



# County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING  
STEVEN E. WHITE, DIRECTOR

## Planning Commission Staff Report Agenda Item No. 2 November 14, 2024

**SUBJECT:** **Unclassified Conditional Use Permit Application No. 3677, Sonrisa Solar Project and associated Environmental Impact Report No. 7869 (State Clearinghouse No. 2020110008).**

Allow the construction, operation, maintenance, and decommissioning of the Sonrisa Solar Project (Project), of a photovoltaic (PV) solar electricity generating up to 200 megawatts and energy storage facilities with a capacity of approximately 184 megawatts on approximately 2,000 acres.

The Project would connect to the electrical grid via an approximately 0.2-mile gen-tie connection to an existing 3.3-mile long 230 kilovolt (kV) gen-tie through an adjacent energy project which connects to the existing Tranquillity Switching Station, which is operated by Pacific Gas and Electric Company (PG&E). The requested term for the CUP is 35 years.

**LOCATION:** The approximately 2,000-acre site is located in western Fresno County, generally bounded by State Route 33 (SR 33 also known as S. Derrick Avenue) to the west, West Manning Avenue to the south, S. Merced Avenue to the east, and W. Adams Avenue to the north, W. South Avenue bisects the site from east to west, approximately 7 miles west of the unincorporated community of Tranquillity.

**OWNER:** **Westlands Water District**

**APPLICANT:** **EDPR CA Solar Park VI LLC**

**STAFF CONTACT:** **Jeremy Shaw, Planner  
(559) 600-4207**

**David Randall, Senior Planner  
(559) 600-4052**

**RECOMMENDATION:**

1. Move to:
  - Determine that the Final EIR was presented to, reviewed and considered by the Planning Commission;
  - Determine the certification of the Final EIR reflects the Planning Commission’s independent judgement; and
  - Adopt the CEQA Findings of Fact and certify that the Environmental Impact Report (EIR) No. 7869 prepared for the Sonrisa Solar Project processed under Unclassified Conditional Use Permit No. 3677, as complete and adequate in conformance with the California Environmental Quality Act (CEQA);
2. Move to determine the required Findings can be made as discussed in the staff report, and move to approve Unclassified Conditional Use Permit Application No. 3677, subject to the Mitigation Measures, Conditions of Approval and Project Notes listed in Exhibit 1; and
3. Direct the Secretary to prepare a Resolution documenting the Commission’s action.

**EXHIBITS:**

1. Mitigation Monitoring and Reporting Program, Conditions of Approval, and Project Notes
2. Location Map
3. Zoning Map
4. Land Use Map
5. Site Plan
6. Applicant’s Operational Statement
7. CEQA Findings of Fact
8. Reclamation Plan
9. Integrated Pest Management and Noxious Weed Control Plan
10. Draft EIR No. 7869
11. Draft EIR Appendices
12. Final EIR No. 7869

*NOTE: Items 10-12 (the Draft EIR, Appendices, and Final EIR for the Sonrisa Solar Project) are available for review at the following link: <https://www.fresnocountyca.gov/eir7869>. These documents were previously distributed to members of the Planning Commission as part of Advance Agenda Item Materia on October 24, 2024.*

**SITE DEVELOPMENT AND OPERATIONAL INFORMATION:**

<b>Criteria</b>	<b>Existing</b>	<b>Proposed</b>
General Plan Designation	Agriculture	No Change
Zoning	AE-20 (Exclusive Agriculture, 20-acre minimum parcel).	No Change

<b>Criteria</b>	<b>Existing</b>	<b>Proposed</b>
Parcel Size	APN 028-071-15: 10.00 acres APN 028-071-02: 2.00 acres APN 028-071-33: 160.00 acres APN 028-071-40: 80.00 acres APN 028-071-41: 20.00 acres APN 028-071-43: 140.00 acres APN 028-071-44: 20.00 acres APN 028-071-45: 60.00 acres APN 028-071-20: 10.00 acres APN 028-071-07: 50.00 acres APN 028-071-17: 10.00 acres APN 028-071-16: 10.00 acres APN 028-071-21: 20.00 acres APN 028-071-06: 318.18 acres APN 028-071-01: 639.95 acres APN 028-071-04: 138.00 acres APN 028-071-13: 20.00 acres APN 028-101-84: 389.20 acres APN 028-071-39: 30 acres APN 028-111-01: 558 acres APN 028-111-07: 164 acres APN 028-111-10: 144 acres APN 028-111-13: 22 acres APN 028-111-14: 24 acres APN 028-111-15: 21 acres APN 028-111-16: 40 acres APN 028-111-17: 40 acres APN 028-111-19: 140 acres APN 028-071-47: 157 acres	No Change
Project Site	The Project site consists of lands that have been used for dry-farmed (non-irrigated) agriculture (such as rangeland grasses) or which have lain fallow for at least the past 10 years. Together with relatively high levels of selenium and a water table that does not provide sufficient drainage for commercially irrigated crops, the non-irrigation covenants restrict what agricultural use may be made of the property.	A new solar facility, with energy storage facilities, project substation, and extension (by 0.2 miles) of an existing (3.3-mile) 230kV gen-tie line. The Project includes approximately 300 acres of land to be transferred from the approved adjacent Scarlet Solar project.
Structural Improvements	Existing WWD water infrastructure	Solar PV facility with 200 MW capacity; energy storage system with 184 MW capacity; an extension to an existing gen tie line; other structures include a Project substation, a permanent

Criteria	Existing	Proposed
		operation and maintenance building, a Supervisory Control and Data Acquisition System (SCADA), meteorological data collection equipment, telecommunications infrastructure, well, septic system, access roads, parking, and security fencing.
Nearest Residence	The closest residence is located at the southeast corner of the intersection of West Adams Avenue and South Monterey Avenue (approximately 50 feet east of South Monterey Avenue and 185 feet from the Project site boundary)	No Change
Surrounding Development	Agricultural uses, other energy facilities, and the existing PG&E Tranquillity Switching Station generally surround the site.	No Change
Operational Features	N/A	See above "Project Site"
Employees	No permanent employees, site is vacant; periodic agricultural labor employed during intermittent farming operations	Peak daily workforce would be up to approximately 350 workers for construction and decommissioning/site restoration activities. Once operational, it is anticipated that there will be seven (7) full-time O&M employees on site during normal business hours.
Customers	N/A	None: The site would not receive customers.
Traffic Trips	Negligible	Project construction and decommissioning/site restoration would require up to 422 daily vehicle trips (211 trips each, inbound and outbound). During Project operation, up to 14 daily vehicle trips infrequently may be required.

Criteria	Existing	Proposed
Lighting	None	Project lighting would be installed within the control building, within the O&M building, and otherwise as needed for maintenance and security. Low-level lighting may be installed at entry and egress gates and at other strategic locations around the facility. Manually controlled lights would be installed at equipment pads and substations. All exterior lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties, in conformance with applicable Fresno County requirements for exterior lighting.
Hours of Operation	N/A	The solar facility would operate between sunrise and sunset, year-round; the energy storage facility may operate within and outside of solar energy generating hours.

**EXISTING VIOLATION (Y/N) AND NATURE OF VIOLATION: N/A**

**ENVIRONMENTAL ANALYSIS:**

As stated in CEQA Guidelines §15121(a), “An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.” An EIR is not intended to recommend either approval or denial of a project: Its primary purpose is to disclose the potential environmental impacts of the project and to document the evaluation of methods for agencies to avoid or reduce environmental harm by adopting feasible project alternatives or mitigation measures.

In addition, CEQA Guidelines §15151 contains the following standards of adequacy:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does*

*not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

As required by CEQA Guidelines §15120(c), an EIR shall:

- Provide a sufficiently detailed project description;
- Describe the existing environmental setting;
- Identify and evaluate potential environmental impacts of the project, including the cumulative effects of the project in combination with the impacts of other existing or proposed activities in the vicinity;
- Describe feasible mitigation measures that could minimize the project's significant adverse environmental impacts; and
- Describe a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

CEQA does not require evaluation of all possible alternatives, only evaluation of "a range of reasonable alternatives" to encourage both meaningful public participation and informed decision making (CEQA Guidelines §15126.6[a]). "The discussion of alternatives need not be exhaustive, and the requirement as to the discussion of alternatives is subject to a construction of reasonableness. The statute does not demand what is not realistically possible given the limitation of time, energy, and funds" (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3d 274, 286; see also CEQA Guidelines §15126.6[f][3]). In addition, as stated by the court in *Village of Laguna Beach, Inc. v. Board of Supervisors* (1982) (134 Cal.App.3d 1022, 1029), "Absolute perfection is not required; what is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned."

EDP Renewables CA Solar Park VI, LLC submitted an application for an Unclassified CUP for the Project on May 21, 2020. County staff determined that preparation of an EIR was necessary. The EIR was prepared in compliance with CEQA (Pub. Res. Code §21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. §15000 et seq.). Technical analysis was conducted, and public comment was solicited and considered to ensure that potential environmental impacts of the Project were evaluated and disclosed in the EIR. A summary of the steps of environmental review and public comment process is provided below:

- A Notice of Preparation (NOP) was prepared for the project and circulated to all trustee agencies, responsible agencies, and interested parties beginning on November 2, 2020, for a 30-day review (scoping) period that ended on December 2, 2020; the NOP also was posted for the same time period in the Office of the County Clerk.
- A Notice of Completion for the Draft EIR was filed with the California State Clearinghouse on November 2, 2020.
- A Notice of Availability of the Draft EIR was published in The Business Journal on July 3, 2024; was posted on the County's website (<https://www.fresnocountyca.gov/eir7869>), and notification of the document's availability was mailed to the Project's distribution list to inform individuals, organizations, and agencies that previously expressed interest in the Project.

- The Draft EIR was circulated for review and comment during a 45-day period that began on July 3, 2024, and ended on August 19, 2024.
- The Draft EIR was made available for public review at Fresno County Main Library Reference Department, Mendota Branch Library, the County Public Works and Planning offices, and on the County's Internet website.
- Copies of the Draft EIR were provided, upon request, to responsible agencies, trustee agencies, and to other federal, state, and local agencies expected or known to have expertise or interest in the resources that the Project may affect.
- Copies of the Draft EIR or notices of the Draft EIR's availability were sent to organizations and individuals with special expertise on environmental impacts and/or who had previously expressed an interest in this Project or other activities.
- On October 14, 2024, the Final EIR also was provided to Tribes, agencies, organizations, and members of the public who were included on the Project's distribution list. Printed copies of the Final EIR were made available for public review at Fresno County Main Library Reference Department, Mendota Branch Library, the County Public Works and Planning offices, and on the County's EIR Project website.

The EIR found that the Project would have:

No impact regarding:

- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation

Less-than-significant impact regarding:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Utilities and Service Systems
- Wildfire

Less-than-significant impact with the implementation of recommended Mitigation Measures regarding:

- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology, Soils, and Paleontological Resources
- Noise and Acoustics
- Transportation

The EIR found that the Project would have no significant and unavoidable impacts.

#### **PUBLIC NOTICE:**

Notices were sent to 25 property owners within one-mile of the subject parcels, exceeding the 300-foot minimum notification requirements prescribed by California Government Code §65091 and County Zoning Ordinance §874.6.020(B).

#### **PROCEDURAL CONSIDERATIONS:**

An Unclassified Conditional Use Permit (CUP) may be approved only if the four Findings specified in Fresno County Zoning Ordinance §842.5.050(B) are made by the Planning Commission.

The decision of the Planning Commission on an Unclassified CUP Application is final, unless appealed to the Board of Supervisors within 15 days of the Commission's action.

#### **BACKGROUND INFORMATION:**

EDP Renewables CA Solar Park VI, LLC (the Applicant) filed an application with the Fresno County Department of Public Works and Planning for Unclassified Conditional Use Permit (CUP No. 3677) to construct, operate, maintain, and decommission the Project on an approximately 2,000-acre site located in western unincorporated Fresno County. Lands proposed for Project use are currently zoned AE-20 (Exclusive Agricultural) and have been dry farmed or lain fallow for the past 10 years.

The Project would generate renewable energy from ground-mounted single axis tracking arrays and intermittently store electricity by charging and discharging lithium-ion batteries. The Project would have a generating capacity of up to 200 MW<sub>AC</sub> and a battery storage capacity of 184 MW<sub>AC</sub> (with battery duration of approximately 4 hours). The Project would connect to the electrical grid via an approximately 0.2-mile extension to an existing approved approximately 3.3-mile long 230 kV gen-tie to reach the point of interconnection to the existing Tranquillity Switching Station, which is owned and operated by PG&E. Agricultural uses, including non-irrigated fields, generally predominate in the vicinity of the Project site. Four energy facilities are operating or under development adjacent to the Project site, including the existing Tranquillity and Adams East solar projects; Scarlet Solar (proposed to share a gen-tie line and other infrastructure with the Sonrisa Solar Project) and the Luna Valley solar project, which is under construction.

If the project is approved, the applicant anticipates that it would have an operational lifespan of approximately 35 years.



**Finding 1: That the site of the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping, and other features required by this Division, to adjust said use with land and uses in the neighborhood.**

	<b>Current Standard:</b>	<b>Proposed Operation:</b>	<b>Is Standard Met (y/n)</b>
Setbacks	Front: 35 feet Side (each): 20 feet Street side: 35 feet Rear: 20 feet Reversed corner (street side): 35 feet. (§808.2.040, Table 2-3)	Minimum 50-foot setback of structural improvements and equipment proposed from property lines.	<b>Yes</b>
Parking	The required parking area for commercial, business, office, and professional uses shall be provided on the parcel with the structure or uses being served, or on a contiguous parcel in the same zone. (§828.3.030[G]) For a facility that is not open to the public, 1 space is required per 2 employees, based on the maximum number of employees on duty at any one time. (§828.3.040, Table 3-7) When four or fewer parking spaces are required for a specific project, then the parking space for the disabled shall be 17 feet wide but does not need to be marked or reserved exclusively for the disabled. (§828.3.050[F])	Parking would be provided on-site. Operations structures would include an adjacent parking area of sufficient size.	<b>Yes</b>
Lot Coverage	None (§808.2.040, Table 2-3)	N/A	<b>N/A</b>
Space Between Buildings	6 feet (§808.2.040, Table 2-3)	Only one building proposed; will conform to County setback requirements.	<b>Yes</b>
Wall Requirements	No requirements.	N/A.	<b>N/A</b>

	<b>Current Standard:</b>	<b>Proposed Operation:</b>	<b>Is Standard Met (y/n)</b>
Fencing Requirements	None AE zones excluded from maximum fence height requirements. (§822.3.050 Table 3-2)	Perimeter fence will be 6-10 feet high; substation will be secured by 8-foot-tall, barbed wire fence.	<b>Yes</b>
Septic Replacement Area	100 percent (LAMP §101.6)	Septic system will conform to Local Area Management Plan (LAMP) requirements.	<b>Yes</b>
Water Well Separation	Building Sewer: 50 feet Septic Tank: 100 feet Dispersal Field: 100 feet Seepage Pit: 150 feet	Project will comply with the minimum distances outlined in Table 101.8 of the LAMP and adhere to applicable Fresno County Code requirements.	<b>Yes</b>

**Reviewing Agency/Department Comments Regarding Site Adequacy:**

No comments specific to the adequacy of the site were expressed by reviewing Agencies or Departments.

**Finding 1 Analysis:**

The County’s Supplemental Information for Solar Electrical Generation Facilities (“Solar Facility Guidelines”) approved by the Fresno County Board of Supervisors were last amended on December 12, 2017. In these Guidelines, Item 5 requires “a buffer between the proposed solar facility and adjacent agricultural operations.” Consistency with this Guideline has been interpreted to mean a minimum 50-foot buffer from the edges of a project’s boundaries to the closest structural improvements or equipment, excluding fencing. The 50-foot buffer includes the required yard setbacks. The submitted Project site plans demonstrate that the proposed infrastructure would be set back between 50 and 175 feet from the surrounding properties to sufficiently buffer adjacent agricultural operations.

Adherence to a Site Plan Review (SPR) pursuant to Chapter 854.5 of the County Zoning Ordinance has been included as a Condition of Approval (see Exhibit 1). This would ensure compliance with the setback requirements and other design standards. Conditions of the SPR may include, but are not limited to, design of parking and circulation areas, access, onsite grading and drainage, septic conformance with LAMP requirements, fire protection, landscaping, signage and lighting.

Based on the above information, the 2,000-acre site is adequate in size and shape to be able to conform to County Standards and not adversely impact surrounding properties.

**Recommended Conditions of Approval:**

None

**Finding 1 Conclusion:**

Finding 1 can be made.

**Finding 2:** **That the site for the proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use.**

		<b>Existing Conditions</b>	<b>Proposed Operation</b>
Private Road	No	Project site contains existing unimproved dirt roads associated with agricultural uses.	A perimeter road inside the fence line would be 20-feet wide. Existing interior unpaved roads would be improved for site circulation to be up to 15-feet wide with a minimum of 3 feet of clearance on either side. Crushed aggregate base or other native material would be placed on interior access roadways with soil stabilization material, as necessary, to minimize fugitive dust and for ease of maintenance.
Public Road Frontage	Yes	West Adams Avenue is a two-lane undivided local roadway that provides a connection from the California Aqueduct (approximately 6.5 miles west of the Project site) to the intersection of West Manning Avenue/James Road/South Calaveras Avenue. The northern most parcel has frontage on West Adams Avenue.	Primary site access (ingress and egress) would be on West Manning via SR 33, with secondary access via West Adams Avenue. Access gates would be provided at each site entry.
Direct Access to Public Road	Yes	Northernmost parcel has access to West Adams Avenue	Primary driveway access from the public roadway network would be provided along West Manning Avenue; secondary access at West Adams Avenue.
Road Average Daily Traffic (ADT)		- I-5: 41,500 vehicles per day	(Construction) - I-5: 294 additional trips

		<b>Existing Conditions</b>	<b>Proposed Operation</b>
		<ul style="list-style-type: none"> <li>- West Adams Avenue: 187 vehicles per day</li> <li>- West Manning Avenue: 1,055 vehicles per day</li> <li>- SR 33: 1,790 vehicles per day</li> </ul>	<ul style="list-style-type: none"> <li>- West Adams Avenue: 329 additional trips</li> <li>- West Manning Avenue: 307 additional trips</li> <li>- SR 33: 357 additional trips (Operation)</li> <li>- Estimated addition of 14 daily vehicle trips on roadways (listed above) for periodic maintenance of site.</li> </ul>
Road Classification		<ul style="list-style-type: none"> <li>- I-5 and SR 33: Major Highways</li> <li>- West Manning Avenue and West Adams Avenue: local roads</li> </ul>	No change
Road Width		32 feet	No change
Road Surface		Existing dirt roads are present on the project site.	No change, except as described (see Private Roads) or as determined through transportation mitigation (see Exhibit 1)
Traffic Trips		Typical Agriculture	See above for construction trips.
Traffic Impact Study (TIS) Prepared	Yes	TIS prepared for Sonrisa Solar Project	Limited additional trips following construction (Maintenance only)
Road Improvements Required		N/A	No change to public roads except as determined through transportation mitigation (Exhibit 1). Mitigation Measure 4.18-1 requires an approved traffic management plan; Mitigation Measure 4.18-2 requires preconstruction and pre-decommissioning road survey report; Mitigation Measure 4.19-3 requires that a road repair

	Existing Conditions	Proposed Operation
		agreement be secured with Fresno County and provides for mitigation of impacts to roadways.

**Reviewing Agency/Department Comments Regarding Adequacy of Streets and Highways:**

Road Maintenance and Operations Division: Manning Avenue is classified as an Expressway with 100 feet of right-of-way, a paved width of 32 feet, a pavement condition index (PCI) of 82.3, an annual average daily traffic count of 800 and is in good condition.

Adams Avenue is classified as a local road with 60-feet of road right-of-way, a paved width of 24.9 feet, a pavement condition index (PCI) of 95, an annual average daily traffic count of 150 and is in good condition.

Monterey Avenue is classified as a local road with 60-feet of road right-of-way, a paved width of 15 feet, an unknown pavement condition index (PCI), an annual average daily traffic count of 300 and is in poor condition.

No other comments specific to the adequacy of streets and highways were expressed by reviewing Agencies or Departments.

**Finding 2 Analysis:**

The Project site would be accessible from West Manning Avenue, providing primary site access on the south side of the Project site; secondary site access would be from West Adams Avenue on the north side of the Project site. All access points would meet applicable California Department of Forestry and Fire Protection standards as well as County standards. A perimeter road inside the fence line would be 20-feet wide. Existing interior roads would be improved for site circulation to be up to 15-feet wide with a minimum of 3 feet of clearance on either side. Crushed aggregate base or other native material would be placed on interior access roadways with soil stabilization material, as necessary, to minimize fugitive dust and for ease of maintenance.

In coordination with the County Roads Department, County Planning staff determined that it is desirable to substitute the Mitigation Measure 4.18-3: calling for a Road Repair Agreement with more practicable, workable, and equally effective requirements. Mitigation measures 4.18-1, 4.18-2, and 4.18-3 were included in the Final EIR Exhibit 12 and MMRP Exhibit 1 as follows:

- **Mitigation Measure 4.18-1: Construction and Decommissioning Traffic Management Plan.** Prior to the issuance of construction or building permits and the issuance of decommissioning authorizations, the Project owner and/or its construction contractor shall prepare and submit a Traffic Management Plan to the Fresno County Public Works Department and the California Department of Transportation, District 6, as appropriate, for approval.
- **Mitigation Measure 4.18-2: Preconstruction and Pre-Decommissioning Road Survey Report.** Prior to Project construction and decommissioning, a preconstruction report and a pre-decommissioning report shall be prepared by a qualified registered engineer, retained by the Project owner, to include a detailed analysis of road suitability

to accommodate haul trucks during Project construction and decommissioning. The report shall be submitted to the Fresno County Department of Public Works and Planning. Prior to initiating the preconstruction or decommissioning report, the proposed methodology shall be presented to the Fresno County Department of Public Works and Planning for review and approval. Improvements to existing roads, to be implemented by the Project owner, may be necessary based on the findings of the report.

- **Mitigation Measure 4.18-3: Road Repair.** After final delivery of main equipment and prior to the later to occur of, (a) the closing of the final phase III permit or, (b) the start of operations of phase III of the Project, other than testing processes of the facilities, the Applicant shall crack seal and chip seal Manning Avenue between Derrick Avenue and the San Mateo Avenue Alignment. Prior to chip seal application, in locations where the construction entrances are directly across from each other along Manning Avenue, the area of Manning Avenue between the construction entrances shall be grinded to a depth of 0.3 feet and replaced with hot mixed asphalt.

Based on the above information, with adherence to the Conditions of Approval and the Mitigation Measures described in the EIR and presented in Exhibit 1 and acknowledging that the site is situated in the context of streets, highways, and the interstate, which are adequate for the traffic generated by the proposed use, the streets and highways serving the project site are adequate to accommodate the proposed use.

**Recommended Conditions of Approval:**

None.

**Finding 2 Conclusion:**

Finding 2 can be made.

**Finding 3:** **That the proposed use will have no adverse effect on abutting property and surrounding neighborhood or the permitted use thereof.**

**Surrounding Parcels**

	Size:	Use:	Zoning:	Nearest Residence:
North	APN 028-031-46: (75.96 acres) APN 028-031-34: (54.77 acres) APN 028-031-33: (4.77 acres) APN 028-031-12: (20 acres) APN 028-031-41: (320 acres) APN 028-031-31: (320 acres) APN 028-311-32: (320 acres) APN 028-071-03: (20 acres) APN 028-071-52 (10 acres) APN 028-071-53 (20 acres) APN 028-071-12: (10 acres) APN 028-071-29: (40 acres) APN 028-071-30: (20 acres) APN 028-071-31: (10 acres)	Parcels to the north consist mostly of lands owned by Westlands Water District in non-irrigated agricultural use or fallow.  WWD Office- (non-irrigated agriculture)  APNs 028-071-52 & 028-071-53: G&G	AE-20	185 feet north of Project site boundary on the north side of West Adams Avenue, approximately 2,000 feet east of SR 33;

	Size:	Use:	Zoning:	Nearest Residence:
		Enterprises (aviation parts supply business)		
South	APN 028-071-56: (633.90 acres) APN: APN 028-071-57: (313.90 acres) APN 028-111-73: (1,428.31 acres)	APN 028-071-56: Scarlet Solar facility	AE-20	185 feet southeast of the Project site boundary and 50 feet east of S. Monterey Avenue at West Adams (which may be used for construction access); Several residences are located 1 mile south (in the southeastern quadrant) of the intersection of West Dinuba Avenue and SR 33 (South Derrick Avenue).
East	APN 028-071-23: (303.52) APN 028-241-01 (55.81 acres) APN 028-241-02 (29.93 acres)	Agricultural land	AE-20	750 feet from the closest Project site boundary, on a parcel to the south of West Adams Avenue, adjacent to the northeastern corner of the Project site boundary.
West	APN 028-071-54: (200.00 acres) APN 028-061-77: (628.06 acres) APN 028-171-18: (78.13 acres) APN 028-171-46: (19.53 acres) APN 028-171-48 (19.54 acres) APN 028-171-42 (19.53 acres) APN 028-171-44 (19.53 acres)	APN 028-071-54: Adams East solar project; remaining parcels: agricultural land.	AE-20	One -mile west of the nearest project site boundary.

