROJECT, SCH NO. 2023030603; CITY OF BOULEVARD, SAN DIEGO COUNTY

Dear Nicholas Koutoufidis:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the Starlight Solar Project (Project), which has been proposed by the County of San Diego (County) on behalf of Starlight Solar, LLC (Project Proponent).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G.

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Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), CDFW recommends the County obtain appropriate authorization under the Fish and Game Code.

Project Summary

Project Proponent: Starlight Solar LLC

Objective: The objective of the Project is to construct a 588-acre, remotely controlled solar energy generation and storage facility. The Project will produce up to 100 megawatts of alternating current solar energy and will include a battery energy storage system that will store up to 217.4 megawatts of electricity for dispatch into the local San Diego Gas and Electric grid. The power produced by the facility will connect into the Boulevard East Substation via an underground generation tie-line. The Project will also include internal access roads, security fencing, lighting, and signage, a 30-foot fuel modification zone, and water tanks for fire protection.

Location: The Project site is located south of the community of Boulevard in southern unincorporated San Diego County and is less than a mile from the southern United States border. The site is south of Interstate 8 and Old Highway 80, and East of Tierra Del Sol Road. Access to the Project site will be provided by Jewel Valley Road and Tule Jim Lane, both of which connect to Old Highway 80 in the community of Boulevard. Land surrounding the site consists of ranches, vacant land, and single-family residences.

Biological Setting:

The Project site is largely undeveloped and is designated by the County's General Plan as rural. According to the DEIR, natural communities mapped on site include granitic northern mixed chaparral, redshank chaparral, granitic chamise chaparral, montane buckwheat scrub, field/pasture, big sagebrush scrub, open coast live oak woodland, non-native grassland, southern riparian scrub, freshwater, coast live oak woodland, tamarisk scrub, freshwater seep, and alkali marsh. Three additional cover types within the categories of disturbed or developed were also mapped, including urban/developed, bare ground, and disturbed areas.

The DEIR states that open space easement areas will be conserved and managed as an off-site mitigation site southwest of the Project area. The Project's proposed open space easement areas (Project's proposed off-site mitigation) would cover approximately 447.93-acres, which includes sensitive vegetation communities, special-status plant species, and habitat for special-status species. This Project's proposed off-site mitigation would be granted to the County or other approved conservation entity. Granting these off-site mitigation parcels would authorize the County and its agents to

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periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. The Project's proposed off-site mitigation parcels are for protection of biological resources and prohibits all of the following activities on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. The Project's proposed off-site mitigation would be unfenced. The Project is proposed in two phases; two separate (and respective) off-site mitigation parcels would be dedicated within the 448-acre area. The recordation of each off-site mitigation would occur prior to the issuance of a grading permit for each phase.

The Project site has potential to support a variety of sensitive wildlife species, including Quino checkerspot butterfly (*Euphydryas editha quino*; Federal Endangered Species Act listed endangered and CESA candidate listed), western spadefoot (*Spea hammondii*; California Species of Special Concern (SSC)), Southern California legless lizard (*Anniella stebbinsi*; SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), Blainville's horned lizard (*Phrynosoma blainvillii*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), red-diamond rattlesnake (*Crotalus ruber*; SSC), tricolored blackbird (*Agelaius tricolor*; CESA listed-threatened), burrowing owl (*Athene cunicularia*; CESA listed- candidate), golden eagle (*Aquila chrysaetos*; Fully-Protected (FP); Watch List (WL)), prairie falcon (*Falco mexicanus*; WL), Cooper's hawk (*Accipiter cooperii*; WL), sharp-shinned hawk (*Accipiter striatus*; WL), northern harrier (*Circus hudsonius*; SSC), white-tailed kite (*Elanus leucurus*; FP), loggerhead shrike (*Lanius ludovicianus*; SSC), California horned lark (*Eremophila alpestris actia*; WL), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL), long-eared owl (*Asio otus*; SSC), Yuma mountain lion (*Puma concolor browni*; SSC), Trinidad kangaroo rat (*Dipodomys merriami trinidadensis*; SSC), Jacumba pocket mouse (*Perognathus longimembris internationalis*; SSC), Bryant's woodrat (*Neotoma bryanti lepida*; SSC), San Diego desert woodrat (*Neotoma lepida intermedia*; SSC), pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*; SSC), pallid bat (*Antrozous pallidus*; SSC), western red bat (*Lasiurus frantzii*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), and a very uncommon species, the southern grasshopper mouse (*Onychomys torridus*).

The Project site also has potential to support sensitive and rare plant species, including Jacumba milk-vetch (*Astragalus douglasii* var. *perstrictus*; California Rare Plant Rank (CRPR) 1B.2), long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*; CRPR 1B.2), desert beauty (*Linanthus bellus*; CRPR 2B.1), Tecate tarplant (*Deinandra floribunda*; CRPR 1B.2), sticky geraea (*Geraea viscida*; CRPR 2B.2), Higgin's barberry (*Berberis higginsiae*; CRPR 3.2), San Bernardino aster (*Symphyotrichum defoliatum*; CRPR 1B.2), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*; CRPR 1B.2), and southern jewelflower (*Streptanthus campestris*; CRPR 1B.3).

