Comment Letter O7

Hingtgen, Robert J

From: Bill Tippets <btippets@tnc.org>
Sent: Tuesday, February 25, 2014 9:51 AM
To: Hingtgen, Robert J; Fogg, Mindy; Stephenson, Bobbie
Cc: Alfredo B. Gonzalez; Laura Crane; Bill Christian; Trish Smith; John Randall; Jerre Stallcup; Dan Silver (dsilverla@me.com); Gail Sevrens (Gail.Sevrens@wildlife.ca.gov); Doreen Stadtlander (Doreen_Stadtlander@fws.gov)
Subject: Soitec PEIR Comments
Attachments: Soitec PEIR final TNC comments_25 Feb 14.pdf

Dear Mr. Hingtgen, et al.,

Attached are The Nature Conservancy's comments on the Soitec PEIR. The Conservancy has been involved in conservation planning and helping to build the conservation reserves in San Diego County for two decades. East San Diego County does not have a formal reserve plan, and large projects that may impact future conservation efforts should be carefully analyzed for, and avoid significant impacts to, habitat lands that could preclude effective conservation in that part of the County. The Conservancy supports renewable energy projects as an important component of the larger efforts to reduce greenhouse gas emissions and address climate change effects when they are compatible with effective conservation planning. O7-1

Our comments identify a number of concerns about the level of available biological information in the PEIR documents and potential effects that the project or alternatives could have on future conservation planning. This is a complex project and we appreciate the extent of public involvement and information sharing that the County has provided. We look forward to working with the County as this project proceeds.

Regards,

Bill Tippets

Please consider the environment before printing this email

William E. Tippets
Senior Project Director

btippets@tnc.org
(619) 209-5830 x 14408 (new)
(619) 822-4323 (Mobile)
(619) 702-7621 (Fax)

The Nature Conservancy
San Diego Office
402 W. Broadway, Suite 1350
San Diego, CA 92101

The Nature Conservancy
Protecting nature. Preserving life.

nature.org

1

Response to Comment Letter O7

The Nature Conservancy
Bill Tippets
February 25, 2014

O7-1 The County of San Diego (County) appreciates the Nature Conservancy's comment and acknowledges the Nature Conservancy's role in conservation planning in the region. Specific comments on the Proposed Project are addressed below.

The Nature Conservancy
Protecting nature. Preserving life.

The Nature Conservancy
San Diego Field Office
402 West Broadway, Suite 1350
San Diego, CA 92101

Tel: (619) 209-5830
Fax: (619) 702-7621
nature.org
nature.org/california

February 25, 2014

RECEIVED
FEB 25 2014
Planning and Development Services

Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Attention: Robert Hingtgen

RE SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR), LOG NO. PDS2012-3910-120005 (ER); 3800-12-010 (GPA); TIERRA DEL SOL, 3300-12-010 (MUP); 3600-12-005 (REZ); 3921-77-046-01 (AP); RUGGED SOLAR, 3300-12-007 (MUP); SCH NO. 2012121018

Dear Mr. Hingtgen:

The Nature Conservancy (Conservancy) is an international non-profit conservation organization working around the world to protect ecologically important lands and waters for nature and people, seeking to preserve the lands and waters upon which all life depends. We are known for our science-based collaborative approach to developing creative solutions to conservation and development challenges. We carry out on-the-ground conservation work in all 50 states and across the globe with the support of approximately one million members, and have protected nearly 15 million acres of land in the US and Canada, including 1.5 million acres in the State of California.

In California, the Conservancy participates actively in large-scale energy siting and mitigation issues. We contributed extensively to the BLM's Solar Programmatic Environmental Impact Statement and to the ongoing state and federal Desert Renewable Energy Conservation Plan processes. We also worked with the Bureau of Land Management, the U.S. Fish and Wildlife Service, and California state agencies in evaluating mitigation approaches to solar energy development proposals on private land in the Carrizo Plain. Our primary focus has been to advocate the use of landscape-level analysis and planning as the foundation for making siting and mitigation decisions. We believe that our work, centered to date on renewable energy development, has been useful to permitting agencies, energy developers, and key stakeholders. O7-2

We have worked in San Diego County, an area of global ecological significance, for more than 20 years. Since 2004, the Conservancy has included eastern San Diego County in our conservation planning; this area has significant biological resources and functions as a key part of the Peninsular Range landscape connectivity to Baja California. The Conservancy acknowledges the importance and need for California (and San Diego County) to increase clean, renewable energy supplies and supports efforts to develop renewable energy that is consistent with good conservation planning.