**Reviewing Agency/Department Comments:**

No comments specific to land use compatibility were expressed by reviewing Agencies or Departments.

### **Finding 3 Analysis:**

As discussed in Draft EIR Section 2.9.4 (p. 2-20), the Applicant shall comply with all applicable laws and standards, including, but not limited to, those governing the use, storage, and disposal of hazardous materials; worker training and safe work practices; air quality (such as the San Joaquin Valley Air Pollution Control District's indirect source rule and fugitive dust regulation); water quality; and energy storage systems more generally. Compliance with these requirements would avoid or reduce potential adverse environmental impacts to soil, air quality, surface water and groundwater quality, human health, fire-related risk, and other environmental considerations.

As required by the County's Solar Facility Guidelines, and as a Condition of Approval, the Applicant submitted a draft decommissioning and reclamation plan as part of the CUP application package, which the County included in the Draft EIR and is attached as Exhibit 8. If the Project is approved, the draft reclamation plan may be updated and finalized in accordance with final, approved design plans and submitted with the Project's grading and building permit applications – a final reclamation plan would be in place before ground disturbance occurs. The County requires, and the Applicant would provide, money in an amount equal to the estimated cost of implementing all activities associated with returning the Project site to its original state.

In compliance with the Fresno County Solar Guidelines, the Applicant has prepared a noxious weed and rodent control plans (included in Draft EIR Appendix B-2, and B-3, respectively). Accordingly, the Applicant has acknowledged the Fresno County "Right to Farm" Ordinance. Recordation of the notice would be required as a standard Condition of Approval (Exhibit 1).

The EIR found that the Project would have a less than significant impact on aesthetics, including the Project's potential to degrade the existing visual character or public views of the site and its surroundings. There are no designated scenic highways within 50 miles of the Project site. SR-180 (from the eastern edge of Fresno to Cedar Grove in Kings Canyon National Park) is Fresno County's only officially designated state scenic highway.

Based on the above information and with adherence to Mitigation Measures and recommended Conditions of Approval attached as Exhibit 1, the proposed use would have no adverse effect on (or the permitted use of) adjacent property or the surrounding neighborhood.

### **Recommended Conditions of Approval:**

The project will be required as a condition of approval to adhere substantially to the provisions of the draft Reclamation Plan (attached as Exhibit 8) with regard to the decommissioning of the facility once operation ceases; and, the project owner will be required to enter into a financially secured agreement with the County for decommissioning of the project; and, the amount of such financial security will be subject to approval by the County. See Conditions 3, 4 and 5 in Exhibit 1.

### **Finding 3 Conclusion:**

Finding 3 can be made as no detrimental impacts to surrounding property would occur, with adherence to the included Conditions of Approval.



**Finding 4: That the proposed development is consistent with the General Plan.**

Relevant Policies:	Consistency/Considerations:
<p><b>Policy LU-A.1:</b> <i>The County shall maintain agriculturally-designated areas for agriculture use and shall direct urban growth away from valuable agricultural lands to cities, unincorporated communities, and other areas planned for such development where public facilities and infrastructure are available.</i></p>	<p><b>Consistent.</b> The Project site is zoned AE-20, Exclusive Agricultural. As indicated in Chapter 806.2 of the Fresno County Zoning Ordinance, permitted uses in the AE district include electrical transmission and distribution.</p>
<p><b>Policy LU-A.13:</b> <i>The County shall protect agricultural operations from conflicts with nonagricultural uses by requiring buffers between proposed non-agricultural uses and adjacent agricultural operations.</i></p>	<p><b>Consistent.</b> The Project would maintain a buffer between the Project and adjacent agricultural operations. The Project would be subject to review as part of the unclassified conditional use permit (CUP) process. Draft EIR Section 4.3 discusses potential impacts to agricultural resources. Project would implement measures during decommissioning to restore the land as described in Appendix B-1, Decommissioning and Reclamation Plan. The Project would make no other changes to the existing environment (such as those altering soil quality or water availability) that would affect the defining characteristics of off-site Farmland.</p>
<p><b>Policy LU-A.14:</b> <i>The County shall ensure that the review of discretionary permits includes an assessment of the conversion of productive agricultural land and that mitigation be required where appropriate.</i></p>	<p><b>Consistent.</b> The Project would be decommissioned and the site restored as nearly as is feasible to its original agricultural condition at the end of the project’s operational lifetime.</p>
<p><b>Program LU-A.C:</b> <i>The County shall develop and implement guidelines for design and maintenance of buffers to be required when new non-agricultural uses are approved in agricultural areas. Buffer design and maintenance guidelines shall include, but not be limited to, the following:</i></p> <ul style="list-style-type: none"> <li><i>a. Buffers shall be physically and biologically designed to avoid conflicts between agriculture and non-agricultural uses.</i></li> <li><i>b. Buffers shall be located on the parcel for which a permit is sought and shall protect the maximum amount of farmable land,</i></li> <li><i>c. Buffers generally shall consist of a physical separation between agricultural and non-agricultural uses. The appropriate width</i></li> </ul>	<p><b>Consistent.</b> As required by the Fresno County Solar Facility guidelines and as summarized in Draft EIR Section 2.9.3 (p. 2-20), the Project would include a sufficient buffer to minimize impacts of the operation to adjacent properties.</p>

Relevant Policies:	Consistency/Considerations:
<p><i>shall be determined on a site-by-site basis taking into account the type of existing agricultural uses, the nature of the proposed development, the natural features of the site, and any other factors that affect the specific situation.</i></p> <p><i>d. Appropriate types of land uses for buffers include compatible agriculture, open space and recreational uses such as parks and golf courses, industrial uses, and cemeteries.</i></p> <p><i>e. The County may condition its approval of a project on the ongoing maintenance of buffers.</i></p> <p><i>f. A homeowners' association or other appropriate entity shall be required to maintain buffers to control litter, fire hazards, pests, and other maintenance problems.</i></p> <p><i>g. Buffer restrictions may be removed if agricultural uses on all adjacent parcels have permanently ceased. (See Policy LU-A.16).</i></p>	
<p><b>Policy PF-C.16: Water Supply Evaluation.</b>  <i>The County shall, prior to consideration of any discretionary project related to land use, require a water supply evaluation be conducted. The evaluation shall include the following:</i></p> <p><i>a. A determination that the water supply is adequate to meet the highest demand that could be permitted on the lands in question. If surface water is proposed, it must come from a reliable source and the supply must be made "firm" by water banking or other suitable arrangement. If groundwater is proposed, a hydrogeologic investigation may be required to confirm the availability of water in amounts necessary to meet project demand. If the lands in question lie in an area of limited groundwater, a hydrogeologic investigation shall be required.</i></p> <p><i>b. If use of groundwater is proposed, a hydrogeologic investigation may be required. If the lands in question lie in an</i></p>	<p>The project was reviewed and a water supply evaluation conducted by the Water and Natural Resources Division. It was determined that existing groundwater supplies were adequate to serve the project, and that the project would not result in significant detrimental impacts to groundwater supplies in the area nor would the project be in conflict with any groundwater sustainability plans.</p>

<b>Relevant Policies:</b>	<b>Consistency/Considerations:</b>
<p><i>area of limited groundwater, a hydrogeologic investigation shall be required. Should the investigation determine that significant pumping-related physical impacts will extend beyond the boundary of the property in question, those impacts shall be mitigated.</i></p> <p><i>c. A determination that the proposed water supply is sustainable or that there is an acceptable plan to achieve sustainability. The plan must be structured such that it is economically, environmentally, and technically feasible. In addition, its implementation must occur prior to long-term and/or irreversible physical impacts, or significant economic hardship, to surrounding water users.</i></p>	

**Reviewing Agency Comments:**

No other comments specific to General Plan Policy were expressed by reviewing Agencies or Departments.

**Finding 4 Analysis:**

As discussed in the table above, and in further detail in Draft EIR Appendix I-1 (Exhibit 11), the project is consistent with the Fresno County General Plan. As further discussed in Draft EIR Appendix I-2 (Exhibit 11), the project is consistent with the Fresno County Solar Facility Guidelines, which were adopted to balance new renewable energy technologies with the need to protect important farmlands and minimize impacts to existing agricultural operations. To briefly summarize, the project:

- Is not urban growth.
- Is not incompatible with and would not adversely impact the surrounding agricultural uses.
- It does not tax the strained groundwater water resources of the area.
- Does not pose any hazards or blight to the area.
- Has adequate transportation infrastructure to serve the use.

The Solar Facility Guidelines require documentation of historical information on the agricultural use of the property, crop yield information, the source of water, the soil type, information on improvements and site buffering, the submittal of a Reclamation Plan, pest management information, and acknowledgement of the County’s Right-to-Farm Ordinance. The Applicant has provided this information.

**Recommended Conditions of Approval:**

None

#### **Finding 4 Conclusion:**

Based on the above information, staff believes the proposed development is consistent with the applicable Fresno County General Plan Policies, therefore, Finding 4 can be made.

#### **PUBLIC COMMENT:**

The County received written comments on the Draft EIR from these organizations:

- Pacific Gas and Electric Company (PG&E) (July 19, 2024)
- Carpenters Local 701 (August 19, 2024)

Responses to all comments were provided in Chapter 2 of the Final EIR (Exhibit 12).

#### **OTHER AGENCY COMMENTS:**

The County also received comments on the Draft EIR from these agencies:

- San Joaquin Valley Air Pollution Control District (August 2, 2024)
- Westlands Water District (June 12, 2020 & August 14, 2024).
- California Department of Fish and Wildlife (August 19, 2024)
- San Joaquin Air Pollution Control District (August 14, 2024)

Responses to all comments were provided in Chapter 2 of the Final EIR (Exhibit 12).

#### **SUMMARY CONCLUSION:**

Based on the factors cited in the analysis, staff believes the required Findings for granting the Conditional Use Permit can be made. Staff therefore recommends approval of Unclassified Conditional Use Permit Application No. 3677, subject to the recommended Mitigation Measures and Conditions of Approval.

#### **PLANNING COMMISSION MOTIONS:**

##### **Recommended Motion** (Approval Action)

1. Determine the Final EIR was presented to, reviewed and considered by the Planning Commission, and represents their independent judgement;
2. Move to adopt the California Environmental Quality Act (CEQA) Findings of Fact and certify that Environmental Impact Report (EIR) No. 7869 prepared for the Project, consisting of Unclassified Conditional Use Permit (CUP) No. 3677 complete and adequate in conformance with California Environmental Quality Act;
3. Move to determine the required Findings can be made, as stated in the Staff Report, and move to approve the Unclassified Conditional Use Permit Application No. 3677 subject to the Mitigation Measures, Conditions of Approval, and Project Notes listed in Exhibit 1;
4. Direct the Secretary to prepare a Resolution documenting the Commission's action and direct staff to file a Notice of Determination for the Project.

**Alternative Motion** (Denial Action)

- Move not to certify Environmental Impact Report (EIR) 7869; and
- Move to determine that the required Findings cannot be made (state basis for not making the Findings) and move to deny Unclassified CUP No. 3677; and
- Direct the Secretary to prepare a Resolution documenting the Commission's action.

**Mitigation Measures, Recommended Conditions of Approval and Project Notes:**

See attached Exhibit 1.

JS:jp

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**MITIGATION MONITORING AND REPORTING PROGRAM  
SONRISA SOLAR PARK PROJECT; UNCLASSIFIED CONDITIONAL USE PERMIT NO. 3677; EIR NO. 7869**

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing	
<b>General: Applicable to Multiple Issue Areas</b>					
1.	<b>Compliance with Applicable Laws and Standards</b>	<b>Applicant Proposed Measure (DEIR §2.9.4), Compliance with Applicable Laws and Standards:</b> The Applicant shall comply with all applicable laws and standards, including, but not limited to, those governing the use, storage, and disposal of hazardous materials; worker training and safe work practices; air quality (such as the San Joaquin Valley Air Pollution Control District’s indirect source rule and fugitive dust regulation); water quality; and energy storage systems more generally. Compliance with these requirements would avoid or reduce potential adverse environmental impacts to soil, air quality, surface water and groundwater quality, human health, fire-related risk, and other environmental considerations.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	During all phases of the Project.
<b>Aesthetics</b>					
1.	<b>Glare and Lighting</b>	<b>Applicant Proposed Measure (DEIR §2.9.2), Solar Technology – Glare and Lighting:</b> The Project shall use solar panels that have a low profile (no more than 9 feet high at the highest point during the day) to minimize visual impacts. Solar panels are designed to be anti-reflective. Nighttime exterior lighting impacts shall be minimized by the use of manually controlled lights. All exterior lighting shall be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	During all phases of the Project.
<b>Biological Resources</b>					

EXHIBIT 1

Impact		Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
1.	<b><i>Pest Control, Noxious Weeds</i></b>	<b>Applicant Proposed Measure (DEIR §2.9.3), Pest Control:</b> The Applicant shall implement an Integrated Pest Management Plan to prevent noxious weeds from invading onto immediately adjacent agricultural lands, protect special status and other biological resources surrounding the Project site from the potential for harmful effects of noxious weeds that could result from Project activities, avoid unintended harm from noxious weed management techniques, and manage potential pest populations. A plan for noxious weed control is provided in DEIR Appendix B-2, <i>Weed Control Plan</i> . A plan for rodent control is provided in DEIR Appendix B-3, <i>Rodent Control Plan</i> .	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	During all phases of the Project.

EXHIBIT 1 PAGE 2



Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing	
<b>Biological Resources (cont.)</b>					
2.	<p><b>Impact 4.5-1:</b> Project construction and decommissioning could have a substantial adverse direct or indirect impact on special-status species.</p>	<p><b>Mitigation Measure 4.5-1: Protection of Special-Status Species During Construction.</b>                      Preconstruction surveys shall be conducted by a qualified biologist for the presence of San Joaquin kit fox and burrowing owl within 14 days prior to commencement of construction activities pursuant to the USFWS (2011) <i>Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox</i> and CDFW (2012) staff report for burrowing owl. Staff Report on Burrowing Owl Mitigation. The surveys shall be conducted in areas of suitable habitat for San Joaquin kit fox and burrowing owl. Areas that have been disked or cultivated within 12 months prior to the start of ground-disturbing activities are not considered suitable. Surveys need not be conducted for all areas of suitable habitat at one time; they may be phased so that surveys occur within 14 days prior to disturbance within active portions of the site. If no potential San Joaquin kit fox dens or burrowing owl burrows are identified, no further mitigation is required. If potential kit fox dens are observed and avoidance is determined to be feasible (as defined in CEQA Guidelines §15364 consistent with the USFWS [2011] <i>Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox</i>) by a qualified biologist in consultation with the Project owner and the County, buffer distances shall be established prior to construction activities. If potential burrowing owl burrows are observed and avoidance is determined to be feasible (as defined in the CDFW 2012 staff report on burrowing owl) by a qualified biologist in consultation with the Project owner and the County, an exclusion plan will be developed with minimum buffer distances prior to construction activities.</p>	<p>Project owner and/or its designee to implement measure as defined.</p>	<p>Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.</p>	<p>Surveys to occur within 10 days prior to construction. Buffer distances and avoidance measures to be implemented prior to construction if necessary.</p>

EXHIBIT 1 PAGE 3

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<ul style="list-style-type: none"> <li>• If kit fox are detected within the Project site and avoidance is not feasible, the Project owner shall initiate consultation with CDFW to discuss how to avoid take or, if avoidance is not feasible, to acquire an Incidental Take Permit (ITP) pursuant to federal Endangered Species Act Section 7 and California Fish and Game Code section 2081(b), prior to initiating or resuming ground-disturbing activities.</li> <li>• In the event an active burrowing owl den is documented on the Project site and avoidance following the no-disturbance buffer recommendations outlined in the “Staff Report on Burrowing Owl Mitigation” (CDFG 2012) guidance document is not feasible, the Project owner shall consult with CDFW for guidance on take avoidance and minimization of harm to this species.</li> </ul>			

EXHIBIT 1 PAGE 4

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
Impact 4.5-1 (cont.)	<p><b>Mitigation Measure 4.5-2: Worker Environmental Awareness Training and Best Management Practices for Biological Resources.</b> During construction, operation and maintenance, and decommissioning of the facility, the Project owner and/or contractor shall implement the following general avoidance and protective measures to protect San Joaquin kit fox, burrowing owl, Swainson’s hawk, and other special-status wildlife species:</p> <ul style="list-style-type: none"> <li>• Prior to the initiation of ground disturbing activities and for the duration of construction and decommissioning activities, the Project owner, or its contractor, shall implement a Worker Environmental Awareness Program (WEAP) to train construction and decommissioning personnel how to recognize and protect biological resources on the Project site. The WEAP training shall be conducted by a qualified biologist. Personnel shall sign a form provided by the trainer documenting their attendance and comprehension of the training. New personnel shall also be trained prior to joining existing work crews as the construction and/or decommissioning proceeds. The WEAP training shall include a review of the special-status species and other sensitive biological resources that could exist in the Project area, the locations of sensitive biological resources and their legal status and protections, and measures to be implemented for avoidance of these sensitive resources, highlighting the birds protected under the California Fish and Game Code and nesting birds protected under the MBTA; San Joaquin kit fox; burrowing owl; and Swainson’s hawk. The WEAP training shall indicate the appropriate steps to be taken if a special-status species is observed, which may include work stoppage and coordination with the CDFW and USFWS.</li> </ul>	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	Protection measures to be implemented during all project phases; WEAP training to occur prior to construction and decommissioning and repeated as necessary to train new personnel.

EXHIBIT 1 PAGE 5

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<ul style="list-style-type: none"> <li>•</li> <li>• To prevent inadvertent entrapment of wildlife during construction, all excavated, steep-walled holes or trenches with a 2-foot or greater depth shall be covered with plywood or similar materials at the close of each working day, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected by construction personnel for trapped animals. If trapped animals are observed, escape ramps or structures shall be installed immediately to allow escape. If a special-status species is trapped, the USFWS and/or CDFW shall be contacted immediately.</li> </ul>			

EXHIBIT 1 PAGE 6

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
	<p>Impact 4.5-1 (cont.)</p> <ul style="list-style-type: none"> <li>• All construction pipes, culverts, or similar structures with a 4-inch or greater diameter that are stored at a construction site for one or more overnight periods shall be thoroughly inspected by construction personnel for special-status wildlife or nesting birds before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If an animal is discovered inside a pipe, that section of pipe shall not be moved until a qualified biologist has been consulted and the animal has either moved from the structure on its own accord or until the animal has been captured and relocated by the qualified biologist. Any vertical tubes (e.g., solar mount poles, chain link fencing poles, or any other hollow tubes or poles) used on the Project site shall be capped immediately after installation to avoid entrapment of birds.</li> <li>• Vehicles and equipment parked on the site shall have the ground beneath the vehicle or equipment inspected by construction personnel for the presence of wildlife prior to moving.</li> <li>• Vehicular traffic shall use existing routes of travel. Cross-country vehicle and equipment use outside of the Project properties shall be prohibited.</li> <li>• A speed limit of 20 miles per hour shall be enforced within all construction areas.</li> <li>• No work shall be conducted after sunset.</li> <li>• A long-term trash abatement program shall be established for construction, operation, and decommissioning and submitted to the County. Trash and food items shall be contained in closed containers and removed daily to reduce the attractiveness to wildlife such as common raven</li> </ul>			

EXHIBIT 1 PAGE 7

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<p>(Corvus corax), coyote (Canis latrans), and feral dogs.</p> <ul style="list-style-type: none"> <li>• Prior to the use of rodenticides as part of any rodent control program during construction, operation, or decommissioning, a rodent control plan shall be developed by the Project owner in coordination with a biologist familiar with special-status species (e.g. San Joaquin kit fox, Swainson’s hawk) that occur in the area and could be adversely affected by the use of rodenticides. The plan shall include goals and objectives of rodent control, including that rodent control will only be implemented in focused locations where rodent populations have exceeded acceptable levels and the types of rodent control methods, and shall include pre-use coordination with Fresno County Agricultural Commissioner for recommendation of select rodenticides or other control programs. The rodent control program shall be developed in consultation with</li> </ul>			

EXHIBIT 1 PAGE 8

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
Impact 4.5-1 (cont.)	<ul style="list-style-type: none"> <li>• a qualified biologist and the Project owner to ensure that methods proposed to control rodents do not impact non-target species. For any rodenticide approved for rodent control, the product label shall be thoroughly examined prior to application to verify if any restrictions exist for application of the product within the range of the San Joaquin kit fox or other endangered or protected animals. Pellet bait rodenticide will be prohibited from use in areas accessible to San Joaquin kit fox.</li> <li>• Workers shall be prohibited from bringing pets (excluding service animals) to the Project site and from feeding wildlife in the vicinity.</li> <li>• No firearms shall be allowed on the Project site during construction, operation, or decommissioning.</li> <li>• Intentional killing or collection of any wildlife species shall be prohibited.</li> <li>• Fencing of the Solar Facility Project site shall incorporate wildlife-friendly fencing design. Fencing plans may use one of several potential designs that would allow kit foxes to pass through the fence while still providing for Project security and exclusion of other unwanted species (e.g., domestic dogs and coyotes). Raised fences or fences with entry/exit points of at least 6 inches in diameter spaced along the bottom of the fence to allow species such as San Joaquin kit fox access into and through the Project site would be appropriate designs.</li> <li>•</li> </ul>			
	<p><b>Mitigation Measure 4.5-3: Swainson’s Hawk Nest Avoidance.</b> For Swainson’s hawk, preconstruction activity surveys shall be conducted for Swainson’s hawk nests in</p>	Project owner and/or its designee to implement	Fresno County Department of Public Works and Planning,	Preconstruction surveys to be conducted prior to construction or

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<p>accordance with the Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley (Swainson’s Hawk Technical Advisory Committee 2000). Timing and the number of phases of surveys can be adjusted based on the timing of the construction schedule. The surveys may be phased to coincide with active construction areas plus a 0.5-mile buffer of those areas.</p> <p>If an active Swainson’s hawk nest is discovered during the nesting season (February 1 through September 15) within 0.5 mile of active construction, a qualified biologist should complete an assessment of the potential for current construction activities to impact the nest. The assessment would consider the type of construction activities (e.g., noise levels and duration), the location of construction relative to the nest and pre-existing disturbance levels (e.g., construction activities in historically agricultural land versus activities in non-agricultural land), the visibility of construction activities from the nest location</p>	measure as defined.	Development Services Division, and/or its designee.	decommissioning activities as described. Measures to be implemented and buffers observed during construction and decommissioning.