The proposed Project is located within the draft East County Multiple Species Conservation Program (MSCP) coverage area. The MSCP remains in a draft form and has not been adopted. Further, the Planning Agreement, which established an interim

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process to help ensure projects within the planning area met preliminary conservation objectives, expired on January 31, 2025.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

Comment #1: Impacts to High Conservation Value Habitats

Issue: The Project may adversely impact two sensitive upland habitats, granitic northern mixed chaparral and granitic chamise chaparral.

Specific impacts: Granitic northern mixed chaparral and granitic chamise chaparral are identified as special-status chaparral communities. Project implementation and decommissioning includes grading and vegetation clearing, which may result in population declines, or local extirpation of these special-status chaparral communities.

Why impacts would occur: The Project is within an area designated by the County of San Diego as a Focused Conservation Area (County 2008). A Focused Conservation Area is land identified through the County's habitat evaluation models as having high or very high biological value and is prioritized for conservation because it supports large, intact habitat blocks and maintains landscape connectivity and ecological functions. According to the County of San Diego's North and East County Multiple Species Conservation Program Natural Community Conservation Plan Planning Agreement (2021), this area is considered of high conservation value. The DEIR did not consider the Project's location within the Focused Conservation Area, or its high habitat value, when determining the 0.5:1 mitigation ratio of granitic northern mixed chaparral and granitic chamise chaparral. Absent adequate mitigation, the Project may result in significant individual and/or cumulative impacts to sensitive plant resources within the Project area and surrounding region.

Evidence impacts would be significant: CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2009). The Project may have direct or indirect effects on these sensitive plant communities.

Impacts to special-status plant communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in a project(s) continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

plans such as multispecies habitat conservation plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service.

Recommended Potentially Feasible Mitigation Measure(s):

To ensure that compensatory mitigation adequately offset impacts to high-value conservation habitats, maintains ecological function, and is consistent with CEQA requirements, including CEQA Guidelines Sections 15065 (Significant Effects on Environment), 15380 (Rare and Endangered Species), and 15126.4 (Mitigation Measures), CDFW recommends the following mitigation measure:

Mitigation Measure #1: Compensatory Mitigation. To compensate for Project impacts on high value conservation habitats (granitic northern mixed chaparral and granitic chamise chaparral), the County shall provide offsite mitigation for 437.75 acres of granitic northern mixed chaparral and 129 acres of granitic chamise chaparral. These communities are considered sensitive and declining at a regional level, and compensatory mitigation at these acreages is necessary to fully offset adverse impacts, maintain ecological functions, and reduce potential impacts to less-than-significant level under CEQA.

Comment #2: The Project's Proposed Off-Site Mitigation Parcels may not be Sufficiently Protected

Issue: The Project's proposed off-site mitigation may not be sufficiently protected due to impacts associated with the United States Border Patrol (Border Patrol) activities along the USA-Mexico Border.

Specific impacts: The Project's proposed off-site mitigation areas are located directly along the USA-Mexico Border. Border Patrol activities in the area may include clearing of vegetation to create new, unauthorized paths for heavy vehicles. These activities could result in significant impacts on the Project's proposed off-site mitigation, potentially rendering the mitigation unsuitable for addressing the Project's impacts on sensitive vegetation communities, habitats for plant and wildlife species, and special-status individuals.

Why impacts would occur: The DEIR indicates that the Project is consistent with U.S. Customs and Border Protection safety and access policies but does not specify what kind of access will be allowed for the Project's proposed off-site mitigation. According to the Project's 2025 Conceptual Resource Management Plan in the DEIR, "[t]he mitigation is undeveloped and is surrounded by undeveloped land to the north, east, and west, with the border along the USA-Mexico border to the south. Dirt access roads within the mitigation site have a typical width of approximately 20 feet and are used by U.S. Border Patrol" (p. 7). However, the DEIR does not provide information regarding the locations of these dirt access roads, nor does it offer avoidance or minimization measures to ensure that Border Patrol activities do not impact vegetated areas.

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

Furthermore, the 2025 Conceptual Resource Management Plan states, “(i)n the event that individuals were able to illegally cross the border, the mitigation site may be subject to noise impacts from Border Patrol helicopters, crushing of wildlife and vegetation by vehicles, as well as trash deposition and the increased risk of fires (p. 6).” Wildlife may be trapped or crushed in Border Patrol staging areas. Large equipment, vehicles, and foot traffic could trample or bury wildlife. Border patrol activities within and adjacent to the Project’s proposed off-site mitigation area pose a significant challenge to adequately mitigate the Project’s impacts.

According to Lenihan (2016), Border Patrol activities can include cutting new access roads, burying detection equipment underground, and driving vehicles off-road which can disrupt desert hydrology and create dustbowl conditions. Without a contingency plan to address unforeseen impacts associated with Border Patrol activities, the Project’s proposed off-site mitigation may result in inadequate compensatory mitigation which could result in significant impacts under CEQA (CEQA Guidelines Sections 15065, 15380, and 15126.4).

Evidence impacts would be significant: CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2009). The Project may have direct or indirect effects on these sensitive plant communities.

Impacts to special-status plant communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in a project(s) continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans such as multispecies habitat conservation plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service. Absent adequate mitigation, including contingency measures and funding, the Project may result in significant individual and/or cumulative impacts to sensitive plant resources within the Project area.

