



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 30, 2025

Zoe Carlson
County of Santa Barbara
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101
carlsonz@countyofsb.org

Subject: Draft Program Environmental Impact Report for the Utility-Scale Solar Amendments Project, SCH No. 2024110254, San Barbara County, CA

Dear Zoe Carlson:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Programmatic Environmental Impact Report (DPEIR) from Santa Barbara County (County) for the Utility-Scale Solar Amendment Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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 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, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subd. (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 (Fish & G. Code, § 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 fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: County of Santa Barbara

Objective: The objective of the Project is to allow solar development in various areas of the County and to establish a streamlined permitting process to promote utility-scale solar development. The proposed amendments to County regulations would establish the streamlined permitting process. The majority of the proposed amendments would be within the three zoning ordinances: County Land Use Development Code (LUDC), Montecito LUDC, and Article II Coastal Zoning Ordinance. In addition, the Project includes amendments to the County's Comprehensive Plan Land Use Element and the Coastal Land Use Plan. To facilitate utility-scale solar development throughout the unincorporated county, the Project would, in part, remove the Utility-Scale Solar Photovoltaic Overlay within the LUDC and allow utility-scale solar as a conditional use on lands zoned as Professional and Institutional (PI), Agricultural I (AG-I), Agricultural II (AG-II), Public Utility (PU), Light Industry (M-1), General Industry (M-2), Industrial Research Park (M-RP), and Coastal Related Industry (M-CR) within the Inland Area and Coastal Zone portions of the unincorporated county. In addition, the Project would create and define a new category of solar energy facility, termed "community-scale." Community-scale solar would be conditionally allowed within the same zoning designations.

The three ordinances would also be revised to streamline permitting for rooftop and small ground mounted solar energy systems and to clarify the County's existing permitting process for stand-alone battery energy storage systems (BESS). The ordinance definitions and use tables would be revised to clarify that BESS facilities are a permitted use. Stand-alone BESS facilities would be subject to the same proposed development standards as BESS components of a Tier 3 or 4 solar energy facility, ensuring permitting consistency across all three ordinances and the unincorporated portions of the county. The solar energy systems and facilities would be categorized based on size. The smaller-scale systems (e.g., rooftop and small ground-mounted solar energy systems) would be categorized as Tier 1 or Tier 2, respectively. Tier 1 or 2 systems could occur on all unincorporated County lands (regardless of the zoning designation). Larger solar energy facilities (e.g., community-scale and utility-scale)

² "Take" is defined in section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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would be categorized as Tier 3 and Tier 4, respectively. Tier 3 or 4 facilities would be allowed on lands zoned as described above.

The final Project component is an update to the Uniform Rules for Agricultural Preserves and Farmland Security Zones (Uniform Rules). The Uniform Rules amendments would allow utility-scale and community-scale solar energy facilities to be placed within Williamson Act agricultural preserve contracted lands, within specific parameters.

The DPEIR also includes three alternatives which are:

Alternative 1 – No Project Alternative: Under the No Project Alternative, utility-scale solar facilities would only be allowed within the 600-acre Utility-Scale Solar Photovoltaic Overlay, in accordance with the LUDC. Utility-scale facilities could only be developed outside of the overlay area if they are accessory to a primary use, or are not subject to County permitting regulations (e.g., are on State, Federal, or Tribal lands or are initiated by the County on County lands). Rooftop solar energy systems would be allowed throughout the unincorporated County without a planning permit. Freestanding or ground-mounted solar energy systems that are accessory to a principal use would be allowed in the Inland areas without a planning permit, but would require a Coastal Development Permit (CDP) in the Coastal Zone. BESS would continue to be allowed as part of a utility-scale solar energy facility within the Utility-Scale Solar Photovoltaic Overlay, and also to be allowed as stand-alone facilities in other zones.

Alternative 2 – Reduction of Solar on Williamson Act Contracted Lands: Under Alternative 2, the location and requirements for Tier 1 and Tier 2 would be the same as under the Project. However, under Alternative 2, *Reduction of Solar on Williamson Act-Contracted Lands*, the locations within agriculturally zoned lands in which Tier 3 and Tier 4 solar energy facilities could be located would be reduced. In general, Alternative 2 would limit or prevent the development of Tier 3 or 4 facilities within certain Williamson Act-contracted lands, thereby reducing the overall acreage that could be developed with Tier 3 and Tier 4 solar energy facilities.