EXHIBIT 1 PAGE 10



Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
	<p>Impact 4.5-1 (cont.)</p> <p>(e.g., topography or vegetation that could block line-of-sight to the nest), the number of construction personnel required to perform activities within the setback, and other existing disturbances in the area that are not related to construction activities of this project. Based on this assessment, the biologist will determine if construction activities can proceed and the level of nest monitoring required. When conducting the assessment, the biologist will consider the following levels of construction activity, with higher levels of activity requiring greater caution in determining setbacks:</p> <ul style="list-style-type: none"> <li>• Light construction activity such as fence installation and limited vehicle access. Noise levels generated by these construction activities would likely be similar to existing ambient noise levels in closer proximity to the occupied nests.</li> <li>• Moderate and/or isolated construction activity such as grading and construction of substation, substation-access road, inverter skids, and manual installation of solar panels. Noise levels generated by these construction activities would likely be similar to existing ambient noise levels beyond a moderate distance from the occupied nests.</li> <li>• Heavy construction activity across a large area of the Project and/or using louder equipment such as pile drivers, concrete saws, or jackhammers. Noise levels for this type of activity will depend on location of the activities relative to the nest and allowing these activities within the 0.5-mile setback would require coordination with CDFW.</li> </ul> <p>In the event the assessment determines that construction activities could occur closer than 0.5 miles to an active nest, in no event would construction activities occur within 500 feet of an active nest without</p>			

EXHIBIT 1 PAGE 11

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<p>approval from CDFW. Full-time monitoring to evaluate the effects of construction activities on nesting Swainson’s hawks would be required where activity occurs closer than 0.5 miles. The qualified biologist shall have the authority to stop work if it is determined that project construction is disturbing nesting activities. These buffers may need to increase depending on the sensitivity of the nesting Swainson’s hawk to disturbances and at the discretion of the qualified biologist. No avoidance would be needed if construction occurs near a known Swainson’s hawk nest outside of the Swainson’s hawk nesting season. In the event take cannot be avoided, the proponent shall confer with CDFW on the need for an incidental take permit and will comply with any specific-specific minimization and avoidance measures identified in the issued incidental take permit prior to the removal of active nest trees.</p>			

EXHIBIT 1 PAGE 12

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
	<p><b>Impact 4.5-1 (cont.)</b></p> <p><b>Mitigation Measure 4.5-4: Protection of Migratory Birds and Other Raptors</b></p> <p>If construction or decommissioning is scheduled to commence outside of nesting season (September 16 to January 31), no preconstruction surveys or additional measures are required for nesting birds, including raptors. During the nesting bird breeding season (February 1 to September 15), to avoid impacts to nesting birds in the Project site and immediate vicinity, a qualified biologist shall conduct preconstruction surveys of all potential nesting habitat within the Project site where vegetation removal or ground disturbance is planned. The survey shall be performed within the site and also include potential nest sites within 300 feet of the site in areas where access to neighboring properties is available or visible using a spotting scope. Surveys shall be conducted no more than 10 days prior to construction or decommissioning activities. If construction is halted for 10 days or more, the area shall be re-surveyed prior to re-initiating work.</p> <p>Surveys may be phased to occur shortly before a portion of the Project site is disturbed. The surveying biologist must be qualified to determine the status and stage of nesting by migratory birds and all locally breeding raptor species without causing intrusive disturbance. If active nests are found, a suitable buffer (generally 300-500 feet for common raptors; 250 feet for passerines, to be determined in the field by a qualified biologist) shall be established around active nests by a qualified biologist and no construction within the buffer allowed until a qualified biologist has determined that the nest is no longer active (e.g., the nestlings have fledged and are no longer reliant on the nest). Encroachment into the buffer may occur at the discretion of a qualified biologist in coordination with</p>	<p>Project owner and/or its designee to implement measure as defined.</p>	<p>Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.</p>	<p>Surveys to be conducted within 10 days (prior to construction and decommissioning activities (if scheduled during nesting season); and if activities are halted for 10 days or more, the area should be resurveyed prior to commencing work.</p>

EXHIBIT 1 PAGE 13

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<p>CDFW. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the adults or the nest, or if breeding attempts have otherwise been unsuccessful.</p> <p>To minimize the potential for avian injury and mortality from collision and electrocution, the Project will adhere to current Avian Power Line Interaction Committee (APLIC) design standards for overhead powerlines and associated structures, including use of avian-safe line designs, and installation of devices to make powerlines visible to birds (APLIC 2006, 2012).</p>			

EXHIBIT 1 PAGE 14

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Biological Resources (cont.)</b>				
	<p><b>Impact 4.5-1 (cont.)</b></p> <p><b>Mitigation Measure 4.5-5: Protection of Bats.</b> No earlier than 30 days prior to any construction or decommissioning ground disturbance, a qualified bat biologist shall conduct a pre-construction survey for roosting bats in trees to be removed or pruned and structures to be dismantled. Preconstruction surveys for roosting bats shall be conducted during the maternity season (March 1-July 31) for any construction or decommissioning ground disturbance that occurs within 300 feet of habitat capable of supporting bat nursery colonies. A minimum of one (1) day and one (1) evening visit shall take place. If no roosting bats are found, no further action is required. If a bat roost is found, the following measures shall be implemented to avoid impacts on roosting bats.</p> <p>If active maternity roosts are found in trees or structures that shall be removed as part of construction or decommissioning, tree removal or dismantling of that structure shall commence before maternity colonies form (generally before March 1) or after young are flying (generally by July 31). Active maternal roosts shall not be disturbed.</p> <p>If a non-maternal roost of bats is found in a tree or structure to be removed as part of construction or decommissioning, the individuals shall be safely evicted, under the direction of a qualified bat biologist and with approval from CDFW. Removal of the tree or dismantling of the structure should occur no sooner than two nights after the initial minor site modification (to alter airflow), under guidance of the qualified bat biologist. The modifications shall alter the bat habitat, causing bats to seek shelter elsewhere after they emerge for the night. On the following day, the tree or structure may be removed, in presence of the bat biologist. If any bat habitat is not removed, departure of bats from the construction area shall be confirmed with a follow-up survey prior to start of construction.</p>	<p>Project owner and/or its designee to implement measure as defined.</p>	<p>Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.</p>	<p>Survey to be conducted within 30 days of construction and decommissioning ground disturbance.</p>

EXHIBIT 1 PAGE 15

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
3.	<p><b>Impact 4.5-2:</b> Project operation could have a substantial adverse direct or indirect impact on special-status species.</p>	<p>Implement Mitigation Measure 4.5-4. See Impact 4.5-1 row, above, for text of the mitigation measure.</p>	<p>Project owner and/or its designee to implement measure as defined.</p>	<p>Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.</p>	<p>Preconstruction surveys to be conducted prior to construction or decommissioning activities as described. Measures to be implemented and buffers observed during construction and decommissioning.</p>

EXHIBIT 1 PAGE 16

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing	
<b>Biological Resources (cont.)</b>					
4.	<b>Impact 4.5-4:</b> Construction could conflict with local policies or ordinances protecting biological resources.	Implement Mitigation Measures 4.5-1 through 4.5-4. See Impact 4.5-1 row, above, for text of the mitigation measures.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	See Impact 4.5-1 row, above.
<b>Cultural Resources</b>					
1.	<b>Impact 4.6-1:</b> Ground disturbing activities associated with the Project could cause a substantial adverse change in the significance of a newly-discovered historical or archaeological resource, as defined in CEQA Guidelines Section 15064.5.	<b>Mitigation Measure 4.6-1: Cultural Resources Awareness Training.</b> The Project owner shall retain a qualified archaeologist to carry out all mitigation measures related to archaeological and historical resources.  Prior to the start of any ground-disturbing activities, the Project owner shall ensure that the qualified archaeologist has conducted a Cultural Resources Awareness Training for all construction personnel working on the Project. The training shall include an overview of potential cultural resources that could be encountered during ground disturbing activities to facilitate worker recognition, avoidance, and subsequent immediate notification to the qualified archaeologist for further evaluation and action, as appropriate; and penalties for unauthorized artifact collecting or intentional disturbance of archaeological resources. A sign-in sheet shall be completed, retained by the Project construction contractor for the duration of Project construction to demonstrate attendance at the awareness training, and provided to the County upon the completion of Project construction.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	Cultural Resources Awareness Training to be conducted prior to and during construction. Work to be conducted consistent with training during construction.

Impact		Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		<p><b>Mitigation Measure 4.6-2: Inadvertent Discovery of Cultural Resources.</b> In the event archaeological materials are encountered during Project activities, the designated Project construction contractor shall immediately cease any ground disturbing activities within 100 feet of the find. The qualified archaeologist (and a Native American-designated representative if the resource is Native American-related) shall evaluate the significance of the resources for California Register of Historical Resources eligibility and recommend appropriate treatment measures to the County and the Project Owner. Per CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall (in coordination with a Native American-designated representative if the resource is Native American-related) develop additional treatment measures in consultation with the County, which may include data recovery or other appropriate measures. The County shall consult with appropriate Native American representatives in determining appropriate treatment for</p>	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	During ground disturbing construction and decommissioning activities.
<b>Cultural Resources (cont.)</b>					
	Impact 4.6-1 (cont.)	<p>unearthed cultural resources if the resources are prehistoric, tribal cultural resources, or Native American in nature. The qualified archaeologist shall prepare a report documenting evaluation and/or additional treatment of the resource. A copy of the report shall be provided to the County and to the Southern San Joaquin Valley Information Center. Construction can recommence based on direction of the qualified archaeologist with the County's agreement.</p>			



	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
2.	<p><b>Impact 4.6-2:</b> Ground disturbing activities associated with the Project could result in damage to previously unidentified human remains.</p>	<p>Implement Mitigation Measures 4.6-1 and 4.6-2. See Impact 4.6-1 row, above, for text of the mitigation measures.</p>	<p>Project owner and/or its designee to implement measure as defined.</p>	<p>Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.</p>	<p>Cultural Resources Awareness Training to be conducted prior to and during construction. Work to be conducted consistent with training during construction. Discovery procedures to be implemented during ground disturbing construction and decommissioning activities.</p>
3.		<p><b>Mitigation Measure 4.6-3: Inadvertent Discovery of Human Remains.</b> If human remains are uncovered during Project activities, the Project owner shall immediately halt work, contact the Fresno County Coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.55(e)(1). If the County Coroner determines that the remains are Native American in origin, the Native American Heritage Commission (NAHC) will be notified, in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code 5097.98 (as amended). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per Public Resources Code Section 5097.98, and the Project Applicant shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices where</p>			

Impact		Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		the Native American human remains are located, is not damaged or disturbed by further activity under the landowner has discussed and conferred, as prescribed in Public Resources Code Section 5097.98, with the MLD regarding their recommendation for the disposition of the remains, taking into account the possibility of multiple human remains.			
<b>Cultural Resources (cont.)</b>					
4.	<b>Impact 4.6-3:</b> Ground disturbing activities associated with the Project could cause a substantial adverse change to previously unknown archaeological resources that are also tribal cultural resources, as defined in Public Resources Code Section 21074(a).	Implement Mitigation Measures 4.6-1 through 4.6-3. See Impact 4.6-1 row, above, for text of the mitigation measures.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	See rows for Impacts 4.5-1 and 4.5-2, above.
<b>Geology, Soils, and Paleontological Resources</b>					
1.	<b>Impact 4.8-7:</b> The Project could directly or	<b>Mitigation Measure 4.8-1: Unanticipated Fossil Discovery.</b> Prior to ground disturbing activities for Project construction or decommissioning, the Project owner shall retain a qualified professional	Project owner and/or its designee to	Fresno County Department of Public Works and	Prior to and during construction and decommissioning.

EXHIBIT 1 PAGE 20

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
indirectly destroy a unique paleontological resource or site or unique geologic feature.	<p>paleontologist (meeting the standards of the Society of Vertebrate Paleontology [SVP]) to develop and implement a Paleontological Worker Education and Awareness Program (WEAP). If paleontological resources are discovered during ground-disturbing activities (e.g., during Project construction or decommissioning), all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find.</p> <p>Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations will be consistent with the standards of the SVP that are current as of the discovery and with currently-accepted scientific practice. The current standards of the SVP are set forth in the SVP's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, as prepared by the SVP's Impact Mitigation Guidelines Revision Committee. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report for publication describing the finds.</p>	implement measure as defined.	Planning, Development Services Division, and/or its designee.	

EXHIBIT 1 PAGE 21

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing	
<b>Hydrology and Water Quality</b>					
1.	<i>Erosion Control and Water Quality</i>	<b>Applicant Proposed Measure (DEIR §2.9.1), Erosion Control and Water Quality:</b> The Project shall implement best management practices (BMPs) to limit runoff and control erosion during construction, as required, and in compliance with the terms stipulated by a stormwater pollution prevention plan (SWPPP) and associated conditions of the Construction General Permit (if applicable). In the absence of a nexus with waters of the United States, the Project shall limit runoff and control erosion compliance with the terms of a plan that incorporates stormwater BMPs that are substantively similar to what would be required by a SWPPP to reduce the adverse effects of erosion and sedimentation. If required by the code of federal regulations (CFR), the Project shall require preparation of a Spill Prevention, Control, and Countermeasures (SPCC) Plan under 40 CFR §112.1. If a SPCC Plan is not required by regulation, the Project shall prepare and adhere to a substantively similar plan.	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	If a SPCC Plan is required, it shall be prepared at least 30 days prior to construction; otherwise measure to be implemented during construction.
<b>Noise</b>					
1.	<b>Impact 4.14-1:</b> The Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project site in excess of standards	<b>Mitigation Measure 4.14-1: Noise Reduction for Construction Activities.</b> At least 30-days prior to conducting nighttime construction activities for the proposed project, the Project Applicant shall submit to the County for approval a Construction Noise Reduction Plan to be implemented by all contractors as a condition of contract. Contents of the Plan should include at a minimum: <ul style="list-style-type: none"> <li>Maintain all construction tools and equipment in good operating order according to manufacturers' specifications;</li> </ul>	Project owner and/or its designee to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee.	Submit plan to County for review and approval at least 30 days prior to construction; implement plan during construction.

Impact		Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
	established in the local general plan or noise ordinance, or applicable standards of other agencies.	<ul style="list-style-type: none"> <li>• Limit use of major excavating, pile driving, and earth-moving machinery to daytime hours;</li> <li>• Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks;</li> <li>• For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible;</li> <li>• Limit possible evening and nighttime shift work to the southern and/or western portions of the Project site conducting low noise activities such as welding, wire pulling, and other similar activities, together with appropriate material handling equipment; and</li> <li>• Utilize a Complaint Resolution Procedure to address any noise complaints received from residents.</li> <li>•</li> </ul>			
<b>Noise (cont.)</b>					
	Impact 4.14-1 (cont.)	<ul style="list-style-type: none"> <li>• The Plan shall include documentation that quantifies and substantiates how the contents of the Plan shall ensure that any nighttime construction noise levels would not exceed the Fresno County exterior noise standard of 45 dBA Leq at the closest residences.</li> <li>•</li> </ul>			
<b>Transportation</b>					
1.	<b>Impact 4.18-1:</b> Construction of the Project would generate a temporary increase in traffic	<b>Mitigation Measure 4.18-1: Construction and Decommissioning Traffic Management Plan.</b> Prior to the issuance of construction or building permits and the issuance of decommissioning authorizations, the Project owner and/or its construction contractor shall prepare and submit a Traffic Management Plan to the Fresno County Public Works Department and the	Project owner and/or its designee to implement	Fresno County Department of Public Works and Planning, Development Services Division,	Prior to issuance of construction permits and during construction and decommissioning.

	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
	<p>volumes on area roadways, which could conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.</p>	<p>California Department of Transportation, District 6, as appropriate, for approval. The Traffic Management Plan must be prepared in accordance with both the California Department of Transportation Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook and must include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> <li>• Temporary Traffic Control (TTC) plan that addresses traffic safety and control through the work zone, including during temporary lane closures (if needed) to accommodate materials delivery, transmission line stringing activities, or any other utility connections;</li> <li>• Identify the timing of deliveries of heavy equipment and building materials;</li> <li>• Requirement for designated construction staff to be assigned as flaggers to direct traffic into and/or through temporary traffic control zones, as needed;</li> <li>• Requirement to place temporary signage, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;</li> <li>• Ensure access for emergency vehicles to the Project site;</li> <li>• Access to adjacent properties shall be maintained;</li> <li>• Specify both construction/decommissioning-related vehicle travel and oversize load haul routes, minimizing construction/decommissioning traffic during the a.m. and p.m. peak hour, distributing construction/decommissioning traffic flow across alternative routes to access the Project site, and avoiding residential neighborhoods to the maximum extent feasible.</li> </ul>	<p>measure as defined.</p>	<p>and/or its designee.</p>	

Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
<b>Transportation (cont.)</b>				
Impact 4.18-1 (cont.)	<ul style="list-style-type: none"> <li>Requirement to obtain all necessary permits for the work within the road right of way or use of oversized/overweight vehicles that would utilize County-maintained roads, which may require California Highway Patrol or a pilot car escort. Copies of the approved traffic plan and issued permits shall be submitted to the Fresno County Divisions of Public Works and Planning.</li> </ul> <p>The Traffic Management Plan elements listed above would reduce the potentially significant effects of short-term and intermittent construction-related congestion caused by construction and decommissioning vehicles/equipment on local roadways.</p>			
2.	<p><b>Mitigation Measure 4.18-2: Preconstruction and Pre-Decommissioning Road Survey Report.</b> Prior to Project construction and decommissioning, a preconstruction report and a pre-decommissioning report shall be prepared by a qualified registered engineer, retained by the Project owner, to include a detailed analysis of road suitability to accommodate haul trucks during Project construction and decommissioning. The report shall be submitted to the Fresno County Department of Public Works and Planning. Prior to initiating the preconstruction or decommissioning report, the proposed methodology shall be presented to the Fresno County Department of Public Works and Planning for review and approval. Improvements to existing roads, to be implemented by the Project owner, may be necessary based on the findings of the report.</p>	Project owner and/or its designated contractor to implement measure as defined.	Fresno County Department of Public Works and Planning, Development Services Division, and/or its designee to review report and provide recommendations and/or approval and monitor for implementation.	Prior to project construction and decommissioning.
3.	<p><b>Mitigation Measure 4.18-3: Road Repair Agreement.</b> After final delivery of main equipment and prior to the later to occur of (a) the closing of the final phase III permit or (b) the start of operations of phase III of the Project, other than testing processes of the facilities, the Applicant shall crack seal and chip seal Manning Avenue between Derrick Avenue and the San Mateo Avenue Alignment. Prior to chip seal application, in</p>	Project owner and/or its designated contractor to implement	Fresno County Department of Public Works and Planning, Development Services Division,	Agreement secured 15 days prior to the start of construction and terms of the agreement

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	Impact	Mitigation Measure / Applicant Proposed Measure	Implementation Responsibility	Monitoring Responsibility	Timing
		locations where the construction entrances are directly across from each other along Manning Avenue, the area of Manning Avenue between the construction entrances shall be grinded to a depth of 0.3 feet and replaced with hot mixed asphalt.	measure as defined.	and/or its designee.	implemented after the conclusion of construction activities.



<b>Conditions of Approval</b>	
1.	Development and operation of the project shall be substantially in accordance with the Site Plans and Operational Statement submitted to the Planning Commission.
2.	Prior to the issuance of development permits, the Applicant shall record with the County recorder a Right-to-Farm Notice indicating that adjacent agricultural operations shall not become a nuisance due to the changed condition of the Project site.
3.	The project shall adhere substantially to the provisions in the Reclamation Plan as submitted to the Planning Commission and prepared for the decommissioning of the facility when operation ceases. Reasonable modifications may be made to the Plan to address changes of scope and configuration of the final Site Plan and improvements. The draft reclamation Plan shall be reviewed and approved as final by the County of Fresno, Department of Public Works and Planning, Current Planning Division prior to the issuance of any development permits.
4.	Prior to the County of Fresno's issuance of any grading or development permits, the project owner must enter into a reclamation agreement with the County of Fresno on terms and conditions acceptable to the County of Fresno, which reclamation agreement shall require the project owner to (1) decommission, dismantle, and remove the project and reclaim the site to its pre-project condition in accordance with the approved Reclamation Plan, and (2) maintain a financial assurance to the County of Fresno, to secure the project owner's obligations under the reclamation agreement, in an amount sufficient to cover the costs of performing such obligations, as provided herein. Such financial assurance shall be in the form of cash and maintained through an escrow arrangement acceptable to the County of Fresno. Such financial assurance may be in any other form of security acceptable to the County of Fresno.
5.	The amount of the financial assurance under the reclamation agreement shall (1) initially cover the project owner's cost of performing its obligations under the reclamation agreement, as stated above, based on the final County of Fresno-approved design of the project, which cost estimate shall be provided by the project owner to the County of Fresno, and be subject to approval by the County of Fresno, and (2) be automatically increased annually, due to increases in costs, using the Engineering News-Record construction cost index. This initial cost estimate will consider any project components, other than Improvements, that are expected to be left in place at the request of and for the benefit of the subsequent landowner as long as the improvements are directly supportive restoring the site to a viable agricultural use (e.g., access roads, electrical lines, O&M building).
<b>Project Notes</b>	
<b>The following Notes reference mandatory requirements of Fresno County or other Agencies and are provided as information to the project Developer.</b>	
1.	Construction plans, building permits and inspections are required for all proposed improvements on the property.

Project Notes	
2.	Conditional Use Permit No. 3677 will become void unless there has been substantial development within two years of the effective date of this approval, or there has been a cessation of the use for a period more than two years.
3.	Prior to initiating construction, the developer shall be required to contact Underground Service Alert (811) to allow Westlands Water District staff to locate and mark its facilities prior to commencement of grading or construction activities.
4.	Per Article 19 Rules & Regulations of Westland Water District, the proposed water sources are on-site groundwater wells and through a Municipal & Industrial (M&I) water agreement secured with the District. The District will make available up to five (5) acre-feet annually per 160 acres for solar developments. If the Applicant’s annual water use is expected to exceed the aforementioned amount, the Applicant must submit a supplemental M&I Water Application to the District and identify the source of water to be made available to meet the incremental increased use.
5.	The project shall comply with California Code of Regulations Title 24– Fire Code and “Prior to receiving FCFPD conditions of approval for the project, the developer shall submit construction plans to the County of Fresno Public Works and Planning for review. The project may also be annexation into the Community Facilities District No. 2010-01 of the Fresno County Fire Protection District.
6.	<p>To address public health impacts resulting from the project, Fresno County Department of Public Health, Environmental Health Division (Health Department) requires the following:</p> <ul style="list-style-type: none"> <li>• Facilities that use and/or store hazardous materials and/or hazardous wastes shall meet the requirements set forth in the California Health and Safety Code (HSC), Division 20, Chapter 6.95, and the California Code of Regulations (CCR), Title 22, Division 4.5.</li> <li>• Any business that handles a hazardous material or hazardous waste may be required to submit a Hazardous Materials Business Plan pursuant to the HSC, Division 20, Chapter 6.95.</li> <li>• All hazardous waste shall be handled in accordance with requirements set forth in the California Code of Regulations (CCR), Title 22, Division 4.5.</li> <li>• Should any underground storage tank(s) be found during the project, the applicant shall apply for and secure an Underground Storage Tank Removal Permit from the Health Department.</li> <li>• All abandoned water wells and septic systems on the subject parcels shall be properly destroyed by an appropriately licensed contractor. .</li> </ul>

**Project Notes**

- Any underground storage tank(s) found during construction, shall be removed with an Underground Storage Tank Removal Permit from the Health Department.
- Prior to destruction of agricultural wells, a sample of the upper most fluid in the well column should be sampled for lubricating oil. The presence of oil staining around the well may indicate the use of lubricating oil to maintain the well pump. Should lubricating oil be found in the well, the oil should be removed from the well prior to placement of fill material for destruction. The "oily water" removed from the well must be handled in accordance with federal, state and local government requirements.
- Should the structures have an active rodent or insect infestation, the infestation should be abated prior to demolition of the structures to prevent the spread of vectors to adjacent properties.
- In the process of demolishing the existing structures, if asbestos containing construction materials and materials coated with lead-based paints are encountered, contact the San Joaquin Valley Air Pollution Control District.
- If the structures were constructed prior to 1979 or if lead-based paint is suspected to have been used in these structures, then prior to demolition work contact the California Department of Public Health, Childhood Lead Poisoning Prevention Branch, at (560) 620-5600, United States Environmental Protection Agency, Region 9 at (415) 947-8000, State of California, Industrial Relations Department, Division of Occupational Safety and Health, Consultation Service (CAL-OSHA) at (559) 454-5302.

**References**

- Avian Power Line Interaction Committee (APLIC), 2006. *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*. Washington, DC, and Sacramento, CA: Edison Electric Institute, APLIC, and California Energy Commission.
- \_\_\_\_\_, 2012. *Reducing Avian Collisions with Power Lines: The State of the Art in 2012*. Edison Electric Institute and APLIC. Washington, DC. [http://www.aplic.org/uploads/files/.11218/.Reducing\\_Avian\\_Collisions\\_2012watermarkLR.pdf](http://www.aplic.org/uploads/files/.11218/.Reducing_Avian_Collisions_2012watermarkLR.pdf)
- California Department of Fish and Wildlife (CDFW), 2012. Staff Report on Burrowing Owl, Mitigation. State of California Natural Resources Agency Department of Fish and Game, March 7, 2012.
- Fresno County, 2018. Guidelines for the Preparation of Traffic Impacts Studies within the County of Fresno, May 2018.

Swainson's Hawk Technical Advisory Committee, 2000. Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. May 31, 2000. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990>. Accessed October 4, 2022.

U.S. Fish and Wildlife Service (USFWS), 2011. Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. Sacramento Fish and Wildlife Office, June 2011.

