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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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July 6, 2026

Aditi Arya, Energy and Sustainability Manager
California State University, Bakersfield
9001 Stockdale Hwy, Mail Stop: 5CORP
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(661) 654-2211
ORG-CEQA@csub.edu

Subject: Ground Mount Solar and Battery Project (Project)
Initial Study/Mitigated Negative Declaration (MND)
State Clearinghouse No. 2026060645

Dear Aditi Arya:

The California Department of Fish and Wildlife (CDFW) received an MND from California State University, Bakersfield (CSUB) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA 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, 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 Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue 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 is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

[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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projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. 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.), related authorization as provided by the Fish and Game Code may be required.

Nesting Birds: CDFW has jurisdiction over actions with the potential to result in the disturbance or destruction of active nest sites or unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs, or nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: CSUB

Objective: The Project proposes to construct a ground-mounted photovoltaic (PV) solar energy system with associated electrical components necessary to generate 4.55 megawatts (MW) of renewable energy for use on the CSUB campus. The proposed Project also includes installation of a lithium-ion battery energy storage system (BESS) with an 11.7 megawatt-hour storage capacity.

Location: The proposed Project site is located on 15 acres within the main CSUB campus in the City of Bakersfield, Kern County. The site is bounded on the north by Kroll Way, on the east by the Arvin-Edison Canal, and on the west and south by undeveloped campus land.

Timeframe: Construction is anticipated to occur during an approximate 8-month period between October 2026 and December 2027.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist CSUB in adequately identifying and/or mitigating the Project's significant, or potentially

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significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the MND.

As stated in the MND, the Project site is currently undeveloped, consists primarily of non-native grasslands, and undergoes occasional maintenance activities (e.g., vegetation trimming, tilling). The CSUB campus is generally set in an urban landscape but contains a comparatively large amount of undeveloped land, including CSUB's 20-acre Environmental Studies Area (ESA) directly to the south of the Project site (used for teaching and research about the environment), and is surrounded by the Kern River and associated riparian habitat to the north.

A Biological Resources Assessment (BRA), including a field survey conducted on February 12, 2026, was prepared in support of the MND and identified four special-status species that are either expected or have moderate potential to occur on the Project site: the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*); the State candidate western burrowing owl (*Athene cunicularia hypugaea*); and the State species of special concern (SSC) Bakersfield legless lizard (*Anniella grinnelli*) and San Joaquin coachwhip (*Masticophis flagellum ruddocki*). The MND evaluates the Project's potential impacts on these species and concludes impacts would be less than significant with mitigation incorporated. Accordingly, the MND proposes mitigation measures to reduce the Project's impact on special-status species to a less-than-significant level.

CDFW has concerns about the ability of the MND's proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for the species above as well as the State threatened Swainson's hawk (*Buteo swainsonii*); the State candidate Crotch's bumble bee (*Bombus crotchii*); the State SSC western spadefoot (*Spea hammondii*); and special-status plant species.

San Joaquin Kit Fox

The MND states that San Joaquin kit fox (SJKF) is considered present within the CSUB campus and is expected to occur on the Project site. The MND provides Mitigation Measure (MM) BIO-4 to mitigate impacts to SJKF, which discloses that CSUB is currently in the process of acquiring a State Incidental Take Permit (ITP) for SJKF and requires the Project to adhere to several avoidance and mitigation measures listed in the ITP. CDFW would like to clarify that the measures outlined in MM BIO-4 are those proposed by CSUB in its ITP application. The ITP has not been issued and, therefore, the avoidance, minimization, and mitigation measures in the issued ITP may be different than the measures listed in MM BIO-4.

Nonetheless, for purposes of CEQA, CDFW concurs with several portions of MM BIO-4, including SJKF preconstruction surveys no less than 14 days and no more than 30 days prior to ground disturbance; implementation of an employee education program; monitoring during construction; immediate reporting of any SJKF incident to CDFW; and

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implementation of the listed best management practices during construction. However, for purposes of CEQA, CDFW does not concur with the remainder of MM BIO-4. Absent an ITP issued prior to the start of Project construction, CDFW does not recommend excavating, sealing, or otherwise preventing or discouraging use of any known dens (i.e., any dens that are currently used or have been used at any time in the past) during the pupping season, even if they are determined to be inactive at any given time. Additionally, CDFW asserts that avoidance of an active natal den by 100 feet is likely insufficient to reduce impacts to less than significant and recommends an appropriate buffer distance be determined in consultation with CDFW and the U.S. Fish and Wildlife Service (USFWS) in accordance with the USFWS "Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance" (2011; USFWS Protocol). Lastly, CDFW stresses that if a SJKF individual were to move into the Project site during construction (or operation), all work should stop while a biologist assesses the situation, but harassment of the fox under any circumstances would likely be considered take under the federal Endangered Species Act and may be considered take under CESA. It is recommended to contact CDFW immediately if a SJKF enters the Project site, especially during construction, to determine the best course of action. Proceeding with this Project without an ITP has the potential to result in unauthorized take of SJKF, which would be a violation of CESA, and unauthorized take could result in an enforcement action.