Alternative 3 – Removal of Utility-Scale Solar in Coastal Areas: Alternative 3 would reduce the areas in the County where utility-scale solar energy facilities (Tier 4) would be allowed. Under Alternative 3, solar energy systems (Tiers 1 and 2) and community-scale solar energy facilities (Tier 3) would be allowed in the Coastal Zone. The Coastal Zone includes properties along the Gaviota Coast and properties within the Carpinteria Agricultural Overlay District. However, under Alternative 3, utility-scale solar (Tier 4) would not be allowed in the Coastal Zone.

Location: Santa Barbara County is located on the central coast of California, encompassing approximately 2,734 square miles. Bordered by the Pacific Ocean to the west and south, San Luis Obispo County to the north, Ventura County to the east, and diagonally opposite to Kern County. The County includes the incorporated cities of

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Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang.

Biological Setting: Four primary watersheds occur within the Project area including Santa Maria, which includes the Cuyama and Sisquoc watersheds; San Antonio Creek; Santa Ynez; and South Coast, which is composed of approximately 50 short, steep watersheds. The headwaters of the principal waters are generally undeveloped, and the middle and lower sections are often developed with urban or agricultural uses. The four major rivers draining these watersheds are the Santa Maria, Sisquoc, Cuyama, and Santa Ynez. Several creeks are associated with each one of these watersheds. The drainages within these watersheds are of biological importance as they provide valuable foraging habitat, breeding habitat, and movement habitat for a variety of animal species including sensitive species such as Southern California steelhead (*Oncorhynchus mykiss*), California red-legged frog (*Rana draytonii*), and southwestern willow flycatcher (*Empidonax traillii extimus*). Several types of wetlands exist in the County, including coastal salt marshes, vernal pools, and riparian habitats. The mountainous regions of the Project area may support wildlife movement on a regional scale and riparian corridors may provide regional or more local scale opportunities for wildlife movement throughout the Project area. Habitat within the County includes trees, shrubs, forblands, and grasslands within the Project area may provide habitat for nesting birds (e.g., individual nests or rookeries) or that are important nursery areas for other wildlife species (e.g., bat maternity colonies).

Fifteen special status plant species have a high potential to occur in the Project area. While some are not federally or state listed, they do have a California Rare Plant Rank (CRPR). A CRPR of 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet the definitions of CESA and are eligible for state listing (CNPS 2020). These species include: La Graciosa thistle (*Cirsium scariosum* var. *loncholepis*; Endangered Species Act (ESA) listed and CESA-listed; 1B.1); Gaviota tarplant (*Deinandra increscens* ssp. *villosa*; ESA-listed and CESA-listed; 1B.1), Vandenberg monkeyflower (*Diplacus vandenbergensis*; ESA-listed; 1B.1); Lompoc yerba santa (*Eriodictyon capitatum*; ESA-listed and State Rare; 1B.2); seaside bird's beak (*Cordylanthus rigidus* ssp. *littoralis*; CESA-listed; 1B.1); mesa horkelia (*Horkelia cuneata* var. *puberula*; 1B.1); umbrella larkspur (*Delphinium umbraculorum*; 1B.3); blushing layia (*Layia erubescens*; 1B.2); black-flowered figwort (*Scrophularia atrata*; 1B.2); Hoover's bent grass (*Agrostis hooveri*; 1B.2); La Purisima manzanita (*Arctostaphylos purissima*; 1B.1); Refugia manzanita (*Arctostaphylos refugioensis*; 1B.2); sand mesa manzanita (*Arctostaphylos rudis*; 1B.1); late-flowered mariposa-lily (*Calochortus fimbriatus*; 1B.3); and Santa Barbara ceanothus (*Ceanothus impressus* var. *impressus*; 1B.2).

Twenty-six special status wildlife species have a high potential to occur in the Project area. These species include: Crotch's bumble bee (*Bombus crotchii*; CESA candidate listed); vernal pool fairy shrimp (*Brachinecta lynchi*; ESA-listed); monarch – California