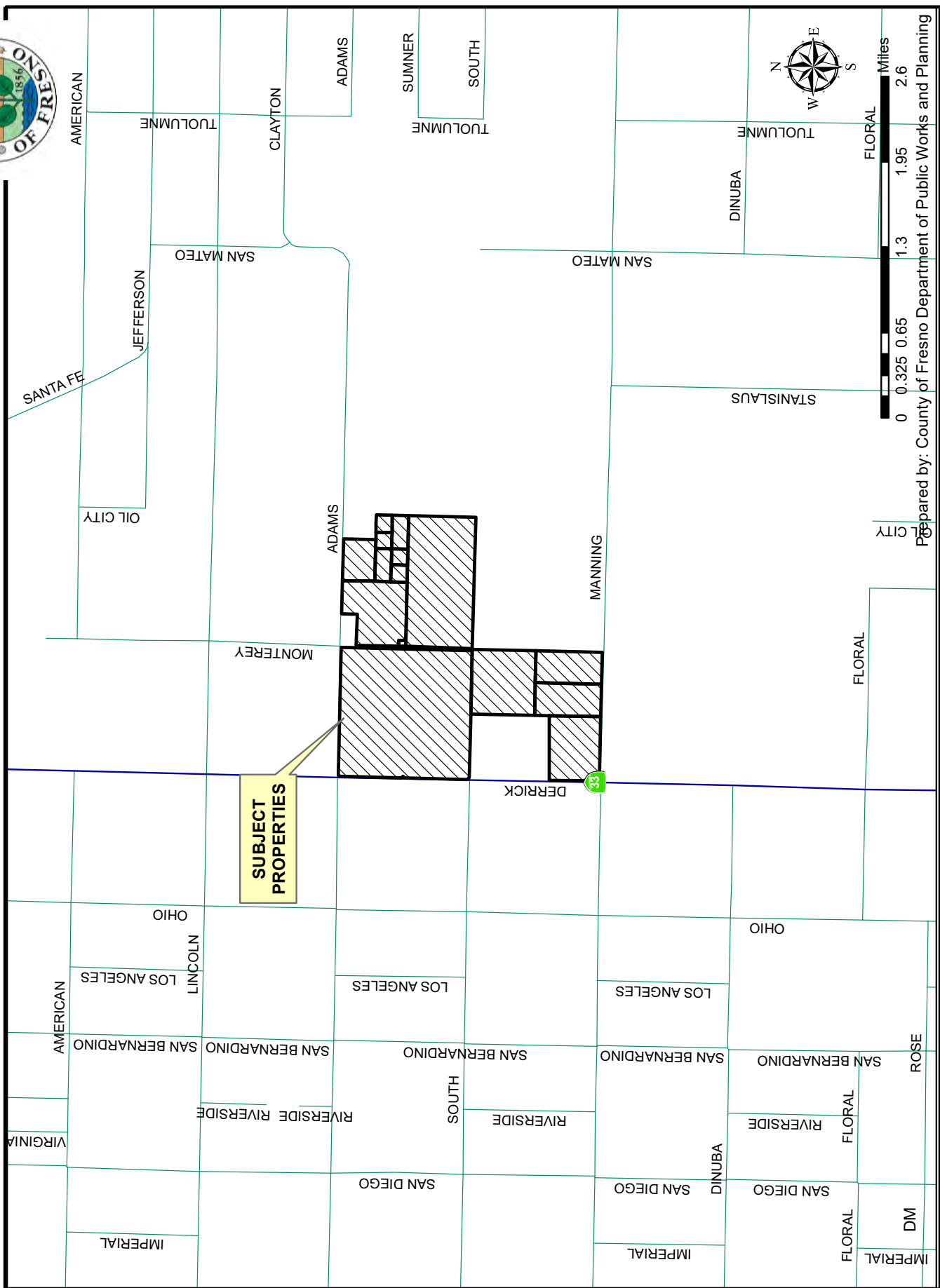
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EXHIBIT 2

# LOCATION MAP

CUP 3677



Prepared by: County of Fresno Department of Public Works and Planning



# EXISTING ZONING MAP



CUP 3677  
STR 16-21/15/15

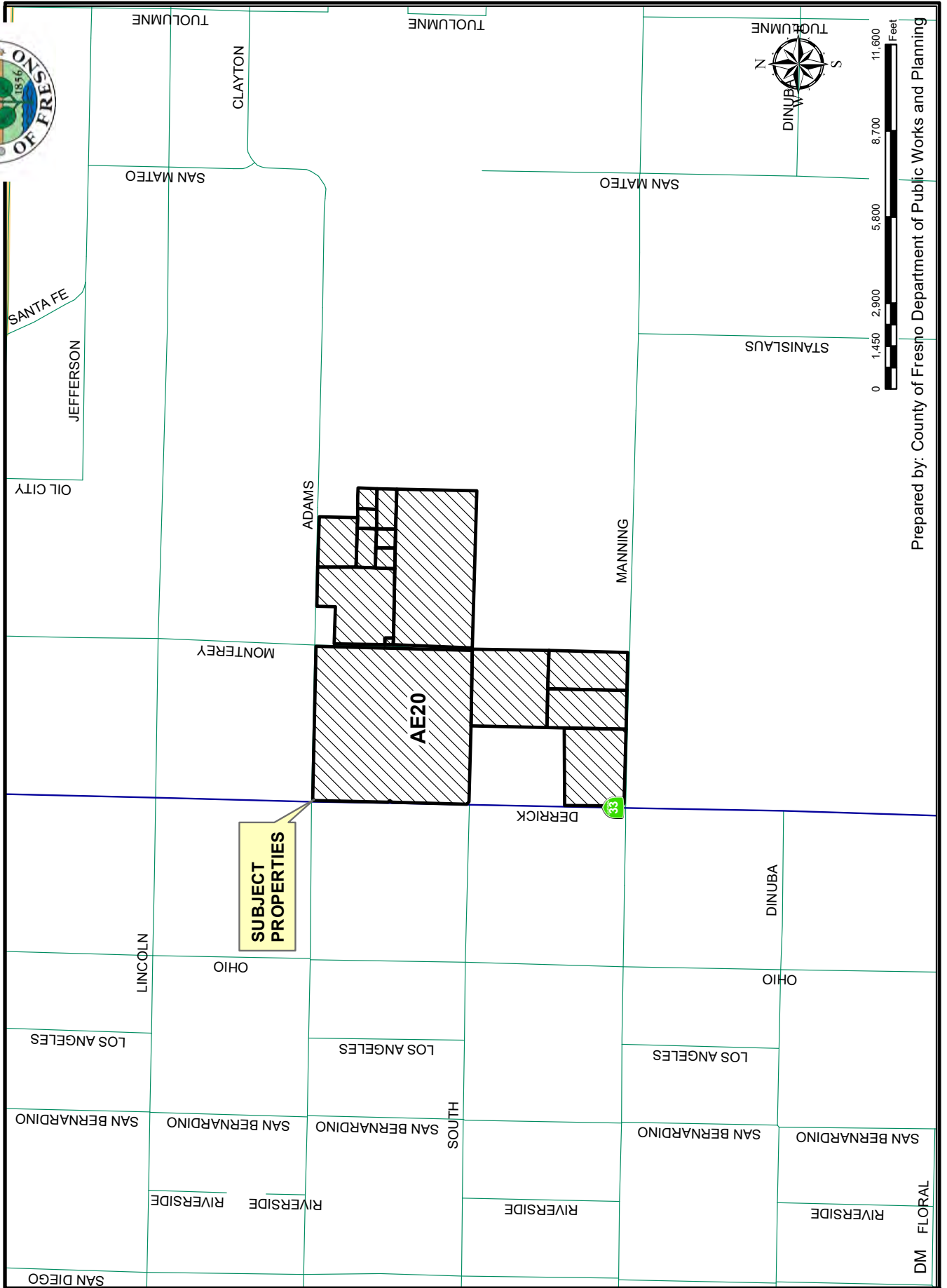




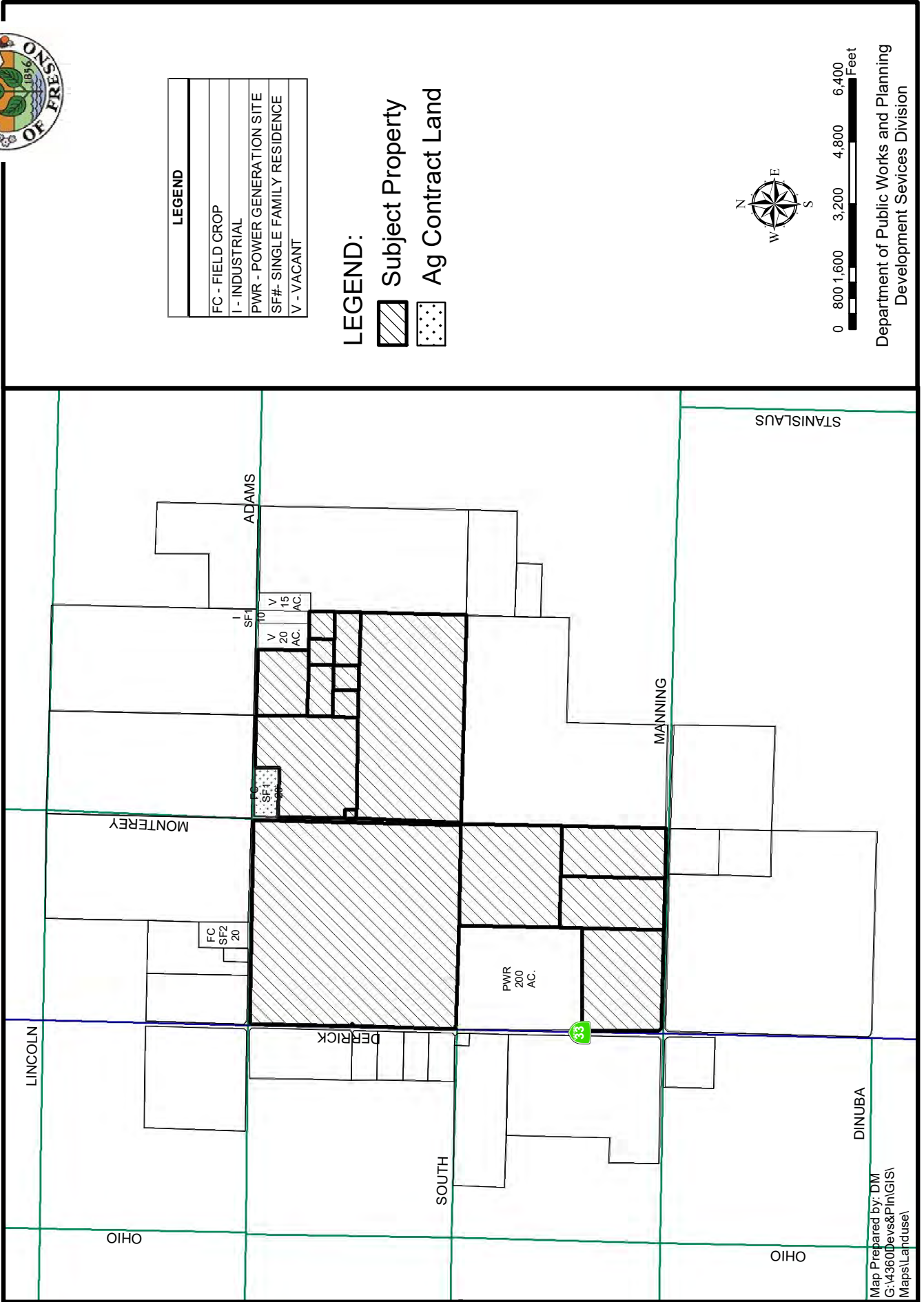




EXHIBIT 4

# EXISTING LAND USE MAP

CUP 3677



LEGEND	
FC - FIELD CROP	
I - INDUSTRIAL	
PWR - POWER GENERATION SITE	
SF# - SINGLE FAMILY RESIDENCE	
V - VACANT	

LEGEND:

-  Subject Property
-  Ag Contract Land



Department of Public Works and Planning  
Development Services Division



EXHIBIT 5



D20190733.00 - EDP Renewables Sonrisa Solar Project\05 Graphics-GIS-Modeling\Illustrator

SOURCE: EDP Renewables, 2022



EXHIBIT 5

EDP Renewables Sonrisa Solar Project

Figure 2-2  
Site Plan



## EXHIBIT 6

### Sonrisa Solar Park CUP Application

#### EDPR CA Solar Park VI LLC

#### **OPERATIONAL STATEMENT**

##### **Nature of Operation:**

EDP Renewables North America, LLC (EDPR or the Applicant) has submitted an application to the Fresno County Department of Public Works and Planning for an Unclassified Conditional Use Permit (CUP) to construct, operate, maintain, and eventually decommission a photovoltaic (PV) solar electricity generating facility upon approximately 2,000 acres of land in Fresno County.

The Project consists of three main components: a solar PV facility with 200 MWAC generating capacity; an energy storage system with 184 MWAC battery storage capacity; and a gen-tie line extension to the point of interconnection with the Tranquillity Switching Station. Other necessary infrastructure would include a Project substation and a permanent operation and maintenance (O&M) building (both proposed to be shared with the Scarlet Solar project). The O&M building would be supported by a septic system and leach field. Supervisory Control and Data Acquisition System (SCADA), meteorological data instruments, telecommunications infrastructure, access roads parking, security fencing, lighting, and signage. The Project would generate renewable energy from ground-mounted single axis tracking arrays and intermittently store electricity by charging and discharging lithium-ion batteries. The Project would have a generating capacity of up to 200 megawatts alternating current (MWAC) and a battery storage capacity of 184 MWAC (with battery duration of approximately 4 hours). The Project would connect to the electrical grid via an approximately 0.2-mile extension to an existing or approved approximately 3.3-mile long 230 kilovolt (kV) transmission line (also called a generation-tie, or gen-tie, line) to reach the point of interconnection to the existing Tranquillity Switching Station, which is owned and operated by Pacific Gas and Electric Company (PG&E). The requested term for the CUP is 35 years.

The Project site is located in unincorporated Fresno County, approximately 3.5 miles southwest of the community of Tranquillity and approximately 6.5 miles east of Interstate 5 (I-5). The Project site is located northeast of and adjacent to the Tranquillity Solar Generating Facility, which is currently under construction. The Project site is generally located south of West South Avenue, north of West Dinuba Avenue, east of State Route 33 (SR 33; South Derrick Avenue), and west of South San Mateo Avenue.

##### **Operational time limits:**

This facility will be fully operational and generating solar electricity from sunrise until sunset every day of the year. The facility will also be charging, discharging and storing electricity via the connected battery storage project, which may operate both within and outside of solar generating hours.

##### **Number of customers or visitors:**

This facility will be privately owned and operated throughout its life and will not be open to the public. Only authorized personnel will be permitted on site, and these will generally be the employees operating and maintaining the facility with the exception of other contractors, company

personnel or visitors who have been briefed on the relevant safety procedures for being on site.

**Number of Employees:**

This facility is expected to have up to 7 full time employees responsible for maintenance and other activities related to ongoing operations. These employees will generally be on site during normal business hours, unless otherwise required.

**Service and delivery vehicles:**

During construction the Project will have a staging area sufficiently large to deliver project equipment and components. Once the project has been commissioned, this staging area will no longer serve that purpose and will be incorporated into the larger project area. The only vehicles expected on site during operation of the facility will be maintenance vehicles used by employees or contractors.

**Access to site:**

This facility can be accessed from the following public roads: S Derrick Ave (Route 33), W Manning Ave and W Adams Ave.

**Number of parking spaces for employees, customers, and service/delivery vehicles:**

Parking plans are developed with the Operations and Maintenance (O&M) building design and will be provided consistent with County requirements.

**Are any goods to be sold on-site?**

This facility will exclusively generate, convert and convey electricity to the grid. No durable goods will be sold on site.

**What equipment is used?**

The exact type of photovoltaic (PV) solar panels that would be installed on the Project site have yet to be determined, however, it is anticipated that the proposed PV solar panels would be made from a polycrystalline silicon or thin-film technology. Polycrystalline silicon PV panels may include Cadmium Telluride (CdTe) technology. Elemental single axis ground-mounted tracking system, PV inverters, lithium-ion batteries, battery enclosures and a collector substation.

**What supplies or materials are used and how are they stored?**

Normal operations and maintenance materials include grease, spare PV panels, and miscellaneous hardware and tools. These materials would be stored in the O&M building, and transported around the site as needed. During construction the primary materials used are the unassembled components of the project. PV panels are shipped in stored on palletted crates. The steel structure of the project is stored on the ground in staging areas where similar components would be staged together.

**Does the use cause an unsightly appearance?**

The facility will not cause an unsightly appearance. The entire facility will be surrounded by chain linked fence, and the modules will not produce any significant glare for passing pedestrians or

vehicles. The Project would use solar panels that have a low profile (no more than 9 feet high at the highest point during the day) to minimize visual impacts. Solar panels are designed to be anti-reflective. Additionally, the surrounding land use at this site is primarily agricultural land with very few residences within the immediate vicinity. Additionally, there are multiple large-scale solar projects currently operating within a three-mile radius of this project site.

**List any solid or liquid wastes to be produced.**

The facility will likely generate a small amount of solid waste through maintenance activities during operations, though the amount of hazardous waste should be negligible. The type of solid waste expected includes rusted metal, defective or malfunctioning equipment, electrical materials, empty containers, other miscellaneous solid waste, and typical refuse from the O&M staff.

**Estimated volume of water to be used (gallons per day). Source of water?**

During construction, non-potable water could be provided by a new onsite well or existing on-site water infrastructure. It is estimated that construction of the Project would require 300-acre feet of groundwater over a period of 12-14 months, likely sourced from a proposed new groundwater well at the center of the site. Potable water would be provided for employee use by the construction contractor through deliveries to the site.

During the operation and maintenance phase, up to 2 AFY of water is expected to be used, which equates to an O&M water demand of up to 70 AF over the (35 year) life of the Project. This water would be supplied through a groundwater well to be installed, existing on-site water infrastructure, or imported/ delivered from off-site.

**Describe any proposed advertising including size, appearance, and placement.**

The facility is not expected to include any advertising apart from limited signage identifying the solar project and its ownership.

**Will existing buildings be used or will new buildings be constructed?**

A new O&M building will be constructed.

**Explain which buildings will be used in the operation.**

During Operations, the O&M building will be used on a daily basis during normal working hours.

**Will any outdoor lighting or an outdoor sound amplification system be used?**

Project lighting would be installed within the control building, within the O&M building, and otherwise as needed for maintenance and security. Low-level lighting may be installed at entry and egress gates and at other strategic locations around the facility. Manually controlled lights would be installed at equipment pads and substations. All exterior lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties, in conformance with applicable Fresno County requirements for outdoor lighting. No sound amplification system will be used.

**Landscaping or fencing proposed? Describe type and location.**

The solar facility would be secured with (6- to 10-foot high) chain-link or game fencing along the perimeter of the Project site that is raised off the ground to permit passage by kit fox and smaller mammals. One additional foot of three-strand concertina wire may also be added to the top of the

perimeter fence. The substation would be surrounded by an 8-foot-tall, chain-link fence topped with barbed wire, or a game fence to comply with electrical codes.

Vegetation will be cleared from the area underneath the arrays as necessary.

**Any other information that will provide a clear understanding of the project or operation.**

**Identify all Owners, Officers and/or Board Members for each application submittal; this may be accomplished by submitting a cover letter in addition to the information provided on the signed application forms:**

**Sandhya Ganapathy**, Chief Executive Officer

**Gabriel Yamal**, Executive Vice President – Western and Central Regions and Mexico

**Thomas LoTurco**, Executive Vice President – Eastern, Canada and Governmental Affairs

**Pedro Pires**, Executive Vice President – Finance

**Timothy Hertel**, Executive Vice President – Asset Operations

**Kent Shields**, Executive Vice President – Technical

**Meredith Chambers**, Chief Legal Officer

**Erin Bowser**, Executive Vice President – Project Management

**Raquel Costa**, Executive Vice President People & Organization



**CEQA Findings of Fact for the Final Environmental Impact Report  
Sonrisa Solar Project**

**State Clearinghouse No. 2020110008;  
County EIR File No. 7869, CUP No. 3677**

## **I. Introduction**

### **A. Purpose**

This statement of Findings of Fact (Findings) addresses the environmental impacts of the Sonrisa Solar Project (Project) on approximately 2,000 acres of land in unincorporated western Fresno County. These Findings are made pursuant to the California Environmental Quality Act (CEQA) under sections 21081, 21081.5, and 21081.6 of the Public Resources Code and section 15091 of the regulations implementing CEQA (the CEQA Guidelines, 14 Cal. Code Regs. section 15000 et seq.). Potentially significant impacts were identified in the Draft Environmental Impact Report (Draft EIR) and the Final EIR, based on facts cited therein and facts found in the complete record of proceedings.

Public Resources Code section 21081 and section 15091 of the CEQA Guidelines require that the lead agency prepare written findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. Fresno County (County) is the lead agency responsible for preparation of the EIR in compliance with CEQA and the CEQA Guidelines. Section 15091 of the CEQA Guidelines states, in part:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
  2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The “changes or alterations” referred to in CEQA Guidelines section 15091(a)(1) may include any among the following variety of measures or actions set forth in CEQA Guidelines section 15370:

- a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

e) Compensating for the impact by replacing or providing substitute resources or environments.

The Final EIR identified potentially significant effects that could result from Project implementation. However, the County finds that the inclusion of certain mitigation measures as part of Project approval will reduce all of those effects to less-than-significant levels.

In accordance with CEQA and the CEQA Guidelines, the County adopts these Findings as part of its certification of the Final EIR for the Project. Pursuant to Public Resources Code section 21082.1(c)(3), the County also finds that the Final EIR reflects the County's independent judgment. As required by CEQA, the County, in adopting these Findings, also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the Project. The County finds that the MMRP, which is incorporated by reference and made a part of these Findings, meets the requirements of Public Resources Code section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the Project.

## B. Organization and Format of Findings

**Section I, *Introduction***, explains the purpose of these Findings, describes the organization and format of this document, and provides a summary of the Project and background facts regarding the environmental review process.

**Section II, *CEQA Findings of Independent Judgment***, discusses the CEQA findings of independent judgment:

- *Section II(A)* identifies the effects of the Project that were determined not to be significant and, therefore, not to require mitigation measures.
- *Section II(B)* identifies the potentially significant effects of the Project that would be mitigated to a less-than-significant level with implementation of identified mitigation measures.
- *Section II(C)* documents the County's determination that the Project would result in no significant and unavoidable impacts.
- *Section II(D)* outlines findings regarding alternatives and identifies the feasibility of the alternatives to the Project that were analyzed in the EIR.
- *Section II(E)* makes the findings required by CEQA, including but not limited to findings related to the mitigation of significant adverse impacts and adoption of the MMRP, certification of the EIR, and the County's exercise of its independent judgment.

## C. Project Summary

### 1. Project Description

EDP Renewables CA Solar Park VI, LLC (the Applicant) applied to the Fresno County Department of Public Works and Planning for Unclassified Conditional Use Permit (CUP) No. 3677, proposing to construct, operate, maintain, and ultimately decommission the Sonrisa Solar Project (Project). As proposed, the Project consists of a photovoltaic (PV) solar electricity generating facility upon approximately 2,000 acres of land in Fresno County. The Project would generate renewable energy from ground-mounted single axis tracking arrays and intermittently store electricity by charging and discharging

lithium-ion batteries. The Project would have a generating capacity of up to 200 megawatts alternating current ( $MW_{AC}$ ) and a battery storage capacity of 184  $MW_{AC}$  (with battery duration of approximately 4 hours). The Project would connect to the electrical grid via an approximately 0.2-mile extension to an existing or approved approximately 3.3-mile long 230 kilovolt (kV) transmission line (also called a gen-tie line) to reach the point of interconnection to the existing Tranquillity Switching Station, which is owned and operated by Pacific Gas and Electric Company (PG&E). The requested term for the CUP is 35 years.

## 2. Project Site and Location

The Project site consists of approximately 2,000 acres of land in unincorporated western Fresno County that are owned by Westlands Water District (WWD). The Project site consists of lands that have been used for dry-farmed (non-irrigated) agriculture (such as rangeland grasses) or which have lain fallow for at least the past 10 years. WWD acquired the property as part of a 2002 settlement agreement in the *Sumner Peck Ranch et al. v. Bureau of Reclamation et al.* lawsuit, which prohibits irrigation on the site via non-irrigation covenants. Together with relatively high levels of selenium and a water table that does not provide sufficient drainage for commercially irrigated crops, the non-irrigation covenants restrict what agricultural use may be made of the property.

The site is zoned AE-20, Exclusive Agriculture, with a 20-acre minimum parcel size. The site is generally bounded by State Route 33 (SR 33, also known as South Derrick Avenue) to the west, West Manning Avenue to the south, South Merced Avenue to the east, and West Adams Avenue to the north. West South Avenue bisects the site from east to west. The nearest communities to the Project site include the unincorporated community of Tranquillity, approximately 7 miles to the east; the City of Mendota, approximately 8 miles to the north; and the City of San Joaquin, approximately 9 miles to the east. Agricultural uses (including non-irrigated fields) generally predominate in the vicinity of the Project site, but four solar energy facilities are operating or under development adjacent to the Project site: the existing Tranquillity and Adams East solar projects, the Scarlet solar project, and Luna Valley solar projects, which is under construction.

## 3. Project Approvals

The following authorizations or entitlements are anticipated to be necessary for the Project to proceed:

- **Fresno County**— approval of unclassified CUP No. 3677 for the solar energy generating facility on lands within an AE-20 zone district; variance for structures exceeding 35 feet in height; County approvals also may be required if work is to be performed within a County right-of-way (i.e., an encroachment permit from the Road Maintenance and Operations Division of the Department of Public Works and Planning) or for the erection, demolition, or conversion of any building or structure (i.e., building and grading permits).
- **California Department of Fish and Wildlife**— An incidental take permit (ITP) pursuant to Fish and Game Code §2081(b) would be required if Project implementation could cause “take” of a California Endangered Species Act (CESA)-listed species. Take could occur, for example, if an active Swainson’s hawk nest tree needed to be removed or if any occupied San Joaquin kit fox burrows cannot be avoided.
- **Central Valley Regional Water Quality Control Board**— authorization may be required if construction activities disturbing more than 1 acre implicate waters of the United States, pursuant to the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of

Storm Water Associated with Construction and Land Disturbance Activities (Construction General Permit) (Order 2022-0057-DWQ, NPDES No. CAS000002).

- **Central Valley Regional Water Quality Control Board**— authorization may be required under the Waste Discharge Requirements (WDR) Program if the Project will result in discharges to waters of the state.
- **San Joaquin Valley Unified Air Pollution Control District**— confirmation of compliance with the Indirect Source Review Program and stationary source and/or mobile source best performance standards and of a Dust Control Plan pursuant to Regulation VIII may be required. .

#### 4. Project Objectives

The objectives for this Project can be found in Draft EIR Section 2.4, *Project Purpose and Objectives*, in Chapter 2, *Project Description*, pursuant to CEQA Guidelines Section 15124(b). The Applicant’s primary objective is to construct and operate an economically feasible, commercially financeable 200 MW solar PV power plant. The Project objectives are to:

1. Fulfill the Applicant’s executed large generator interconnection agreement for 200 MW solar PV;
2. Provide an energy storage system with 184 MW<sub>AC</sub> battery storage capacity;
3. Develop a site which is proximate to existing transmission infrastructure to minimize environmental impacts;
4. Reduce environmental impacts by using contiguous lands located near existing solar projects;
5. Support California and Fresno County goals of protecting farmland and conserving groundwater through appropriate siting of the Project upon lands under a “non-irrigation covenant”;
6. Increase local short-term and long-term employment opportunities and provide economic benefits to Fresno County;
7. Support the generation of renewable energy in the State of California per the objectives outlined in SB 100 (2018, De León);
8. Provide the California Community Choice Aggregators (CCA) with zero-emissions renewable energy to support the goal of providing clean energy to CCA customers using established solar and energy storage technology in an economically feasible manner; and
9. Generate clean, reliable electricity and provide long-term property tax revenue that would support public services and create jobs within Fresno County and in California.

