

11 – County of San Diego



County of San Diego

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February 25, 2015

Jim Minnick, Director
Planning and Development Services
County of Imperial
801 Main Street
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Sent via email to: RichardCabanilla@co.imperial.ca.us and
PatriciaValenzuela@co.imperial.ca.us

COMMENTS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR) FOR RENEWABLE ENERGY AND TRANSMISSION ELEMENT (RETE) UPDATE

Dear Mr. Minnick,

The County of San Diego (County) has received and reviewed the Draft Programmatic Environmental Impact Report (PEIR) for the Imperial County General Plan Renewable Energy and Transmission Element Update, dated January 6, 2015. County Planning & Development Services staff have reviewed the PEIR for environmental impacts that may occur in neighboring jurisdictions and have the following comments:

Comment
11-1

GENERAL COMMENTS

1. The goals and objectives related to the siting of transmission facilities should acknowledge potential impacts to adjacent counties and/or state resources and encourage collaboration to minimize impacts to all resources regardless of jurisdictional boundaries.
2. If the Imperial Irrigation District (IID) pursues construction of the 500-kV Direct Current link between Imperial County and the San Onofre Nuclear Generation Station, the County strongly requests early consultation on the transmission line routing, design, constraints and consistency with County General Plan guiding principles and objectives, in addition to development regulations and County CEQA guidelines and significance criteria.
3. The County requests that proposed projects that are planning to utilize groundwater as a water supply from the Ocotillo-Clark Valley Basin or Borrego Valley Basin be required to provide notification to the County as part of the project approval process and provide the County to opportunity to review the Groundwater Monitoring and Mitigation Plan.

Comment
11-2

Comment
11-3

Comment
11-4

Mr. Jim Minnick
February 25, 2015
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The County appreciates the opportunity to comment on the environmental review process. The County looks forward to reviewing future environmental documents for this project. If you have any questions regarding these comments, please contact Eric Lardy, Planning Manager at (858) 694-3052 or email eric.lardy@sdcounty.ca.gov.

Comment
11-5

Sincerely,



ANDREW SPURGIN, Chief
Advanced Planning Division
Planning & Development Services

e-mail cc:

Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Mel Millstein, Policy Advisor, Board of Supervisors, District 3
Victor Avina, Policy Advisor, Board of Supervisors, District 4
Chris Livoni, Land Use Advisor, Board of Supervisors, District 5
Conor McGee, CAO Staff Officer, LUEG
Richard Grudman, ERP System Administrator, General Services
Noah Alvey, Planning Manager, Planning & Development Services
Eric Lardy, Planning Manager, Planning & Development Services

Response to Comment Letter #11: County of San Diego

Comment 11-1: Thank you for your comments on the Imperial County General Plan *Renewable Energy and Transmission Element* Update Draft PEIR. We have provided a response to your specific comments below.

Comment 11-2: Comment noted. Siting of future transmission facilities will be coordinated with the five balancing authorities in the region (e.g., CAL-ISO, IID, SCE, SDG&E, and Western Area Power Administration/Arizona Public Service).

Comment 11-3: Comment noted. Early coordination shall occur between the County of Imperial, IID, SCE, and County of San Diego as it relates potential impacts associated with the 550-kV Direct Current link between Imperial County and the San Onofre Nuclear Generation Station.

Comment 11-4: Comment noted. Future renewable energy facilities developed under the proposed project that utilize groundwater resources from the Ocotillo-Clark Valley Basin or Borrego Valley Basin would coordinate with the County of San Diego as it relates to groundwater supplies.

Comment 11-5: Thank you for your comments on the Imperial County General Plan *Renewable Energy and Transmission Element* Update Draft PEIR.

12 – Audubon California



February 25, 2015

Jim Minnick
Director, Planning & Development Services Department
County of Imperial
Planning & Development Services
801 Main Street
El Centro, CA 92243

Sent via email to: JimMinnick@co.imperial.ca.us

RE: Comments on Draft Programmatic EIR for Imperial County's Renewable Energy and
Transmission Element Update

Dear Mr. Minnick,

Thank you for the opportunity to provide the Imperial County Planning & Development Services Department with comments on the Renewable Energy and Transmission Element Update ("RET Update") and its impacts on the environment. On behalf of Defenders of Wildlife, Sierra Club and Audubon California, please accept these comments on the Draft EIR for the RET Update.

