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In Reply Refer To:
FWS/CDFW-13B0073-14TA0062

DEC - 4 2013

Mr. Patrick Brown
Permitting Manager, Solar Energy Division
Soitec Development LLC
16550 Via Esprillo
San Diego, California 92127

Subject: Biological Evaluation of the Proposed Soitec Mitigation Site, San Diego County, California.

Dear Mr. Brown:

Soitec Development, LCC has requested comments from the U. S. Fish and Wildlife Service and California Department of Fish and Wildlife (Wildlife Agencies) regarding the suitability of a property referred to as the Soitec Mitigation Property (Property) to mitigate biological impacts associated with development of proposed solar farms in the Boulevard area of eastern San Diego County (County). The County and the Wildlife Agencies entered into a planning agreement in 2008 for the development of Multiple Species Conservation Program (MSCP) plans to address regional conservation needs and future planned development in north and east County. The planning agreement includes an interim review process to ensure that projects do not compromise conservation objectives prior to the completion of the MSCP plans. The Wildlife Agencies have reviewed the August 21, 2013 Memorandum Evaluation of Biological Resources for the Soitec Mitigation Site and conducted a field visit of the Property on October 25, 2013, in coordination with the County. Our comments are based on the provided information, our knowledge of sensitive species and declining vegetation communities in the County, and our participation in regional conservation planning efforts.

At this time, the Wildlife Agencies cannot comment on the suitability of the Property to offset project related impacts because the specific impacts associated with each of the proposed solar projects have not been fully quantified. Once we have had an opportunity to visit the entire Property and the specific impacts associated with each of the projects are characterized and quantified using current biological survey information, the Wildlife Agencies will be better positioned to provide more direction on the suitability of the Property to address specific project mitigation needs. However, the Wildlife Agencies are able to generally assess the biological value of the Property in terms of representation of native habitat characteristics, biological diversity, functional value within a landscape context, and what regional conservation planning has identified thus far for the area. The latter focuses on the potential value of the Property in contributing to the conservation goals and preserve assembly envisioned for the draft East County MSCP, which focuses on conserving

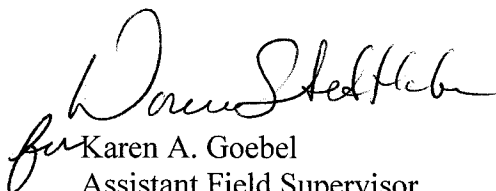
representative large patches of habitat that provide connectively to other large blocks of habitats.

The 2,619-acre Property is located between the unincorporated community of Boulevard, San Diego County, California and Mexico. As with the surrounding undeveloped areas, the Property is dominated by various upland scrub and chaparral vegetation communities. According to the Memorandum Evaluation of Biological Resources, the Property hosts over 20 acres of oak woodland and approximately 10 acres of riparian habitat. Water resources on the property include ephemeral washes and at least two water bodies (e.g., Lake Domingo). Less than 100 acres of the property is considered disturbed or dominated by non-native vegetation. Although comprehensive surveys have not been completed, the Property appears to support special-status species that are typical for the area.

From a landscape perspective, the Property has the potential to function as a connection between natural habitat to the south in Mexico and existing protected land north of Interstate 8 (I-8). Given existing impacts of ranching practices to the east and west, the Property appears to be logically positioned to provide this north-south connection. As there appear to be limited opportunities for unconstrained north-south connections in the east San Diego County region, the Property may serve as an integral component for maintaining connectivity, including vegetation cover and water sources essential for wildlife movement. Consistent with this assessment, the Property is located within the focused conservation area (FCA) identified by the draft East County MSCP where conservation and mitigation are anticipated to be targeted in order to assemble the East County MSCP preserve (Independent Science Advisor's Documentation Binder/Workshop #1, February 2006 and the January 2007 Workshop). From a regional landscape connectively perspective, the overall value of the site diminishes if a connection linking this property to lands to the north and through I-8 cannot be provided. At this time, we anticipate that the north-south connection in this area of east County would include the McCain Valley underpass and adjacent lands.

Thank you for the opportunity to comment on the proposed Property. Should you have any questions regarding this letter, please contact Eric Porter of the U.S. Fish and Wildlife Service at eric_porter@fws.gov or 760-431-9440 and/or Eric Weiss of the Department of Fish and Wildlife at eric.weiss@wildlife.ca.gov or 858-467-4289.

Sincerely,



Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

cc:

Ashley Gungle, County of San Diego