## II. CEQA Findings of Independent Judgment

### A. Impacts Determined Not to Be Significant

Section 15128 of the CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant. The EIR for the Sonrisa Solar Project evaluated whether the Project would cause significant impacts on any of the resources identified in the CEQA Guidelines Appendix G environmental checklist and determined, based on substantial evidence in the record including information in the Final EIR, that the impacts identified below would not be significant based either on a finding of no impact or a finding of less-than-

significant impact. Accordingly, no mitigation is required for these resources pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a).

## 1. Aesthetics

Draft EIR Section 4.2 analyzed impacts on Aesthetics. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and so no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): Project impacts on scenic vistas, scenic resources within a state scenic highway, the existing visual character or quality of public views of the site and its surroundings, and the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Aesthetics are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 2. Agriculture and Forestry Resources

Draft EIR Section 4.3 analyzed impacts on Agriculture and Forestry Resources. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): Project impacts related to the conversion to non-agricultural use of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency; conflict with existing zoning for agricultural use or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g]); the loss of forest land or conversion of forest land to non-forest use; and other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Agriculture and Forestry Resources are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 3. Air Quality

Draft EIR Section 4.4 analyzed impacts on Air Quality. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): Project impacts related to a conflict with or obstruction of the implementation of the applicable air quality plan; a cumulatively considerable net increase of any nonattainment pollutant; violation of any air quality standard or substantial contribution to an existing or projected air quality violation; the exposure of sensitive receptors to substantial pollutant concentrations; and other emissions (such as those leading to odors) affecting a substantial number of people.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Air Quality are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

#### 4. Biological Resources

Draft EIR Section 4.5 analyzed impacts on Biological Resources. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that impacts of the Project on the following have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): Riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS); federally protected wetlands as defined by Section 404 of the Clean Water Act; substantial interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or conflict with the provisions of an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or state HCP. See Section II(B) of these Findings regarding the Project's potential significant impacts on special status species and County policies protecting biological resources.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on these Biological Resources-related considerations would not be significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact in these areas.

#### 5. Cultural Resources and Tribal Cultural Resources

Draft EIR Section 4.6 analyzed impacts on Cultural Resources and Tribal Cultural Resources. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that impacts of the Project on the following have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): substantial adverse change to a known historical or archaeological resource as defined in CEQA Guidelines section 15064.5; and disturbance of any human remains, including those interred outside of formal cemeteries. See Section II(B) of these Findings regarding the Project's other potential significant impacts on Cultural and Tribal Cultural Resources.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on these types of Cultural Resources would not be significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact in this area.

#### 6. Energy

Draft EIR Section 4.7 analyzed impacts on Energy. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): wasteful, inefficient, or unnecessary consumption of energy resources; and conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Energy are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 7. Geology, Soils, and Paleontological Resources

Draft EIR Section 4.8 analyzed impacts on Geology, Soils, and Paleontological Resources. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts on Geology and Soils have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): the direct or indirect causation of potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; and (iv) landslides. The County also finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): substantial soil erosion or loss of topsoil; potential to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project; the creation of substantial direct or indirect risks to life or property as a result of being located on expansive soil, as defined in California Building Code (2019) section 1803.5.3; having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater. See Section II(B) of these Findings regarding the Project's potential significant impact on Paleontological Resources.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Geology and Soils are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 8. Greenhouse Gas Emissions

Draft EIR Section 4.9 analyzed impacts related to Greenhouse Gas (GHG) Emissions. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project related to GHG emissions are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 9. Hazards and Hazardous Materials

Draft EIR Section 4.10 analyzed impacts related to Hazards and Hazardous Materials. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following

impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school; creation of a significant hazard to the public or the environment as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5; causation of a safety hazard or excessive noise for people residing or working in the Project area as a result of being located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport; and impairment of the implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan.

**Finding:** The County finds, based upon substantial evidence in the record, that these impacts of the Project related to Hazards and Hazardous Materials are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 10. Hydrology and Water Quality

Draft EIR Section 4.11 analyzed impacts on Hydrology and Water Quality. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality; impedance of the sustainable groundwater management of the basin as a result of causing a substantial decrease in groundwater supplies or substantial interference with groundwater recharge; substantial alteration of the existing drainage pattern of the site or area in a manner that would: i) result in substantial erosion or siltation on- or off-site, ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or iv) impede or redirect flood flows; and risk the release of pollutants due to Project inundation as a result of being located in a flood hazard, tsunami, or seiche zone; and conflict with or obstruction of the implementation of a water quality control plan or sustainable groundwater management plan.

**Finding:** The County finds, based upon substantial evidence in the record, that these impacts of the Project on Hydrology and Water Quality are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact in these ways.

## 11. Land Use and Planning

Draft EIR Section 4.12 analyzed impacts on Land Use and Planning. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The physical division of an established



community; and conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Land Use and Planning are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 12. Mineral Resources

Draft EIR Section 4.13 analyzed impacts on Mineral Resources. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Mineral Resources are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 13. Noise

Draft EIR Section 4.14 analyzed impacts related to Noise. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The generation of excessive groundborne vibration or groundborne noise levels; and exposure of people residing or working in the project area to excessive noise levels as a result of the Project's location within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. See Section II(B) of these Findings regarding the Project's other potential significant impacts on Noise.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Noise are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 14. Population and Housing

The Draft EIR Section 4.15 analyzed impacts on Population and Housing. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The inducement of substantial unplanned population growth in an area, either directly or indirectly; and displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Population and Housing are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 15. Public Services

Draft EIR Section 4.16 analyzed impacts on Public Services. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The potential for the Project to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Public Services are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 16. Recreation

Draft EIR Section 4.17 analyzed impacts on Recreation. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): Increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and the inclusion of recreational facilities or a requirement that new or expanded recreational facilities be constructed, where the construction could have an adverse physical effect on the environment.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Recreation are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## 17. Transportation

Draft EIR Section 4.18 analyzed impacts on Transportation. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): A conflict or inconsistency with CEQA Guidelines section 15064.3(b); a substantial increase hazards due to a geometric design feature or incompatible uses; and inadequate emergency access. See Section II(B) of these Findings regarding the Project's other potential significant impacts on Transportation.

**Finding:** The County finds, based upon substantial evidence in the record, that these impacts of the Project on Transportation are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact in these areas.

## 18. Utilities and Service Systems

Draft EIR Section 4.19 analyzed impacts on Utilities and Service Systems. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): A significant environmental effect as a result of requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities; a determination by the wastewater treatment provider that serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments; the generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and compliance with federal, state, and local solid waste management and reduction statutes and regulations.

**Finding:** The County finds, based upon substantial evidence in the record, that these impacts of the Project on Utilities and Service Systems are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact in these areas.

## 19. Wildfire

Draft EIR Section 4.20 analyzed impacts on Wildfire. The County finds, based upon substantial evidence in the record, including information in the Draft EIR, that the following impacts have been determined not to be significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a): The substantial impairment of an adopted emergency response plan or emergency evacuation plan; exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, or other exacerbation of wildfire risks; exacerbation of fire risk or creation of temporary or ongoing impacts to the environment as a result of the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities); the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

**Finding:** The County finds, based upon substantial evidence in the record, that the impacts of the Project on Wildfire are not significant, and that no mitigation measures are required to ensure that the Project would not cause a significant impact.

## B. Significant Impacts that Can Be Mitigated to a Less-than-Significant Level

Pursuant to Public Resources Code section 21081(a) and section 15091(a)(1) of the CEQA Guidelines, the County finds that, for each of the following potential significant impacts identified in the EIR, changes or alterations have been required in, or incorporated into, the Project that avoid the identified

significant impact on the environment or reduce the impact to a less-than-significant level. These findings are explained below and are supported by substantial evidence in the record of proceedings.

## 1. Biological Resources (Special Status Species)

The analysis of impacts on Biological Resources in Draft EIR Section 4.5 determined that the Project could have a substantial adverse effect, either directly or through habitat modifications, on San Joaquin Kit Fox (*Vulpes macrotis mutica*), which is listed on the federal endangered species list by U.S. Fish and Wildlife Service as *endangered* and is listed by the California Department of Fish and Wildlife on the State endangered species list as *threatened*. The disked and actively cultivated agricultural lands on-site are not preferred denning habitat and only provide limited foraging habitat for San Joaquin kit fox; however, the Project site is surrounded by other agricultural lands, which could potentially support San Joaquin kit fox movement. Construction sites could indirectly attract this species through the presence of food items or materials such as large pipes that could provide temporary shelter. Thus, San Joaquin kit fox may sporadically occur on the Project site. If this species occurs at the site, then construction activities could have the potential to cause a significant adverse impact to the San Joaquin kit fox either directly (e.g., through mortality or injury from construction vehicles or ground disturbance) or indirectly (disturbance from night lighting, which may interfere with foraging; increased site activity, which may draw predators; or other factors, such as poisoning from rodenticides or injury from trenches). This impact would be potentially significant.

Preconstruction clearance surveys would be conducted; wildlife appropriate fencing would be installed; measures set forth in Chapter 2, Section 2.9.3 *Pest Control* (integrated management and noxious weed control plan) would be implemented; and the other minimization measures described in **Mitigation Measures 4.5-1 and 4.5-2** would be implemented, to ensure that no significant adverse impact on San Joaquin kit foxes would occur during construction or decommissioning. Implementing these mitigation measures would reduce potentially significant direct impacts on the San Joaquin kit fox to a less-than-significant level.

During Project operation, the site would be fenced with chain-link fencing with space for wildlife to pass underneath, allowing access for transit by San Joaquin kit fox. Thus, operation at the Project site would have a less-than-significant impact on this species

### **Mitigation Measure 4.5-1: Protection of Special-Status Species During Construction**

Preconstruction surveys shall be conducted by a qualified biologist for the presence of San Joaquin kit fox and burrowing owl within 14 days prior to commencement of construction activities pursuant to the USFWS (2011) *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox* and CDFW (2012) staff report for burrowing owl\_Staff Report on Burrowing Owl Mitigation. The surveys shall be conducted in areas of suitable habitat for San Joaquin kit fox and burrowing owl. Areas that have been disked or cultivated within 12 months prior to the start of ground-disturbing activities are not considered suitable. Surveys need not be conducted for all areas of suitable habitat at one time; they may be phased so that surveys occur within 14 days prior to disturbance within active portions of the site. If no potential San Joaquin kit fox dens or burrowing owl burrows are identified, no further mitigation is required. If potential kit fox dens are observed and avoidance is determined to be feasible (as defined in CEQA Guidelines §15364 consistent with the USFWS [2011] *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox*) by a qualified biologist in consultation

with the Project owner and the County, buffer distances shall be established prior to construction activities. If potential burrowing owl burrows are observed and avoidance is determined to be feasible (as defined in the CDFW 2012 staff report on burrowing owl) by a qualified biologist in consultation with the Project owner and the County, an exclusion plan will be developed with minimum buffer distances prior to construction activities.

- If kit fox are detected within the Project site and avoidance is not feasible, the Project owner shall initiate consultation with CDFW to discuss how to avoid take or, if avoidance is not feasible, to acquire an Incidental Take Permit (ITP) pursuant to federal Endangered Species Act Section 7 and California Fish and Game Code section 2081(b), prior to initiating or resuming ground-disturbing activities.
- In the event an active burrowing owl den is documented on the Project site and avoidance following the no-disturbance buffer recommendations outlined in the “Staff Report on Burrowing Owl Mitigation” (CDFG 2012) guidance document is not feasible, the Project owner shall consult with CDFW for guidance on take avoidance and minimization of harm to this species.

**Mitigation Measure 3.5-2: Worker Environmental Awareness Training and Best Management Practices for Biological Resources** During construction, operation and maintenance, and decommissioning of the facility, the Project Owner and/or contractor shall implement the following general avoidance and protective measures to protect San Joaquin kit fox, burrowing owl, Swainson’s hawk, and other special-status wildlife species:

- Prior to the initiation of ground disturbing activities and for the duration of construction and decommissioning activities, the Project Owner, or its contractor, shall implement a Worker Environmental Awareness Program (WEAP) to train construction and decommissioning personnel how to recognize and protect biological resources on the Project site. The WEAP training shall be conducted by a qualified biologist. Personnel shall sign a form provided by the trainer documenting their attendance and comprehension of the training. New personnel shall also be trained prior to joining existing work crews as the construction and/or decommissioning proceeds. The WEAP training shall include a review of the special-status species and other sensitive biological resources that could exist in the Project area, the locations of sensitive biological resources and their legal status and protections, and measures to be implemented for avoidance of these sensitive resources, highlighting the birds protected under the California Fish and Game Code and nesting birds protected under the MBTA, San Joaquin kit fox, burrowing owl, and Swainson’s hawk. The WEAP training shall indicate the appropriate steps to be taken if a special-status species is observed, which may include work stoppage and coordination with the CDFW and USFWS.
- To prevent inadvertent entrapment of wildlife during construction, all excavated, steep-walled holes or trenches with a 2-foot or greater depth shall be covered with plywood or similar materials at the close of each working day, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected by construction personnel for trapped animals. If trapped animals are observed, escape ramps or structures shall be installed immediately to allow escape. If a special-status species is trapped, the USFWS and/or CDFW shall be contacted immediately.
- All construction pipes, culverts, or similar structures with a 4-inch or greater diameter that are stored at a construction site for one or more overnight periods shall be thoroughly inspected by construction personnel for special-status wildlife or nesting birds before the pipe is

subsequently buried, capped, or otherwise used or moved in any way. If an animal is discovered inside a pipe, that section of pipe shall not be moved until a qualified biologist has been consulted and the animal has either moved from the structure on its own accord or until the animal has been captured and relocated by the qualified biologist. Any vertical tubes (e.g., solar mount poles, chain link fencing poles, or any other hollow tubes or poles) used on the Project site shall be capped immediately after installation to avoid entrapment of birds.

- Vehicles and equipment parked on the site shall have the ground beneath the vehicle or equipment inspected by construction personnel for the presence of wildlife prior to moving.
- Vehicular traffic shall use existing routes of travel. Cross-country vehicle and equipment use outside of the Project properties shall be prohibited.
- A speed limit of 20 miles per hour shall be enforced within all construction areas.
- No work shall be conducted after sunset.
- A long-term trash abatement program shall be established for construction, operation, and decommissioning and submitted to the County. Trash and food items shall be contained in closed containers and removed daily to reduce the attractiveness to wildlife such as common raven (*Corvus corax*), coyote (*Canis latrans*), and feral dogs.
- Prior to the use of rodenticides as part of any rodent control program during construction, operation, or decommissioning, a rodent control plan shall be developed by the Project owner in coordination with a biologist familiar with special-status species (e.g. San Joaquin kit fox, Swainson's hawk) that occur in the area and could be adversely affected by the use of rodenticides. The plan shall include goals and objectives of rodent control, including that rodent control will only be implemented in focused locations where rodent populations have exceeded acceptable levels; the types of rodent control methods, and include pre-use coordination with Fresno County Agricultural Commissioner for recommendation of select rodenticides or other control programs. The rodent control program shall be developed in consultation with a qualified biologist and the project owner to ensure that methods proposed to control rodents do not impact non-target species. For any rodenticide approved for rodent control, the product label shall be thoroughly examined prior to application to verify if any restrictions exist for application of the product within the range of the San Joaquin kit fox or other endangered or protected animals. Pellet bait rodenticide will be prohibited from use in areas accessible to San Joaquin kit fox.
- Workers shall be prohibited from bringing pets (excluding service animals) to the Project site and from feeding wildlife in the vicinity.
- No firearms shall be allowed on the Project site during construction, operation, or decommissioning.
- Intentional killing or collection of any wildlife species shall be prohibited.
- Fencing of the Solar Facility Project site shall incorporate wildlife-friendly fencing design. Fencing plans may use one of several potential designs that would allow kit foxes to pass through the fence while still providing for Project security and exclusion of other unwanted species (e.g., domestic dogs and coyotes). Raised fences or fences with entry/exit points of at least 6 inches in diameter spaced along the bottom of the fence to allow species such as San Joaquin kit fox access into and through the Project site would be appropriate designs.

**Finding:** The County finds that Mitigation Measures 4.5-1 and 4.5-2 are feasible, will reduce the Project's potential significant impact on Special Status Species to a less-than-significant level, and are adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measures 4.5-1 and 4.5-2 will ensure that appropriate impact avoidance and minimization measures are implemented. Thus, with the implementation of Mitigation Measures 3.5-1 and 3.5-2, the impacts of the Project on San Joaquin kit fox, burrowing owl, other special status species, and their habitats would be less than significant.

## 2. Biological Resources (Swainson's Hawk and Other Raptors)

The analysis of impacts on Biological Resources in Draft EIR Section 4.5 determined that construction or decommissioning activities within 0.25 mile of an active Swainson's hawk nest or within approximately 500-feet of other raptor nests could agitate Swainson's hawk (*Buteo swainsoni*), which is listed on the State endangered species list as *threatened*, or disturb other special status birds (including northern harrier and other raptor species) nesting in the vicinity, thereby resulting in nest disturbance or abandonment, a significant impact. Implementation of the worker environmental awareness program and the pre-construction clearance surveys described in **Mitigation Measures 4.5-2 and 4.5-3** would minimize disturbance impacts on Swainson's hawks and other raptors and reduce potential impacts on Swainson's hawk and other raptors (during construction and decommissioning) to a less-than-significant level.

### Mitigation Measure 4.5-3: Swainson's Hawk Nest Avoidance

For Swainson's hawk, preconstruction activity surveys shall be conducted for Swainson's hawk nests in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee 2000). Timing and the number of phases of surveys can be adjusted based on the timing of the construction schedule. The surveys may be phased to coincide with active construction areas plus a 0.5-mile buffer of those areas.

If an active Swainson's hawk nest is discovered during the nesting season (February 1 through September 15) within 0.5 mile of active construction, a qualified biologist should complete an assessment of the potential for current construction activities to impact the nest. The assessment would consider the type of construction activities (e.g., noise levels and duration), the location of construction relative to the nest and pre-existing disturbance levels (e.g., construction activities in historically agricultural land versus activities in non-agricultural land), the visibility of construction activities from the nest location (e.g., topography or vegetation that could block line-of-sight to the nest), the number of construction personnel required to perform activities within the setback, and other existing disturbances in the area that are not related to construction activities of this project. Based on this assessment, the biologist will determine if construction activities can proceed and the level of nest monitoring required. When conducting the assessment, the biologist will consider the following levels of construction activity, with higher levels of activity requiring greater caution in determining setbacks:

- Light construction activity such as fence installation and limited vehicle access. Noise levels generated by these construction activities would likely be similar to existing ambient noise levels in closer proximity to the occupied nests.
- Moderate and/or isolated construction activity such as grading and construction of substation, substation-access road, inverter skids, and manual installation of solar panels. Noise levels generated by these construction activities would likely be similar to existing ambient noise levels beyond a moderate distance from the occupied nests.
- Heavy construction activity across a large area of the Project and/or using louder equipment such as pile drivers, concrete saws, or jackhammers. Noise levels for this type of activity will depend on location of the activities relative to the nest and allowing these activities within the 0.5-mile setback would require coordination with CDFW.

In the event the assessment determines that construction activities could occur closer than 0.5 miles to an active nest, in no event would construction activities occur within 500 feet of an active nest without approval from CDFW. Full-time monitoring to evaluate the effects of construction activities on nesting Swainson's hawks would be required where activity occurs closer than 0.5 miles. The qualified biologist shall have the authority to stop work if it is determined that project construction is disturbing nesting activities. These buffers may need to increase depending on the sensitivity of the nesting Swainson's hawk to disturbances and at the discretion of the qualified biologist. No avoidance would be needed if construction occurs near a known Swainson's hawk nest outside of the Swainson's hawk nesting season. In the event take cannot be avoided, the proponent shall confer with CDFW on the need for an incidental take permit and will comply with any specific-specific minimization and avoidance measures identified in the issued incidental take permit prior to the removal of active nest trees.

**Finding:** The County finds that Mitigation Measure 4.5-3 is feasible, and along with other mitigation identified, will reduce the Project's potential significant impact on Swainson's Hawk and Other Raptors to a less-than-significant level, and is adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale:** Implementation of Mitigation Measure 4.5-3 will ensure that during construction, operation and maintenance, and decommissioning of the facility, the Project owner and/or contractor shall implement general avoidance and protective measures to protect San Joaquin kit fox and other special-status wildlife species, such as the Swainson's hawk and other raptors. Thus, with the implementation of Mitigation Measure 4.5-3, the impacts of the Project on Swainson's hawk and other raptor species would be less than significant.

### 3. Biological Resources (Migratory and other Special Status Birds)

The analysis of impacts on Biological Resources in Draft EIR Section 4.5 determined that raptors, smaller migratory birds, and special status birds and bats may experience collision risk from powerlines. The potential loss of an active migratory or special-status bird nest would be a significant impact. Implementing **Mitigation Measure 4.5-4** would reduce potential significant impacts on nesting migratory birds to a less-than-significant level.



#### **Mitigation Measure 4.5-4: Protection of Migratory Birds and Other Raptors.**

If construction or decommissioning is scheduled to commence outside of nesting season (September 16 to January 31), no preconstruction surveys or additional measures are required for nesting birds, including raptors. During the nesting bird breeding season (February 1 to September 15), to avoid impacts to nesting birds in the Project site and immediate vicinity, a qualified biologist shall conduct preconstruction surveys of all potential nesting habitat within the Project site where vegetation removal or ground disturbance is planned. The survey shall be performed within the site and also include potential nest sites within 300 feet of the site in areas where access to neighboring properties is available or visible using a spotting scope. Surveys shall be conducted no more than 10 days prior to construction or decommissioning activities. If construction is halted for 10 days or more, the area shall be re-surveyed prior to re-initiating work.

Surveys may be phased to occur shortly before a portion of the Project site is disturbed. The surveying biologist must be qualified to determine the status and stage of nesting by migratory birds and all locally breeding raptor species without causing intrusive disturbance. If active nests are found, a suitable buffer (generally 300-500 feet for common raptors; 250 feet for passerines, to be determined in the field by a qualified biologist) shall be established around active nests by a qualified biologist and no construction within the buffer allowed until a qualified biologist has determined that the nest is no longer active (e.g., the nestlings have fledged and are no longer reliant on the nest). Encroachment into the buffer may occur at the discretion of a qualified biologist in coordination with CDFW. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the adults or the nest, or if breeding attempts have otherwise been unsuccessful.

To minimize the potential for avian injury and mortality from collision and electrocution, the Project will adhere to current Avian Power Line Interaction Committee (APLIC) design standards for overhead powerlines and associated structures, including use of avian-safe line designs, and installation of devices to make powerlines visible to birds (APLIC 2006, 2012).

**Finding:** The County finds that Mitigation Measure 4.5-4 is feasible, will reduce the Project's potential significant impact on migratory birds and other raptors to a less-than-significant level, and is adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measure 4.5-4 will ensure that during construction, operation and maintenance, and decommissioning of the facility, the Project owner and/or contractor shall implement measures to protect nesting birds during nesting season with suitable construction avoidance buffers. Thus, with the implementation of Mitigation Measure 4.5-4, the impacts of the Project on migratory birds and other raptor species would be less than significant.

## **4. Biological Resources (Bats)**

The analysis of impacts on Biological Resources in Draft EIR Section 4.5. determined that the Project would result in impacts on Western red bats or other tree roosting bats from construction may include loss of roosting habitat in the tamarisk trees on-site which may serve as day roosts or maternity roosts for bats. Indirect impacts identified include construction noise and disturbance, which could potentially result in

abandonment of maternity roosts and daytime roosts, exposing the bats to heat stress or predators. Construction noise and human disturbance that could adversely affect roosting bats or maternal roosts would be a significant impact. **Mitigation Measure 4.5-5** would be implemented to include preconstruction surveys and specific avoidance measures, which would reduce the potential impact to a less-than-significant level.

#### **Mitigation Measure 4.5-5 Protection of Bats**

No earlier than 30 days prior to any construction or decommissioning ground disturbance, a qualified bat biologist shall conduct a preconstruction survey for roosting bats in trees to be removed or pruned and structures to be dismantled. Preconstruction surveys for roosting bats shall be conducted during the maternity season (March 1-July 31) for any construction or decommissioning ground disturbance that occurs within 300 feet of habitat capable of supporting bat nursery colonies. A minimum of one (1) day and one (1) evening visit shall take place. If no roosting bats are found, no further action is required. If a bat roost is found, the following measures shall be implemented to avoid impacts on roosting bats.

If active maternity roosts are found in trees or structures intended for removal as part of construction or decommissioning, such tree removal or dismantling of that structure shall commence before maternity colonies form (generally before March 1) or after young are flying (generally by July 31). Active maternal roosts shall not be disturbed.