Defenders is dedicated to protecting all wild animals and plants in their natural communities. To that end, Defenders employs science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions in order to prevent the extinction of species, associated loss of biological diversity, habitat alteration, and destruction.

The Sierra Club is a national nonprofit organization of approximately 2.5 million members and supporters (over 380,000 who live in California) dedicated to exploring, enjoying, and protecting the wild places of the earth. The Sierra Club's concerns encompass protecting our lands, wildlife, air and water while at the same time rapidly increasing use of renewable energy to transition towards a carbon-free future.

Now in its second century, Audubon connects people with birds, nature and the environment that supports us all. Our national network of state programs, community-based nature centers, chapters, scientific, education, and advocacy programs engages millions of people from all walks of life in conservation action to protect and restore the natural world focusing on birds, other wildlife and their habitat.

Our organizations are actively engaged in planning for renewable energy and conservation in the California deserts. We have been participating in Imperial County's Technical Advisory Group

Comment
12-1



("TAG") for the RET Update since February 2014, and provided previous public comment to the County on the Baseline Environmental Report on July 11, 2014 (attached here). We support Imperial County's ("County") effort to proactively plan for renewable energy development and build a renewable energy economy while simultaneously protecting the County's rich biological resources. We acknowledge the considerable time and effort the County has invested in the RET Update and appreciate the outreach and coordination with our organizations through development of the TAG. The comments below are intended to support the efforts of the County to balance renewable energy development and conservation of sensitive species, waters, lands and the agricultural economy.

Comment
12-1
(continued)

1 Relevance to State and Federal Planning Processes and Policies

1.1 Desert Renewable Energy Conservation Plan (DRECP)

The DRECP, when approved, will be a Land Use Plan Amendment (LUPA) for the BLM, a Habitat Conservation Plan (HCP) under the Fish and Wildlife Service (USFWS), and a Natural Communities Conservation Plan under CA Department of Fish and Wildlife (CDFW). The plan is a coordinated land use planning process involving federal and state agencies, tribal governments and other stakeholders. The DRECP aims to identify those areas most suitable for development while providing conservation for species and natural communities that are impacted by the planned level of renewable energy development. The majority of Imperial County falls within the DRECP planning area which highlights the importance of cooperation and collaboration to ensure identification of development areas for renewable energy that take into consideration local considerations while not undermining the landscape-level conservation strategy for the desert as a whole. We acknowledge the County's efforts to utilize data from the DRECP to identify renewable energy overlay zones for Imperial County.

Comment
12-2

As mentioned in the Draft EIR, the DRECP's conservation strategy does focus on biological resources and it must in order to meet the conservation standards under the Natural Communities Conservation Planning Act (NCCP Act). Our hope is that the biological information used to develop the DRECP conservation strategy for species and habitat is fully considering in the development of the County's RET Update. The Draft DRECP may not give appropriate attention to agricultural resources, especially in Imperial County and this is where we see the County's RET Update providing critical input to the DRECP so that the Plan can work for wildlife, renewable energy, Imperial County and its local communities.

Recommendation: The Draft EIR should ensure that the RET Update is consistent with the DRECP's proposed conservation strategy, including preservation of habitat linkages and other important habitat for sensitive and covered species in Imperial County.



1.2 BLM Solar Energy Program

The Bureau of Land Management (BLM) has identified areas of public land having suitable insolation and relatively low environmental conflicts that are zoned for streamlined permitting of solar energy projects that employ standardized design features. The BLM Solar Energy Program Record of Decision (ROD)¹ included one solar energy zone (SEZ) within Imperial County – Imperial East, which consists of 5,717 acres of gravel flats in the Sonoran desert along the border with Mexico.

The West Chocolate Mountains Renewable Energy Evaluation Area (REEA) is also located in Imperial Valley and in 2013, the REEA Amendment ROD² established the 10,759 acre West Chocolate Mountains SEZ as part of the BLM's Solar Energy Program. It is important to note that the ROD for the REEA indicates that solar facilities that require high water use (solar trough and power tower) would not be approved, nor would facilities including structures exceeding 200 ft in height. Additionally, the ROD for the REEA requires that lands in the REEA that are east of the Coachella Canal will be limited in surface disturbance for solar development to less than 10% (706 acres) of available BLM lands.

Recommendation: The Draft EIR must consider the existing land use decisions on BLM land related to renewable energy develop and ensure consistency with these regulations.