The Proposed Project encompasses a total of approximately 1,490 acres within the Mountain Empire Subregional Plan area in unincorporated San Diego County. The four individual solar farms comprising the Proposed Project would utilize concentrator photovoltaic (CPV) electric generation system technology to produce solar energy at the utility-scale. Together, these four solar farms comprise the whole of the action as defined by the California Environmental Quality Act (CEQA). The Proposed Project would produce up to 168.5 megawatts (MW) of solar energy and would be located on approximately 1,490 acres in southeastern San Diego County. O7-3

As noted in the PEIR, the Soitec project is an Environmental Leadership Development Project. That designation and the Project Objectives identify certain expectations and commitments on the project including but not limited to adding to the State's renewable energy supply, economic investment and job creation in California, and environmental benefits (e.g., supporting the State's climate change goals). The PEIR provides a detailed description of key elements of the project and

O7-2 The County concurs with this comment. This comment does not raise specific issues related to the Proposed Project or adequacy of the environmental analysis in the Draft Program Environmental Impact Report (DPEIR); therefore, no additional response is provided or required.

O7-3 The County concurs with this comment. This comment does not raise specific issues related to the Proposed Project or adequacy of the environmental analysis in the DPEIR; therefore, no additional response is provided or required.

how it would meet the project objectives. It provides specific analyses of the Rugged and Tierra Del Sol project components but not the Lan East and West components, and presents a range of alternatives to the Proposed Project and identifies an Environmentally Superior Alternative that would address all components (Alternative 7). O7-3 Cont.

In reviewing the Soitec PEIR and associated documents, we have identified a number of substantive issues and additional information needs that should be addressed in the document in order for the public and lead agency/decision-makers to be fully informed about the project and its impacts. Our focus is on biological resources, potential impacts to those resources, and the ramifications to conservation in eastern San Diego County. O7-4

Regional Conservation Issues

The County of San Diego has prepared a draft Focused Conservation Area (FCA) map for east county. However, that map does not include all of the biological considerations that constitute a full habitat and species conservation planning map – such as those prepared for the Multiple Species Conservation Plan areas that address the western portions of the County. Also, the draft map was created prior to the County finalizing General Plan 2020. The PEIR should provide an updated evaluation of existing conserved lands, potential conservation (i.e., the FCA analysis, with additional information collected a part of this PEIR process) and other regional conservation assessments such as the Las Californias Binational Conservation Initiative (which is referenced in the PEIR documents). O7-5

The PEIR includes a map (Figure 1-12) illustrating past, present and reasonably foreseeable projects in project area that could contribute to cumulative effects – which should address effects on regional conservation. An important regional conservation concern is what effects the project would have on animal movement in the area. The PEIR acknowledges that no specific movement studies were conducted (Page 2.3-140 et seq.) but states that there are no known or defined wildlife movement corridors on proposed project area and the proposed project as well as the other foreseeable project pose a cumulative impact that is less-than-significant to habitat linkages and wildlife corridors. We believe that this conclusion is not supported by the information in the documents. Wildlife tracking studies on the project site(s), as well as along Interstate 8 within the project area would provide the information necessary to determine whether -- or where – the project would pose a significant potential impact to wildlife. For example, if wildlife is using undercrossings within or near the project development sites, development may cause animals to avoid the project development areas and use other crossings that may be less safe or effective. O7-6