If a non-maternal roost of bats is found in a tree or structure to be removed as part of construction or decommissioning, the individuals shall be safely evicted, under the direction of a qualified bat biologist and with approval from CDFW. Removal of the tree or dismantling of the structure should occur no sooner than two nights after the initial minor site modification (to alter airflow), under guidance of the qualified bat biologist. The modifications shall alter the bat habitat, causing bats to seek shelter elsewhere after they emerge for the night. On the following day, the tree or structure may be removed, in presence of the bat biologist. If any bat habitat is not removed, departure of bats from the construction area shall be confirmed with a follow-up survey prior to start of construction.

**Finding:** The County finds that Mitigation Measure 4.5-5 is feasible, will reduce the Project's potential significant impact relating to loss of bat roosting habitat to less than significant levels and is adopted by the County. Accordingly, the County finds, pursuant to the Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measure 4.5-5 will ensure that preconstruction surveys for roosting bats will occur, and avoidance and protection measures will be taken by the project owner or designee in the event that roosts are located. Thus, with implementation of Mitigation Measures 4.5-5, the impact on roosting bats will be less than significant.

## **5. Biological Resources (Compliance with General Plan Goal OS-E)**

The analysis of impacts on Biological Resources in Draft EIR Section 4.5 determined that the Project would result in a significant impact as a result of a potential conflict with General Plan Goal OS-E, which requires environmental review for protection of sensitive wildlife and habitats. The Project site and

immediate vicinity contain potentially suitable breeding, denning, or nesting habitat for wildlife species, including San Joaquin kit fox, burrowing owl, Swainson's hawk, and other raptors. Construction of the Project would have the potential to harm these species, if present. Implementing the preconstruction wildlife surveys, worker environmental awareness training, and wildlife avoidance and protection measures described in **Mitigation Measures 4.5-1 through 4.5-4** would avoid or minimize potential impacts on these species and ensure compliance with General Plan Goal OS-E. Therefore, with mitigation incorporated, the Project would not conflict with and would have a less-than-significant impact on local policies and ordinances protecting biological resources.

**Finding:** The County finds that Mitigation Measures 4.5-1 through 4.5-4 are feasible, will reduce the Project's potential significant impact relating to compliance with General Plan Goal OS-E to a less-than-significant level, and is adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measures 4.5-1 through 4.5-4 will reduce impacts to a less-than-significant level because impacts on special-status wildlife species would be avoided or minimized by surveys, monitoring, and relocation if required; site workers would be trained to avoid biological resources and construction site impacts would be curtailed; and nesting birds would be avoided in nesting season with suitable construction avoidance buffers. Thus, with the implementation of Mitigation Measures 4.5-1 through 4.5-4, the impacts of the Project relating to consistency with local general plan goals, policies or ordinances protecting biological resources would be less than significant.

## 6. Cultural Resources (Historical/Archeological Resources)

The analysis of impacts on Cultural and Tribal Cultural Resources in Draft EIR Section 4.6 determined that significant impacts could occur (at the Project level and cumulatively) if unknown archaeological resources are discovered during ground-disturbing activities required for Project construction, operation, and maintenance, or decommissioning and site restoration. According to the geoarchaeological review, the Project site has low sensitivity for buried archaeological resources based on its geomorphology, proximity to water, and landform slope. The lack of nearby water sources in particular suggests that long-term habitation sites are unlikely. Nonetheless, given that the general vicinity is covered by Holocene alluvial deposits, which have been deposited over the course of known human occupation in the region, the deposition of alluvium could possibly have buried prehistoric archaeological sites that once existed on the surface. Therefore, although the probability of significant prehistoric resources existing within the Project site is low overall, there nevertheless exists the possibility that buried archaeological resources may be encountered during ground-disturbing activities. If unknown archaeological resources are discovered during ground-disturbing activities, then significant impacts could occur. With the implementation of **Mitigation Measure 4.6-1**, which requires the retention of a qualified archaeologist and cultural resources awareness training, and **Mitigation Measure 4.6-2**, which governs procedures in the event of inadvertent discovery of archaeological materials, impacts on any newly discovered historical or unique archaeological resources would be reduced to less than significant (at the Project level) and would ensure that the Project's incremental contribution to the potential significant cumulative impact would not be cumulatively considerable (i.e., less than significant).

Decommissioning and reclamation of the Project site would not affect historical or unique archaeological resources. Ground disturbance associated with decommissioning and site reclamation would occur within soils previously disturbed by construction (and would be subject to Mitigation Measures 4.6-1 and 4.6-2 during construction). Therefore, no impact on historical and unique archaeological resources would result from decommissioning.

**Mitigation Measure 4.6-1: Cultural Resources Awareness Training.**

The Project Owner shall retain a qualified archaeologist to carry out all mitigation measures related to archaeological and historical resources.

Prior to the start of any ground-disturbing activities, the Project owner shall ensure that the qualified archaeologist has conducted a Cultural Resources Awareness Training for all construction personnel working on the Project. The training shall include an overview of potential cultural resources that could be encountered during ground disturbing activities to facilitate worker recognition, avoidance, and subsequent immediate notification to the qualified archaeologist for further evaluation and action, as appropriate; and penalties for unauthorized artifact collecting or intentional disturbance of archaeological resources. A sign-in sheet shall be completed, retained by the Project construction contractor for the duration of Project construction to demonstrate attendance at the awareness training, and provided to the County upon the completion of Project construction.

**Mitigation Measure 4.6-2: Inadvertent Discovery of Cultural Resources.**

In the event archaeological materials are encountered during Project activities, the designated Project construction contractor shall immediately cease any ground disturbing activities within 100 feet of the find. The qualified archaeologist (and a Native American-designated representative if the resource is Native American-related) shall evaluate the significance of the resources for California Register of Historical Resources eligibility and recommend appropriate treatment measures to the County and the Project Owner. Per CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall (in coordination with a Native American-designated representative if the resource is Native American-related) develop additional treatment measures in consultation with the County, which may include data recovery or other appropriate measures. The County shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric, tribal cultural resources, or Native American in nature. The qualified archaeologist shall prepare a report documenting evaluation and/or additional treatment of the resource. A copy of the report shall be provided to the County and to the Southern San Joaquin Valley Information Center. Construction can recommence based on direction of the qualified archaeologist with the County's agreement.

**Finding:** The County finds that Mitigation Measures 4.6-1 and 4.6-2 are feasible, will reduce the Project's potential significant impact on historical and archeological resources as defined by CEQA Guidelines section 15064.5 to a less-than-significant level, and are adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measures 4.6-1 and 4.6-2 will reduce the impact to a less-than-significant level because these measures establish a plan to evaluate any cultural resources identified during Project construction for eligibility and, if necessary, to prepare a treatment plan to minimize

impacts on the resource. In this way, implementation of the mitigation measures will ensure that during construction, operation and maintenance, and decommissioning of the facility, general avoidance and protective measures will be implemented to protect significant historical and archeological resources. Thus, with the implementation of Mitigation Measures 4.6-1 and 4.6-2, the impacts of the Project on historical and archeological resources would be less than significant.

## 7. Cultural Resources and Tribal Cultural Resources (Inadvertent Discovery of Human Remains)

The analysis of impacts on Cultural and Tribal Cultural Resources in Draft EIR Section 4.6 determined that ground-disturbing activities associated with the Project could result in inadvertent discovery of human remains. There is no indication that the Project site has been used for human burial purposes in the recent or distant past. However, if human remains are discovered, including those interred outside of formal cemeteries, then the human remains could be inadvertently damaged, which would be a significant impact for the purposes of CEQA. Implementation of **Mitigation Measure 4.6-3** would ensure that any human remains encountered are appropriately addressed, thus reducing any potential impacts to a less-than-significant level. Operation and maintenance of the Project would cause no impact to human remains because no ground disturbance would occur at depths greater than those reached during construction. Decommissioning and site reclamation of the Project similarly would not impact human remains. Ground disturbances associated with these activities would occur within soils previously disturbed by construction and subject to Mitigation Measure 4.6-3.

### **Mitigation Measure 4.6-3: Inadvertent Discovery of Human Remains**

If human remains are uncovered during Project activities, the Project owner shall immediately halt work, contact the Fresno County Coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.4 (e)(1). If the County Coroner determines that the remains are Native American in origin, the Native American Heritage Commission (NAHC) will be notified, in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code 5097.98 (as amended). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per Public Resources Code Section 5097.98, and the Project Applicant shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further activity under the landowner has discussed and conferred, as prescribed in Public Resources Code Section 5097.98 with the MLD regarding their recommendation for the disposition of the remains, taking into account the possibility of multiple human remains.

**Finding:** The County finds that Mitigation Measure 4.6-3 is feasible, will reduce the Project's potential significant impact on unknown human remains as defined by CEQA Guidelines section 15064.5 to a less-than-significant level, and are adopted by the County. Accordingly, County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** In the event of inadvertent discovery during Project ground disturbance, work would be halted, and procedures would be followed consistent with state requirements pursuant to Health and Safety Code Section 7050.5(c), and Public Resources Code 5097.98 (as amended). In conjunction with

the training and monitoring protocols identified in Mitigation Measures 4.6-1 and 4.6-2, with implementation of Mitigation Measure 4.6-3. potential impacts to unknown human remains would be less than significant.

## 8. Cultural Resources (Tribal Cultural Resources)

The analysis of impacts on Cultural and Tribal Cultural Resources in Draft EIR Section 4.6 determined that ground-disturbing activities associated with the Project could cause a substantial adverse change to previously unknown archaeological resources that are also tribal cultural resources, as defined in Public Resources Code section 21074(a). A tribal consultation letter from the Santa Rosa Rancheria Tachi Yokut Tribe requested that a cultural survey and records search be conducted for the Project site, and that the results report be submitted to the tribe for review. The results of the Southern San Joaquin Valley Information Center (SSJVIC) records search indicate that four previous technical studies have been performed within the records search area, and, of these, one of the studies intersected portions of the Project site. The records search also indicated that no cultural resources previously have been recorded within the Project site or the 1-mile buffer. The pedestrian survey did not identify any cultural resources within the Project site. In light of the nature of the Project and the disturbed character of the site, types of tribal cultural resources, if any, are anticipated to be subsurface prehistoric archaeological resources, including human remains. As described above, no such prehistoric resources have been documented within, or in the immediate vicinity of, the Project site.

Nonetheless, if not discovered before development, such resources could be damaged or destroyed through earthwork, ground disturbance, or other subsurface construction activities. Damage to or loss of tribal cultural resources would be a potentially significant impact. Implementation of **Mitigation Measures 4.6-1, 4.6-2, and 4.6-3** (set forth above) would ensure that any encountered archaeological resources that are considered tribal cultural resources would be addressed appropriately, thus reducing any potential impacts to a less-than-significant level.

Operation, maintenance, decommissioning, and reclamation of the Project would cause no impact on tribal cultural resources.

**Finding:** The County finds that Mitigation Measures 4.6-1, 4.6-2, and 4.6-3 are feasible, will reduce the Project's potential significant impact on significant tribal cultural resources to a less-than-significant level, and are adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale:** Implementation of Mitigation Measures 4.6-1 and 4.6-2, and 4.6-3 will result in the training of all construction personnel involved in ground-disturbing activities in the identification and notification process in the event of the identification of archaeological deposits and human remains. Because any potential archaeological resources identified that could be considered tribal cultural resources would be evaluated and treated, and because consultation with Native American representatives would occur to determine appropriate treatment, the impact would be reduced to less-than-significant levels.

## 9. Geology, Soils, and Paleontological Resources (Paleontological Resources)

The analysis of impacts on Geology, Soils, and Paleontological Resources in Draft EIR Section 4.8 determined that the Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, if they are present, as a result of the use of construction equipment to grade and excavate on-site soils. This impact was determined to be significant at the Project level and cumulatively.

Geologic mapping indicates that the surficial deposits at the Project site consist of Holocene-age fan-derived alluvial sediments, with older Pleistocene-age sediments (Tulare Formation) mapped in the vicinity. Pleistocene-age sediments are considered to have a high potential to contain significant paleontological resources due to their age and the well-documented presence of significant fossil finds in Fresno County and throughout California. The actual depth to Pleistocene-age deposits is unknown, and the potential to encounter significant paleontological resources below 10 feet below ground surface (bgs) is undetermined. Therefore, construction of the Project could encounter paleontological resources in Pleistocene-age sediments areas where excavations result in disturbance at depths at or below 10 feet. If so, a potential significant impact would result.

To avoid or substantially reduce potential impacts on paleontological resources, if present, during construction, **Mitigation Measure 4.8-1** would require that all earthwork halt in the event of a fossil discovery and that a qualified paleontologist assess the discovery. If the discovery is determined to be significant by the qualified paleontologist, it would be recovered using appropriate recovery techniques, identified, catalogued, and prepared for storage in a recognized paleontological repository. In the event of a discovery, a qualified paleontologist may recommend paleontological resource monitoring on an as-needed basis.

**Mitigation Measure 4.8-1 Unanticipated Fossil Discovery.** Prior to ground disturbing activities for Project construction or decommissioning, the Project owner shall retain a qualified professional paleontologist (meeting the standards of the Society of Vertebrate Paleontology [SVP]) to develop and implement a Paleontological Worker Education and Awareness Program (WEAP). If paleontological resources are discovered during ground-disturbing activities (e.g., during Project construction or decommissioning), all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations will be consistent with the standards of the SVP that are current as of the discovery and with currently-accepted scientific practice. The current standards of the SVP are set forth in the SVP's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, as prepared by the SVP's Impact Mitigation Guidelines Revision Committee. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report for publication describing the finds.

**Finding:** The County finds that Mitigation Measure 4.8-1 is feasible, will reduce the Project's potential significant impact on paleontological resources to a less-than-significant level, and is adopted by the

County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.

**Rationale:** Implementation of Mitigation Measure 4.8-1 will halt work upon discovery of a potential paleontological resource and ensure that a qualified paleontologist assesses the discovery. If the discovery is determined to be significant by the qualified paleontologist, then it would be recovered using appropriate recovery techniques, identified, catalogued, and prepared for storage in a recognized paleontological repository. In the event of a discovery, the qualified paleontologist may recommend paleontological resource monitoring on an as-needed basis. Thus, with the implementation of Mitigation Measure 4.8-1, the direct, indirect, and cumulative impacts of the Project on paleontological resources would be less than significant.

## 10. Noise (Nighttime Noise)

The analysis of impacts related to Noise in Draft EIR Section 4.14 determined that the Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. A significant impact would result.

The Fresno County Noise Ordinance states that 50 dBA is the standard for daytime (7 a.m. to 10 p.m.) and 45 dBA is the standard for nighttime (10 p.m. to 7 a.m.). Therefore, if a proposed project would generate noise levels from non-construction noise sources in excess of 50 dBA  $L_{eq}$  during the daytime or 45  $L_{eq}$  during the nighttime, such noise generation would constitute a significant noise impact. Project-caused noise that occurs outside these exempt hours could include activity for material and equipment delivery and/or where the schedule has been delayed due to weather or other events – such activity could exceed exterior noise level standards. The nearest noise-sensitive uses near the Project site are agricultural residences north of the Project site along West Adams Avenue. While Section 8.040.110 of the County Code provides a mechanism for the granting of variances from noise ordinance restrictions that must be approved by the County Board of Supervisors, provision of such a variance does not necessarily mean that there would be no nighttime noise impact. The implementation of **Mitigation Measure 4.14-1: Noise Reduction for Construction Activities** would reduce the potential significant impact of construction noise to less than significant.

### **Mitigation Measure 4.14-1: Noise Reduction for Construction Activities.**

At least 30-days prior to conducting nighttime construction activities for the proposed project, the Project Applicant shall submit to the County for approval a Construction Noise Reduction Plan to be implemented by all contractors as a condition of contract. Contents of the Plan should include at a minimum:

- Maintain all construction tools and equipment in good operating order according to manufacturers' specifications;
- Limit use of major excavating, pile driving, and earth-moving machinery to daytime hours;



- Equip any internal combustion engine used for any purpose on the job or related to the job with a properly operating muffler that is free from rust, holes, and leaks;
- For construction devices that use internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible;
- Limit possible evening and nighttime shift work to the southern and/or western portions of the Project site conducting low noise activities such as welding, wire pulling, and other similar activities, together with appropriate material handling equipment; and
- Utilize a Complaint Resolution Procedure to address any noise complaints received from residents.
- The Plan shall include documentation that quantifies and substantiates how the contents of the Plan shall ensure that any nighttime construction noise levels would not exceed the Fresno County exterior noise standard of 45 dBA Leq at the closest residences.

**Finding:** The County finds that Mitigation Measure 4.14-1 is feasible, will reduce the Project's potential significant impact of nighttime noise from construction activities to a less-than-significant level, and is adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

**Rationale:** Implementation of Mitigation Measure 4.14-1 will reduce nighttime construction noise impacts below established thresholds by limiting the types of activities that might occur during nighttime hours near sensitive receptors. Thus, with the implementation of Mitigation Measure 4.14-1, the impacts of the Project from nighttime construction noise would be less than significant.

## 11. Transportation (Temporary Increase in Traffic Volumes)

The analysis of impacts on Transportation in Draft EIR Section 4.18 determined that construction of the Project would generate a temporary increase in traffic volumes on area roadways, which could conflict with a program, plan, ordinance, or policy addressing the circulation system. This would be a significant impact at the Project level and cumulatively.

Project site clearing and construction would be short-term and would occur over 10 to 14 months. Construction traffic would result in short-term increases in traffic volumes on study area roadways. An increase in Project-related traffic volume could be accommodated; however, during commute hours potentially significant congestion could occur during the construction and decommissioning phases. With the addition of Project-related construction vehicle traffic to existing roadway volumes, there could be increased congestion and delay for vehicles along SR 33 and West Manning Avenue. Implementation of the Construction and Decommissioning Traffic Management Plan identified in **Mitigation Measure 4.18-1** would reduce the direct, indirect, and cumulative impacts of Project construction traffic on study area roadways during peak commute hours to a less-than-significant level.

Based on the County's thresholds, the traffic impact analysis concluded that construction of the Project would result in a significant impact on two area roadways: West Manning Avenue and West Adams Avenue, between SR 33 and the Project driveways. Implementation of **Mitigation Measure 4.18-2** would ensure documentation of pre-construction and pre-decommissioning roadway conditions. Implementation of **Mitigation Measure 4.18-3** would provide for a road repair agreement subject to review and approval by Fresno County (and as informed by the roadway surveys required under Mitigation Measure 4.18-2).

#### **Mitigation Measure 4.18-1 Construction and Decommissioning Traffic Management Plan**

Prior to the issuance of construction or building permits and the issuance of decommissioning authorizations, the Project owner and/or its construction contractor shall prepare and submit a Traffic Management Plan to the Fresno County Public Works Department and the California Department of Transportation, District 6, as appropriate, for approval. The Traffic Management Plan must be prepared in accordance with both the California Department of Transportation Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook and must include, but not be limited to, the following elements:

- Temporary Traffic Control (TTC) plan that addresses traffic safety and control through the work zone, including during temporary lane closures (if needed) to accommodate materials delivery, transmission line stringing activities, or any other utility connections;
- Identify the timing of deliveries of heavy equipment and building materials;
- Requirement for designated construction staff to be assigned as flaggers to direct traffic into and/or through temporary traffic control zones, as needed;
- Requirement to place temporary signage, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;
- Ensure access for emergency vehicles to the Project site;
- Access to adjacent properties shall be maintained;
- Specify both construction/decommissioning-related vehicle travel and oversize load haul routes, minimizing construction/decommissioning traffic during the a.m. and p.m. peak hour, distributing construction/decommissioning traffic flow across alternative routes to access the Project site, and avoiding residential neighborhoods to the maximum extent feasible.
- Requirement to obtain all necessary permits for the work within the road right of way or use of oversized/overweight vehicles that would utilize County-maintained roads, which may require California Highway Patrol or a pilot car escort. Copies of the approved traffic plan and issued permits shall be submitted to the Fresno County Divisions of Public Works and Planning.

#### **Mitigation Measure 4.18-2: Preconstruction and Pre-Decommissioning Road Survey Report**

Prior to Project construction and decommissioning, a preconstruction report and a pre-decommissioning report shall be prepared by a qualified registered engineer, retained by the Project owner, to include a detailed analysis of road suitability to accommodate haul trucks during Project construction and decommissioning. The report shall be submitted to the Fresno County Department of Public Works and Planning. Prior to initiating the preconstruction or decommissioning report, the proposed methodology shall be presented to the Fresno County Department of Public Works and Planning for review and approval. Improvements to existing

roads, to be implemented by the Project owner, may be necessary based on the findings of the report.

### **Mitigation Measure 4.18-3: Road Repair Agreement**

Prior to the start of construction, the Project owner shall enter into a secured agreement with the County to ensure that the Project contributes its fair-share portion toward repairs of County roads that are demonstrably damaged by this Project including but not limited to West Manning Avenue and West Adams Avenue, between SR 33 and the Project driveways, and South Monterey Avenue. Subject to the discretion of the County of Fresno and Caltrans District 6, roadway impacts shall be mitigated either by construction of an overlay, reconstruction of the pavement section, or by participating financially for the costs of the mitigation to the extent of the Project's fair share (Fresno County 2018).

**Finding:** The County finds that Mitigation Measures 4.18-1, 4.18-2, and 4.18-3 are feasible, will reduce the Project's potential significant direct, indirect, and cumulative impacts on increased traffic volumes to less than significant, and is adopted by the County. Accordingly, the County finds, pursuant to Public Resources Code section 21081(a)(1) and CEQA Guidelines section 15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the EIR.

**Rationale:** Implementation of Mitigation Measures 4.18-1, 4.18-2, and 4.18-3 will reduce the impact to a less-than-significant level because vehicle access on roadways adjacent to the Project site would be safely maintained and delays caused by additional Project-related traffic would be minimized, with an emphasis on peak-hour conditions when roadway volumes are highest. Additionally, Mitigation Measures 4.18-2 and 4.18-3 include provisions for the affected roadways to be surveyed and restored to pre-Project conditions. Thus, with the implementation of these Mitigation Measures, the direct, indirect, and cumulative impacts of the Project related to increased traffic volumes would be less than significant.

## **C. No Significant Unavoidable Impacts**

Section 15126.2(a) of the CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less-than-significant levels. As analyzed in Draft EIR Chapter 3, *Environmental Analysis*, the Project would result in no significant unavoidable impacts.

## **D. Findings Regarding Alternatives**

Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The EIR identified and considered the following reasonable range of feasible alternatives to the Project that would be capable, to varying degrees, of reducing identified impacts:

- Alternative 1—Reduced Acreage Alternative
- No Project Alternative

## 1. Summary of Alternative 1, Reduced Acreage Alternative

Alternative 1, the reduced acreage alternative would consist of a solar energy generating facility and battery storage project reduced in size and capacity by 20 percent. The alternative would be constructed, operated, maintained, and decommissioned upon a smaller footprint within the Project site. The PG&E infrastructure would be built and operated to support renewable energy development on the Project site, with the exception that under Alternative 1, the size and capacity of the proposed solar facility would be reduced by 20 percent. This would equate to a solar energy project on approximately 1,600 acres with the capacity to generate approximately 160 MW with 147 MW battery storage, compared to the Project's 200 MW with 184 MW battery storage on upon approximately 2,000 acres. All other infrastructure and improvements proposed as part of the Project would continue to be required under Alternative 1. The disturbance area would be reduced by approximately 400 acres and the remaining on-site acreage would remain vacant.

## 2. Summary of No Project Alternative

Consistent with CEQA Guidelines section 15126.6(e), the EIR evaluates a no project alternative. The analysis discusses the existing conditions at the time the notice of preparation was published, as well as what reasonably would be expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

If the No Project Alternative is implemented, the Project site would continue to be used for dry-farmed agriculture and/or left fallow unless and until a different use is proposed. The Project site is designated "Agriculture" as shown on Fresno County General Plan Countywide Land Use Diagram Figure LU-1a and is zoned AE-20 (Exclusive Agricultural, 20-acre minimum parcel size). If the Project were not approved, then other uses consistent with the AE-20 zoning designation could be made on one or more of the parcels that comprise the Project site. Pursuant to Fresno County Ordinance Code Section 816, uses (among others) that are allowed by right without a permit relate to livestock, poultry, and crops; home occupations; agricultural products; apiaries; kennels; and welding and blacksmith shops. No such competing proposals for site use are before the County. Accordingly, rather than speculate as to possible other uses, the analysis of the No Project Alternative in this Draft EIR assumes a no-development/no Project scenario where the existing agricultural use is continued as it exists under pre-Project conditions.

Under a no-development scenario, the property would continue in agricultural use and the existing environmental setting would be maintained. Changes to that setting, including changes to the landscape (visual resources, habitat, and land use/agriculture); Project-related construction noise, traffic, and air emissions would not occur; and potential ground-disturbance related impacts to cultural tribal cultural resources, wildlife habitat, and environmental benefits relating to maintaining the existing groundcover as it relates to dust control or carbon sequestration, or benefits relating to renewable energy generation would not be realized from solar development of the site.

## 3. Findings Concerning Project Alternatives

If a proposed project would result in significant environmental impacts that would not be avoided or substantially lessened by mitigation measures, then CEQA requires the lead agency to consider environmentally superior alternatives identified in the EIR and to find that they are "infeasible" before approving the project (Public Resources Code section 21081[a][3]; CEQA Guidelines

section 15091[a][3]). This findings requirement flows from the policy stated in Public Resources Code section 21002, which states:

[I]t is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives *or* feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. ... The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. [Emphasis added.]

