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April 29, 2019

Mr. Tom Nievez
San Bernardino County
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Governor's Office of Planning & Research

APR 29 2019

STATE CLEARINGHOUSE

Dear Mr. Tom Nievez:

Daggett Solar Power Facility (PROJECT)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH# 2018041007

The California Department of Fish and Wildlife (CDFW) received the Notice of Availability of a Draft Environmental Impact Report (DEIR) from San Bernardino County (Lead Agency) for the Daggett Solar Power Facility (Project) pursuant 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 the Fish and Game Code (FGC).

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. (FGC, §§ 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 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

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.

need to exercise regulatory authority as provided by the FGC. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (FGC, § 1600 et seq.) 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) (FGC, § 2050 et seq.), the project proponent may seek related take authorization as provided by the FGC.

PROJECT DESCRIPTION SUMMARY

Proponent: Daggett Solar Power 1 LLC

Location: The project is bounded by the town of Daggett approximately 0.5 miles to the west; the Mojave River, Yermo, and Interstate 15 to the north; Barstow-Daggett Airport, Route 66, and Interstate 40 to the south; and Newberry Springs and Mojave Valley to the east in San Bernardino County.

Project Description

Daggett Solar Power 1 LLC, a subsidiary of Clearway Energy Group LLC, proposes constructing, operating, maintaining, and decommissioning of a utility-scale, solar photovoltaic (PV) electricity generation and energy storage facility with associated on-site substations, inverters, fencing, roads and supervisory control and data acquisition system that would produce up to 650 megawatts (MW) of power and include up to 450 MW of battery storage capacity on approximately 3,500 acres of land. The proposed project would utilize existing electrical transmission infrastructure adjacent to the existing Coolwater Generating Station, a recently retired natural gas-fired power plant, to deliver renewable energy to the electric grid.

Facilities and Design

The proposed project would consist of solar PV panels mounted on a single-axis tracking system that follows the sun throughout the day. The tracking system would be supported by steel piles, with the panels arranged into long narrow rows, grouped into regions, referred to as solar arrays or blocks. The proposed design also includes inverters and transformers mounted on small concrete pads or steel foundations, distributed across the site. Inverter equipment pads may be accompanied with distributed Battery Energy Storage System (BESS) equipment. Electricity produced by the solar arrays would be collected and routed to an on-site substation where voltage would be increased to the interconnection voltage.

The Project is anticipated to be constructed in three phases. The phases would share certain facilities, such as the on-site project substations and generation tie (gen-tie) line. Each phase would have its own on-site substation, which may also include a BESS. From the on-site substations, each phase would include a segment of the overhead gen-tie line, which would connect the Project to the existing Southern California Edison (SCE)-owned 115-kilovolt (kV) and 230-kV Coolwater substations, which are adjacent to

the retired Coolwater Generating Station. The Project would also include security fencing for all phases, a Supervisory Control and Data Acquisition system (SCADA), telecommunications equipment and an operations and maintenance (O&M) building to be constructed with the first phase.

Solar Array

Solar panels would be mounted on a tracking system that would be supported, when practical, by driven piers (piles) directly embedded into the ground. Panels would be organized in rows in a uniform grid pattern, with each row separated by approximately 10-20 feet (from post to post). A fixed-tilt tracking system, which does not track the sun, may also be used if deemed suitable. Panels are proposed to be a maximum of 20 feet in height.

Inverters and Switchgear

Individual PV panels would be electrically connected in series to create a "string" to carry direct current (DC) electricity. Strings of DC electricity would be routed to inverters, which would take the DC output and convert it to alternating current (AC) electricity.

Project Substations

One new substation would be constructed as a part of each of the three project phases for a total of three project substations. The substations (which contain high-voltage equipment) would be unenclosed, occupy an area of approximately 300 feet by 300 feet each, and be protected with security fences.

Battery Storage

The project is anticipated to include up to 450 MW of battery storage to be constructed in three phases corresponding to the phased construction of the solar arrays. The battery storage system is expected to be either located adjacent to each of the substations or distributed throughout the solar array at the inverter equipment pads or tracker rows. Up to 16 acres may be utilized for the battery energy storage system throughout the Project site at full buildout.