Alternatives Analysis

The alternatives analysis describes eight alternatives (the "reasonable range of feasible alternatives") to the proposed project. However, four of the alternatives (Alternative Locations 1-4) would relocate substantial portions of the proposed project development to the "Los Robles" property. The biological condition and resources on that property are only generally described, and the level of information is not comparable to what is provided for the Rugged and Tierra Del Sol sites, or even the Lan East and West sites (which are not analyzed at the level of detail as Rugged and Tierra Del Sol). The lack of comparable site information, specifically biological resources, presents a significant obstacle to evaluating the merits of those alternative locations and is a serious omission in the PEIR. O7-7

Sensitive species are found throughout this part of the County. It is not clear what species, and what level of impacts, would occur if a large portion of the Los Robles site were developed. While the PEIR states that the acreage of that site could allow for development to be sited to avoid/minimize impacts to sensitive species, the absence of species information compromises the presumed certainty of that statement of intent. Ideally, information about the Los Robles alternative site should be have been obtained during the periods when the bulk of the Rugged and Tierra Del Sol sites were surveyed.

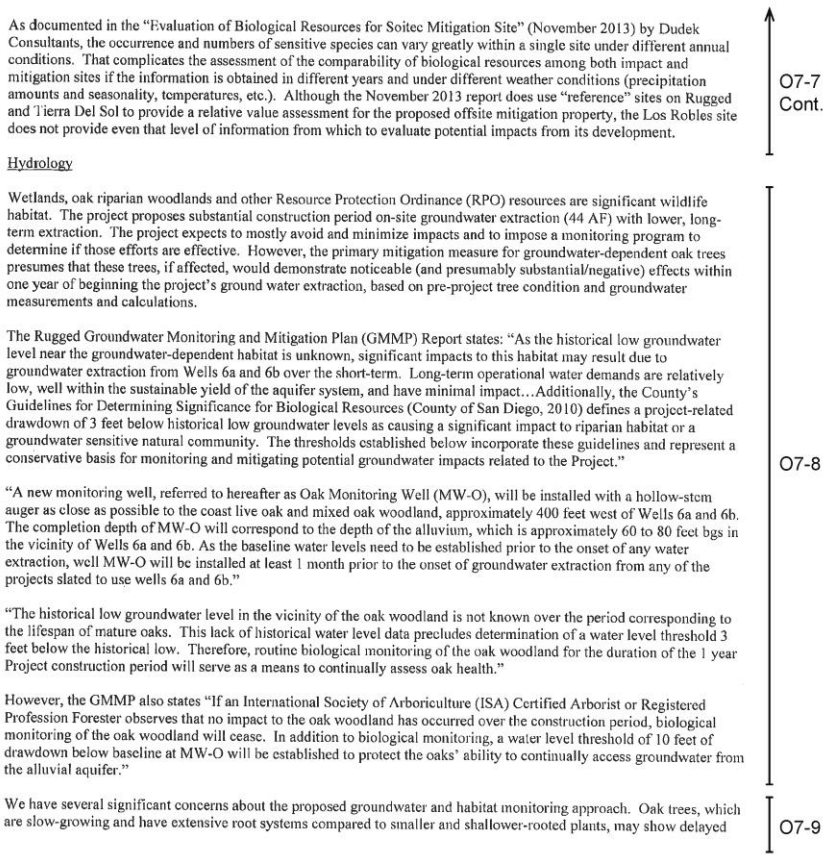
O7-4 Specific comments on the Proposed Project are addressed below.

O7-5 The comment is acknowledged; since 2008, there have been a number of initiatives which seek to conserve key linkages across the U.S./Mexico border (South Coast Wildlands, Las Californias, La Posta Linkage, etc.), but none is as comprehensive as the completion of the East County Multiple Species Conservation Program (ECMSCP) promises. Only the completion of the ECMSCP would meet the full need.