Recommended Potentially Feasible Mitigation Measure(s):

To adequately address potential risks to the Project’s proposed off-site mitigation parcels from Border Patrol activities, to ensure that compensatory mitigation will remain effective, enforceable, and consistent with CEQA, including CEQA Guidelines Sections 15065 (Significant Effects on Environment), 15380 (Rare and Endangered Species), and 15126.4 (Mitigation Measures), CDFW recommends the following contingency measures, including the permanent projection of all mitigation areas through a conservation easement:

Recommendation #1: Contingency Plan in Mitigation Measure M-BI-4. CDFW recommends that the final environmental document and the Resource Management Plan include detailed contingency measures to address ongoing unauthorized access

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

through the Project site, and any resulting significant disturbance or damage to the area. These contingency measures are necessary to ensure compliance with CEQA Guidelines Sections 15065 and 15126.4, which require feasible mitigation for significant impacts to sensitive habitats. Contingency measures may include the identification and conservation of additional mitigation areas of high biological value, located away from the USA-Mexico border. Areas subject to routine or ongoing Border Patrol activity that could compromise habitat quality or accessibility should not be counted towards the Project's required mitigation acreage. Only areas capable of providing long-term, effective conservation should be credited.

Recommendation #2: Contingency Funding in Mitigation Measure M-BI-4. CDFW recommends that the Resource Management Plan include a 10 percent contingency added to the non-wasting endowment calculation. This contingency funding is intended to offset unanticipated expenditures, inflation, catastrophic events, and/or unauthorized damage, and supports implementation of mitigation measures consistent with CEQA Section 15126.4.

Recommendation #3: Conservation Easement. CDFW recommends that all mitigation areas associated with the Project be permanently protected under a conservation easement. The conservation easement should be recorded prior to or concurrently with mitigation implementation to ensure long-term protection of biological resources, maintain ecological function, and prevent unauthorized disturbance.

Comment #3: Impacts on Special Status and Rare Plant Species

Issue: The Project may adversely impact special-status and rare plant species during implementation and decommissioning activities.

Specific impacts: Project implementation and decommissioning include grading and vegetation clearing activities, which may result in direct mortality, population declines, or local extirpation of sensitive plant species.

Why impacts would occur: According to the 2025 Biological Resources Report in the DEIR, focused plant surveys found Jacumba milk-vetch, long-spineflower, Tecate tarplant, sticky geraea, and desert beauty. The traditional method of solar construction is "blade and grade", which involves blading vegetation and grading, resulting in soil compaction. According to Karban et al. (2024), construction practices often include the removal of all native vegetation with "blade and grade", causing redistribution of seeds that are stored in a soil seed bank. Many rare or special-status plant species are annuals that avoid disturbance with a dormant seed phase, so their persistence depends on seeds stored in undisturbed soils (Karban et al. 2024). Project activities that do not minimize disturbance to vegetation and soil could result in population declines, or local extirpation of sensitive plant species.

Evidence impacts would be significant: Impacts on rare flora could be considered a significant effect on the environment. Plants with a CRPR of 1B are classified as rare

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

throughout their range, endemic to California, and are seriously or fairly threatened. Most of the plants that are ranked 1B have declined significantly over the last century. The additional threat rank of 0.1 indicates a species with over 80 percent of its occurrences threatened in California. The additional threat rank of 0.2 indicates a species with 20 to 80 percent of its occurrences threatened (CNPS 2025). Impacts to CRPR 1B plant species and their habitat meet the definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Impacts on CRPR 1B plant species and their habitat may result in a mandatory finding of significance because the Project would potentially threaten to eliminate a plant community and substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065). Insufficient mitigation may result in unmitigated temporal or permanent impacts to a rare plant species. Without appropriate avoidance and minimization measures or appropriate mitigation, the Project could have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a plant species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

To minimize the potential for direct and indirect impacts to rare and special-status plant species, including mortality, population decline, or local extirpation, and to ensure mitigation measures consistent with CEQA Guidelines Sections 15065, 15380, and 15126.4, CDFW recommends the following measure:

Recommendation #4: Additional Minimization Measure. CDFW recommends the Project proponent consider an alternative construction method instead of the traditional “blade and grade” method, where vegetation is crushed in some areas, but soils and vegetation are otherwise left intact (“drive and crush”). Leaving vegetation crushed with the “drive and crush” method, leaves roots intact and allows special-status plant species and other vegetation to more successfully regenerate. This alternative construction method can create an opportunity for vegetation to be left between panel rows and ameliorate some habitat effects (Karban et al. 2024).

Comment #4: Revisions to Mitigation Measure M-BI-5: Avian Breeding and Special-Status Wildlife Impact Avoidance

Issue: The Project may impact a wide range of species including avian and sensitive species protected under CESA or designated as an SSC.

Specific impacts: Several sensitive species have been regularly observed nesting and foraging throughout the Boulevard area. The Project may potentially result in the loss of foraging and nesting habitat for Cooper’s hawk, sharp-shinned hawk, Bell’s sage sparrow, turkey vulture, Southern California legless lizard, coast horned lizard, San Diego black-tailed jackrabbit, San Diego desert woodrat, coastal whiptail, California horned lark, western bluebird, mule deer, mountain lion, southern California rufous-crowned sparrow, golden eagle, long-eared owl, red-shouldered hawk, northern harrier,

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

white-tailed kite, prairie falcon, loggerhead shrike, Lewis' woodpecker, California glossy snake, red-diamond rattlesnake, pallid bat, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, greater western mastiff bat, southern grasshopper mouse, mountain quail, rosy boa, San Diego ringneck snake, ringtail, western red bat, small-footed myotis, long-eared myotis, Quino checkerspot butterfly, and monarch butterfly. These impacts could result in increased nestling mortality and reduced reproductive success, representing a significant impact on these imperiled species. The Project may also result in a loss of breeding and/or foraging habitat.

