



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 26, 2025

Amy Spitzer
Environmental Specialist
Environmental Services Department
6201 S Street, MS B209
Sacramento, CA 95817
CurryCreekSolar@smud.org

Subject: Curry Creek Project
NOTICE OF PREPARATION
SCH No. 2025080634

Dear Amy Spitzer:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report from Sacramento Municipal Utility District (SMUD) for the Curry Creek Project (Project) in Placer County pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.¹

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, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise 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. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW provides, 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.) The Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the

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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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.), related authorization as provided by the Fish and Game Code will be required. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Program, and other provisions of the Fish and Game Code that afford protection to California’s fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

The Project site is located on up to 680 acres of land in southwestern Placer County just west of the City of Roseville, north of Baseline Road and east of Country Acres Lane. The Project is adjacent to SMUD’s Country Acres Solar Project, which is currently under construction. The Project Area includes seven contiguous parcels in western Placer County, CA. These seven parcels are Assessor’s Parcel Numbers (APN) 017-130-013-000, APN 017-130-014-000, APN 017-130-055-000, APN 017-130-062-000, APN 017-130-063-000, APN 017-130-064-000, and APN 017-130-065-052-0000. Primary access to the Project site would be provided by entry roads going from Country Acres Lane and Baseline Road.

The Project consists of a 680-acre Photovoltaic (PV) energy generation solar facility, a 4-hour Battery Energy Storage System (BESS), and a Generation Substation. The total Project site would generally comprise PV solar modules, foundation piles, racking, direct current (DC) collection, alternative current (AC) collection, fencing, roads, inverters, medium voltage transformers, a generation substation with possible restroom facility, an interconnection line between the generation substation and the adjacent Country Acres Switch Station, and battery storage equipment. The new interconnection facilities, other than the generation substation, and the interconnection line, will be located within the footprint of the Country Acres Switchyard. During construction, a temporary construction trailer/office complex and staging areas would be established. During operation, the proposed Project would likely include an operations facility. At the end of the Project’s life (anticipated to be 30 to 35 years), the site would be decommissioned.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging area, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist SMUD in adequately identifying and/or mitigating the Project’s significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the Project with respect to impacts on biological resources. CDFW recommends that the Draft Environmental Impact Report (DEIR) incorporate the following principles and objectives in order to minimize impacts to biological resources:

1. Promote the preservation and restoration of continuous areas of natural habitat within the site and support their integration with existing and future preserves;

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2. Retain plant and wildlife habitat areas where there are known sensitive resources (e.g., sensitive habitats, special-status, threatened, and endangered, candidate species, and species of special concern). Particular attention should be focused on retaining habitat areas that are contiguous with other existing natural areas and/or wildlife movement corridors:
3. Preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive nonnative plants. If not feasible, adverse impacts on riparian habitat shall be mitigated by the preservation and/or restoration of this habitat in compliance with state and federal regulations in perpetuity;
4. Preserve and protect aquatic and wetland resources including creeks, streams, marshes, ponds, rivers, lakes and other seasonal wetlands to the extent feasible. If not feasible then mitigation measures shall be required in coordination with the state and federal regulations to protect fish and wildlife resources. Additionally, either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no net loss of resource value and/or function;
5. Preserve and protect wetlands and grasslands that provide habitat for rare and endangered species. If not feasible, mitigation of all adverse impacts on annual grasslands to comply with the state and federal regulations protecting foraging habitat for those species known to utilize this habitat;
6. Preserve and protect oak woodlands, heritage oaks, and/or significant stands of oak trees in the site that provide habitat for common native, and special-status wildlife species;
7. Preserve, protect, and avoid impacts to natural, undisturbed habitats that provide movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat should be replaced with habitat of equivalent value or enhanced to enable the continued movement of species;
8. Thoroughly analyze future project's potential direct, indirect and cumulative impacts on biological resources. To ensure these impacts are fully analyzed, SMUD should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). SMUD should analyze potential direct impacts from lighting, noise, human activity, and wildlife-human interactions created by development activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages, as well as analyze potential indirect impacts including resources in areas adjacent to the Project area, such as nearby public lands, open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands. Additionally, SMUD should analyze a project's cumulative impacts and determine if that contribution would result in a significant impact;
9. Adopt appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of construction and long-term operation and maintenance of projects. Mitigation will be

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roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355);

10. Support active habitat restoration and enhancement to reduce impact of climate change stressors and improve overall resilience of habitat within existing open space at the site.