The applicant continues to work with the County to help the entire ECMSCP move forward. That effort has to be integrated into the larger County process, which due to resources, staffing, and more development pressure, prioritizes the completion of the more urbanizing North County MSCP over the ECMSCP. Due to these constraints, the applicants coordinated with other projects, both renewable and otherwise, under the rubric of the East County Renewables Coalition, to ensure that future preserve planning will not have options foreclosed with the forthcoming projects going forward. In other words, the Proposed Project was planned as if the preserve plan were done and fit within that construct. The applicants continue to push for funding, and have worked to obtain San Diego Association of Governments (SANDAG) grants to fund regional

		mapping of key constituent species such as golden eagles (*Aquila chrysaetos*). These studies will be used as part of the database to inform future planning decisions as the ECMSCP moves forward. In addition, the Interim Review Process provided in the Planning Agreement (County et al. 2008) for the ECMSCP ensures that projects initiated in the ECMSCP planning area prior to the adoption of the ECMSCP do not compromise the successful implementation of the ECMSCP (Planning Agreement, Exhibit B, p. 1). Through the Interim Review Process, the CDFW and USFWS collaboratively review projects that may have the potential to preclude long-term preservation planning or impact the viability of biological resources. The project analysis supports the finding that the Proposed Project would not preclude or prevent the preparation of the ECMSCP because the Proposed Project has been designed in accordance with the preliminary conservation objectives outlined in the Planning Agreement.
	O7-6	The County disagrees that the analysis in the DPEIR is inadequate to support less-than-significant conclusions regarding impacts to habitat linkages and wildlife corridors from development of the Tierra del Sol and Rugged solar farms. The analysis is based on surveys of the site and site visits, and takes into consideration geography of the region, the presence/absence of riparian

		corridors and other water bodies, connectivity to adjacent sites, and existing habitat, among other factors. The County also disagrees that wildlife tracking studies are required to determine whether the Proposed Projects pose a potentially significant impact to wildlife corridors. Please refer to the analysis presented in Section 2.3.3.4, Wildlife Movement and Nursery Sites, of the FPEIR. In response to comments such as this and others from CDFW, the DPEIR has been revised to refrain from making certain significance conclusions for LanEast and LanWest regarding wildlife movement and more specifically, substantial interference with connectivity between blocks of habitat or interference with a local or regional wildlife corridor or linkage; see response to comment S3-3.
	O7-7	The County generally agrees that the biological condition and resources were only generally described for the Los Robles property and the level of information that was provided was of less detail than for the four solar farm sites composing the Proposed Project. The County disagrees with the commenter's assertion that the lack of comparable information for the Los Robles site presents an obstacle to evaluating the merits of this alternative location. The County does not agree that this constitutes a serious omission in the DPEIR. Please refer to the responses to comments F1-15 and F1-18 related to the level of detail required for analysis of an alternative location. Additionally,



Mr. Robert Hingtgen
February 25, 2014
Page 3

As documented in the "Evaluation of Biological Resources for Soitec Mitigation Site" (November 2013) by Dudek Consultants, the occurrence and numbers of sensitive species can vary greatly within a single site under different annual conditions. That complicates the assessment of the comparability of biological resources among both impact and mitigation sites if the information is obtained in different years and under different weather conditions (precipitation amounts and seasonality, temperatures, etc.). Although the November 2013 report does use "reference" sites on Rugged and Tierra Del Sol to provide a relative value assessment for the proposed offsite mitigation property, the Los Robles site does not provide even that level of information from which to evaluate potential impacts from its development.

O7-7 Cont.

Hydrology

Wetlands, oak riparian woodlands and other Resource Protection Ordinance (RPO) resources are significant wildlife habitat. The project proposes substantial construction period on-site groundwater extraction (44 AF) with lower, long-term extraction. The project expects to mostly avoid and minimize impacts and to impose a monitoring program to determine if those efforts are effective. However, the primary mitigation measure for groundwater-dependent oak trees presumes that these trees, if affected, would demonstrate noticeable (and presumably substantial/negative) effects within one year of beginning the project's ground water extraction, based on pre-project tree condition and groundwater measurements and calculations.