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overwintering population (*Danaus plexippus plexippus* pop. 1; Precluded³ ESA-listed); tidewater goby (*Eucyclogobius newberryi*; ESA-listed and California Species of Special Concern (SSC)); California tiger salamander (*Ambystoma californiense*; ESA-listed and CESA-listed); arroyo toad (*Anaxyrus californicus*; ESA-listed); California red-legged frog (ESA-listed and SSC); western spadefoot (*Spea hammondi*; Precluded ESA-listed and SSC); Coast Range newt (*Taricha torosa*; SSC); Northern California legless lizard (*Anniella pulchra*; SSC); California legless lizard (*Anniella* spp. SSC); California glossy snake (*Arizona elegans occidentalis*; SSC); southwestern pond turtle (*Actinemys pallida*; Precluded ESA-listed and SSC); blunt-nosed leopard lizard (*Gambelia sila*; ESA-listed and CESA-listed); coast horned lizard (*Phrynosoma blainvillii*; SSC); two-striped garter snake (*Thamnophis hammondi*; SSC); Cooper's hawk (*Accipiter cooperii*; State Watch List); tricolored blackbird (*Agelaius tricolor*; Federal Bird of Conservation Concern and CESA-listed); southern California rufous crowned sparrow (*Aimophila ruficeps canescens*; State Watch List); western snowy plover (*Charadrius nivosus nivosus*; ESA-listed and SSC); white-tailed kite (*Elanus leucurus*; State Fully Protected); California horned lark (*Eremophila alpestris actia*; State Watch List); double-crested cormorant (*Nannopterum auritum*; State Watch List); pallid bat (*Antrozous pallidus*; SSC); Townsend's big-eared bat (*Corynorhinus townsendii*; SSC); and western red bat (*Lasiurus frantzii*; SSC).

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. Additional comments or other suggestions are also included to improve the document.

COMMENT # 1: Impacts to Riparian Habitat and Wildlife Connectivity Areas

Issue: Future projects that tier from the DPEIR, especially those in the Tier 3 and 4 Study Area, have the potential to impact and degrade riparian habitats, upland linkages, and other sensitive areas throughout the County. These habitats not only support aquatic and riparian functions but may also serve as critical connectivity corridors for wildlife. Impacts to both stream systems and non-riparian upland habitats (such as grasslands, oak woodlands, and coastal sage scrub) could reduce habitat permeability, fragment wildlife populations, and impair long-term ecological functions.

Specific impact: The DPEIR does not sufficiently delineate or characterize sensitive habitat areas, including riparian, wetlands, and/or other aquatic features that provide

³ The United States Fish and Wildlife Service has determined the species needs protection under the Endangered Species Act (ESA) but listing it is being delayed because other species are at higher risk and require immediate attention. The species becomes a candidate for listing and is added to the candidates list. These "warranted but precluded" findings require subsequent 12-month findings on each succeeding anniversary of the petition until they either undertake a proposal or make a "not warranted" finding.

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essential ecological functions for numerous special-status species. In Santa Barbara County, riparian systems associated with the Santa Maria, Cuyama, Santa Ynez, and Sisquoc Rivers, as well as ephemeral drainages in inland and foothill regions, constitute critical habitat and linkages for these species. Projects proposed within Tier 3 and Tier 4 Study Areas have the potential to result in substantial adverse impacts on these systems, including habitat loss, functional degradation, and increased fragmentation.

In addition to riparian and aquatic systems, the DPEIR should also characterize non-stream habitat linkages, including upland open space areas, native grasslands, oak woodlands, and coastal sage scrub, which serve as critical movement corridors and refugia for terrestrial wildlife. These habitats support ecological connectivity by allowing species to migrate, disperse, and forage. The DPEIR should assess potential impacts on these broader landscape connections and incorporate conservation strategies that maintain or enhance regional habitat permeability beyond stream-centered systems.

CEQA Guidelines, section 15125 requires the environmental baseline to describe the physical conditions as they exist at the time the Notice of Preparation is published, supported by substantial evidence, to allow meaningful public and agency review of potential project effects. The DPEIR should provide a detailed, evidence-based description of existing riparian, upland, and connectivity habitats with Tier 3 and 4 areas, including current species distributions, habitat quality, and ecological functions. Without a clear baseline, it is difficult to assess the incremental impacts from proposed development.

Why impact would occur: Without comprehensive mapping and characterization of sensitive natural communities within the proposed solar development areas, the County cannot ensure that future projects tiering from this DPEIR will effectively avoid, minimize, and mitigate impacts to these resources. Figure 3.4-6 of the DPEIR shows the designated Environmentally Sensitive Habitat and Riparian Habitat but this information is insufficient to provide a comprehensive baseline. The DPEIR should include a quantitative baseline of riparian and upland habitats to allow meaningful assessment of cumulative impacts at a regional scale (CEQA Guidelines, §§15125, 15126.2(a)(1), 15126.4(a)(1), 15130). Multiple studies, including Stein et al. (2014), have documented the widespread loss and fragmentation of California's riparian vegetation due to urbanization, agriculture, water diversions, and other anthropogenic disturbances. These impacts have contributed to the decline of sensitive species and the impairment of critical ecosystem functions.