Gen-Tie Line

The project is expected to be constructed in three phases. Each phase would include a new substation and segment of aboveground gen-tie transmission line. From each substation, a segment of gen-tie line would be constructed to connect the solar facility's output to the electrical grid at the existing SCE-owned 115-kV and 230-kV substations adjacent to the Coolwater Generating Station.

Access Roads

On-site access routes, with a minimum width of 20 feet, may be constructed along the project's fence line. All interior access roads would also be a minimum of 20 feet wide. Maximum width of all on-site roads would be 26 feet. All roads within the site would

consist of compacted native soil per San Bernardino County Fire Department requirements. All roads would be stabilized with soil stabilization material.

Perimeter Fencing

Fencing is proposed along the perimeter of the Project site or set back a minimum of 15 feet from the existing/proposed right-of-way, as required by the County Development Code. Fencing will be at least 7 feet tall, in compliance with National Electrical Code (NEC). Chain-link fencing is likely to be used, potentially topped with 1 foot of barbed wire. In consultation with the County, slats or mesh may be added to the chain-link fence, as appropriate and in areas where needed, to manage windblown sand. Access gates would be installed at each site entry point. Substation sites and/or battery storage sites may be separately fenced.

Operations and Maintenance

An O&M building would be constructed on approximately 1.5 acres within the project footprint during the first phase of the project. The building would serve to store spare parts and vehicles and to accommodate full- and part-time staff associated with the project. Water would come from on-site wells.

Water would be required for panel washing activities and general maintenance. The frequency of panel washing would be determined based on soiling of the PV panels and expected benefit from cleaning. Should cleaning be necessary, water would be sprayed on the PV panels to remove dust. An estimated 25 acre-feet per year of water would be necessary for panel washing (for all phases of the project or full 650 MW buildout). This water would be obtained from on-site wells.

Decommissioning

If operations at the site were permanently terminated, the facility would be decommissioned. Most components of the proposed system are recyclable or can be resold for scrap value. Panels consisting primarily of silicon, glass, and an aluminum frame. Tracking systems typically consist of steel and concrete, in addition to motors and control systems. All these materials can be recycled.

Numerous recyclers, for the various materials to be used on the Project site, operate in San Bernardino and Riverside counties. Metal, scrap equipment, and parts that do not have free-flowing oil can be sent for salvage. Equipment containing any free-flowing oil would be managed as waste and would require evaluation. Oil and lubricants removed from equipment would be managed as used oil, which is a hazardous waste in California. Decommissioning would comply with federal, state and local standards and all regulations that exist when the project is decommissioned, including the requirements of San Bernardino County Development Code Section 84.29.060.

STATE THREATENED, ENDANGERED, SENSITIVE, SPECIES OF SPECIAL CONCERN, AND SPECIAL STATUS SPECIES

CDFW has discretionary authority over activities that could result in the "take" of any species listed as candidate, threatened, or endangered, pursuant to the California Endangered Species Act (CESA; FGC, § 2050 *et seq.*). CDFW considers adverse impacts to CESA-listed species, for the purposes of CEQA, to be significant without mitigation. Take of any CESA-listed species is prohibited except as authorized by state law (FGC, §§ 2080 & 2085). Consequently, if a Project, including Project construction or any Project-related activity during the life of the Project, results in take of CESA-listed species, CDFW recommends that the Project proponent seek appropriate authorization prior to Project implementation. This may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances (FGC, §§ 2080.1 & 2081).

Please note that CDFW must comply with CEQA prior to issuance of an ITP for a Project. As such, CDFW may consider the lead agency's CEQA documentation for the Project. To minimize additional requirements by CDFW and/or under CEQA, the CEQA avoidance, minimization, mitigation, monitoring and reporting measures should be included in the CEQA document for issuance of an ITP.

PROJECT SPECIFIC COMMENTS AND RECOMMENDATIONS

Following review of the DEIR CDFW offers the comments and recommendations below to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources.

REPTILES:

Agassiz's Desert Tortoise (*Gopherus agassizii*)

The desert tortoise is listed as a threatened species under the federal Endangered Species Act and CESA (Cal. Code Regs., tit. 14, § 670.5, subd. (b)(4)(A)). The DEIR states there is a total of 1,080.9 acres of suitable tortoise habitat within the Project site.