The Rugged Groundwater Monitoring and Mitigation Plan (GMMP) Report states: "As the historical low groundwater level near the groundwater-dependent habitat is unknown, significant impacts to this habitat may result due to groundwater extraction from Wells 6a and 6b over the short-term. Long-term operational water demands are relatively low, well within the sustainable yield of the aquifer system, and have minimal impact…Additionally, the County's Guidelines for Determining Significance for Biological Resources (County of San Diego, 2010) defines a project-related drawdown of 3 feet below historical low groundwater levels as causing a significant impact to riparian habitat or a groundwater sensitive natural community. The thresholds established below incorporate these guidelines and represent a conservative basis for monitoring and mitigating potential groundwater impacts related to the Project."

O7-8

"A new monitoring well, referred to hereafter as Oak Monitoring Well (MW-O), will be installed with a hollow-stem auger as close as possible to the coast live oak and mixed oak woodland, approximately 400 feet west of Wells 6a and 6b. The completion depth of MW-O will correspond to the depth of the alluvium, which is approximately 60 to 80 feet bgs in the vicinity of Wells 6a and 6b. As the baseline water levels need to be established prior to the onset of any water extraction, well MW-O will be installed at least 1 month prior to the onset of groundwater extraction from any of the projects slated to use wells 6a and 6b."

"The historical low groundwater level in the vicinity of the oak woodland is not known over the period corresponding to the lifespan of mature oaks. This lack of historical water level data precludes determination of a water level threshold 3 feet below the historical low. Therefore, routine biological monitoring of the oak woodland for the duration of the 1 year Project construction period will serve as a means to continually assess oak health."

However, the GMMP also states "If an International Society of Arboriculture (ISA) Certified Arborist or Registered Profession Forester observes that no impact to the oak woodland has occurred over the construction period, biological monitoring of the oak woodland will cease. In addition to biological monitoring, a water level threshold of 10 feet of drawdown below baseline at MW-O will be established to protect the oaks' ability to continually access groundwater from the alluvial aquifer."

We have several significant concerns about the proposed groundwater and habitat monitoring approach. Oak trees, which are slow-growing and have extensive root systems compared to smaller and shallower-rooted plants, may show delayed

O7-9

explained in the response to comment S3-18, further information could not have been obtained on the Los Robles site as the Rugged and Tierra del Sol sites were being surveyed because of applicants' lack of access to the Los Robles site at that time.

O7-8 The County agrees with this comment, which is not inconsistent with the existing content of the DPEIR.

O7-9 To address the commenter's concern regarding the potential for oak habitat to show delayed effects, as well as in response to other groundwater-related comments received from the public, the County has made several revisions and clarifications to M-BI-PP-14 in the DPEIR (the mitigation measure has been renumbered M-BI-PP-15 in the FPEIR). These revisions are presented in ~~strikeout~~/underline format; refer to Section 2.3.6 of the FPEIR (see M-BI-PP-15). These revisions have been made to more accurately reflect both the GMMPs that have been prepared for the Rugged Solar Project and the Tierra del Sol Solar Project. Part of the revisions include clarifying that monitoring would continue in years 2 through 5 following initiation of project-related groundwater extraction if the drawdown thresholds for the groundwater-dependent habitat monitoring wells are reached at any time during the construction phase of either project.

The action triggers associated with water level declines in Wells MW-O1 and MW-O2 (Rugged) and wells RM-1

	and RM-3 (TDS) are independent of observable effects on oak health. Although oak trees, if affected by water level declines, may not show observable effects within one year of the peak pumping period, the water level thresholds established in M-BI-PP-15 would indicate whether the potential for a delayed significant impact exists, and monitoring would then continue past the 1-year construction phase to a maximum of 5 years. As described in greater detail in Response O10-23, if impacts to groundwater-dependent habitat were to occur as a result of pumping-induced water level drawdowns, such impacts would first become apparent in locations closer to the pumping center and in species that have roots deep enough to actually access the available groundwater. The setup of the oak woodland and well monitoring network is appropriate because it would trigger action at the first sign of project-related impacts. Pumping cessation or curtailment, if triggered by evidence of a significant impact (through project-induced water level declines and/or observed groundwater-related stress in oak trees), would likewise avoid substantial adverse impacts to more distant (and/or topographically elevated) groundwater-dependent habitats. The commenter also claims that there are no specific triggers for a finding of significant impact by the forester during oak habitat monitoring. The Certified Arborist / Registered Professional Forester will have numerous data points (water level monitoring data, biological