Given these documented declines, CEQA Guidelines, section 15130 requires the DPEIR to evaluate cumulative impacts to riparian and connectivity resources at the regional scale. Without such an analysis, the DPEIR risks underestimating the Project's contribution to long-term habitat fragmentation and biodiversity loss. Assessing cumulative impacts at a regional scale is essential to ensure that future projects tiering from this DPEIR will not incrementally degrade riparian habitats, upland linkages, and wildlife corridors. CDFW recommends that the DPEIR explicitly identify cumulative

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impacts from past, present, and reasonably foreseeable future development on Tier 3 and 4 areas.

Potential riparian linkages occur along segments of the Santa Maria, Cuyama, Santa Ynez, and Sisquoc Rivers within the Tier 3 and Tier 4 areas (CDFW 2010), underscoring the role of these systems in supporting terrestrial and aquatic connectivity. Additionally, fragmentation or loss of non-stream habitat linkages of upland habitats, especially in foothill and montane zones, can isolate wildlife populations, reduce genetic diversity, and undermine the long-term viability of special-status species.

The DPEIR states, “wildlife movement corridors that have not been included in the CDFW Terrestrial Habitat Connectivity Mapper and Missing Linkages report may be present within the County, which should be assessed on a site-specific level by a qualified biologist.” Site-specific analyses risk overlooking critical linkages that maintain landscape connectivity and enable wildlife to adapt to environmental changes. Without a broader-scale assessment, the cumulative impacts of development on wildlife corridors may be underestimated, leading to habitat fragmentation and loss of biodiversity. Assessing wildlife connectivity at a county or regional scale is essential because many species rely on large, interconnected habitats for movement, breeding, and survival. CDFW recommends that the final CEQA document identify the significance of these impacts (CEQA Guidelines, §§ 15065 and 15380).

The DPEIR lacks a sufficient environmental baseline and fails to provide an adequate impact assessment necessary to inform meaningful avoidance, minimization, or mitigation measures for riparian and/or other sensitive habitats/linkages countywide. CDFW recommends that the DPEIR provide a spatially explicit baseline of sensitive habitats and species distributions to support impact assessment and mitigation planning.

Evidence impact may be significant: The Project area supports a variety of special status species. CEQA Guidelines, section 15065(a)(1) and section 15380 require that a finding of significance is mandatory where a project has the potential to substantially reduce the number or restrict the range of rare, threatened, or endangered species. CEQA Guidelines, section 15126.4(a)(1) emphasizes that mitigation should be designed to avoid impacts whenever feasible, and that reliance on future project-level biological assessments does not eliminate the need for meaningful programmatic safeguards. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Further, CEQA Guidelines, section 15126.4(a)(3) specify that compensatory mitigation, when necessary, must be measurable, enforceable, and maintained over the long term.

Habitat fragmentation and loss of connectivity constitute significant impacts under CEQA because they restrict wildlife movement, reduce genetic exchange, and impair long-term viability of sensitive populations. Loss of riparian areas within the Tier 3 and 4 scope may result in substantial adverse direct, indirect, and cumulative effects, either

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directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

To adequately reduce potential impacts to riparian habitats, upland linkages, and sensitive biological resources, ensure consistency with CEQA Guidelines, sections 15065, 15126.4, and 15380, and provide sufficient avoidance, minimization, and mitigation measures to support sustainable land use planning, CDFW recommends the following mitigation measures and analyses be incorporated into the final CEQA document:

Mitigation Measure #1: Analysis of Impacts to Riparian and Sensitive Habitat Linkages: Prior to identifying or designating specific project sites within Tier 3 and Tier 4 Study Areas, the County shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity Constraints Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale.

This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set asides shall be determined based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent Tier 3 and 4 areas. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along the Santa Maria River, Cuyama River, and Santa Ynez River corridors, as well as associated drainages, upland habitat, and regional wildlife movement corridors. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130.