Mitigation Measures for Impacts to Biological Resources

1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511 and 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: white-tailed kite (*Elanus leucurus*). CDFW recommends that SMUD conduct a thorough review of available data and habitat conditions and disclose all fully protected species with the potential to occur within or adjacent to the Project area. The DEIR should analyze potential adverse impacts to these species, including those related to loss of foraging habitat disruption or migratory or breeding behaviors. The DEIR should identify general avoidance, minimization, and mitigation strategies that could be implemented to reduce indirect impacts to fully protected species. This analysis will help ensure future project-level CEQA documents are based on a well-informed and legally adequate programmatic foundation.
2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: American badger (*Taxidea taxus*) and western spadefoot (*Spea hammondi*). CDFW recommends that the DEIR disclose all possible SSC that may be present in the Project area and broadly analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends SMUD include in the analysis, general avoidance, minimization and mitigation measures that could be implemented to reduce impacts to SSC.
3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
4. *Nesting Birds*: Please note that it is SMUD's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the

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Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the Project area. At the assessment level, the DEIR should disclose the likelihood of nesting habitat occurring within the Project area and identify general seasonal constraints associated with avian breeding activity, typically from February 1 through August 31, depending on the bird species with the potential to occur in the area, and local conditions. General avoidance, minimization, and/or mitigation measures to avoid take shall be included in the environmental document which may include:

- Conducting pre-construction nesting bird surveys by a qualified biologist within appropriate buffer distances for all phases of construction. Timelines and nesting bird survey distances shall be decided upon based on the risk of impacts to potential nesting bird species that shall be identified for smaller scale projects to follow.
- Establishing protective species-specific buffers around active nests with distances based on activity type and intensity, as well as nest stage and location.
- Restricting ground disturbance or vegetation removal to outside of avian breeding and nesting season (approximately February 1 – August 31).

The DEIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the DEIR should be made a condition of approval of the Project.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if future Project activities have the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project. State candidate species with the potential to occur in the area include, but are not limited to: candidate threatened species: Crotch’s bumble bee (*Bombus crotchii*) (CBB) and Burrowing owl (*Athene cunicularia*) (BUOW).

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BUOW have suffered significant habitat loss due to large-scale development, including wind and solar energy infrastructure development, and from the killing and removal of mammals during significant grading activities whose underground burrows the owls use for nesting. BUOW is designated as a candidate species under CESA and has additional protection under the Migratory Bird Treaty Act and Section 3503.5 of the Fish and Game Code; therefore, impacts may be considered potentially significant unless adequate mitigation is incorporated.

CDFW recommends that the DEIR include the following BUOW measures:

- Burrowing Owl Survey. A Designated Biologist shall conduct using the methods described in most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D](#) (2012). Surveys shall be conducted during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Non-breeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere on-site or within a 1650-foot accessible radius around the Project Area shall be recorded and mapped. The Designated Biologist shall submit the results of the survey, to the lead agency prior to beginning Project activities. If changes in BUOW presence are detected (e.g., BUOW have moved on-site or changed burrow use), the Designated Biologist shall contact the lead agency by phone or email within 24 hours of the observation to consult on appropriate measures to avoid or minimize impacts of the Project to BUOW and the Designated Biologist shall establish no-disturbance buffers.
- Burrowing Owl Preconstruction Survey. No more than 14 days prior to beginning Project activities, a Designated Biologist shall conduct a preconstruction survey for BUOW. Surveys shall be conducted during the breeding (February 1 to August 31) and overwintering (September 1 to January 31) seasons. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere on the site or within a 1650-foot accessible radius around the Project footprint shall be recorded and mapped. The Designated Biologist shall submit the results of the survey to the lead agency prior to beginning Project activities. If changes in BUOW presence are detected (e.g., BUOW have moved on-site or changed burrow use), the Designated Biologist shall contact the lead agency by phone or email within 24 hours of the observation to consult on appropriate measures to *avoid* or minimize impacts of the Project to BUOW and the Designated Biologist shall establish no-disturbance buffers. If a lapse in Project-related work of 14 calendar days or longer occurs, another preconstruction survey and consultation with the lead agency shall be required before Project work can be reinitiated, and

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the survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted.