However, findings rejecting alternatives are required only if one or more significant environmental effects will not be avoided or substantially lessened by mitigation measures. To emphasize, an agency need not make findings rejecting alternatives described in the EIR if all of the proposed project's significant impacts would be avoided or substantially lessened by mitigation measures. See Public Resources Code section 21081(a)(1)–(2); CEQA Guidelines section 15091(a)(1)–(2).

As stated in Section II(C) and as analyzed in Draft EIR Chapter 3, *Environmental Analysis*, the Project would result in no significant unavoidable impacts. Therefore, CEQA does not require the County to make findings rejecting the alternatives before considering approval of the Project as proposed.

## E. General CEQA Findings

Having received, reviewed, and considered the information in the Final EIR, and otherwise in the record, the County hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

### 1. Certification of the EIR

Based on the foregoing findings and the information contained in the administrative record and prior to approving the Project, the County certifies pursuant to CEQA Guidelines Section 15090 that:

- **Finding 1.** The Final EIR has been completed in compliance with CEQA.
- **Finding 2.** The Final EIR was presented to the Planning Commission, which has authority to approve the requested Unclassified Conditional Use Permit for the Sonrisa Solar Project. The Planning Commission reviewed and considered the information contained in the Final EIR prior to approving the Project.
- **Finding 3.** The Final EIR reflects the County's independent judgment and analysis. The County has exercised independent judgment in accordance with Public Resources Code section 21082.1(c)(3) in retaining ESA as its own environmental consultant in the preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

### 2. Significant Environmental Impacts

Based on the foregoing findings and the information contained in the administrative record and pursuant to CEQA Guidelines sections 15091 and 15092, the County has made one or more of the following findings with respect to each of the significant effects of the Project:

- **Finding 1.** Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- **Finding 2.** Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.
- **Finding 3.** Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the Final SEIR.

Based on the foregoing findings and the information contained in the administrative record, and as conditioned by the foregoing:

1. All significant effects on the environment due to the Project have been eliminated or substantially lessened where feasible with implementation of mitigation measures.
2. No significant effects remain that have been found to be unavoidable.

### 3. Feasibility of Mitigation Measures

Public Resources Code section 21081.5 requires the County to base its findings on substantial evidence in the record. Based on the entire record before the County, the County hereby determines that all feasible mitigation within the County’s responsibility and jurisdiction has been adopted to reduce or avoid the potentially significant impacts identified in the Final EIR. The feasible mitigation measures are discussed in Section II.B, above, and are set forth in the MMRP prepared for the Project.

### 4. Environmental Mitigation Monitoring and Reporting Program

Public Resources Code section 21081.6(a) requires the County to adopt a monitoring or compliance program regarding the changes in the Project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP for the Project is hereby adopted by the County because it fulfills the CEQA mitigation monitoring requirements:

- The MMRP is designed to ensure compliance with the changes in the Project and mitigation measures imposed on the Project during Project implementation.
- Measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements, or other measures.

### 5. Reliance on Record

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, contained in the administrative record for the Project.

#### ***Record of Proceedings***

In addition to this Statement of Findings, in accordance with Public Resources Code section 21167.6(e), the record of proceedings for the Project includes, but is not limited to, the following elements:

- (i) The Notice of Preparation (NOP) and all other public notices issued by the County for the Project;
- (ii) The June 2024 Draft EIR for the Project (with appendices, Staff Report Exhibits 10 and 11);

- (iii) The August 2024 Final EIR for the Project (Staff Report Exhibit 12);
- (iv) The Mitigation Monitoring and Reporting Program for the Project (Staff Report Exhibit 1);
- (v) All reports, studies, memoranda, staff reports, or other documents related to the Project prepared by the County, or consultants to the County with respect to the County's compliance with the requirements of CEQA and with respect to the County's action on the Project;
- (vi) All documents submitted to the County by other public agencies, the Applicant or the Applicant's consultants, or members of the public in connection with the Project, up through the close of the public hearing;
- (vii) Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the County in connection with the Project; and
- (viii) Any other materials required for the record of proceedings by Public Resources Code section 21167.6(e).

### ***Custodian and Location of Records***

The documents and other materials that constitute the record of the proceedings on which the County's decision is based are located at the County of Fresno, Public Works & Planning Department, 2220 Tulare Street, 6th Floor, Fresno, California. The custodian for these documents and materials is Jeremy Shaw, Planner, County of Fresno Department of Public Works and Planning, Development Services and Capital Projects Division. This information is provided in compliance with Public Resources Code section 21081.6(a)(2) and CEQA Guidelines section 15091(e).

## **6. Nature of Findings**

Any finding made by the County shall be deemed made, regardless of where it appears in this document. All language included in this document constitutes findings by the County, whether or not any particular sentence or clause includes a statement to that effect. The County intends that these findings be considered as an integrated whole; and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, any finding required or committed to be made by the County with respect to any particular subject matter of the Final EIR, shall be deemed to be made if it appears in any portion of these findings.

## **7. Recirculation Not Required**

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The CEQA Guidelines provide the following examples of significant new information under this standard:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines §150885(a); *Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043).

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is “not intend[ed] to promote endless rounds of revision and recirculation of EIRs.” *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132. “Recirculation was intended to be an exception, rather than the general rule.” *Id.*

No substantial changes were made between the DEIR and FEIR. Additionally, no new information was incorporated into the FEIR. Therefore, recirculation is not necessary.



# Sonrisa Solar Energy Project

## Reclamation Plan

*Prepared for*

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Development Services Division  
2220 Tulare Street, 6th Floor  
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*Prepared by*

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## ACRONYMS AND ABBREVIATIONS

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AC	alternating current
CDA	Community Development Agency
County	County of Fresno
CUP	Conditional Use Permit
DC	direct current
dS/m	decisiemens per meter
EC	electrical conductivity
ESP	exchangeable sodium percentage
gen-tie	generation intertie
MMRP	Mitigation, Monitoring and Reporting Program
NAS Lemoore	Naval Air Station Lemoore
O&M	Operations and Maintenance
PG&E	Pacific Gas & Electric Company
Plan	Scarlet Solar Energy Project Reclamation Plan
PV	photovoltaic
SCADA	supervisory control and data acquisition

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## 1.0 INTRODUCTION

### 1.1 PURPOSE OF THE PLAN

The Sonrisa Solar Energy Project Reclamation Plan (Plan) outlines a framework for decommissioning and post-operational restoration of the Sonrisa Solar Energy Project (project). This Plan is submitted to fulfill the requirements of the Fresno County Solar Facility Guidelines (Fresno County 2017) related to post-operational site reclamation.

The purpose of this Plan is to outline a framework for the removal of the power generation equipment at the end of the project's operational life and to return the project site to a condition as close to a pre-construction state as possible. The project energy generation equipment is expected to have a life of up to 35 years. At the end of the useful life of the project, the project owner or operator will restore the project site such that it may be re-used or sold or will provide the County of Fresno (County) with the financial assurances to conduct such work in the event that the owner or operator is incapable of performing such work. The procedures outlined in this Plan will ensure that the project owner, operator, and contractors protect public health and safety, provide environmental protection, and comply with applicable regulations. Additionally, should the facility not be re-used, this Plan describes methods to decommission the facility and restore the site to pre-development conditions. Should the site be recommissioned rather than decommissioned, it will be done so in accordance with County permitting requirements.

A Final Reclamation Plan will be prepared and finalized in the months prior to decommissioning which will address the approved project, proposed land uses of the site post-decommissioning, and the applicable rules and regulations in place at that time.

### 1.2 FRESNO COUNTY SOLAR FACILITY GUIDELINES

The Fresno County Solar Facility Guidelines (Fresno County 2017) require that as part of the application review process, the applicant will provide a Reclamation Plan detailing the lease life, timeline for removal of the improvements, and specific measures to return the site to the agricultural capability prior to installation of solar improvements. The Guidelines also include detailed guidance for the minimum content of Reclamation Plans (addressed in Section 2 of this Plan).

### 1.3 PROJECT LOCATION AND OVERVIEW

The project site is an approximately 2,181-acre site located in unincorporated Fresno County, approximately 4 miles west-southwest of the community of Tranquillity and approximately 7.4 miles east of Interstate 5 (I-5). The existing Pacific Gas and Electric Company's (PG&E) Tranquillity Solar Generating Facility is approximately 0.75 mile southwest of the project site. The project site would encompass 23 parcels<sup>1</sup> generally located south of West Adams Avenue, north of West Manning Avenue, east of State Route (SR) 33 (South Derrick Avenue), and west of South San Mateo Avenue. A total of 6 parcels, Assessor's Parcel Numbers (APNs) 028-071-47, 028-071-40, 028-071-41, 028-071-43, 028-071-44, and 028-071-45, are currently owned by EDP Renewables North America LLC. The remaining 17

<sup>1</sup> The project parcels include: 028-071-01, 028-071-02, 028-071-04, 028-071-06, 028-071-07, 028-071-13, 028-071-15, 028-071-16, 028-071-17, 028-071-20, 028-071-21, 028-071-33, 028-071-35, 028-071-36, 028-071-40, 028-071-41, 028-071-43, 028-071-44, 028-071-44, 028-071-45, 028-071-47 (Shared Facility), 028-071-55, 028-101-72 (Shared Facility; Portion), and 028-101-74 (Shared Facility; Portion).

parcels are currently owned by Westlands Water District<sup>2</sup>; however, EDP Renewables North America LLC holds agreements with Westlands Water District for these parcels. Refer to Figure 1, *Regional Location Map*, in Appendix A for the project site in the region.

The project is proposed to construct, operate, maintain, and decommission a 200-megawatt (MW) solar photovoltaic (PV) electricity generating facility, energy storage system, and associated infrastructure. The project would provide solar power to utility customers by interconnecting to the regional electricity grid at PG&E Tranquillity Switching Station.

The project would operate year-round to generate solar electricity during daylight hours and would store and dispatch power to the energy storage system during both daylight and non-daylight hours. The project is anticipated to be constructed as early as late 2024. The exact timing of project construction is dependent on opportunities in the solar market, but the project is currently anticipated to be online in 2026.

Components of the project would include the following, which are further described below:

- Groups of solar arrays (arrays include PV modules and steel support structures, electrical inverters, transformers, cabling, and other infrastructure);
- One electrical substation;
- A switchyard, including one high-voltage 230 kV utility switchyard, telecommunications infrastructure, and two 65-foot high dead-end structures;
- Approximately 3.5 miles of 230 kV generation intertie (gen-tie) transmission line (from the substation and project 230 kV switchyard) to connect to the existing PG&E Tranquillity Switching Station;
- Improvements to PG&E electrical infrastructure, including a minor expansion of PG&E's Tranquillity Switching Station and approximately 1,900 feet of PG&E 230 kV transmission line to connect the 230 kV gen-tie line to the Tranquillity Switching Station;
- A 184 MW energy storage system, consisting of battery and electrical cabling; and
- Other necessary infrastructure, including one permanent operations and maintenance (O&M) building, a septic system and leach field, a supervisory control and data acquisition (SCADA) system, a meteorological data system, buried conduit for electrical wires, overhead collector lines, on-site access roads, a shared busbar,<sup>3</sup> lighting, and wildlife-friendly security fencing.

<sup>2</sup> The Westlands Water District acquired these properties as part of the following settlements: (1) the September 3, 2002 settlement agreement reached among the United States, Westlands Water District, and others in the Sumner Peck Ranch et al. v. Bureau of Reclamation et al. lawsuit; (2) the Britz settlement (a separate action executed on September 3, 2002); and (3) the 2002 settlement agreement reached in the Sagouspe et al. v. Westlands Water District et al. lawsuit.

<sup>3</sup> A busbar is a system of electrical conductors in a generating or receiving station on which power is concentrated for distribution to several electrical circuits.



This project is anticipated to remain in operation for up to 35 years from completion of construction. Figure 2, *Site Plan*, in Appendix A shows the location of the components of the proposed project and associated facilities.

## 2.0 RECLAMATION PLAN CONTENT

The County Solar Facility Guidelines include guidelines for preparing a Reclamation Plan (Fresno County 2020). Each of the requirements is addressed individually below.

### 1. Description of present use of the site;

The existing land use of the project site is primarily dry-farmed agriculture. For the past 10 years, the project site has been intermittently in low-yield agricultural production (tilled, seeded, and harvested for winter wheat); intermittently irrigated (drip or sprinkler) and harvested for alfalfa seed or other crops; or disked twice a year and left fallow.

### 2. Describe the proposed alternative use of the land (all equipment to be installed above and underground, structures, fencing, etc.);

Section 1.3 includes a description of the proposed project facilities. The PV modules will be installed on steel posts supported by piles. Inverters, transformers, substations, electrical storage system containers, and the O&M building will be installed on concrete pads and/or be supported by piles. The collection system will be installed overhead and/or underground. Additional facilities include the 230 kV utility switchyard, telecommunications infrastructure, two 65-foot-high dead-end structures, SCADA system, meteorological data system, septic system with leach field, and wildlife-friendly security fencing.

### 3. Duration of the alternative use of the property (specify termination date);

The proposed facility is expected to be in commercial operation for approximately 35 years from the commencement of operations. Extension of use would be in accordance with County permitting requirements.

### 4. Address ownership of the property (lease or sale);

A total of 6 parcels, APNs 028-071-47, 028-071-40, 028-071-41, 028-071-43, 028-071-44, and 028-071-45, are currently owned by EDP Renewables North America LLC. The remaining 17 parcels are currently owned by Westlands Water District; however, EDP Renewables North America LLC holds agreements with Westlands Water District for these parcels.

### 5. Describe how the subject property will be reclaimed to its previous agricultural condition (if applicable), specifically:

- a. Timeline for completion of reclamation after solar facility lease has terminated (identify phasing if needed);
- b. Handling of any hazardous chemicals/materials to be removed;
- c. Removal of all equipment, structures, buildings, and improvements at and above grade;
- d. Removal of any below-grade foundations;

- e. Removal of any below-grade infrastructure (cables/lines, etc.) that are no longer deemed necessary by the local public utility company;
- f. Detail any grading necessary to return the site to original grade;
- g. Type of crops to be planted; and
- h. Irrigation system details to be used (existing wells, pumps, etc. should remain throughout the solar facility use);

Procedures to remove the facility and restore the project site back to pre-project conditions are included in Section 3 of this Plan. A total of 17 parcels are currently owned by Westlands Water District; however, EDP Renewables North America LLC holds agreements with Westlands Water District for these parcels. The remaining 6 parcels are currently owned by EDP Renewables North America LLC. In consideration of these restrictions, this Plan contemplates decommissioning the project and stabilizing the site but does not propose additional actions to restore agricultural capacity to the property beyond its present condition on those parcels.

- 6. A Site Plan shall be submitted along with the text of the Reclamation Plan showing the location of equipment, structures, above and underground utilities, fencing, buffer area, reclamation phasing, etc.;

A Site Plan is included as Figure 2 in Appendix A.

- 7. An engineering cost estimate of reclaiming the site to its previous agricultural condition shall be submitted for review and approval;

Per the Solar Facility Guidelines for a Final Reclamation Plan, the engineer cost estimate to implement the Reclamation Plan will be provided following project approval and will be included in this Plan as Appendix B.

- 8. Financial assurances equal to the cost of reclaiming the land to its previous agricultural condition shall be submitted to ensure the reclamation is performed according to the approved plan. Financial assurances shall be made to the County of Fresno and may take the form of cash, letter of credit or bond that complies with Section 66499 of the California Government Code, et seq.;

Financial assurances will be provided based on the engineer cost estimate noted under item 7, above.

- 9. Evidence that all owners of record have been notified of the proposed Reclamation Plan.

As discussed under item 4, above, a total of 6 parcels are currently owned by EDP Renewables North America LLC. The remaining 17 parcels are currently owned by Westlands Water District; however, EDP Renewables North America LLC holds agreements with Westlands Water District for these parcels.

## 3.0 BASELINE CONDITIONS

### 3.1 SOIL CONDITIONS

Table 1, *Project Site Soils Land Capability Classification and Storie Index Scores*, describes the project’s soil classifications according to various systems used in California. Refer to Figure 3, *Soils Map*, in Appendix A for the distribution of soils on the project site. The site consists of the Tranquility clay, Ciervo clay, and Calfax clay loam, as shown in Table 1.

**Table 1  
PROJECT SITE SOILS LAND CAPABILITY CLASSIFICATION AND STORIE INDEX SCORES**

Map Symbol	Mapping Unit	Acres	Proportion Project Site	LCC Rating	LCC Rating Value	Storie Index Rating Class	Storie Index Rating Class
286	Tranquility clay, saline-sodic, wet	1,274.9	0.60	IIIw	60	5	Grade 5 – Poor
461	Ciervo clay, saline-sodic, wet	336.4	0.16	III <sub>s</sub>	60	26	Grade 4 – Poor
482	Calfax clay loam, saline-sodic, wet	529.8	0.24	III <sub>s</sub>	60	39	Grade 4 – Poor
<b>TOTAL</b>		2,141.1	<b>1.00</b>	--	--	--	

Source: NRCS 2023

Notes: LCC – Land Capability Classification.

Land Capability Classification (LCC) demonstrates the suitability of soils for growing field crops. Based on LCC, the site’s LCC soil rating is Class 3. Class 3 soils have severe limitations that reduce the choice of plants or require special conservation practices, or both. The letter “s” in the LLC Rating column in Table 1 indicates that the soil is limited mainly because it is shallow, droughty, or stony, and the letter “w” indicates that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage).

The Storie Index Rating provides a numeric rating (based on a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture use. This rating is based upon soil characteristics only. Named components are assigned grades according to their suitability for general intensive agriculture as shown by their Storie index ratings. The six grades and their range in index ratings are: Grade 1—80 to 100; Grade 2—60 to 79; Grade 3—40 to 59; Grade 4—20 to 39; Grade 5—10 to 19; and Grade 6—less than 10 (USDA 2006). As shown in Table 1, the soils on the site are classified as poor and have ratings of 4 and 5.

The LCC rating for each soil type and the Storie Index rating was determined based on the Soil Survey for Fresno County (USDA 2006).

### 3.2 HISTORICAL AGRICULTURAL USE

The project site is primarily dry-farmed agriculture that has been intermittently irrigated. For the past 10 years, the project site has been in low-yield agricultural production (tilled, seeded, and harvested for winter wheat); intermittently irrigated (drip or sprinkler) and harvested for alfalfa seed or other crops;

or disked twice a year and left fallow. The site is subject to high levels of selenium and a water table that does not provide sufficient drainage for most commercially irrigated crops.

For the portion of the project site that is cultivated without the benefit of irrigation, the productivity of these crops depends entirely on rainfall. When the unirrigated crops fail to mature to harvest, the land is grazed as rangeland grasses.

## 4.0 PROJECT FACILITY AND EQUIPMENT

The project would be comprised of solar panels, inverters, access roads, an O&M building, septic system and leach field, and electrical equipment including substations, battery storage enclosures, and wiring. The site would be secured by an up to 8-foot-high chain link perimeter fence, topped with three-strand barbed wire, through which multiple points of ingress/egress would be accessed by locked gates.

### 4.1 FOUNDATIONS

Concrete foundations (equipment pads) would be required for energy storage containers, substation dead-end structures, project inverters, transformers, and switchgear. The O&M building would be constructed on a concrete foundation. Foundations would vary in depth based on micro-siting of these elements but would range from approximately 6 inches to 36 inches. PV arrays would be supported by steel piles that are driven directly into the substrate and will not require concrete foundations.

### 4.2 SOLAR PV ARRAYS AND RACKING

The PV modules would be manufactured at an off-site location and then transported to the project site. The PV modules would be mounted on a galvanized metal racking system (that would include a metal single-axis utility-scale tracker or a fixed-tilt racking system) and would be connected to inverter-transformer stations. The modules would be made of a semiconductor material covered by a tempered glass pane or otherwise sealed for long-term outdoor durability. PV modules would be dark colored, highly absorptive, and minimally reflective. As previously mentioned, the structures supporting the PV modules consist of steel piles, driven into the substrate.

### 4.3 ENERGY STORAGE SYSTEM

The project would include a battery storage system capable of storing up to 184 MW of electricity and conducting energy to the regional electricity grid. The storage system will consist of battery banks housed in electrical enclosures and buried electrical conduit. The project will use one of a number of commercially available energy storage technologies, including but not limited to Lithium-ion (Li-ion) or flow batteries. The energy storage system will either be dispersed throughout the project site, connected to the PV array via direct current (“DC-coupled”); or concentrated in one location on the site, connected to the PV array via alternating current (“AC-coupled”).

### 4.4 ELECTRICAL COLLECTION, INVERTERS, AND TRANSFORMERS

Panels would be electrically connected into panel strings using wiring attached to the panel racking system. Panel strings would be electrically connected to one another via overhead and/or underground wiring installed from the panel strings to combiner boxes located throughout the PV arrays. Wire depths

would be in accordance with local, state, and federal codes, and would likely be buried at a minimum of 18 inches below grade by excavating a trench wide enough to accommodate the cables. To accommodate the cables, a polyvinyl chloride (PVC) conduit may be installed in the trench, or, alternatively, cable rated for direct burial would be installed. Where used, overhead cables would be installed on wood poles up to 50 feet in height.

Each 2 MW block of the project would include an inverter-transformer station. Each inverter-transformer station would be constructed on a concrete pad or steel skid measuring approximately 40 feet by 25 feet; however, the final size would depend on available technology and market conditions. Each inverter and transformer station would contain a DC combiner (which would collect DC electrical power from the PV modules), up to four inverters, a transformer, an auxiliary power transformer, and a switchboard approximately eight to 11 feet high. If required based on site meteorological conditions, an inverter shade structure would be installed at each pad. The shade structure would consist of wood or metal supports and a durable outdoor material shade structure (metal, vinyl, or similar). The shade structure would extend up to 10 feet above the top of the inverter pad.

#### 4.5 SUBSTATION AND GEN-TIE TRANSMISSION LINES

The project would include one substation. The substation would occupy an approximately 27,000-square-foot (150 feet by 180 feet) area enclosed by an approximately 8-foot-high chain link fence topped with one foot of barbed wire. The substation is anticipated to be shared with the Scarlet Solar Energy Project and would be located in the southwestern portion of parcel 028-071-47.

Structural components in the substation area would include transformers, footings, control buildings, metering stand, capacitor bank, circuit breaker and air disconnect switches, fiber optic telecommunications infrastructure, lighting mast, dead-end structure, and equipment storage containers. The substation area would be graded and compacted, and the equipment placed on concrete pads.

Because the substation transformers would contain oil as an insulating fluid, the substation would be designed to accommodate an accidental spill of transformer fluid using containment-style mounting. Each of the dead-end structures would require foundations excavated to a depth of 20 feet or more.

The gen-tie structures would include tubular steel poles and H-frame structures with foundations excavated to a depth of 20 feet or more. The overhead gen-tie line would be up to approximately 3.5 miles long and consist of up to 30 structures. The structures could be up to 150 feet tall, although most would likely be no more than 110 feet. Overhead gen-tie lines are anticipated to be shared with the Scarlet Solar Energy Project and would be located on portions of APNs 028-101-72, 028-101-74, 028-071-39, 028-111-01, 028-111-07, 028-111-10, 028-111-13, 028-111-14, 028-111-15, 028-111-16, 028-111-17, and 028-111-19.

#### 4.6 SUPPORT FACILITIES

Support facilities include the 700-square-foot O&M building, SCADA system, and the meteorological data collection system. The O&M building would be located on a concrete foundation and would include plumbing, a septic system and leach field. The O&M building is anticipated to be shared with the Scarlet Solar Energy Project and will be located in the southwestern portion of APN 028-071-47.

The SCADA system would include buried fiber optic cables, and the SCADA system cabinet will be located in the control buildings in the substation facility. Telecommunication systems associated with the SCADA system would interconnect at PG&E's Tranquillity Switching Station.

#### 4.7 FENCING

A dual purpose security and wildlife fence would be constructed around the project and would enclose all operational areas throughout the lifetime of the project through decommissioning. The fence design would reach up to 8 feet high and topped by three strands of barbed wire approximately one foot high.

#### 4.8 DRIVEWAYS

The perimeter road and main access roads would be approximately 20 to 30 feet wide and constructed to be consistent with facility maintenance requirements and Fresno County Fire Department standards. These roads would be surfaced with gravel, compacted dirt, or another commercially available surface. Internal roads would have permeable surfaces and be approximately 12 to 20 feet in width or as otherwise required by Fresno County Fire Department standards. They will be treated to create a durable, dustless surface for use during construction and operation. This will likely involve surfacing with gravel, compacted native soil, or a dust palliative.

## 5.0 DECOMMISSIONING AND RESTORATION PROCESS

Decommissioning of the project is assumed to begin approximately 35 years after operation of the project is initiated. Project decommissioning may incorporate sale and/or recycling of some components; however, this Draft Reclamation Plan assumes that all equipment and facilities within and associated with the facility will be removed. Decommissioning will be conducted in accordance with a Final Reclamation Plan that will be finalized in the months prior to initiation of decommissioning activities.

### 5.1 DECOMMISSIONING PROCEDURES AND TIMING

All decommissioning, reclamation, and restoration activities will adhere to the requirements of appropriate governing authorities and be in accordance with all applicable federal, state, and local permits. The reclamation and restoration process comprises removal of above ground structures; removal of below ground foundations and infrastructure to three feet below ground surface; and restoration of topsoil, re-vegetation, and seeding. Electrical conduit and other materials that break off more than three feet below the ground surface would be decommissioned in place. Appropriate temporary (construction-related) erosion and sedimentation control best management practices (BMPs) will be used during the reclamation phase of the project. The BMPs will be inspected on a regular basis to ensure their function.

