

Hingtgen, Robert J

From: Gungle, Ashley
Sent: Wednesday, January 14, 2015 11:50 AM
To: Hingtgen, Robert J; Fogg, Mindy
Subject: FW: Final Program Environmental Impact Report for the Proposed Soitec Solar Development Project, San Diego County, California
Attachments: 13B0073-15CPA0094_SDG_Soitec Solar_FEIR Comments_s20150114_ds.pdf

Rob- can you please add these to the AR?

Ashley Gungle, Land Use/ Environmental Planner
COUNTY OF SAN DIEGO | Planning & Development Services
T. 858.495.5375

From: Garn, John [mailto:john_garn@fws.gov]
Sent: Wednesday, January 14, 2015 11:24 AM
To: Gungle, Ashley
Cc: Sevrens, Gail@Wildlife; eric.weiss@wildlife.ca.gov; Thomas Dietsch
Subject: Final Program Environmental Impact Report for the Proposed Soitec Solar Development Project, San Diego County, California

Good morning,

Please see attached.

Sincerely,
John

--
John Garn
Office Assistant
US Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, CA 92008
760.431.9440 Front Desk x200 / Office x251



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer To:
FWS-SD-13B0073-15CPA0094

JAN 14 2015

Ms. Ashley Gungle
County of San Diego
Department of Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Subject: Final Program Environmental Impact Report for the Proposed Soitec Solar Development Project, San Diego County, California

Dear Ms. Gungle:

We have reviewed the final Program Environmental Impact Report (FEIR) and response to comments for the proposed Soitec Solar Development Project (SSDP) dated December, 2014. The applicant(s) (Tierra del Sol Solar LCC, Rugged Solar LCC, LanWest Solar LCC, LanEast Solar LCC, and Soitec Solar Development LCC) propose to construct and operate four renewable energy solar farms. The FEIR addresses the LanEast and LanWest solar farms at a programmatic level, Rough Acres and Tierra del Sol at the project level, and Los Robles as an alternative. The solar farms (i.e., the project) would encompass up to 1,490 acres located in the Boulevard Subregion of southeastern San Diego County (County). The proposed project occurs within the plan boundary of the draft East County Multiple Species Conservation Program (MSCP). We offer the following comments based on the County's responses to our March 3, 2015 letter on the draft EIR (DEIR).

We previously recommended development of a Bird and Bat Conservation Strategy to monitor and adaptively manage post-construction impacts to birds and bats. While we appreciate the applicant's proposal to develop a Bird and Bat Monitoring Program, we reiterate our recommendation that the County and applicant work with the Service and the California Department of Fish and Wildlife (Department) to develop such a plan. Coordination with the Service and Department will better ensure that its implementation will provide adequate data to assess impacts on the project site and that the data can contribute to regional efforts to assess impacts of solar projects to birds and bats. Collaboration on an adaptive management strategy is important so that appropriate measures can be implemented if the data demonstrates that project-related impacts to birds and/or bats occur.

We recommended the County and the applicant analyze the project for consistency with the draft East County Multiple Species Conservation Program Plan (MSCP), including the potential for impacts to wildlife connectivity in the area. In response, the FEIR claims that the project is planned in accordance with the draft East County MSCP; however, the proposed project is broadly in conflict with the conservation objectives of the draft East County MSCP as defined by the Focused Conservation Areas (FCAs). FCAs were identified to serve important ecological functions, and an effective analysis of MSCP consistency must identify the ecological functions that the FCAs were

intended to preserve and address how the project will affect these functions. For example, the Rough Acres and Los Robles sites were likely identified as FCAs to augment large conserved blocks that support all aspects of wildlife habitat. Project construction and operation have the potential to eliminate some habitat functions such as sheltering and breeding, and these projects may have the potential to constrain wildlife movement across the landscape.

In response to our recommendation regarding surveys for the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*; *Quino*), the applicant proposes to update surveys for all sites that are included in the program or programmatic analysis. We appreciate the County and applicant's response to our DEIR comment regarding Quino surveys. However, we also recommended that site-specific studies be conducted to assess the potential for impacts to golden eagles (*Aquila chysaetos*). The County and the applicant do not propose to conduct additional studies but rather are relying on existing data from previous studies in the project area. We remain concerned that the existing information may not be sufficient to assess the full scope of potential impacts to golden eagles and recommend that the County and applicant meet with the Service to further discuss this matter.

In our comment letter, we noted the lack of site-specific information to analyze the potential for project-related impacts at the Los Robles, Lan East, and Lan West sites. The County proposes to defer site-specific surveys because these sites are analyzed in at the "programmatic" level rather than the "project" level. Should these sites move forward for project-level consideration, we recommend the County analyze the potential for impacts to sensitive species through site-specific surveys as well as impacts to wildlife movement from the Mexican border north; specifically, where wildlife might cross Interstate 8.

We appreciate the opportunity to comment on the FEIR and are available to work with the County and project applicant to address our concerns. If you have any questions regarding these comments or our recommendations, please contact Eric Porter (eric_porter@fws.gov; 760-431-9440, extension 285).

Sincerely,


for Karen A. Goebel
Assistant Field Supervisor

cc:

Ed Pert, California Department of Fish and Wildlife, San Diego, CA

Thomas Dietsch, US Fish and Wildlife Service, Migratory Bird Program, Carlsbad, CA