- If a BUOW or evidence of presence at or near a burrow entrance is found to occur within 500 feet of the Project site, the following measures shall be implemented:
 - If BUOW are found during the breeding season (approximately February 1 to August 31), the Project applicant shall:
 - Avoid all nest sites that could be disturbed by Project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).
 - Establish a minimum 500-foot, up to 1650-foot non-disturbance buffer zone around nests, consistent the most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D](#) (2012). The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer shall be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist.
 - Construction may occur only outside of the 500-foot buffer zone during the breeding season and only if a qualified biologist monitors the nest and determines that the activities will not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a biological monitor confirms that such measures do not agitate the owls.
 - If BUOW are found during the non-breeding season (approximately September 1 to January 31), the Project applicant shall establish a minimum of 165-foot, up to 1650-foot no-disturbance buffer zone around active burrows consistent with the most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D](#) (2012). The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW consultation and provided a biological monitor confirms that such measures do not agitate the owls.
 - During the non-breeding season only, if a Project cannot avoid occupied burrows after all alternative avoidance and minimization measures are exhausted, Project applicant shall obtain an ITP for the Project. If eviction is

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considered, a BUOW eviction plan must be developed by a qualified biologist consistent with the most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D \(2012\)](#) and submitted to and approved by CDFW under an ITP. Burrow exclusion may not be conducted for burrows located in the Project footprint and within a 160-foot buffer zone until the ITP is obtained. All ITP conditions must be followed when excluding BUOW.

- Burrowing Owl Mitigation and Management Plan. A BUOW Mitigation and Management Plan shall be developed in consultation with CDFW and the most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D \(2012\)](#), or more current CDFW guidelines prior to Project construction. The BUOW Mitigation and Management Plan shall be submitted to the lead agency for review prior to the start of construction. The plan shall address long-term ecological sustainability and maintenance of the site for BUOW, where feasible in the solar development area (i.e., temporary impact areas) and in adjacent areas. The Plan shall require the applicant to achieve a performance standard of no net loss of BUOW nesting and foraging habitat and a minimum of 3 acres for each acre habitat replacement for nesting sites, function, and values and shall include the following elements:
 - A description of the preconstruction distribution and abundance of BUOW and existing habitat conditions at the Project site, including a burrow complex map showing natural burrow complexes and atypical burrows (e.g. culverts, buckled concrete, etc.) utilized by BUOW. The map shall show details and locations of all burrow sightings capable of supporting BUOW and shall indicate potential burrows, occupied burrows, satellite burrows, areas of concentrated burrows, and sign. The map shall include a title, an outline of the Project Area, north arrow, scale bar, and legend.
 - Avoidance and minimization measures to be implemented during Project construction to avoid direct and indirect impacts on BUOW (e.g., establishment by a qualified biologist of a minimum of 165 feet, up to 1650 feet, non-disturbance buffers around active burrows depending on the time of year and type of activity, consistent with the most recent guidelines from CDFW's [Staff Report on Burrowing Owl Mitigation, Appendix D \(2012\)](#)).
 - Proposed management of BUOW nesting and foraging habitat during Project operation and maintenance to achieve the goal of no net loss of existing habitat value for BUOW within temporary impact areas;
 - A monitoring and reporting plan addressing implementation and success of the management plan and identifying actions needed to maintain foraging and nesting habitat and reduce stressors on wintering and nesting BUOW;
 - An adaptive management plan that includes additional measures described below if the performance standards of no net loss of BUOW nesting and foraging habitat value are not being met;

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- If it is determined that off-site compensatory mitigation is necessary to comply with the performance standard of no net loss of habitat acreage, function, and values for BUOW, compensation shall be implemented consistent with the goals of preserving and linking high-quality habitat, preserving and reestablishing natural land covers that provide suitable habitat, and maintaining or expanding the existing distribution of the species within Placer County. The applicant may provide off-site compensatory mitigation to achieve the no net loss performance standard through acquisition of a conservation easement or mitigation credits from an appropriate mitigation bank, or another form of mitigation. Compensation may be layered with other mitigation requirements, such as for Swainson's hawk foraging habitat.