Comment
12-3

2 Relevance to Imperial County Planning Processes

2.1 Open Space Element

Imperial County is currently planning an Open Space General Plan Element Update. The Open Space Element establishes goals and policies to ensure that the County's resources will be available for future generations. The Element focuses on the balanced use, management and maintenance of the following environmental resources: biological resource, mineral resources, cultural resources, regional aesthetics, geology and soils, and open space and recreation. The Open Space Element Update appears to be happening separately from the RET Update despite the fact that many of the same resources that the Open Space Element aims to protect will be impacted by renewable energy development.

Comment
12-4

¹ Bureau of Land Management. Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States. October 2012. Available at: http://blmsolar.anl.gov/documents/docs/peis/Solar_PEIS_ROD.pdf

² Record of Decision: West Chocolate Mountains Renewable Energy Evaluation: Decision to Amend the California Desert Conservation Area Plan and to Approve a Noncompetitive Federal Geothermal Lease Application. BLM/CA/ES-2013-001+1793. 2013. Available at: http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/elcentro/nepa/wcm.Par.60116.File.dat/wcm_reea_rod.pdf



Recommendation: In order to ensure that sensitive biological resources within the County are protected, we recommend that analysis being conducted to update the Open Space Element be considered and incorporated into the establishment of renewable energy overlay zones under the RET Update. This is essential to ensure that the location of renewable energy development does not undermine the biological resources that the Open Space Element aims to protect.

Comment
12-4
(continued)

2.2 Salton Sea Renewable Energy and Restoration Initiative

The aim of the Salton Sea Renewable energy and Restoration Initiative is to leverage funds generated by new renewable energy projects located at the Sea to help finance activities for air quality management and habitat restoration, particularly as the Salton Sea begins to recede and expose the playa. The hope is that projects sited on the exposed lakebed will serve a dual purpose: produce renewable energy and mitigate air emissions. The initiative is in its first phase where it aims to develop 1,700 MW of new geothermal energy at the Sea and designate specific areas for habitat restoration that will be funded by this new development. It is especially important that the location of projects – both renewable energy and habitat restoration – are considered and included into the Draft EIR for the RET Update.

Comment
12-5

Recommendation: Obtain up-to-date information on the proposed location of new geothermal facilities and associated habitat restoration projects to ensure the RE overlay zone and policies related to the RET Update don't undermine efforts to restore habitat around the Salton Sea.

3. Project-specific EIRs

We support the County's efforts to designate different locations for different technologies in line with local values. As discussed in greater detail below, the Preferred Alternative appears at a high-level to present a good balance of protecting biological and economic values, particularly with our recommended refinements. However we believe this effort should not be considered as a substitute for future environmental review. Future project-level decisions must be analyzed in a full Environmental Impact Report which include a robust review and analysis of cumulative and project specific impacts, and strong project-specific avoidance, minimization and mitigation measures.

Comment
12-6

We support program EIRs for a number of reasons—including saving valuable agency resources, as well as the ability to consider biological impacts and mitigation actions at a landscape-level scale that can provide maximum benefits to sensitive plant and animal species. However, this document does not provide program-level analysis. Per the 2014 CEQA Guidelines, advantages of a program EIR include: “ ((2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, (4) Allow the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts”³ With respect to Imperial County, there are tremendous

³ 2014 CEQA Handbook, p 185.



opportunities for this type of program EIR in light of conservation needs for sensitive bird species who use the Salton Sea and agricultural matrix, but the EIR does not include this program-level analysis. Additionally, as discussed in greater detail below, the consideration of cumulative impacts is unduly limited in this document. Program-wide mitigation measure for biological resources are too generic and vague to provide any real guidance to developers. As discussed in greater detail below, the impacts on many resources, particularly biological resources, were not sufficiently analyzed, and contains key gaps on many imperiled species, and thus call tiering into question. For these reasons, despite statements in the EIR that the document should be used for tiering, we do not believe this is necessarily appropriate, and for this reason, believe subsequent projects must be analyzed in an EIR.

Comment
12-6
(continued)

Per the CEQA guidelines, a “later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR.” “Significant environmental effects have been “adequately addressed” if the lead agency determines that: (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.”⁴ As discussed in greater detail below, biological resources were not examined in sufficient detail. Additionally, mitigation and avoidance measures are vague, and in many places defer to the development of future documents. Therefore, any new project would require a new impacts analysis, and hence any future projects would need to conduct new environmental review and analysis in project-specific environmental impact reports.

