

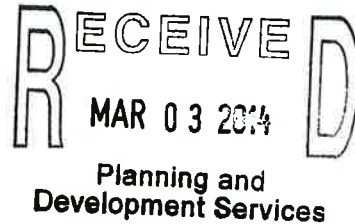
Conservation Biology Institute

651 Cornish Drive
Encinitas, California 92024
(760) 634-1590

www.consbio.org

February 25, 2014

Robert Hingtgen
Planning and Development Services
Project Processing Counter, MS 0-650
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123



RE SOITEC SOLAR DEVELOPMENT PROGRAM ENVIRONMENTAL IMPACT REPORT, 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 Conservation Biology Institute (CBI) is a 501(c)(3) organization that provides science support for habitat conservation efforts. Our staff has played a major role in the habitat conservation programs in San Diego County, both in conservation planning and in implementation (i.e., habitat management and monitoring). Our staff was involved in the science advisory panel for the East County MSCP, and CBI is a partner in the *Las Californias Binational Conservation Initiative*. I have reviewed the Draft Environmental Impact Report (DEIR) for the subject project and have the following comments.

The DEIR is full of detailed information about the project, yet it does not include a biological analysis sufficient to evaluate the regional impacts of the project and alternatives.

Regional reserve design

- The County's preliminary Focused Conservation Areas for the East County MSCP were developed in 2008, and there have been development projects, land conservation, and new biological studies since that time, which have not been integrated into the SOITEC DEIR. The County cannot adequately evaluate the proposed project without an updated conservation planning analysis.

- The DEIR does not reference *Las Californias Binational Conservation Initiative* and areas identified as important for conservation in that plan (see attached map and associated conservation values for Categories A, B, C, and D).
- The DEIR does not address potential impacts to Mexico or whether the development or mitigation would impact or improve connectivity with Mexico.
- The DEIR does not include a map that shows proximity of the project alternatives to public lands (need to show public lands on Fig. 1-3); the Rugged property is adjacent to public lands, and the potential impacts to publicly conserved lands of an alternative on this site is not addressed.

Consolidating development in least sensitive areas

- The DEIR does not address which parts of each property are most suitable for development, i.e., which parts of each property would minimize both direct and indirect impacts to biological resources. The project boundaries are larger than the areas where impacts would occur, and the DEIR should evaluate which portions of the sites are least sensitive for siting development.
- The habitat areas between the solar panels and under transmission lines should be calculated as part of the indirect impacts.
- While the Rugged property appears to be the most disturbed of the alternative project locations, it is adjacent to conserved lands. The DEIR should address whether the project can be sited in disturbed areas and maintain a buffer between the project and disturbed lands.

Critical habitat and recovery areas for peninsular bighorn sheep and Quino checkerspot butterfly; wetlands and headwaters of streams

- Critical habitat, recovery areas, and wetlands should be mapped to show proximity to the alternative project areas.
- The Jacumba Valley is the headwaters of Carrizo Creek that flows north into Carrizo Gorge, a known lambing area for peninsular bighorn sheep.
- The Lansing sites are between I-8 and Old Highway 80, and thus opportunities for conservation and wildlife movement in this area are limited. The DEIR should evaluate whether the project can avoid impacts to wetlands in this area as well as whether impacts to wetlands are less significant than landscape-scale (indirect) impacts of fragmentation.

Impacts to groundwater

- Groundwater recharge is limited in the Boulevard area of San Diego County. The DEIR does not adequately address impacts of groundwater consumption on natural resources and ecological processes or impacts on the Boulevard population.

Wildlife movement and undercrossings

- Types and functionality of undercrossings (e.g., bridge, culvert) and the species they support should be evaluated relative to the project alternatives to ensure that the project does not block wildlife corridors or preclude the ability to protect habitat linkages.

Secondary impacts of fragmentation (not addressed in DEIR)

- Increase in invasive species in graded areas and in areas between panels.
- Increased need for fire management due to increased access roads (most fires start at the edge of roads).
- Decrease in species movement.
- Impacts to environmental resources in Mexico.
- Relationship of project alternatives to surrounding areas of disturbed or intact habitat.