Why impacts would occur: The Project area contains suitable habitat and recent documented occurrences of some of these sensitive species. Project activities include vegetation and tree removal, grading, and construction. Project activities are likely to result in elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. Mitigation measure M-BI-5 may not (1) provide a sufficiently large buffer to avoid take, (2) commit adequate mitigation for the Project (particularly if take occurs), (3) adopt specific performance standards the mitigation will achieve, and/or (4) identify the type(s) of potential action(s) that can feasibly achieve the performance standard(s) to be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4).

Evidence impacts would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5.

An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- Is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- Is listed under the federal Endangered Species Act, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- Is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

qualify the species for State threatened or endangered status; and/or,

- Has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2025a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC's which can be shown to meet the criteria for State listing. These SSC's meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC's could require a mandatory finding of significance (CEQA Guidelines, § 15065). Insufficient avoidance and mitigation measures could result in continual substantial adverse direct and cumulative adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

To adequately reduce potential impacts to avian and special-status wildlife species, ensure consistency with CEQA Guidelines Sections 15065, 15380, and 15126.4, and provide sufficient avoidance, minimization, and mitigation measures to support potential ITP issuance, CDFW recommends the following revision and analysis:

Recommendation #5: CEQA Analysis. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project for CDFW to fully evaluate take and adequately identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to CESA-listed species and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an ITP.

Recommendation #6 Mitigation Measure M-BI-5: Revisions to Avian Breeding and Special-status Wildlife Impact Avoidance. CDFW recommends that M-BI-5(2) and M-BI-5(4) be revised to incorporate the underlined language and omit the language in strikethrough:

> **M-BI-5(2) Special-Status Species Preconstruction Surveys and Relocation Plan**. Prior to construction, the Applicant shall develop preconstruction surveys for special-status terrestrial reptiles (e.g., Southern California legless lizard, coast horned lizard, California glossy snake, red-diamond rattlesnake, rosy boa, and San Diego ringneck snake), small terrestrial mammals (i.e., San Diego black-tailed jackrabbit, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, and southern grasshopper mouse), bats (i.e., pallid bat, greater western mastiff bat, western red bat, small-footed myotis, long-eared myotis), and mule deer, mountain lion, and ringtail documented on-site or with high

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

potential to occur on-site. The Quino checkerspot butterfly (CESA candidate, low potential to occur) is included in this survey list.

The plan shall at minimum include the timing and locations where surveys should be conducted; if and species are confirmed, provide the habitat and conditions in the proposed relocation site(s); the methods that would be used for trapping and relocating the individual species; and the method for documenting/recording the species and number of animals relocated. The plan shall be submitted to the County and CDFW by a qualified biologist prior to any ground-disturbing activities within potentially occupied habitat.

Preconstruction Surveys: No more than 3 days prior to construction, a qualified biologist shall conduct a preconstruction survey within areas of suitable habitat for special-status species wildlife documented on-site (i.e., Cooper's hawk, sharp-shinned hawk, Bell's sage sparrow, turkey vulture, Southern California legless lizard, coast horned lizard, San Diego black-tailed jackrabbit, San Diego desert woodrat, coastal whiptail, California horned lark, western bluebird, mule deer, and mountain lion) as well as those with high potential to occur (i.e., southern California rufous-crowned sparrow, golden eagle, long-eared owl, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, loggerhead shrike, Lewis' woodpecker, California glossy snake, red-diamond rattlesnake, pallid bat, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, greater western mastiff bat, southern grasshopper mouse, mountain quail, rosy boa, San Diego ringneck snake, ringtail, western red bat, small-footed myotis, long-eared myotis, and monarch butterfly). The qualified biologist shall look for special-status species that may be located within or immediately adjacent to the project work areas, as permitted by access. If determined by the qualified biologist that, based on the construction activities, time of year, and presence/location of special-status wildlife species, relocation of special-status wildlife species is necessary, relocation will occur to nearby undisturbed areas within suitable habitat in the off-site open space easements as specified in the plan and a California scientific collecting permit (SCP) (if applicable), but as close to their origin as possible (consistent with the approved plan). The qualified biologist relocating the species shall possess a California SCP to handle these species if required by applicable CDFW regulations.

A qualified biologist shall be present during initial ground-disturbing activities (i.e., vegetation removal) immediately adjacent to or within the vegetation communities and/or disturbed habitats that could support populations of special-status wildlife species to monitor vegetation removal and topsoil salvaging and stockpiling, where applicable. If special-status wildlife species are detected in the work area during biological monitoring, the individual(s) will be documented and relocated as per the approved Plan and in accordance with the SCP conditions as applicable. Survey results, including negative findings, shall be submitted to CDFW prior to implementing ground-disturbing activities.

Documentation: The qualified biologist ~~Project Biologist~~ shall prepare the final

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

survey report and relocation plan and submit it to the ~~PDS~~ County Planning and Development Services (PDS) and CDFW for review and approval.