The analysis shall:

- a) Be conducted by qualified biologists and landscape ecologists and be applied to all Tier 3 and 4 areas as well as any new areas proposed for development. It shall include a minimum 500 foot buffer around the riparian corridors of the Santa Maria, Cuyama, Santa Ynez, and Sisquoc Rivers and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity.
- b) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall

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be removed from further consideration for development. CDFW recommends the following resources for connectivity data:

- i) Wildlife Movement Barriers - CDFW 2024 [ds2867]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer
 - ii) Terrestrial Connectivity - ACE [ds2734]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer
 - iii) Fish Passage Priorities - CDFW - 2021 [ds2970]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer
 - iv) Wildlife Crossing Database- Caltrans [ds3074]
 - v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]
 - vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]
- c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects.
- d) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available.

The recommended Habitat Connectivity Constraints Analysis should be used to supplement and refine environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.

Mitigation Measure #2: No Net Loss of Riparian and Sensitive Habitats: For all projects under the DPEIR, if riparian/sensitive habitat impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the County and CDFW.

- a) Riparian Buffer and Setback Requirements: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater
 - i) Tier 3 Areas: Minimum 300-foot buffer;
 - ii) Tier 4 Areas: Minimum 500-foot buffer.

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- iii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions.
- iv) Buffers and set asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent Tier 3 and 4 areas.
- b) Site-Specific Adjustment: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, independently peer-reviewed by a County-approved biologist, and approved by CDFW.
- c) Monitoring: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of 5 years post-construction, subject to County and CDFW approval.
- d) Reporting: Annual monitoring reports shall be submitted to the County and CDFW by December 31 of each monitoring year. Reports shall include photo documentation, vegetation cover data, and an assessment of whether performance criteria are met.
- e) Adaptive Management. Monitoring and reporting shall include evaluation of cumulative impacts across the County and incorporate adaptive management if mitigation objectives are not met.

CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.

Recommendation #1: Habitat and Connectivity Constrains Analysis

CDFW recommends the County incorporate the Habitat and Connectivity Constrains Analysis into the DPEIR. The Habitats and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the County consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.

ADDITIONAL COMMENTS

Recommendation #2: Project Alternative

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As a natural resource agency, CDFW acknowledges the importance of expanding renewable energy infrastructure. However, CDFW has significant concerns regarding the DPEIR's allowance of utility-scale solar development in Tier 3 and 4 areas that may support special status species, sensitive habitats, and wildlife movement. Figure 3.4-1 in the DPEIR shows the Project area covers a wide variety of vegetation types, including but not limited to coastal sage scrub (*Salvia leucophylla*-*Artemisia californica*), scrub oak mixed chaparral (*Quercus wislizenii* var. *frutescens*), and grassland. These habitats may support a wide variety of special status species. In addition, large areas of agriculture land with the Project area may provide buffers between wildlife corridors or critical habitat and new sources of noise, light, vibration, edge effects, and human activity. According to Figures 3.4-3 and 3.4-5, the Project area is within and adjacent to critical habitat and wildlife movement corridors, respectively. Critical habitat is specifically designated to protect the physical and biological features that are essential areas in the appropriate quantity and spatial arrangement to species survival, reproduction, and recovery (USFWS 2017).

Scientific evidence, including findings from Markwith (2025), highlights that large-scale solar installations in undeveloped and open spaces can cause substantial ecological impacts. Infrastructure development in and in the vicinity of natural habitats may lead to:

- Habitat loss and fragmentation, which disrupts species' movement and breeding patterns.
- Impervious surfaces associated with solar arrays can alter natural water infiltration and runoff patterns, impacting aquatic and riparian species dependent on these systems.
- Increased human activity and noise disturbance, adversely affecting sensitive wildlife behavior and survival.
- Alterations in land surface albedo and hydrology, potentially impacting vegetation and species dependent on specific environmental conditions.

CDFW acknowledges that the County has provided numerous and robust BIO-Measures to avoid and minimize impacts to wildlife and wildlife resources. However, CDFW believes these measures are more appropriate for addressing impacts at the species level and on a project-by-project basis and do not address potential impacts at a landscape or cumulative scale. As required by CEQA Guidelines, sections 15126.4 and 15130, cumulative impacts must be analyzed and mitigated to the extent feasible. These cumulative effects increase the risk to populations of special status species, many of which rely on large contiguous habitats for survival and reproduction. Accordingly, minimizing conversion of intact open space to solar development is a critical to component of effective mitigation.