Recommendation:

We recommend the County future renewable energy projects in Imperial County, regardless of location, be fully analyzed and reviewed in an Environmental Impact Report.

2.3 Treatment of project proposals in no-go areas

Per the EIR, Renewable Energy Conditional Use Permit application(s) proposed for specific renewable energy projects not located in the RE Overlay Zone would not be allowed without an amendment to the RE Overlay Zone.⁵ We are concerned that, in fact, the RE Overlay Zone could be amended in the future, and lead to cumulative impacts not considered in this EIR. For this reason, we reiterate our recommendation that any future projects be analyzed in project specific EIRs.

⁴ 2014 CEQA Guidelines, p 177-178

⁵ Draft EIR, 2-4



3 Renewable Energy Overlay Zone Map

We appreciate the County's effort to provide information in geo-spatial form within the Draft EIR. We appreciate the effort that Imperial County has made to refine the Development Focus Areas as proposed in the Preferred Alternative of the DRECP. The refinements made to the DFA in Imperial Valley we think will not only ensure preservation of agricultural lands but also continue to support the viability of bird populations that visit, live, breed and forage within the agricultural matrix of the Imperial Valley.

Comment
12-7

Recommendations: We offer the following recommendations on the RE Overlay Zone Map:

- 1) Make geo-spatial information related to the RE Overlay Zone available to the public in the form of spatial data compatible with Google Earth and/or ESRI ArcGIS. This aligns with the County's Goal 8 on Overlay Zones, which states the County will "promote exchange of information concerning renewable energy development to be circulated between industry, County staff, and the public," and "provide the public *adequate opportunity to obtain information* on the current status of renewable energy development."⁶ [emphasis added]
- 2) Show the RE Overlay Zone in relation to existing solar, geothermal or other renewable energy projects in order to see if existing projects fall within or outside of the Overlay Zone. Make geo-spatial information on the location of renewable energy facilities available to the public.
- 3) Provide additional information and detailed methodology regarding the constraints analysis conducted to identify the RE Overlay Zone. The information in the Draft EIR is vague and too general to be useful in analyzing the approach used by the County to identify these areas.
- 4) Provide more guidance on which technologies are appropriate within the RE Overlay Zone. Considering that renewable energy technologies have different impacts on biological and other resources, it is essential that the County provide more guidance on where different technologies can be sited within the RE Overlay Zone. For example, as referenced above, the West Chocolate Mountains REEA is not an appropriate location for either wind or solar thermal technologies.
- 5) Revise and refine the RE Overlay Zone to avoid significant biological resources conflicts:
 - a. The RE Overlay zone in the southeastern part of the County overlaps with the East Mesa Flat-tail Horned Lizard management area. Considering this species is a candidate for listing (see more below), we recommend that this part of the RE Overlay Zone be removed from consideration.
 - b. Marsh mitigation lands along the border with Mexico and near the Imperial East solar energy zone need to be removed from the RE Overlay Zone.
 - c. In the northwest part of the County, remove the sections of BLM land from the RE Overlay Zone that correspond with management areas for Flat-tail Horned Lizard.

Comment
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⁶ Goal 8 is on p. 28 of the RET Update



4 Biological Resources

Our organizations have several times provided detailed comments on biological resources in Imperial County that will be impacted by renewable energy development⁷. These comment letters are attached and incorporated by this reference to be considering as part of our comments on the Draft EIR. Below we summarize the specific considerations that we have mentioned in previous letters:

Comment
12-15

Flat-tail horned lizard: This lizard has been declining in its native habitat, much of which is in Imperial County, due to habitat conversion to urban and agricultural development. The California Fish and Game Commission recently voted to provide emergency protection for the Flat-tailed horned lizard in response to a listing petition. The lizard will receive emergency protection during the 12-month formal status review of CDFW. Actions analyzed in the RET Update Draft EIR have the potential to significantly impact the habitat of the lizard due to the overlap of East Mesa Management Area with the RE Overlay Zone. The East Mesa Management Area is not included in the special management areas described in the document.

Comment
12-16

Recommendation: All of the management areas identified in the Flat-tailed Horned Lizard Rangewide Management Strategy (1997) should be excluded from the Overlay Zone. Additional habitat and enhanced conservation measures for this species may be required due to the emergency protection status.