The DEIR states that two condition Class 4 burrows are present within the Project site. The condition class of a burrow does not necessarily exclude use or occupation by a desert tortoise. When estivation in a burrow, desert tortoises may backfill the burrow giving the appearance of a false terminus or back wall. Spider webs, litter, and other debris may accumulate in burrow openings overnight, and openings may collapse during winter rains. Do not assume that a burrow is inactive or not occupied if it looks unused or collapsed. Desert tortoises may use canid or mustelid excavations, and may be found in burrows of other animals, particularly kit foxes. Burrowing owls may use desert tortoise burrows, and both animals may use the burrow at the same time. Juvenile desert tortoises create their own burrows, which may resemble rodent burrows,

or use rodent burrows. Sign of tortoise in the form of burrows does exist within the Project site. Since burrows are present within the Project site presence of desert tortoise has been established within the Project site. Therefore, CDFW recommends the Lead Agency require the Project proponent obtain an ITP for the life of the project.

Mitigation Measure BIO- 1 states that the Project proponent may be required to install exclusionary/perimeter fencing. Exclusionary fencing is an appropriate minimization measure, however, if a desert tortoise is found within the fenced area it may not be moved or handled unless the Project proponent obtains an ITP from CDFW. Take of any CESA-listed species is prohibited except as authorized by state law (FGC, §§ 2080 & 2085). Consequently, if a project, including project construction or any project-related activity during the life of the project, results in take of CESA-listed species, CDFW recommends the Lead Agency require that the Project proponent seek appropriate authorization for the life of the Project prior to project implementation. CDFW also recommends the Lead Agency require the Project proponent include desert tortoise exclusionary fencing as part of the project description.

Mitigation Measure BIO-1 also states that a qualified biologist can move tortoises out of harm's way and that preconstruction clearance surveys for desert tortoise will be conducted. The term clearance survey and moving a tortoise out of harm's way implies that if a desert tortoise is found on the Project site, it will be moved or relocated out of the Project impacted area. Handling a desert tortoise without proper permits from CDFW is considered "take". Take is defined in FGC Section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Take of any CESA-listed species is prohibited except as authorized by state law (FGC, §§ 2080 & 2085). Under the FGC 5000 and 2080 it states that "It is unlawful to sell, purchase, harm, take, possess, or transport any tortoise (*Gopherus*) or parts thereof, or to shoot any projectile at a tortoise (*Gopherus*)." This section does not apply to the taking of any tortoise when authorized by the CDFW. Since desert tortoise may not be moved or handled without proper permits, CDFW recommends the Lead Agency require the Project proponent to obtain an ITP for the life of the Project.

Mojave fringe-toed lizard (*Uma scoparia*)

The Mojave fringe-toed lizard is a State species of special concern that inhabits loose, sandy soils in sand dunes, lakebeds, and washes. Source sand and sand corridors are necessary for the long-term survivorship of an Aeolian sand specialist like the Mojave fringe-toed lizard. The DEIR states there is 80 acres of suitable Mojave fringe-toed lizard habitat within the Project site. The DIER is not clear if the ditches, playas, and washes were surveyed. CDFW recommends the Lead agency require the Project proponent to survey all suitable Mojave fringe-toed lizard habitat. This includes sand dunes, playas, ditches, and washes throughout the Project site. Survey results and impact analysis should be included in the DEIR.

BIRDS

Nesting Birds

Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13), as amended (16 U.S.C. 703 et seq.). In addition, sections 3503, 3503.5, 3511, and 3513 of the FGC stipulate the following: 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 FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds of prey in the orders Falconiformes (such as falcons, hawks, and eagles) and Strigiformes (owls) or the nests or eggs of such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; Section 3511 states a fully protected bird may not be taken or possessed at any time; and Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA or any part of such bird, except as provided by the rules and regulations adopted by the Secretary of the Interior under the MBTA.