Timing: Surveys shall be conducted prior to any clearing, grubbing, trenching, grading, or any land disturbances. Prior to final grading release, or use of the premises in reliance of this permit for each phase, the final survey report and Relocation Plan shall be approved.

Monitoring: The PDS shall review the final survey report and Relocation Plan for compliance with this condition and the report format guidelines. Upon approval of the report, PDS shall inform the Applicant that the requirement is complete, and the bond amount can be relinquished.

M-BI-5(4) Crotch's bumble bee Habitat Assessment and Surveys. This mitigation measure shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered species at the time of project construction.

Habitat assessment: If not previously completed, or if surveys are no longer valid for any reason, a qualified biologist with demonstrated experience with Crotch's bumblebee will conduct a desktop habitat assessment to determine the presence of suitable habitat for Crotch's bumble bee within the project site. This assessment will evaluate historical and current species distribution, proximity to the last known sighting, and potential foraging (including native and nonnative), nesting, and overwintering resources. Field verification surveys by a qualified biologist, who possesses a Memorandum of Understanding to perform surveys for Crotch's bumble bee, will be conducted during the floral blooming period, typically April through August, and will include an in-person project site observation, quantification of blooming vegetation (e.g., percent cover or a scale), and an assessment of plant diversity.

Documentation: The qualified biologist ~~Project Biologist~~ shall prepare the final habitat assessment report and submit it to the CDFW for review and approval for each phase.

Focused Surveys. If the habitat assessment and field verification survey indicate a high likelihood for take of the species, occupancy will be assumed, or a proposed survey protocol will be submitted to the Wildlife Agencies for review. If surveys are proposed, A qualified biologist, who possesses a Memorandum of Understanding to perform surveys for Crotch's bumble bee, shall design a survey methodology ~~will be designed~~ that is project- and site-specific, including the qualifications of the qualified biologist conducting the surveys. The survey methodology will follow the general guidelines and best practices outlined in CDFW's "Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species" (June 6, 2023) during the appropriate flying season. If surveys are conducted and occupied

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Crotch's bumble bee habitat within or bordering the project site is documented, or if Crotch's bumble bee is assumed to be present based on the habitat assessment, preconstruction surveys of such habitat for active bee nest colonies shall be required no more than 5 days prior to any ground disturbance activities that occur between February 1~~5~~ through August 31 ~~September 15~~. The qualified biologist ~~Project Biologist~~ will establish, monitor, and maintain a no-work buffer around any active nest colonies identified during surveys. Survey results, including negative findings, shall be submitted to CDFW prior to implementing ground-disturbing activities.

The size and configuration of the no-work buffer will be based on the best professional judgment of the qualified biologist ~~Project Biologist~~ in consultation with CDFW. The buffer should provide at least 50 feet of clearance around nest entrances. Construction activities should not occur within the no-work buffers until the colony is no longer active. To determine that a nest is no longer active, the nest will be observed for a minimum of 60 minutes each day across multiple days (three days minimum) during suitable flight weather (i.e., ambient air temperature between 60- and 90- degrees Fahrenheit, winds under 10 mph, and no precipitation heavier than a drizzling rain). If no bees are seen flying in or out of the nest it will be determined that the next season's queens have dispersed from the colony and the nest is no longer active.

If Crotch's bumble bee is found on-site during habitat assessments or protocol surveys, the project proponent shall:

i. Notify CDFW of the species' presence within 48 hours and consult with the CDFW to determine whether the project needs to obtain an incidental take permit, and adhere to the following minimum conditions:

ii. Implement Immediate Avoidance and Minimization Measures:

    1. A qualified biologist shall conduct ~~Conduct~~ a nest search within suitable habitat areas identified during surveys
    2. Establish and clearly mark no-work buffer zones of at least 50 feet around active nest colonies if found
    3. Avoid all ground-disturbing activities within these buffer zones during the colony active bee season (February 1~~5~~ through August 31 ~~September 15~~)

iii. Have a qualified Crotch's bumble bee monitor present during initial ground disturbance and vegetation clearance. Compensatory mitigation for permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not necessarily limited to, on-site or off-site habitat preservation,

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

enhancement, restoration, and/or creation at a ratio of no less than 1:1. If an incidental take permit covering Crotch's bumble bee is issued for the project, the measures and mitigation ratios specified in that permit shall take precedence over those outlined in this report.

Comment #5: Impacts of Light-Emitting Diode (LED) Lights

Issue: The Project's installation of LED lights may impact a wide range of wildlife species.

Specific impacts: The installation of LED lights may impact wildlife movement and may result in reduced reproductive capacity, population declines, or local extirpation of rare, special-status, or threatened and endangered species.

Why impacts would occur: The DEIR states that LED lights would be installed at all driveway entrances, inverters, substation, and BESS facilities. Artificial night lighting can affect plants and wildlife through attraction and disorientation, loss of connectivity, interference with pollination and foraging, and disruption of circadian rhythms (Barrientos et al. 2023). These impacts are most pronounced with white or blue rich lighting, which contains shorter wavelengths (560 nm) that are especially disruptive to nocturnal species. Without appropriate design features, such lighting may extend into adjacent habitat areas, altering behavior, reproduction, and survival of wildlife species. To reduce lighting impacts on wildlife, fixtures should be fully shielded, downcast, and utilize long wavelength spectra (e.g., red or amber light) where feasible to avoid illumination of habitat areas outside of the Project area and minimize distribution to wildlife.