CDFW strongly urges the County to prioritize solar energy projects on already disturbed, developed, or impervious surfaces such as parking lots, rooftops, and brownfields. The DPEIR should also evaluate alternatives that reduce or eliminate Tier

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3 and Tier 4 areas from solar development, particularly coastal areas and intact open space habitats. This strategy minimizes ecological disruption by:

- Avoiding loss of critical habitat.
- Utilizing existing infrastructure to reduce land clearing.
- Preventing habitat fragmentation and preserving connectivity.

In addition, CDFW recommends that the DPEIR conduct analyses and modelling to determine how much of the County's renewable energy goal could be achieved through development on already disturbed lands (rooftops, parking lots, etc.), taking into account local constraints. CDFW recommends that, among the alternatives analyzed in the DPEIR, preference be given to those that avoid or substantially minimize solar development in Tier 3 and Tier 4 areas and direct development toward previous disturbed or developed lands, consistent with CEQA Guidelines, section 15126.6.

By directing solar development toward already impacted lands and away from sensitive open spaces, the Project will better align renewable energy goals with conservation priorities, protecting biodiversity and ecosystem functions. Furthermore, consistent with CEQA Guidelines, section 15126.6, the County must consider and evaluate feasible alternatives that could avoid or substantially lessen impacts to special-status species and sensitive habitats while still achieving the Project objectives.

Mitigation and Monitoring Reporting Plan.

CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency 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 a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database that may be used to inform subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).). Accordingly, CDFW requests that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDB). The [CNDDB website](https://wildlife.ca.gov/Data/CNDDB)⁴ provides guidance regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special status native plant populations

⁴ <https://wildlife.ca.gov/Data/CNDDB>

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and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)⁵.

CDFW recommends that the County ensure all data collected for the preparation of the DPEIR is properly submitted to CNDDDB and the Vegetation Classification and Mapping Program to support accurate environmental review and ongoing species conservation.

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 DPEIR to assist the County in identifying and mitigating Project impacts on biological resources. To ensure that significant impacts are adequately avoided or 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 public hearing dates for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Felicia Silva⁶, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:



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Heather A. Pert

Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife
Baron Barrera, Senior Environmental Scientist (Supervisor)
Felicia Silva, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst

⁵ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

⁶ Phone: 562-292-8105; Email: Felicia.Silva@wildlife.ca.gov

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CEQA Program Coordinator – Sacramento

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

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure or Recommendation	Timing	Responsible Party
Mitigation Measure #1: Analysis of Impacts to Riparian and Sensitive Habitat Linkages Prior to identifying or designating specific project sites within Tier 3 and Tier 4 Study Areas, the County shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity Constrains Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale. This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set asides shall be determined based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent Tier 3 and 4 areas. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along the Santa Maria River, Cuyama River, and Santa Ynez River corridors, as well as associated drainages, upland habitat, and regional wildlife movement corridors. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats	Prior to Project Activities	Santa Barbara County

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from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130.

The analysis shall:

- e) Be conducted by qualified biologists and landscape ecologists and be applied to all Tier 3 and 4 areas as well as any new areas proposed for development. It shall include a minimum 500 foot buffer around the riparian corridors of the Santa Maria, Cuyama, Santa Ynez, and Sisquoc Rivers and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity.
- f) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall be removed from further consideration for development. CDFW recommends the following resources for connectivity data:
 - i) Wildlife Movement Barriers - CDFW 2024 [ds2867]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer
 - ii) Terrestrial Connectivity - ACE [ds2734]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer
 - iii) Fish Passage Priorities - CDFW - 2021 [ds2970]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer
 - iv) Wildlife Crossing Database- Caltrans [ds3074]
 - v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]
 - vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]

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Mitigation Measure or Recommendation	Timing	Responsible Party
g) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects. h) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available. The recommended Habitat Connectivity Constraints Analysis should be used to supplement and refine environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.		
Mitigation Measure #2: No Net Loss of Riparian and Sensitive Habitats For all projects under the DPEIR, if riparian/sensitive habitat impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the County and CDFW. a) Riparian Buffer and Setback Requirements: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater i) Tier 3 Areas: Minimum 300-foot buffer; ii) Tier 4 Areas: Minimum 500-foot buffer.	During/After Project Activities	Santa Barbara County