Breeding bird season is usually February 15 through August 31, but note that some species of raptors (e.g., owls) may commence nesting activities in January, and passerines may nest later than August 31. CDFW recommends that the Project proponent complete nesting bird surveys and consult with a qualified ornithologist for advice in developing specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur and that the Project complies with all applicable laws related to nesting birds and birds of prey, including burrowing owl. It is the Lead Agency's responsibility to comply with all applicable laws related to nesting birds and birds of prey. CDFW recommends that the Project proponent prepare a Bird and Bat Conservation Strategy and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities. CDFW also recommends mitigating lake effect impacts to nesting birds by spacing the rows of solar panels more than 20 feet apart.

Tricolored Blackbird (*Agelaius tricolor*)

The tricolored blackbird is listed as a State threatened species. The DEIR does state that tricolored blackbirds were incidentally observed in May 2018 during Mojave fringe-toed lizard and burrowing owl surveys foraging in agricultural fields within the Project site. The DEIR does not provide the number of acres of suitable foraging habitat within the Project site. CDFW considers conversion of foraging areas to renewable energy power plant facility sites to be habitat loss. CDFW recommends the Lead Agency include acres of suitable foraging and potential nesting habitat for tricolored blackbird as part of the DEIR analysis. CDFW also recommends that the Lead Agency require the Project proponent to obtain an ITP for the life of the Project.

Swainson's hawk (*Buteo swainsoni*)

Swainson's hawk is listed as State threatened. During surveys in April 2018 four Swainson's hawks were observed within the Project site. The DEIR states that the Project site does support potential foraging habitat throughout and has several large trees in windrows that could be potential nesting habitat for Swainson's hawk. The DEIR however, does not provide the number of acres of suitable foraging or potential nesting habitat for Swainson's hawk that is present within the Project site. CDFW recommends the Lead Agency include acres of suitable foraging and potential nesting habitat for Swainson's hawk as part of the DEIR analysis.

The DEIR did not clearly state that surveys for Swainson's hawk have been done for the Project site. CDFW recommends focused surveys be conducted by using the California Energy Commission and Department of Fish and Game June 2, 2010 Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California. Potentially significant impacts may result from activities that cause nest abandonment, loss of nest trees, loss of foraging habitat that would reduce nesting success, or direct mortality. Due to the Swainson's hawk known preference for areas of low vegetation that support abundant prey, such as grasslands or alfalfa fields, CDFW considers conversion of foraging areas to renewable energy power plant facility sites to be habitat loss. Because surveys were not conducted to protocol and there is suitable nesting habitat within the Project site, CDFW recommends the Lead Agency require the Project proponent to conduct focused surveys and obtain an ITP for the life of the Project.

Golden Eagle (*Aquila chrysaetos*)

The golden eagle is a Fully Protected Species. The DEIR states that no nesting habitat was identified within the Project site, but during focused raptor nest surveys in April and June 2018 two golden eagles were observed foraging over an agricultural field within the Project site. CDFW recommends focused surveys be conducted using the 2010 United States Fish and Wildlife Service Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations. CDFW also recommends that the Project proponent prepare a Bird and Bat Conservation Strategy and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.

Burrowing Owl (*Athene cunicularia*)

The burrowing owl is a Species of Special concern. The DEIR states that burrowing owls have been observed within the Project site but that the observed owls are presumed to be migratory. The DEIR also states there is 1,627.2 acres of suitable burrowing owl habitat within the Project site.

Based on Appendix E1 and E2 of the DEIR surveys were performed for burrowing owl. However, CDFW recommends focused surveys for burrowing owl be conducted in

accordance with the CDFW Staff Report on Burrowing Owl Mitigation (Staff Report) (CDFW 2012) and prepare a Burrowing Owl Mitigation and Monitoring Plan and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.

Mitigation Measure BIO-2 states that fencing or flagging shall be installed at a 250-foot radius from occupied burrows to create a non-disturbance buffer area. The Staff Report determines buffer distance based on the level of disturbance and time of year project activities take place. CDFW considers solar development a high level of disturbance. Therefore, the buffer distance for areas with a high level of disturbance is 500 meters. CDFW recommends focused surveys for burrowing owl be conducted in accordance with the Staff Report and prepare a Burrowing Owl Mitigation and Monitoring Plan and submitted it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.