Evidence impacts would be significant: CDFW considers adverse impacts to wildlife and wildlife movement, for the purposes of CEQA, to be significant without mitigation or consideration of additional project design features. CDFW recommends that the DEIR specify mitigation that is proportionate to the level of impacts, consistent with CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355).

Recommended Potentially Feasible Mitigation Measure(s):

To minimize the potential adverse effects of artificial lighting on wildlife movement, reproduction, and habitat connectivity, and to ensure that mitigation measures are enforceable and consistent with CEQA Guidelines (reduce potential impacts of artificial lighting on wildlife and ensure consistency with CEQA Guidelines (§§ 15126.4(a)(4)(B), 15064, 15065), CDFW recommends the following measures:

Recommendation #7: Additional Minimization Measure. CDFW recommends that the final environmental document include a Lighting Plan. The Lighting Plan should evaluate lighting impacts on wildlife and other biological resources during both construction and operation. Methods to minimize adverse effects of artificial lighting may include using motion-activated fixtures outside, limiting fixtures to the lowest lumen

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

necessary lumen, using full-shield fixtures (i.e., full cutoff so that no light is emitted above the 90-degree horizontal plane), directing light downward, and orienting lights toward the interior of the sites. These methods will minimize the light source from impacting wildlife species utilizing wildlife corridors between each fenced solar array area of the Project.

Where feasible, use of long-wavelength lighting (e.g., red or amber LEDs) is also encouraged, provided they are true monochromatic or narrow spectrum sources (i.e., minimal emissions below 560 nm). Long-wavelength red/amber light is less disruptive to many nocturnal species than white or blue-rich light. Together these measures will further reduce impacts on wildlife moving through corridors between fenced solar arrays by minimizing light trespass and glare.

Mitigation and Monitoring Reporting Plan

CDFW recommends the County adopt the mitigation measures and recommendations in this letter into the DEIR. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the County in developing mitigation measures that are (1) consistent with CEQA Guidelines, section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

The County is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database (i.e., California Natural Diversity Database (CNDDB)) which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, sub. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDB. The CNNDB field survey form can be filled out and submitted online (CDFW 2025b). Please visit CDFW online to access the types of information reported to CNDDB. Information on special status native plant populations and sensitive natural communities and the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2025c).

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

Conclusion

CDFW appreciates the opportunity to comment on the DEIR to assist the County in identifying and mitigating Project impacts on biological resources. To ensure significant impacts are adequately mitigated to a level less-than-significant, the feasible mitigation measures described above should be incorporated as enforceable conditions in the DEIR for the Project. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)].

Questions regarding this letter or further coordination should be directed to Mary Ngo, Senior Environmental Scientist (Specialist), at Mary.Ngo@wildlife.ca.gov or (562) 477-0743 to schedule a meeting with CDFW.

Sincerely,

DocuSigned by:
Heather A. Pert
DF423498814B441...

Heather A. Pert
Environmental Program Manager
South Coast Region

Attachments

Attachment 1: Mitigation and Monitoring Reporting Plan

ec: California Department of Fish and Wildlife
Baron Barrera, Senior Environmental Scientist (Supervisory)
Felicia Silva, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

Office of Land Use and Climate Innovation
State Clearinghouse – State.Clearinghouse@lci.ca.gov

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Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

Attachment 1: Mitigation and Monitoring Reporting Plan	Timing	Responsible Party
Mitigation Measure #1: Compensatory Mitigation. To compensate for Project impacts on high value conservation habitats (granitic northern mixed chaparral and granitic chamise chaparral), the County shall provide offsite mitigation for 437.75 acres of granitic northern mixed chaparral and 129 acres of granitic chamise chaparral. These communities are considered sensitive and declining at a regional level, and compensatory mitigation at these acreages is necessary to fully offset adverse impacts, maintain ecological functions, and reduce potential impacts to less-than-significant level under CEQA.	Prior to finalizing CEQA document; and, Prior to construction	Lead Agency; and, Project Proponent
Recommendation #1: Contingency Plan in Mitigation Measure M-BI-4. CDFW recommends that the final environmental document and the Resource Management Plan include detailed contingency measures to address ongoing unauthorized access through the Project site, and any resulting significant disturbance or damage to the area. These contingency measures are necessary to ensure compliance with CEQA Guidelines Sections 15065 and 15126.4, which require feasible mitigation for significant impacts to sensitive habitats. Contingency measures may include the identification and conservation of additional mitigation areas of high biological value, located away from the USA-Mexico border. Areas subject to routine or ongoing Border Patrol activity that could compromise habitat quality or accessibility should not be counted towards the Project's required mitigation acreage. Only areas capable of providing long-term, effective conservation should be credited.	Prior to finalizing CEQA document; and, Prior to construction	Lead Agency; and, Project Proponent
Recommendation #2: Contingency Funding in Mitigation Measure M-BI-4. CDFW recommends that the Resource Management Plan include a 10 percent contingency added to the non-wasting endowment calculation. This contingency funding is intended to offset unanticipated expenditures, inflation, catastrophic events, and/or unauthorized damage, and supports implementation of mitigation measures consistent with CEQA Section 15126.4.	Prior to finalizing CEQA document; and, Prior to construction	Lead Agency; and, Project Proponent
Recommendation #3: Conservation Easement**.** CDFW recommends that all mitigation areas associated with the Project be permanently protected under a conservation easement. The conservation easement should be recorded prior	Prior to finalizing CEQA document;	Lead Agency; and,