Burrowing Owl: Imperial Valley's agricultural complex is critically important to the statewide and national population of burrowing owls⁸. However, over 22,000 acres of solar energy development have been approved or proposed in the area, effectively removing foraging, wintering and breeding habitat for the species. Unfortunately, the Draft EIR for the RET Update does not effectively address the potential loss of burrowing owl habitat, nor does it provide a County-wide strategy for mitigation of impacts that would ensure long-term conservation of burrowing owls, as would be well-suited for a program EIR.

Comment
12-17

Recommendation: Develop a County-wide strategy for mitigating impacts to burrowing owl from conversion of agricultural land to solar energy development. This overall strategy should include information on the location of burrowing owl nests that has recently been compiled by Audubon California. The County-wide owl conservation strategy should include owl-friendly farming practices, in-kind mitigation for loss of foraging and nesting habitat,

⁷ Defenders of Wildlife and Sierra Club, "Draft Baseline Environmental Inventory Report, Imperial County Geothermal/Alternative and Transmission Element Update," July 11, 2014; Audubon California Comments on the Draft Baseline Environmental Inventory Report (July 11, 2014); Defenders of Wildlife, Sierra Club and Audubon California, "Notice of Preparation of Draft Programmatic EIR for Renewable Energy and Transmission Element Update" August 22, 2014.

⁸ Rosenberg, D.K. and K.L. Haley. 2004. The ecology of burrowing owls in the agroecosystem of the Imperial Valley, California. Pages 120-135 in W.D. Shuford and K.C. Molina (editors). Ecology and Conservation of Birds of the Salton Sink: An Endangered Ecosystem. Studies in Avian Biology 27, University of California Press, Berkeley, CA. 169 pp.



and an owl displacement strategy including best practices for translocation of owls.

Additionally, we offer the following specific recommendations regarding burrowing owl:

- a) Provide specific guidance on setbacks from burrowing owl nests to buffer the owls from the impacts of solar development. Based on information included in the Draft DRECP⁹, we recommend nest setbacks be at least 2,000 ft.
- b) We suggest that the EIR explicitly state that the burrowing owl surveys must be completed no less than 14 days prior to ground disturbance and also within the same breeding season as the proposed ground disturbance.

Comment
12-17
(continued)

Comment
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Comment
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Mountain Plover: Imperial Valley is also an important wintering and breeding habitat for mountain plover and 30-30% of the global population of wintering Mountain Plover occur in Imperial Valley¹⁰. The smaller footprint of renewable energy development zone in the RET Update compared to the DRECP DFAs would result in less of an impact to Mountain Plovers, however, conversion of agricultural land to solar energy development will have an impact on the species and needs to be addressed explicitly in the Draft EIR. Similar to burrowing owl, the County has an opportunity in its RET Update to address mitigation of these impacts in a coordinated County-wide mitigation strategy.

Comment
12-20

Recommendation: The following recommendations are from Audubon's 2012 report on Mountain Plover surveys and provide guidance on management activities which should be incorporated into planning a County-wide mitigation and conservation strategy for Mountain Plover:

- a) Maintain alfalfa, cultivated grass, or other suitable habitats in critical mountain plover areas in the Imperial Valley and Antelope Valley. Because alfalfa is a relatively low value crop with high water demand, there are likely to be increasing incentives for farmers to switch to more valuable crops that require less water. Although this may be necessary for water supply and economic reasons, a complete loss of alfalfa or grass fields to unsuitable alternative crops could have a significant impact on wintering mountain plovers. We recommend identifying those key areas within regions that regularly attract mountain plovers and working to ensure that a significant proportion of areas are maintained in suitable conditions.
- b) Promote frequent alfalfa harvest and/or grazing during mid-winter. We recommend encouraging and providing incentives for farmers to cut these fields at least once over winter to maintain vegetation height at levels that will encourage use by mountain plovers.

⁹ Section III.7.5.3.1 of the DRECP states that about 80% of burrowing owl foraging occurs within about 1,950 feet of the nest burrows. Similarly, Appendix Q section 5.2.2.1 states that "Nocturnal foraging can occur up to several kilometers away from the burrow."

¹⁰ <http://www.bloone.org/doi/abs/10.1648/0273-8570-74.1.747journalCode=fora>



- c) Promote field fallowing and maintaining winter bare dirt habitat or burned fields. Ensuring an abundance of this habitat, particularly in the Imperial Valley, would greatly benefit wintering mountain plovers. We recommend working with farmers to encourage and provide incentives for leaving some fields fallow and controlling weed growth in these fields to maintain suitable vegetation heights. In cases where a winter cover crop is needed or desired, maintaining relatively low vegetation heights should be encouraged.