CDFW recommends that the DEIR disclose a list of the potentially occurring State-listed and candidate species within the Project area, based on review of available data and habitat conditions. The DEIR should identify potential impact so State-listed and candidate species in the plan area and develop general Avoidance and Minimization Measures to reduce impacts to State-listed and candidate species with a likelihood of being in the Project area. The DEIR should address the level of risk level of take occurring to State-listed and candidate species identified and SMUD should demonstrate compliance with CESA.

Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The DEIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The DEIR should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources, the DEIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;

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2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Review/EPIMS Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW also recommends including a discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Western Placer County Habitat Conservation Plan/Natural Community Conservation Plan (PCCP)

The Project is located within the boundaries of the PCCP. CEQA Guidelines section 15125(d) states that environmental documents must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans/natural community conservation plans). CDFW recommends that the DEIR include a discussion of each Project alternative's consistency with the PCCP and how SMUD will ensure that implementation of the Project alternatives do not impede the PCCP's ability to meet its

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permit conditions and biological goals and objectives. Particular focus in the environmental document's analysis should be directed to:

1. Analysis of potential impacts to all PCCP Covered Species.
2. Assessment of Project impacts to natural communities and constituent habitat types identified in the PCCP.
3. Identification of applicable PCCP avoidance, minimization, or mitigation measures.
4. Analysis of any impacts to reserve land commitments of the PCCP.
5. Discussion of any inconsistencies between the Project and the PCCP.

To identify any potential inconsistencies with the PCCP and provide special emphasis on rare or unique resources in compliance with CEQA, CDFW recommends that the DEIR also address the following:

1. Impacts to established or future reserve land managed under the Placer Conservation Authority (PCA).
2. Reduction of available reserve land in the PCCP (with appropriate buffers and setbacks as detailed in the PCCP).
3. Impacts to PCCP conservation zones and key habitat linkages.
4. Financial impacts to the PCA and fee payers under the PCCP.

Pollinators

The DEIR should include measures to increase use by pollinators such as dual use farming. The Project should be designed to optimize a balance between electrical generation and agricultural production (Jossi 2018) or native plants. Native plantings or dual use farming techniques provide additional foraging resources for pollinator species including but not limited to CBB and for other native species by increasing the amount of nectar resources on a local level. Incorporating locally native plantings or dual use farming techniques help to increase pollinator populations and would help to reduce project impacts to a less than significant level.

CDFW recommends the Project area be planted with deep-rooted native flowers and grasses that capture and filter storm water, build topsoil, and provide abundant and healthy food for bees and other insects that provide critical services to our food and agricultural systems as described on the Fresh Energy website at <https://fresh-energy.org/beeslovesolar/>.

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FILING FEES

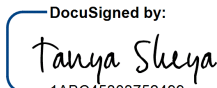
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order 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

Pursuant to Public Resources Code §21092 and §21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to provide early comments on the Project and to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. Questions regarding this letter or further coordination should be directed to Michael Shun, Senior Environmental Scientist (Specialist) at (916) 767-8444 or michael.shun@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tanya Sheya
Environmental Program Manager

ec: Dylan Wood, Senior Environmental Scientist (Supervisor)
Michael Shun, Senior Environmental Scientist (Specialist)
Patrick Moeszinger, Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

REFERENCES

- Jossi, Frank. 2018. Scientific American. Solar Farms Produce Power—and Food.
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- Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. (2009). *A Manual of California Vegetation*, 2nd ed. California Native Plant Society Press. Sacramento, California.
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