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Mitigation Measure or Recommendation	Timing	Responsible Party
iii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions. b) Site-Specific Adjustment: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, peer-reviewed by a County-approved biologist, and approved by CDFW. c) Monitoring: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of 5 years post-construction, subject to County and CDFW approval. d) Reporting: Annual monitoring reports shall be submitted to the County and CDFW by December 31 of each monitoring year. Reports shall include photo documentation, vegetation cover data, and an assessment of whether performance criteria are met.		
Recommendation #1: Habitat and Connectivity Constrains Analysis CDFW recommends the County incorporate the Habitat and Connectivity Constrains Analysis into the DPEIR. The Habitats and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the County consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.	Prior to Project Activities	Santa Barbara County

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Mitigation Measure or Recommendation	Timing	Responsible Party
Recommendation #2: Project Alternative As a natural resource agency, CDFW acknowledges the importance of expanding renewable energy infrastructure. CDFW also has significant concerns regarding the DPEIR's allowance of utility-scale solar development in Tier 3 and 4 areas that may support special status species and sensitive habitats. Figure 3.4-1 in the DPEIR shows the Project area covers a wide variety of vegetation types, including but not limited to coastal sage scrub (<i>Salvia leucophylla</i>-<i>Artemisia californica</i>), scrub oak mixed chaparral (<i>Quercus wislizenii</i> var. <i>frutescens</i>), and grassland. These habitats may support a wide variety of special status species. In addition, the large area of agriculture land may provide buffers to wildlife corridors/critical habitat from increased noise, light, vibration, edge effects, and human activity. Likewise, according to Figures 3.4-3 and 3.4-5, the Project area is within and adjacent to critical habitat and wildlife movement corridors, respectively. Critical habitat is designed to protect the essential physical and biological features of a landscape and essential areas in the appropriate quantity and spatial arrangement that a species needs to survive and reproduce and ultimately be conserved (USFWS 2017). Scientific evidence, including findings from Markwith (2025), highlights that large-scale solar installations in undeveloped and open spaces can cause substantial ecological impacts. Infrastructure development in and in the vicinity of natural habitats may lead to: • Habitat loss and fragmentation, which disrupts species' movement and breeding patterns. • Impervious surfaces associated with solar arrays can alter natural water infiltration and runoff patterns, impacting aquatic and riparian species dependent on these systems. • Increased human activity and noise disturbance, adversely affecting sensitive wildlife behavior and survival.	Prior to Project Activities	Santa Barbara County

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Mitigation Measure or Recommendation	Timing	Responsible Party
- Alterations in land surface albedo and hydrology, potentially impacting vegetation and species dependent on specific environmental conditions. CDFW acknowledges that the County has provided numerous and robust BIO-Measures to avoid and minimize impacts to wildlife and wildlife resources. However, CDFW believes these measures are more appropriate for addressing impacts at the species level and on a project-by-project basis and do not address potential impacts at a landscape or cumulative scale. As required by CEQA Guidelines, sections 15126.4 and 15130, cumulative impacts must be analyzed and mitigated to the extent feasible. These cumulative effects increase the risk to populations of special status species, many of which rely on large contiguous habitats for survival and reproduction. Accordingly, minimizing conversion of intact open space to solar development is a critical to component of effective mitigation. CDFW strongly urges the County to prioritize solar energy projects on already disturbed, developed, or impervious surfaces such as parking lots, rooftops, and brownfields. The DPEIR should also evaluate alternatives that reduce or eliminate Tier 3 and Tier 4 areas from solar development, particularly coastal areas and intact open space habitats. This strategy minimizes ecological disruption by: - Avoiding loss of critical habitat. - Utilizing existing infrastructure to reduce land clearing. - Preventing habitat fragmentation and preserving connectivity. In addition, CDFW recommends that the DPEIR conduct analyses and modelling to determine how much of the County's renewable energy goal could be achieved through development on already disturbed lands (rooftops, parking lots, etc.), taking into account local constraints. CDFW recommends that, among the alternatives analyzed in the DPEIR, preference be given to those that avoid or substantially minimize solar development in Tier 3 and Tier 4 areas and		

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Mitigation Measure or Recommendation	Timing	Responsible Party
direct development toward previous disturbed or developed lands, consistent with CEQA Guidelines, section 15126.6. By directing solar development toward already impacted lands and away from sensitive open spaces, the Project will better align renewable energy goals with conservation priorities, protecting biodiversity and ecosystem functions. Furthermore, consistent with CEQA Guidelines, section 15126.6, the County must consider and evaluate feasible alternatives that could avoid or substantially lessen impacts to special-status species and sensitive habitats while still achieving the Project objectives.		