If CSUB's ITP is issued prior to the start of Project construction, CSUB would be required to adhere to the Conditions of Approval within the ITP. However, to ensure impacts to SJKF are reduced to less than significant for purposes of CEQA, and in the event an ITP is not issued prior to the start of construction, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 1: SJKF Den Protection

CDFW recommends prohibiting excavation, sealing, or otherwise preventing or discouraging use of any known SJKF den, whether it is determined to be active or inactive, without an issued ITP for SJKF and extensive coordination with CDFW.

Recommended Mitigation Measure 2: SJKF Avoidance Buffer

CDFW recommends implementing no-disturbance buffers, as described in the USFWS Protocol, around potentially suitable or known SJKF den sites during Project implementation.

Swainson's Hawk

The Project's BRA determined that suitable Swainson's hawk (SWHA) foraging habitat is present within the Project site, but that suitable nesting habitat is not present and thus

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the species is not expected to occur. As a result, no specific mitigation measures are provided in the MND for SWHA. CDFW does not concur that SWHA can be expected to be absent from the Project site. SWHA are known to breed within the Central Valley of California and prefer to nest and forage in alfalfa, fallow fields, field crops, and grassland habitats with a sufficient source of small mammals (CDFG 1994). Upon review of aerial imagery, numerous tall trees that may be suitable for SWHA nesting appear to be located throughout the CSUB campus and immediately adjacent to the site, including on the ESA and open fields to the south. While it is accurate that no recent SWHA occurrences have been documented in the Project vicinity, CDFW notes that the California Natural Diversity Database (CNDDB) is populated by records through voluntary submissions of species detections and, as a result, the lack of an occurrence record in the CNDDB does not mean a species is not present. Species may be present in locations not depicted in the CNDDB, but where there are suitable habitat features capable of supporting species.

As suitable foraging habitat is present within the Project site, SWHA have been known to nest in the Project vicinity in areas such as the Kern River, and many suitable nest trees are located in the Project vicinity, the MND should be revised to note that SWHA has the potential to occur on the Project site. Additionally, in order to reduce impacts to less than significant and avoid unauthorized take, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 3: SWHA Surveys Prior to Construction

CDFW recommends that a qualified biologist conduct surveys for nesting SWHA following the entire survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000) the survey season immediately prior to construction. Please be advised that CDFW considers a nest active if it was used one or more times within the last 5 years.

Recommended Mitigation Measure 4: SWHA Avoidance Buffer

If Project-specific activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, CDFW recommends a minimum 0.5-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent nest abandonment and other take of SWHA as a result of Project activities.

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Recommended Mitigation Measure 5: SWHA Take Authorization

In the event an active SWHA nest is detected, and a 0.5-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), is necessary to comply with CESA.

Western Burrowing Owl

According to the MND, western burrowing owl (BUOW) has moderate potential to occur within the Project site due to the suitable grassland habitat and numerous ground squirrel burrows present onsite. Additionally, a BUOW individual was observed nearby on the CSUB campus in 2025. The MND provides MM BIO-3 to mitigate impacts to BUOW, which requires that a qualified biologist conduct a preconstruction survey for BUOW 14 days before ground disturbance and, if BUOW is detected, that coordination with CDFW occur regarding the need for an ITP. CDFW concurs that preconstruction surveys and consultation with CDFW are needed but does not concur that MM BIO-3 is sufficient to reduce impacts to BUOW to less than significant. CDFW recommends the measure be revised to include the following:

Recommended Mitigation Measure 6: BUOW Preconstruction Surveys

CDFW recommends that focused surveys, specifically following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012), be conducted the survey season immediately prior to construction. Please note that the 2012 Staff Report necessitates multiple surveys prior to the initiation of construction.

Recommended Mitigation Measure 7: BUOW Avoidance Buffer

Should a BUOW or known BUOW den (active or inactive) be detected, either during preconstruction surveys or construction activities, CDFW recommends that no-disturbance buffers, as outlined in the 2012 Staff Report, be implemented prior to and during any ground-disturbing activities. CDFW recommends that these buffers be implemented for both wintering and breeding BUOW.