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

to or concurrently with mitigation implementation to ensure long-term protection of biological resources, maintain ecological function, and prevent unauthorized disturbance.	Prior to construction	Project Proponent
Recommendation #4: Additional Minimization Measure. CDFW recommends the Project proponent consider an alternative construction method instead of the traditional "blade and grade" method, where vegetation is crushed in some areas, but soils and vegetation are otherwise left intact ("drive and crush"). Leaving vegetation crushed with the "drive and crush" method, leaves roots intact and allows special-status plant species and other vegetation to more successfully regenerate. This alternative construction method can create an opportunity for vegetation to be left between panel rows and ameliorate some habitat effects (Karban et al. 2024).	Prior to finalizing CEQA document; Prior to construction; and, Prior to decommissioning	Lead Agency; and, Project Proponent
Recommendation #5: CEQA Analysis. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project for CDFW to fully evaluate take and adequately identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to CESA-listed species and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an ITP.	Prior to finalizing CEQA document	Lead Agency
Recommendation #6 Mitigation Measure M-BI-5: Revisions to Avian Breeding and Special-status Wildlife Impact Avoidance. CDFW recommends that M-BI-5(2) and M-BI-5(4) be revised to incorporate the underlined language and omit the language in strikethrough: **M-BI-5(2) Special-Status Species Preconstruction Surveys and Relocation Plan**. Prior to construction, the Applicant shall develop preconstruction surveys for special-status terrestrial reptiles (e.g., Southern California legless lizard, coast horned lizard, California glossy snake, red-diamond rattlesnake, rosy boa,	Prior to finalizing CEQA document; and, Prior to construction	Lead Agency; and, Project Proponent

Docusign Envelope ID: FECF5C08-71AB-41C9-BED5-A829C5CE2066

and San Diego ringneck snake), small terrestrial mammals (i.e., San Diego black-tailed jackrabbit, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, and southern grasshopper mouse), bats (i.e., pallid bat, greater western mastiff bat, western red bat, small-footed myotis, long-eared myotis), and mule deer, mountain lion, and ringtail documented on-site or with high potential to occur on-site. The Quino checkerspot butterfly (CESA candidate, low potential to occur) is included in this survey list. The plan shall at minimum include the timing and locations where surveys should be conducted; if and species are confirmed, provide the habitat and conditions in the proposed relocation site(s); the methods that would be used for trapping and relocating the individual species; and the method for documenting/recording the species and number of animals relocated. The plan shall be submitted to the County and CDFW by a qualified biologist prior to any ground-disturbing activities within potentially occupied habitat. **Preconstruction Surveys**: No more than 3 days prior to construction, a qualified biologist shall conduct a preconstruction survey within areas of suitable habitat for special-status species wildlife documented on-site (i.e., Cooper's hawk, sharp-shinned hawk, Bell's sage sparrow, turkey vulture, Southern California legless lizard, coast horned lizard, San Diego black-tailed jackrabbit, San Diego desert woodrat, coastal whiptail, California horned lark, western bluebird, mule deer, and mountain lion) as well as those with high potential to occur (i.e., southern California rufous-crowned sparrow, golden eagle, long-eared owl, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, loggerhead shrike, Lewis' woodpecker, California glossy snake, red-diamond rattlesnake, pallid bat, Dulzura pocket mouse, northwestern San Diego pocket mouse, pallid San Diego pocket mouse, greater western mastiff bat, southern grasshopper mouse, mountain quail, rosy boa, San Diego ringneck snake, ringtail, western red bat, small-footed myotis, long-eared myotis, and monarch butterfly). The qualified biologist shall look for special-status species that may be located within or immediately adjacent to the project work areas, as permitted by access. If determined by the qualified biologist that, based on the construction activities, time of year, and presence/location of		

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special-status wildlife species, relocation of special-status wildlife species is necessary, relocation will occur to nearby undisturbed areas within suitable habitat in the off-site open space easements as specified in the plan and a California scientific collecting permit (SCP) (if applicable), but as close to their origin as possible (consistent with the approved plan). The qualified biologist relocating the species shall possess a California SCP to handle these species if required by applicable CDFW regulations. A qualified biologist shall be present during initial ground-disturbing activities (i.e., vegetation removal) immediately adjacent to or within the vegetation communities and/or disturbed habitats that could support populations of special-status wildlife species to monitor vegetation removal and topsoil salvaging and stockpiling, where applicable. If special-status wildlife species are detected in the work area during biological monitoring, the individual(s) will be documented and relocated as per the approved Plan and in accordance with the SCP conditions as applicable. Survey results, including negative findings, shall be submitted to CDFW prior to implementing ground-disturbing activities. **Documentation**: The qualified biologist ~~Project Biologist~~ shall prepare the final survey report and relocation plan and submit it to the ~~PDS~~ County Planning and Development Services (PDS) and CDFW for review and approval. **Timing**: Surveys shall be conducted prior to any clearing, grubbing, trenching, grading, or any land disturbances. Prior to final grading release, or use of the premises in reliance of this permit for each phase, the final survey report and Relocation Plan shall be approved. **Monitoring**: The PDS shall review the final survey report and Relocation Plan for compliance with this condition and the report format guidelines. Upon approval of the report, PDS shall inform the Applicant that the requirement is complete, and the bond amount can be relinquished. **M-BI-5(4) Crotch's bumble bee Habitat Assessment and Surveys**. This mitigation measure shall only be required if Crotch's bumble bee remains as a		