	indicators, and tensiometers) upon which to make an informed professional decision. The GMMP (and M-BI-PP-15; see Section 2.3.6 of the FPEIR) does provide examples of indicators, and explains the purpose of tensiometers. For example, as stated in M-BI-PP-15, the oak monitoring would "focus on examining crowns for discoloration, loss of vigor, foliage curling, and/or pest presence; and trunks and root crowns for beetle/borer symptoms, bleeding cankers, or seeping areas (indicative of fungal infections). These and similar signs may indicate that a tree or a grouping of trees is experiencing stress, which can be corroborated by tensiometer readings." Monthly and annual reports will describe the results of ongoing habitat monitoring, and will contain recommendations that are based on the professional judgment of both the Certified Arborist (or Registered Professional Forester) and the Certified Hydrogeologist registered in the State of California. The commenter questions the source of the water-level threshold of 10 feet drawdown for Wells MW-O1 and MW-O2 (Rugged) and wells RM-1 and RM-3 (TDS). As stated in the GMMPs, the 10-foot water level drawdown threshold is based on the typical variation of water levels that has been observed through prior work on the groundwater resource investigations (i.e., water levels have been observed to vary by about 7 feet, thus the 10 feet threshold, which is 3 feet below the observed low). The drawdown will be measured against

Mr. Robert Hingtgen
February 25, 2014
Page 4

effects. The PEIR/associated hydrology documents do not specify what would trigger a finding of impacts by the certified arborist or registered professional forester although a list of factors is included (tree height, number of stems, presence of pests, overall condition, etc.). As currently proposed, the evaluation of oak tree impacts would only occur during the construction period, the majority of which would occur within 60 days, but could be up to one year. The PEIR/additional documents include a second evaluation factor ("…a water level threshold of 10 feet of drawdown below baseline at MW-O will be established to protect the oaks' ability to continually access groundwater from the alluvial aquifer."). It appears that well is downslope from most of the oak woodland and it is not clear how that criterion was established and how it relates to the County's 3-foot groundwater drawdown below historic low ground water level threshold (which should be measured within the oak woodlands). Also, the project proposes to install tensiometers within the oak tree areas, but does not present a clear approach to link results from those devices to either the habitat O7-9 Cont. O7-10

groundwater monitoring well (MW-0) results or the tree condition results. Last, the region has been in a drought condition for nearly a year, and absent strong on-site historical data, a longer monitoring period seems warranted. For those reasons, a reasonable and precautionary approach would be to have the project commit to a 5-year post-project-extraction monitoring unless the first 3-year monitoring of groundwater and oaks shows no significant effects (and the thresholds for significant oak effects need to be more clearly delineated/defined) compared to the pre-project condition. The project should also consider establishing a comparable oak reference site that is not affected by the project for comparing project-site oak tree effects. O7-11 O7-12

Summary Recommendation

Based on the above concerns about the amount of information provided in the PEIR to assess regional conservation impacts, the alternatives analysis, and the groundwater mitigation and monitoring program, we recommend the County of San Diego consider the sufficiency of the PEIR and the need to recirculate the PEIR. O7-13

If you have any questions about these comments, please contact me at btippets@tnc.org. Thank you for the opportunity to comment. O7-14

Sincerely,

Bill Tippets

Bill Tippets
San Diego/Baja California Project Director
South Coast and Deserts Region

cc: Mindy Fogg, Bobbie Stephenson (County of San Diego, Planning and Development Services)

baseline water levels established during the one-month preconstruction well monitoring period. This is actually quite conservative, because the County's actual threshold is 3 feet below the *historical* low. The basis for using the historical low as a measuring point is that oak trees have adapted to large fluctuations in water availability (e.g., periods of extreme drought); the water level threshold of 10 feet of drawdown established in M-BI-PP-15 is based on limited time period and is in all likelihood significantly above the historical low. In regards to the location of well MW-O1 (identified as MW-O in the Groundwater Monitoring and Mitigation Plan for the Rugged Solar Farm Project), the commenter is referred to Figure 2 of the Groundwater Monitoring and Mitigation Plan for the Rugged Solar Farm Project. Well MW-O1 is proposed to be located within approximately 100 feet of mapped Coast Live Oak Woodland and within approximately 50 feet of mapped Big Sagebrush Scrub vegetation and would therefore be located near on-site oak woodland and other groundwater dependent vegetation.