Recommended Mitigation Measure 8: BUOW Take Authorization

If a BUOW or known BUOW den (active or inactive) is detected, and the no disturbance buffers outlined in the 2012 Staff Report on Burrowing Mitigation are not feasible, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), is necessary to comply with CESA.

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Crotch's Bumble Bee

The Project's BRA concluded that Crotch's bumble bee (CBB) is not expected to occur on the Project site because the nonnative grassland present onsite is not suitable habitat for CBB. As a result, no specific mitigation measures are provided in the MND for CBB. CDFW does not concur that CBB can be assumed to be absent from the Project site. CBB are generalist foragers and have been documented visiting a wide variety of flowering plants, including those from plant families present on the Project site (i.e., Apocynaceae, Asteraceae, and Fabaceae; Xerces Society et al. 2018). Further, numerous small mammal burrows, which CBB may use for nesting, were observed on the site. The MND also mentions a recent CBB occurrence record located approximately 2.5 miles from the site; in fact, there are several recent occurrences within 2 to 7 miles (CDFW 2026).

Given the presence of potentially suitable CBB nesting and foraging habitat on the Project site and recent nearby occurrence records, CDFW recommends the MND include the following measures to avoid potentially significant impacts to CBB and unauthorized take:

Recommended Mitigation Measure 9: CBB Preconstruction Surveys

CDFW recommends a qualified biologist conduct focused surveys for CBB and their requisite habitat features within and adjacent to the Project site following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023), during the blooming period immediately prior to Project initiation.

Recommended Mitigation Measure 10: CBB Avoidance and Consultation

If CBB is detected, CDFW recommends that all small mammal burrows and thatched/bunch grasses be initially avoided by a minimum of 50 feet to avoid take and potentially significant impacts until CDFW can be consulted regarding an appropriate avoidance area. Any detection of CBB prior to or during construction warrants consultation with CDFW to discuss how to avoid take, regardless of time of year.

Recommended Mitigation Measure 11: CBB Take Authorization

If take of CBB cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), is necessary to comply with CESA.

State Species of Special Concern

The MND identifies the State SSC Bakersfield legless lizard (BLL) and San Joaquin coachwhip (SJC) as species with moderate potential to occur within the Project site.

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However, the only mitigation measure pertaining to these species is MM BIO-2, which requires general biological monitoring during construction activities and, alone, is insufficient to reduce potential impacts to less than significant for BLL, SJC, and other State SSCs that may be present on the Project site. CDFW recommends the MND also include the following measures:

Recommended Mitigation Measure 12: SSC Preconstruction Survey

Prior to the start of work, CDFW recommends that a qualified biologist conduct focused surveys for BLL and SJC and their requisite habitat features.

Recommended Mitigation Measure 13: SSC Avoidance

Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around these species and their associated burrows and habitat areas. CDFW also recommends that, if these species are found, Project activities in their immediate vicinity cease, allowing individuals to leave the Project site on their own accord.

Western Spadefoot

The Project site is within the known geographic range of western spadefoot (WESP), and several occurrences have been documented in the vicinity of the site (CDFW 2026). While WESP occurs primarily in grasslands, seasonal wetlands, and vernal features, WESP is also known to utilize agricultural ponds, ditches, canals, flooded areas of orchards, flooded areas on construction sites, inlet and outlet of culverts with standing water, and sumps for breeding. The Project's BRA states that suitable WESP upland habitat (i.e., grassland habitat) is present within the Project site, but concludes the species is not expected to occur as no vernal pools are present on the site. While the site may not have vernal pools, CDFW recommends that a further evaluation occur to assess whether other aquatic features, such as agricultural ditches or other agriculturally inundated areas which may support WESP breeding or dispersal, may be present within the Project site or vicinity.

CDFW recommends that a qualified biologist conduct a habitat assessment for WESP to determine if suitable breeding and refugia habitat is present. All the potential areas stated above, including but not limited to seasonal wetlands, vernal features, agricultural ponds, ditches, canals, and sumps should be identified as part of this assessment. If suitable habitat is detected, CDFW recommends that a qualified biologist conduct focused surveys for WESP, using appropriate survey methodologies and during the appropriate time of year, within these areas. If it is determined that WESP is present or has the potential to be present within the Project site, consultation with CDFW is recommended for guidance on avoidance, minimization, and mitigation measures.