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candidate state endangered species or is listed as a state endangered species at the time of project construction. **Habitat assessment**: If not previously completed, or if surveys are no longer valid for any reason, a qualified biologist with demonstrated experience with Crotch's bumblebee will conduct a desktop habitat assessment to determine the presence of suitable habitat for Crotch's bumble bee within the project site. This assessment will evaluate historical and current species distribution, proximity to the last known sighting, and potential foraging (including native and nonnative), nesting, and overwintering resources. Field verification surveys by a qualified biologist, who possesses a Memorandum of Understanding to perform surveys for Crotch's bumble bee, will be conducted during the floral blooming period, typically April through August, and will include an in-person project site observation, quantification of blooming vegetation (e.g., percent cover or a scale), and an assessment of plant diversity. **Documentation**: The qualified biologist ~~Project Biologist~~ shall prepare the final habitat assessment report and submit it to the CDFW for review and approval for each phase. **Focused Surveys**. If the habitat assessment and field verification survey indicate a high likelihood for take of the species, occupancy will be assumed, or a proposed survey protocol will be submitted to the Wildlife Agencies for review. If surveys are proposed, A qualified biologist, who possesses a Memorandum of Understanding to perform surveys for Crotch's bumble bee, shall design a survey methodology ~~will be designed~~ that is project- and site-specific, including the qualifications of the qualified biologist conducting the surveys. The survey methodology will follow the general guidelines and best practices outlined in CDFW's "Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species" (June 6, 2023) during the appropriate flying season. If surveys are conducted and occupied Crotch's bumble bee habitat within or bordering the project site is documented, or if Crotch's bumble bee is assumed to be present based on the habitat assessment, preconstruction surveys of such habitat for active bee nest colonies shall be required no more than 5 days prior to any ground disturbance activities that occur between		

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February 1~~5~~ through August 31 ~~September 15~~. The qualified biologist ~~Project Biologist~~ will establish, monitor, and maintain a no-work buffer around any active nest colonies identified during surveys. Survey results, including negative findings, shall be submitted to CDFW prior to implementing ground-disturbing activities. The size and configuration of the no-work buffer will be based on the best professional judgment of the qualified biologist ~~Project Biologist~~ in consultation with CDFW. The buffer should provide at least 50 feet of clearance around nest entrances. Construction activities should not occur within the no-work buffers until the colony is no longer active. To determine that a nest is no longer active, the nest will be observed for a minimum of 60 minutes each day across multiple days (three days minimum) during suitable flight weather (i.e., ambient air temperature between 60- and 90- degrees Fahrenheit, winds under 10 mph, and no precipitation heavier than a drizzling rain). If no bees are seen flying in or out of the nest it will be determined that the next season's queens have dispersed from the colony and the nest is no longer active. If Crotch's bumble bee is found on-site during habitat assessments or protocol surveys, the project proponent shall: iv. Notify CDFW of the species' presence within 48 hours and consult with the CDFW to determine whether the project needs to obtain an incidental take permit, and adhere to the following minimum conditions: v. Implement Immediate Avoidance and Minimization Measures: 4. A qualified biologist shall conduct ~~Conduct~~ a nest search within suitable habitat areas identified during surveys 5. Establish and clearly mark no-work buffer zones of at least 50 feet around active nest colonies if found		

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6. Avoid all ground-disturbing activities within these buffer zones during the colony active bee season (February 15 through August 31 September 15) vi. Have a qualified Crotch's bumble bee monitor present during initial ground disturbance and vegetation clearance. Compensatory mitigation for permanent direct impacts to suitable Crotch's bumble bee habitat shall be offset through compensatory mitigation, which may include, but is not necessarily limited to, on-site or off-site habitat preservation, enhancement, restoration, and/or creation at a ratio of no less than 1:1. If an incidental take permit covering Crotch's bumble bee is issued for the project, the measures and mitigation ratios specified in that permit shall take precedence over those outlined in this report.		
Recommendation #7: Additional Minimization Measure. CDFW recommends the final environmental document include a Lighting Plan. The Lighting Plan should evaluate lighting impacts on wildlife species and biological resources during construction and operational phases. Methods for minimizing adverse effects of artificial lighting may include having all outdoor lighting fixtures be motion activated, be of the lowest lumen necessary, be back-side shielded, be directed downward, and positioned to only the interior of the sites. These methods will minimize the light source from impacting wildlife species utilizing wildlife corridors between each fenced solar array area of the Project. Where feasible, use of long-wavelength lighting (e.g., red or amber LEDs) is also encouraged, provided they are true monochromatic or narrow spectrum sources (i.e., minimal emissions below 560 nm). Long-wavelength red/amber light is less disruptive to many nocturnal species than white or blue-rich light. Together these measures will further reduce impacts on wildlife moving through corridors between fenced solar arrays by minimizing light trespass and glare.	Prior to finalizing CEQA document	Lead Agency