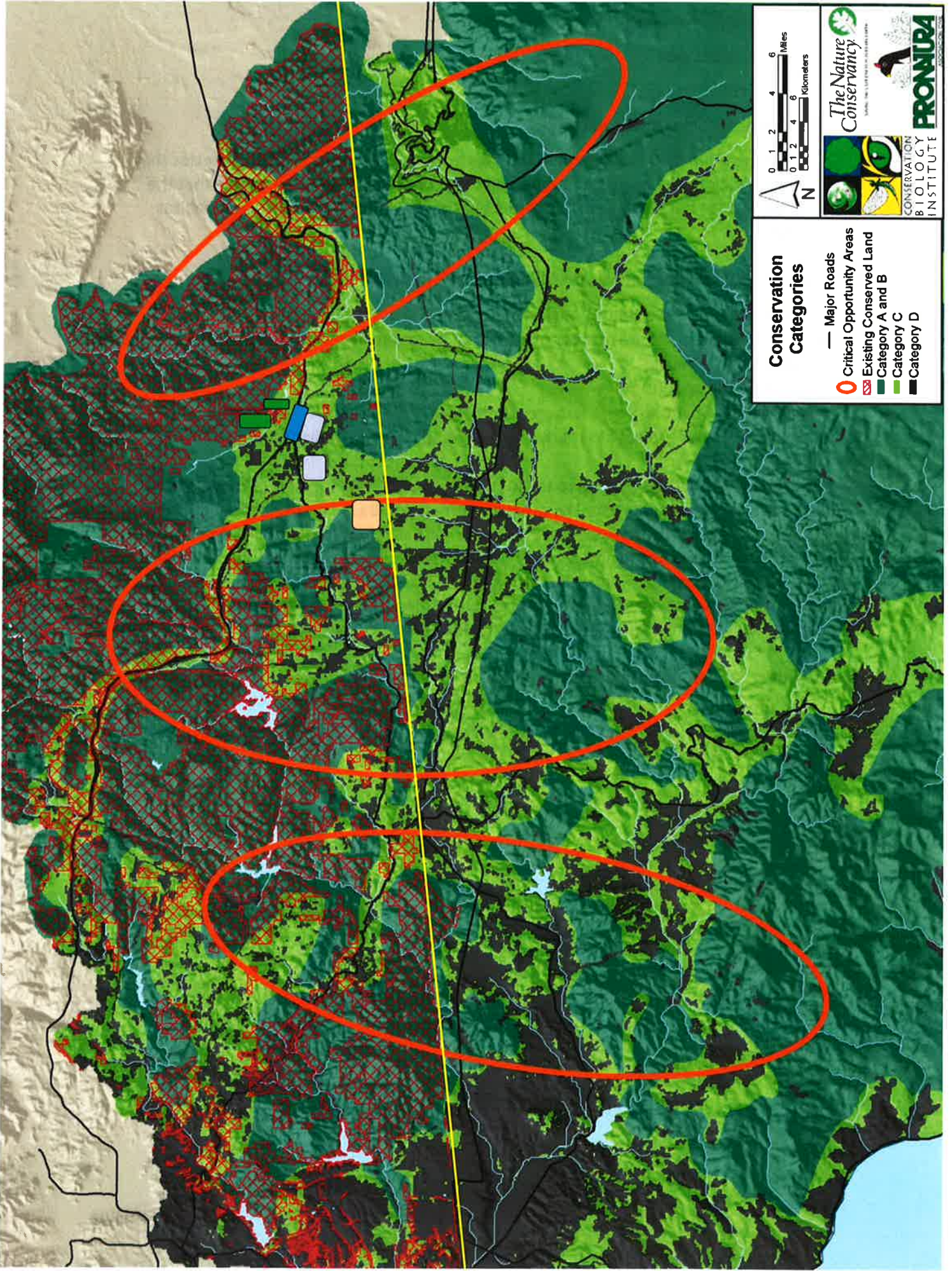
Without further evaluation relative to these criteria, the full level of impacts to biological resources cannot be compared for the project alternatives. Based on the current content of the DEIR, the Rugged location appears to have the least significant impacts if it can be sited so as to avoid indirect impacts to adjacent publicly conserved lands. Siting of mitigation land should consider conservation benefits to the region. Thus, unless the County and wildlife agencies proceed with a conservation analysis for this part of the County, it is difficult to completely evaluate impacts of the project and appropriate mitigation.

Thank you for the opportunity to comment.



Jerre Ann Stallcup
Senior Conservation Ecologist

Attachments



Las Californias gradients

Character	Category A	Category B	Category C	Category D
Reserve function	Core/ecosystem processes	Buffer	Linkage/wildlife corridor	Matrix
Conservation goal	Biodiversity protection			Sustainability
Management strategy	Protected area	Habitat management	Working landscape	Urban green space
Integrity	High	High	Low	
Feasibility	High			
Land use	Wildland		Agriculture, low density residential	Urban
Cost	Low			High?
Feasibility	High			Low?