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On September 24, 2025, the California Fish and Game Commission (FGC) received a petition to list the northern population of WESP as a threatened species and the southern population of WESP as an endangered species under CESA. At the FGC meeting on April 18, 2026, CDFW presented its determination that the petition provided sufficient scientific information that the petitioned action to list WESP under CESA may be warranted; however, the FGC has deferred its decision on WESP candidacy until the August 2026 meeting. If WESP becomes a candidate for listing or ultimately becomes listed as threatened or endangered pursuant to CESA, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), will be necessary to comply with CESA if full avoidance of WESP cannot be achieved. Please note that implementation of the recommended measures above would help minimize impacts to WESP as required by CEQA but may not fully avoid impacts and thus take. Additional measures may need to be implemented to avoid take of WESP. In the event that WESP becomes protected under CESA, CDFW recommends early consultation to help identify if avoidance is feasible or, if not, to initiate discussions regarding the need for ITP acquisition.

Editorial Comments and/or Suggestions

Wildlife Friendly Fencing: CDFW recommends that all fencing installed on the perimeter of the Project be designed to allow for passage of small and medium-sized wildlife, while impeding the passage of larger predators such as coyotes and similar species. Perimeter fencing should be installed with a continuous 4- to 6-inch gap from the ground to the bottom of the fencing material and knuckled back to form a smooth edge and allow permeability for wildlife.

CNDDB: Please note that the CNDDB is populated by records through voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB, but where there are suitable habitat features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. To adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) using the appropriate protocol survey methodology are warranted to determine whether any special-status species are present at or near the Project site.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to the CNDDB at the following email

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address: CNDDB@wildlife.ca.gov. The types of information reported to the CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

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

CDFW appreciates the opportunity to comment on the MND to assist CSUB in identifying and mitigating Project impacts on biological resources. Please see the enclosed Mitigation Monitoring and Reporting Program (MMRP) table (Attachment 1) which corresponds with the recommended mitigation measures in this comment letter. If you have any questions, please contact Amanda Canepa, Senior Environmental Scientist (Specialist), at the address provided on this letterhead, by telephone at (805) 746-0721, or by electronic mail at Amanda.Canepa@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Krista Tomlinson
12950B95267A4F5...

For Julie A. Vance
Regional Manager

Attachment 1 (MMRP)

ec: State Clearinghouse
Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

Amanda Canepa
California Department of Fish and Wildlife

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REFERENCES

California Department of Fish and Game. 1994. Staff report regarding mitigation for impacts to Swainson's hawks (*Buteo Swainsoni*) in the Central Valley of California. Sacramento, California, USA.

California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.

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California Department of Fish and Wildlife. 2026. Biogeographic information and observation system (BIOS). https://www.wildlife.ca.gov/Data/BIOS. Accessed 29 June 2026.

Swainson's Hawk Technical Advisory Committee. 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in California's Central Valley. Swainson's Hawk Technical Advisory Committee.

U. S. Fish and Wildlife Service. 2011. Standard Recommendations for the Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office, Sacramento, California, USA.

Xerces Society for Invertebrate Conservation (Xerces Society), Defenders of Wildlife, and Center for Food Safety. 2018. A petition to the state of California fish and game commission to list the Crotch's bumble bee (Bombus crotchii), Franklin's bumble bee (Bombus franklini), Suckley cuckoo bumble bee (Bombus suckleyi), and western bumble bee (Bombus occidentalis occidentalis) as Endangered under the California Endangered Species Act. October 2018.

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Attachment 1

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Attachment 1
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Ground Mount Solar and Battery Project by California State University, Bakersfield

SCH No.: 2026060645

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
SWHA	
Recommended Mitigation Measure 3: SWHA Surveys Prior to Construction	
Recommended Mitigation Measure 5: SWHA Take Authorization	
BUOW	
Recommended Mitigation Measure 6: BUOW Preconstruction Surveys	
Recommended Mitigation Measure 8: BUOW Take Authorization	
CBB	
Recommended Mitigation Measure 9: CBB Preconstruction Surveys	
Recommended Mitigation Measure 11: CBB Take Authorization	
State SSC	
Recommended Mitigation Measure 12: SSC Preconstruction Survey	
During Construction	
SJKF	
Recommended Mitigation Measure 1: SJKF Den Protection	
Recommended Mitigation Measure 2: SJKF Avoidance Buffer	
SWHA	
Recommended Mitigation Measure 4: SWHA Avoidance Buffer	
BUOW	
Recommended Mitigation Measure 7: BUOW Avoidance Buffer	
CBB	

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Recommended Mitigation Measure 10: CBB Avoidance and Consultation	
State SSC	
Recommended Mitigation Measure 13: SSC Avoidance	