Comment
12-20
(continued)

Migratory Birds: As mentioned in our NOP comments, we have seen evidence of migratory bird mortality at solar facilities throughout the desert. In fact, a federally endangered Yuma Clapper Rail was found at a solar facility in Imperial County. Due to the fact that there is no standardized mortality monitoring for migratory birds, we do not know the actual impacts of solar energy facilities on populations of bird species; however, evidence is accumulating to support a theory that solar photovoltaic fields reflect light in the same way that a body of water does. The Draft EIR does not adequately address potential impacts to migratory birds due to impacts from renewable energy.

Comment
12-21

Recommendation: The County needs to either update the Draft EIR with additional mitigation measures related specifically to migratory bird species, or include this information in project-specific EIRs. The County should consider working with wildlife agencies and Imperial Irrigation District regarding an avoidance area around the Salton Sea and wetland areas for any renewable energy technologies that have been shown to be fatal for migratory birds (wind, solar thermal, solar PV and transmission), or other ways to avoid or minimize these impacts. Additionally, the RET Update provided the County with the opportunity to implement standardized mortality monitoring at solar facilities to further understand the impacts renewable energy facilities are having on migratory birds. We encourage the County to work with the wildlife agencies to develop these recommendations.

Important Bird Areas (IBA): As mentioned in our NOP comments, Imperial County contains all or part of three globally significant Important Bird Areas¹¹: Imperial Valley (see description in NOP comments); Salton Sea Important Bird Area (see description in NOP comments); Lower Colorado River Valley. The Lower Colorado River Valley IBA includes the agricultural fields along the Valley and contains some of the most important habitats for California's most imperiled avifauna of the wetlands and riparian thickets of the lower Colorado River Valley. The original riparian and wetland habitat of the Colorado River has been extensively altered. The best habitat is found at the Nevada/Arizona/California border at Fort Mohave and then to the south between Blythe, CA and Yuma, AZ. The Draft EIR does not adequately analyze impacts and effects of the RET on these IBAs.

Comment
12-22

¹¹ Audubon California. 2008. Important Bird Areas of California



Recommendation: Provide further detailed analysis on the impacts the RET Update will have on the IBAs in Imperial County and, where necessary, offer mitigation for impacts to these areas.

Comment
12-22
(continued)

4.1 Mitigation Measures in the Draft EIR

The mitigation measures included in the Draft EIR for the RET Update are too vague and general to provide any real guidance to developers on avoidance, minimization and mitigation for species, their habitats, wetlands and other natural communities. With these mitigation measures alone, we do not think the County will have adequate assurance that impacts to biological resources will be less than significant. We include below recommendations for project-specific mitigations for inclusion in project-specific EIRs.

Comment
12-23

BIO-1b: The native plant surveys in BIO-1b are too general and do not provide specifics regarding setbacks and buffers for native plants in terms of actual distances.

Comment
12-24

Recommendation: Provide specific buffer distances for native plants and provide measures to ensure that native plants are not isolated and disconnected from other occurrences in the population.

BIO-1c: BIO-1c appears to be an attempt to lump all special status species into one mitigation measure. This approach does not consider that different renewable energy technologies impact species in very different ways. Additionally, mitigation measures that work for one species (e.g. Mountain Plover) may be completely inappropriate for another species (e.g. Flat-tail Horned Lizard). Without species-specific mitigation measures, the Draft EIR proposed measures leave all decisions regarding mitigation to agency discretion and project-specific decisions.

Comment
12-25

Recommendation: We encourage the County to develop species-specific mitigation measures for all special status species impacted by renewable energy development in Imperial County to include in project-specific EIRs. Species-specific mitigation measures need to first and foremost focus on avoidance of impacts to species. These measures also need to be more prescriptive and provide guidance on specific buffer and setback distances.

BIO-1f: This mitigation measure is too vague and does not provide criteria for when additional mitigation measures are needed.

Comment
12-26

Recommendation: Provide specific criteria for when additional mitigation measures are needed.

BIO-2: Again, there is no prescriptive language regarding the distance for setbacks and buffers for natural communities.

Comment
12-27

Recommendation: Provide specific distances for setbacks and buffers for natural communities or reference guidelines from wildlife agencies.