MAMMALS

Desert Kit Fox (*Vulpes macrotis arsipus*)

Desert Kit Fox is addressed in Title 14 of the California Code of Regulations: §460. "Fisher, marten, river otter, desert kit fox and red fox may not be taken at any time." And, within the FGC: §4000. "Fur-bearing mammals enumerated. The following are fur-bearing mammals: pine marten, fisher, mink, river otter, gray fox, red fox, kit fox, raccoon, beaver, badger, and muskrat." Trapping or handling of desert kit foxes is not allowed due to the legal reasons stated above. The DEIR states that one desert kit fox was photographed with a wildlife camera within the Project site.

Mitigation Measure BIO-3 outlines mitigation the Project proponent will implement to reduce the impacts of the Project on desert kit fox to less than significant. CDFW recommends that the project proponent conduct surveys to determine desert kit fox presence and numbers within the Project well in advance of the start of ground disturbing activities. CDFW also recommends the Lead Agency require the Project proponent prepare a Desert Kit Fox Monitoring and Mitigation Plan and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.

SPECIAL HABITATS

Playas

The Jurisdictional Delineation Report in Appendix E4 of the DEIR states that desert flats habitat (referred to in this letter as playa habitat) is present within the Project site, but the DEIR does not include acres of playa habitat present within the Project site, nor does the analysis in the DEIR include impacts to playa habitat and the species such as

fairy shrimp that are known to inhabit playas. CDFW recommends the Lead Agency require the Project proponent to conduct a biological survey of playas during the appropriate time of year and include an impact analysis to playas and the species that inhabit them in the DEIR. If State threatened, endangered, sensitive, species-of-concern, or special status species are found during surveys, then impacts to these species and habitat should be considered significant and mitigation should be required and identified in the DEIR, developed in consultation with CDFW.

LAKE AND STREAMBED ALTERATION AGREEMENT

For any activity that will divert or obstruct the natural flow, or alter the bed, bank, or channel (which may include associated riparian resources) of a river or stream or use material from a streambed, the project proponent (or "entity") must provide written notification to CDFW pursuant to Section 1602 of the FGC.

The DEIR states that 0.08 acres of State jurisdictional water exists within the Project site.

Early consultation with CDFW is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <http://www.dfg.ca.gov/habcon/1600/forms.html>. Please note that CDFW must comply with CEQA prior to issuance of a Lake or Streambed Alteration Agreement for a Project. As such, CDFW may consider the lead agency's CEQA documentation for the Project.

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 California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

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.)

SUMMARY OF CDFW RECOMMENDATIONS

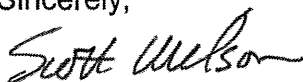
The following is a summary of CDFW recommendations:

1. Conduct focused or protocol level surveys in all suitable habitat within the Project site for desert tortoise, Mojave fringe-toed lizard, tricolored blackbird, Swainson's hawk, burrowing owl, golden eagle, and desert kit fox.
2. Obtain a ITP for the life of the Project for desert tortoise, tricolored blackbirds, and Swainson's hawk.
3. Include desert tortoise exclusionary fencing as part of the project description.
4. Include acres of suitable foraging and potential nesting habitat for tricolored blackbird and Swainson's hawk as part of the DEIR analysis.
5. Prepare a Burrowing Owl Mitigation and Monitoring Plan and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.
6. Prepare a Desert Kit Fox Monitoring and Mitigation Plan and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.
7. Prepare a Bird and Bat Conservation Strategy and submit it to CDFW for approval a minimum of 60 days prior to the start of ground disturbing activities.
8. CDFW recommends the Lead Agency require the Project proponent to survey playas during the appropriate time of year and include an impact analysis to playas and the species that inhabit them in the DEIR. If State threatened, endangered, sensitive, species-of-concern, or special status species are found during surveys, then impacts to these species and habitat should be considered significant and mitigation should be required and identified in the DEIR, developed in consultation with CDFW.
9. Submit a Streambed Alteration notification package to CDFW.
10. CDFW recommends spacing the rows of solar panels more than 20 feet apart as a measure to reduce the lake effect impacts to nesting birds.

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist Lead Agency in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Wendy Campbell, Environmental Scientist at (760) 258-6921 or by email at wendy.campbell@wildlife.ca.gov.

Sincerely,



Scott Wilson
Environmental Program Manager

cc: Wendy Campbell
CHRON
State Clearinghouse

WC:wc