O7-10 Please refer to previous response O7-9; the purpose of the tensiometers is to corroborate whether a tree or a grouping of trees is experiencing stress.

O7-11 The commenter mentions the prevailing drought conditions and suggests a longer minimum monitoring period. The commenter is referred to response O7-9. The

	trigger for requiring continued monitoring after the one-year construction period is very conservative, as it is based on three feet below the observed conditions rather than the historical low. As described in M-BI-PP-15 in Chapter 2.3 of the FPEIR, if there is evidence that water level declines are stressing the oaks, the approach will be to continue monitoring for a longer period of time, or stop pumping altogether. Furthermore, as stated in M-BI-PP-15, if an impact to the oak woodland habitat is observed by the monitoring Certified Arborist or Registered Professional Forester over the duration of the project construction period, routine monitoring of the oak woodland will continue for a maximum up to 5 years following initiation of project-related groundwater extraction. The monitoring Certified Arborist or Registered Professional Forester will base mitigation recommendations on the type and extent of tree issues observed. If groundwater drawdown is determined to be the cause of tree stress, resulting in the presence of secondary pests (insects and/or disease), halting groundwater extraction may be recommended. If measured water level declines do not exceed the established thresholds during the construction phases of the Rugged and Tierra del Sol solar farms, it is reasonable to allow monitoring activities to cease, because yearly operational water demands are substantially lower (by roughly a factor of 10) than the construction-related demands of the project.

	O7-12	As described in Responses O7-9 and O7-11, the GMMPs (and M-BI-PP-15; see Chapter 2.3 of the FPEIR) will generate enough data points to allow professionals to make reasonable, informed decisions about whether project-related pumping is causing stress to groundwater-dependent habitat.
	O7-13	The County disagrees with the commenter's assertion regarding the sufficiency of the DPEIR and the need for recirculation. The DPEIR has provided adequate information to assess regional conservation impacts, Proposed Project alternatives, and groundwater mitigation and monitoring, as discussed above in the responses to comments O7-5 through O7-7 and O7-9 through O7-12. The County does not believe there is a need for recirculation in this circumstance. Under the California Environmental Quality Act (CEQA), if subsequent to the commencement of public review and interagency consultation but prior to final environmental impact report (EIR) certification, the lead agency adds "significant new information" to an EIR, the agency must issue new notice and must recirculate the revised EIR, or portions thereof, for additional commentary and consultation (California Public Resources Code, Section 21092.1; 14 CCR 15088.5). Recirculation is generally required when the addition of new information deprives the public of a meaningful opportunity to comment on substantial adverse project impacts or feasible mitigation

measures or alternatives that are not adopted (*Laurel Heights Improvement Ass'n v. Regents of University of California* (1993) 6 Cal. 4th 1112). The purpose of recirculation is to give the public and other agencies an opportunity to evaluate the new data and the validity of conclusions drawn from it. However, "the Legislature did not intend to promote endless rounds of revision and recirculation of EIR's. Recirculation was intended to be an exception, rather than the general rule" (*Laurel Heights Improvement Ass'n v. Regents of University of California* (1993) 6 Cal. 4th 1132).

Here, no new information or analysis is necessary related to regional conservation impacts, alternatives, or groundwater mitigation and monitoring; therefore, recirculation is not required.

O7-14 This comment concludes the letter and does not raise an environmental issue for which a response is required.

References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Sections 21000–21177. California Environmental Quality Act (CEQA), as amended.