Reclamation of the project will occur within 24 months of either: (i) the expiration of the project's Conditional Use Permit (CUP) or (ii) the abandonment of the project without the project owner making efforts to cure a disruption of electricity production, whichever occurs first.

The project will include shared energy facilities with Phase IV of the Scarlet Solar Energy Project. The shared facilities will be located on APNs 028-071-47, 028-101-72, 028-101-74, 028-071-39, 028-111-01, 028-111-07, 028-111-10, 028-111-13, 028-111-14, 028-111-15, 028-111-16, 028-111-17, and 028-111-19. It is anticipated that the Sonrisa Solar Energy Project and Scarlet Solar Energy Project will share a general substation and O&M facility and parking area located in the southwest corner of APN 028-071-47. Additionally, shared transmission lines will be located on portions of APNs 028-101-72, 028-101-74, 028-071-39, 028-111-01, 028-111-07, 028-111-10, 028-111-13, 028-111-14, 028-111-15, 028-111-16, 028-111-17, and 028-111-19. All infrastructure that would be shared across projects (proposed Sonrisa Solar Energy Project and Scarlet Solar Energy Project) would be decommissioned at the end of the last phase that utilizes that infrastructure. In other words, reclamation of the infrastructure that would be shared across projects will occur within 24 months of either: (i) the later of the expiration of the Sonrisa Solar Energy Project or the Scarlet Solar Energy Project's Conditional Use Permit (CUP) or (ii) the abandonment of both the Sonrisa Solar Energy Project and the Scarlet Solar Energy Project without the project owner making efforts to cure a disruption of electricity production, whichever occurs first.

## 5.2 SITE PREPARATION ACTIVITIES

The project site will be prepared prior to commencement of decommissioning and salvage activities (including removal of facilities, Section 5.3, and site restoration, Section 5.6). These preparatory measures will include electrical inspections as well as inspections of any water tanks on site, access routes, drainage crossings, security fences, and gates to ensure all such components are safe and functional. Following these inspections, preparatory measures may be required including, but not limited to, electrical improvements, road improvements, as-needed vegetation clearing, fencing and gate repair, and removal and disposal of materials generated from the above-listed activities. Creation of temporary work area(s) to provide sufficient area for the lay-down of the disassembled project components and loading onto trucks will be required.

## 5.3 REMOVAL OF FACILITIES

This section describes the materials and other equipment that will require removal or salvage during the decommissioning process. Prior to, during, and after removal, project equipment and components will be inspected to ensure all components are safe and functional.

The equipment will generally be removed in reverse order of the installation, as follows:

1. Solar Array and Rack Disassembly
  - a. The solar facility will be disconnected from the utility power grid.
  - b. PV modules will be disconnected, collected, and either shipped to another project, salvaged, or submitted to a collection and recycling or disposal program. During decommissioning, PV panels will be de-energized and dismantled from the torque tubes by sliding the panels off the mounting saddles once the connector clips are removed. Next, the PV solar panels and rack supports will be removed in their entirety from the site. The panels will be carefully removed by hand and the rack supports will be removed by excavators with attachments, or other similar equipment. The panels will be placed on pallets and transported off-site.

- c. Aboveground and underground electrical interconnection and distribution cables that are no longer deemed necessary by the local public utility company will be removed to approximately three feet below ground surface and disposed of or recycled off-site by an approved recycling facility.
  - d. PV module racking systems will be removed and may be recycled off-site by a metals recycler. The racking structure supporting the PV panels will be unbolted and disassembled using standard hand tools. The vertical steel piles, poles, and posts supporting the racks and all steel support piles will be completely removed and transported off-site for salvage or reuse. Other equipment and/or material will be removed from the site for resale, scrap value, recycled, or disposal depending on market conditions.
2. Pier and Foundation Removal

The larger slab-on-grade concrete foundations and support pads will be broken up by mechanical equipment (such as a backhoe-hydraulic hammer/shovel, or jackhammer), loaded onto trucks, and removed from the site. Concrete pads will be recycled or reused as clean fill at another location.

3. Electrical Demolition

- a. Electrical demolition includes the electrical equipment and infrastructure. DC combiner boxes, power aggregation wiring, Power Conversion Stations (DD recombiner/inverter/transformer modular units), sensors, weather stations, the gen-tie line connecting to the substation. Power Conversion Stations will be removed by cutting and removing the conduit and using a crane to place the unit in a salvage truck. All additional above ground cables would be cut and removed, including above ground conductors and grounding cable, and overhead lines. Decommissioning will require dismantling and removal of all aboveground electrical equipment and conduit to a depth of three feet below grade. Removal of substation equipment includes transformers, switches, structures, overhead lines, equipment pads, and grounding grid. Underground equipment to be removed consists of underground cables, conduit, and electrical lines. Equipment will be de-energized prior to removal; salvaged (where possible); placed in appropriate shipping containers; and secured in a truck transport trailer for transport off-site. All conductors are assumed to be removed and aggregated for recycling. All subterranean conduit, Power Conversion Stations, and other electrical equipment will be removed for off-site recycling or disposal. All decommissioning, recycling, and disposal of electrical devices, equipment and wiring/cabling will be conducted in accordance with applicable local, state, and federal standards and guidelines.
- b. The gen-tie to the PG&E Tranquillity Switching Station will be removed. Overhead electrical lines and poles will be removed and recycled, reused, or disposed of in accordance with regulatory requirements at the time of decommissioning, and holes from pole removal will be filled with clean fill.

4. Civil Site Reclamation

- a. The septic system and leach field will be removed.



- b. Fencing will be removed and will be recycled off-site by an approved recycler.
- c. Interior driveways and pre-fabricated bridges can either remain on-site for future use or be removed. Gravel will be repurposed either on- or off-site.

## 5.4 DEBRIS MANAGEMENT, DISPOSAL, AND RECYCLING

During the demolition process, removed materials and demolition debris will be placed in designated locations within the project site. The stockpiles will then be transported to an off-site recycling center, used equipment market for resale, or an approved landfill depending on the material being disposed of. Equipment will be salvaged or recycled wherever possible.

## 5.5 HAZARDOUS WASTE

Relatively small quantities of hazardous materials would be used during decommissioning. Disposal and transportation of hazardous waste will be conducted in compliance with appropriate state and federal laws, ordinances, regulations, and standards.

## 5.6 SITE RESTORATION

Soils will be restored to pre-project topographic conditions to prepare the site for the continuation of agricultural land uses. Areas planned for crop production within 12 months following decommissioning will be left unplanted.

All driveways and other areas compacted during original construction or by equipment used in the decommissioning will be tilled in a manner adequate to restore the sub-grade material to the proper density and depth consistent with adjacent properties. Holes and low areas resulting from the removal of project features such as piles, poles, and foundations will be filled with clean, compatible sub-grade material resulting from on-site decommissioning activities. After proper sub-grade depth is established, locally-sourced topsoil would be placed to a depth and density consistent with adjacent properties.

As previously mentioned, areas that will be revegetated may be limited to areas disturbed during decommissioning activities and that won't be used for crop production within 12 months following decommissioning. Areas planned for revegetation restoration will be prepared as follows: 1) Mow area; 2) Disk area; and 3) Hydraulic seeding project site using a rangeland seed mix of grasses and forage crops.

# 6.0 DECOMMISSIONING COSTS AND FINANCIAL ASSURANCES

## 6.1 ESTIMATED COST AND SALVAGE VALUES

The estimated budget will present a probable cost, in present value, for the decommissioning based on the assumption that the solar modules, module support structures, racking, electrical system, interconnection facilities, and other project components may be disassembled and recycled and disposed of following completion of the solar electric power system. Per the Solar Facility Guidelines for a Final Reclamation Plan, the engineer cost estimate to implement the Reclamation Plan will be

provided following project approval and will be included in this Plan as Appendix B. The cost estimates are applicable for a five-year period from the date of submission.

## 6.2 FINANCIAL GUARANTEES FOR DECOMMISSIONING

Prior to the issuance of the grading permit, the project owner will provide financial assurance in an amount sufficient to reclaim the site to its previous conditions in accordance with the approved Reclamation Plan. Financial assurances will be made to the County of Fresno and may take the form of cash, letter of credit, or bond that complies with Section 66499 of the California Government Code, et seq. and maintained through an escrow arrangement or other form of security acceptable at the discretion of the Board of Supervisors.

The financial assurance under the agreement shall (1) initially cover the project owner's cost of performing its obligations under the reclamation agreement, as stated above, based on the final County-approved design of the project, which cost estimate shall be provided by the project owner to the County and be subject to approval by the County, and (2) be automatically increased annually, due to increases in costs, using the Engineering News-Record construction cost index. This estimate will consider any project components that are expected to be left in place at the request of and for the benefit of the subsequent landowner (e.g., access roads, electrical lines, O&M building).

## 7.0 REFERENCES

Fresno, County of (Fresno County). 2020. Guidelines for Preparing a Solar Electrical Generation Facility Reclamation Plan. Accessed June 2020. Available at:

<https://www.co.fresno.ca.us/departments/public-works-planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use/photovoltaic-facilities-p-3106>.

2017. Solar Facility Guidelines. Revised by the Board of Supervisors on December 12. Available at: <https://www.co.fresno.ca.us/departments/public-works-planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use/photovoltaic-facilities-p-1621>.

Natural Resource Conservation Service, United States Department of Agriculture (NRCS). 2023. Custom Soil Resource Report for Sonrisa Solar Energy Project. Accessed on July 26, 2023 at

<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

United States Department of Agriculture (USDA). 2006. Soil Survey for Fresno County, California. May. Available at:

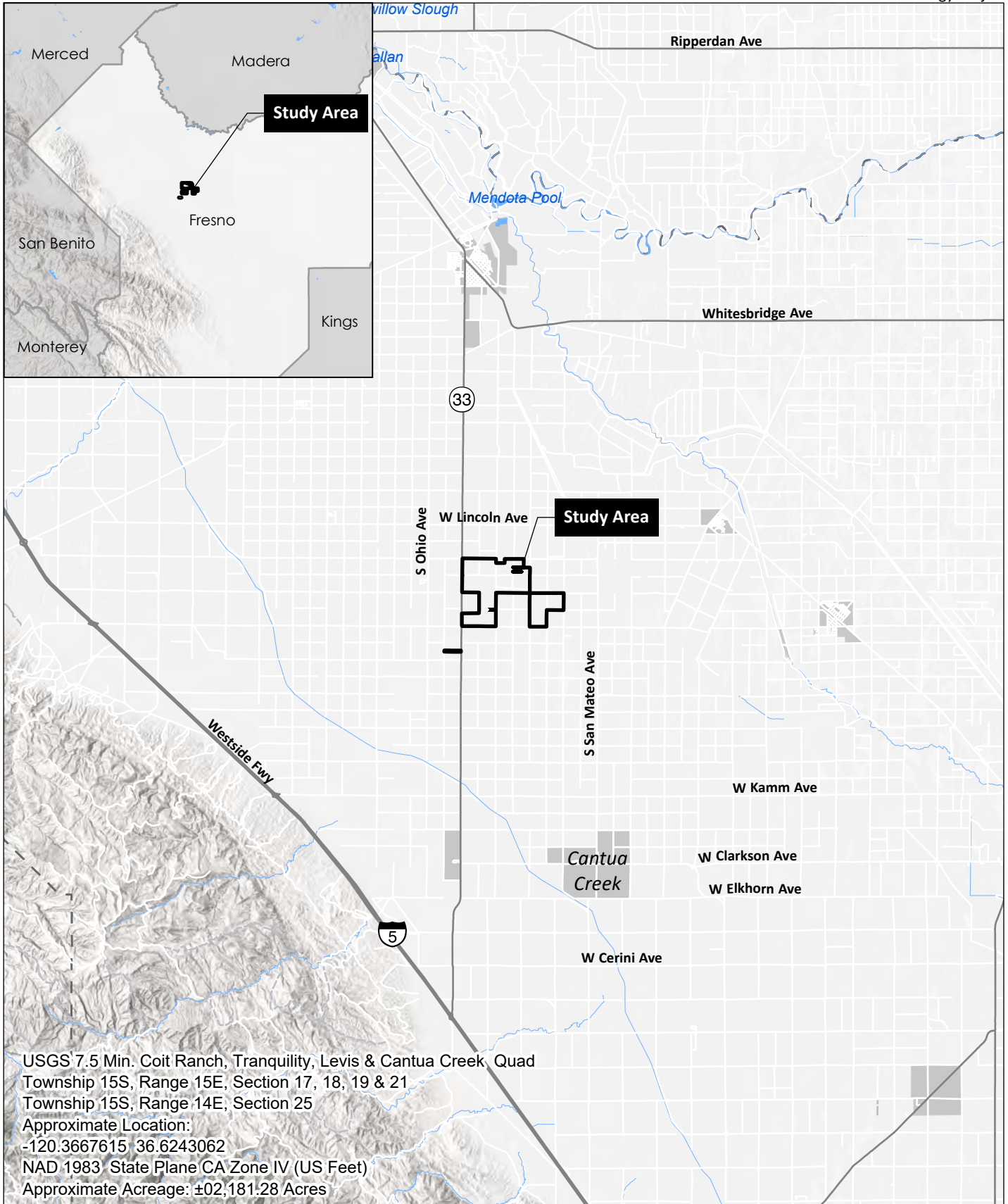
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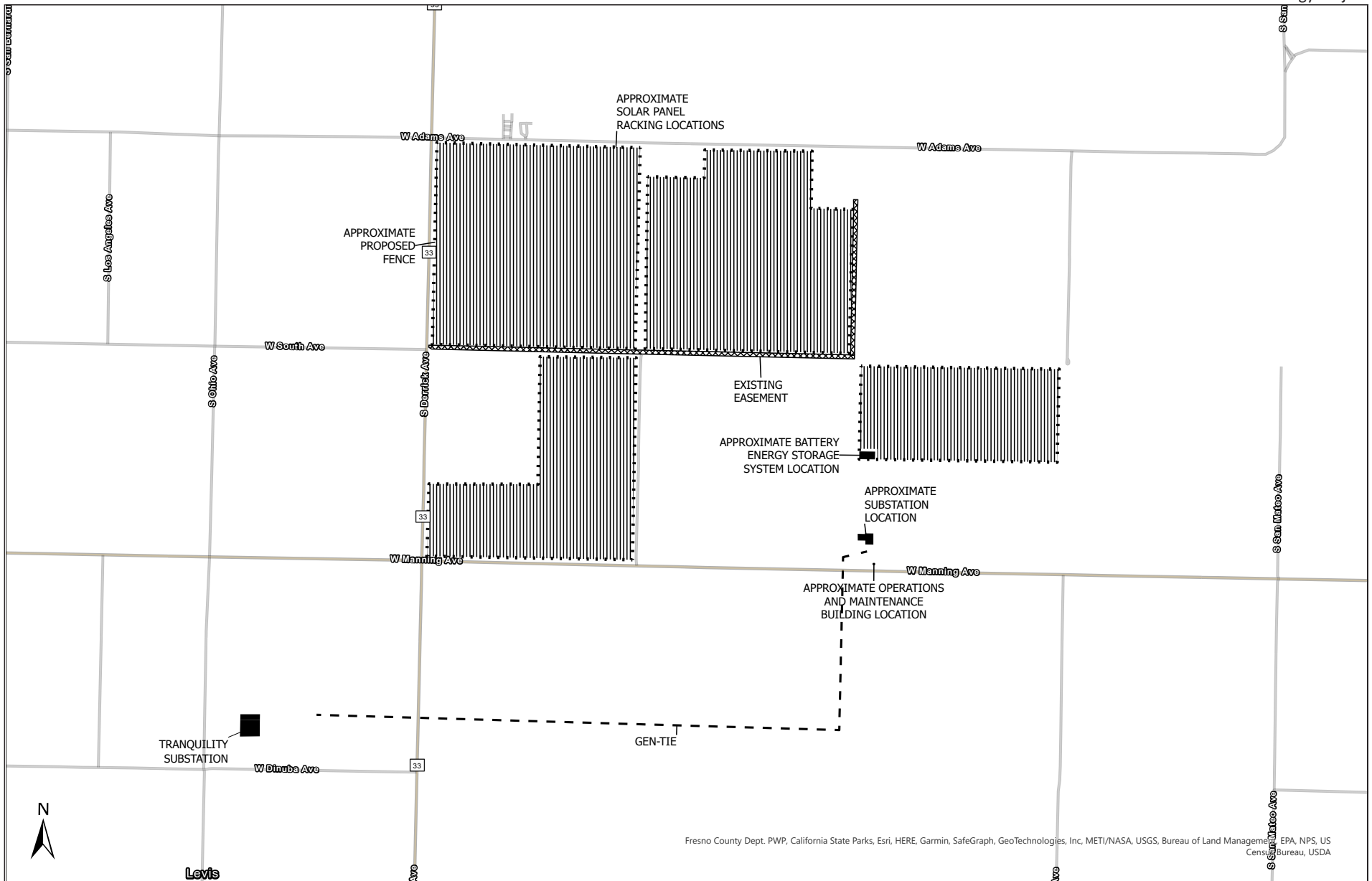
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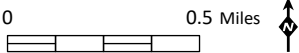
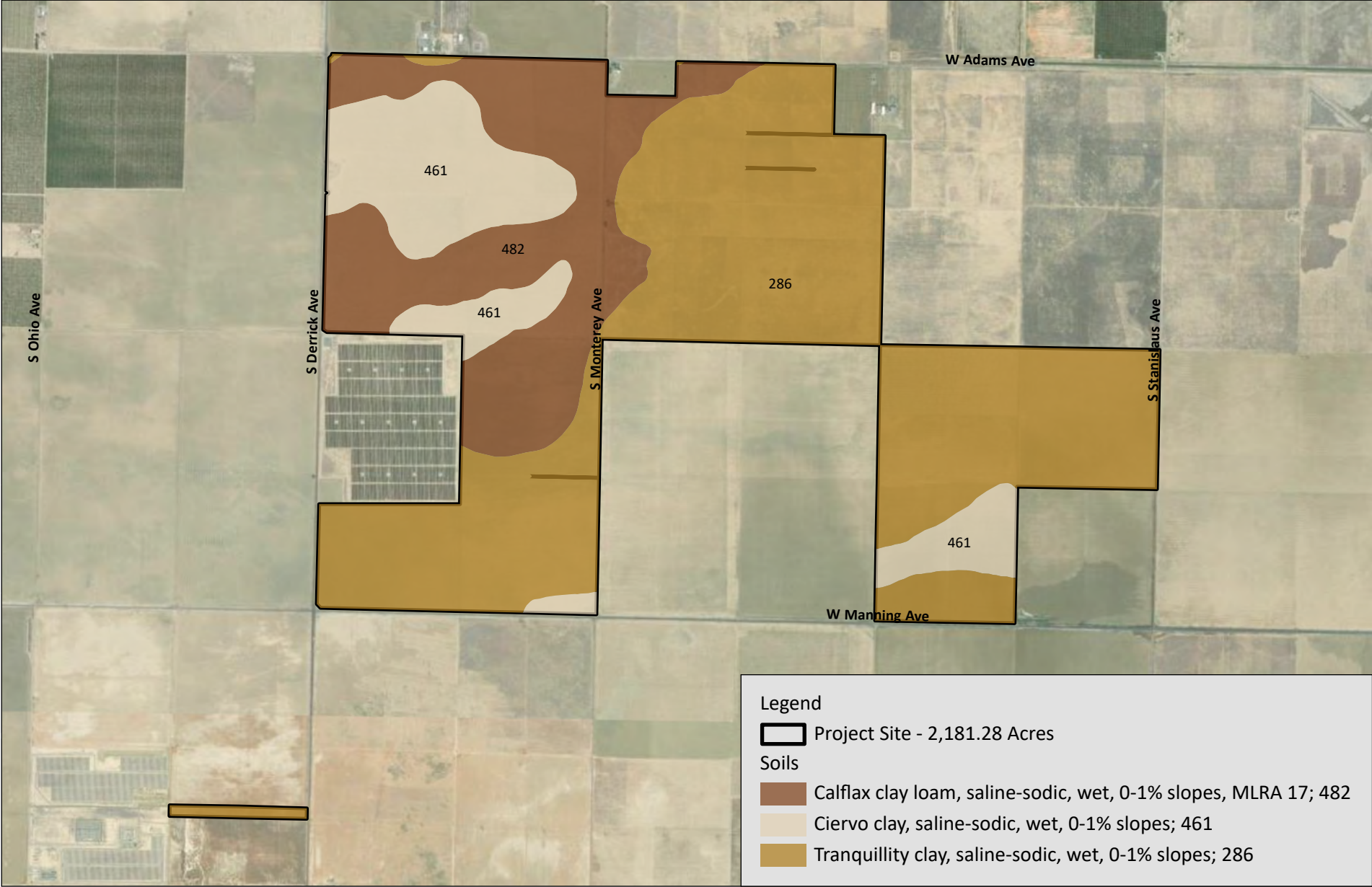
# Appendix A

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Figures







Source: NRCS, 2022; Aerial Imagery (Maxar, 7/20/2022)



Sonrisa Solar Park CUP Application  
EDPR CA Solar Park VI LLC

**SECTION 10A. PEST MANAGEMENT PLAN:  
NOXIOUS WEED CONTROL**

**INTEGRATED MANAGEMENT PLAN  
NOXIOUS WEED CONTROL  
SONRISA SOLAR PARK PROJECT**

*Prepared for*

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**JULY 2019**



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# 1 Introduction

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EDPR CA Solar Park VI, LLC is proposing to develop up to a 200 megawatt (MW) solar photovoltaic (PV) generating facility located on approximately 2,250 acres in Fresno County, California, approximately 8 miles south of the community of Mendota, situated on privately owned land previously utilized for agriculture. A roughly 2.5 mile generation tie-line, connecting the Project to Pacific Gas and Electric's Tranquility Substation, is also proposed.

## 1.1 Plan Purpose

The primary goals of the Integrated Management Noxious Weed Control Plan (Plan) are to protect the biological resources surrounding the Project area from the harmful effects of noxious weeds that result from project activities, to prevent noxious weeds from invading into immediately adjacent agricultural lands, and to avoid unintended harm from noxious weed management techniques. The term "noxious weed" has many different definitions and is explained in Section 2.1.

This Plan has been prepared with the recognition that special status wildlife species have the potential to occur in the project vicinity that must be protected from harm associated with Plan implementation. Consequently, the Plan specifies proposed management activities in accordance with guidelines and restrictions from the U.S. Fish and Wildlife Service (USFWS) Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance, as well as from the U.S. Environmental Protection Agency (Federal Insecticide, Fungicide and Rodenticide Act), and California Department of Food and Agriculture.

The Plan's noxious weed management objectives are consistent with the existing and proposed future site conditions, biology of the identified weed species, and environmental context of the project. Noxious weed management objectives for the Project area include the following:

- **Identification and Risk Assessment:** This objective identifies presence, location, and abundance of noxious weed species in the Project area, both existing conditions and conditions over time.
- **Suppression:** This objective will ensure that populations of existing noxious weed species do not increase due to the Project and, if possible, will be suppressed below current levels.
- **Containment:** This objective will strive to prevent the spread of existing noxious weeds to new areas and prevent the introduction of noxious weed species not currently present in the Project area.

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# 2 Noxious Weed Inventory and Baseline Conditions

## 2.1 Noxious Weed Definitions

The term “noxious weed” has many different definitions. In the broadest sense, it is any plant growing where it is not wanted. Weeds can be native or non-native, invasive or non-invasive, and noxious or not noxious. A noxious weed is any plant designated by a federal, state or county government as injurious to public health, agriculture, recreation, wildlife, or property (Sheley et al. 1999). A noxious weed is “competitive, persistent, and pernicious” (James et al. 1991). Invasive weeds are any non-native plant species that are injurious to the public health, agriculture, recreation, wildlife habitat, or the biodiversity of native habitats.

Many invasive plant species share the trait of being adapted to disturbance and also out-compete some native species in these environments. The California Invasive Plant Council (Cal-IPC) categorizes invasive plants as high, moderate, or limited according to the severity of their ecological impact (Cal-IPC 2019):

**High** – Invasive plants classified as high consist of species that have severe ecological impacts on physical processes, plant and animal communities and vegetation structure, and have a moderate to high rate of dispersal and establishment.

**Moderate** – Invasive plants classified as moderate consist of species that have substantial and apparent (but not severe) ecological impacts and have a moderate to high rate of dispersal and establishment, although establishment is generally dependent upon a disturbance regime such as soil disruption or fire.

**Limited** – Invasive plants classified as limited consist of species that are invasive, but their ecological impacts are minor on a statewide level. Dispersal and establishment of species classified as limited are generally low to moderate.

These classifications are based on cumulative statewide trends and can vary at local scales. As a result, a species classified as limited may be more invasive on a local scale than a species classified as high, depending on local conditions (Cal-IPC 2019). For this reason, all plants Cal-IPC has classified as invasive, even those classified as limited, can potentially impact a local ecosystem. Table 1 contains a list of plant species Cal-IPC has classified for the Great Valley region where the Project is situated.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Acacia dealbata</i>	silver wattle	Moderate	B	B	B	Found in riparian areas, mixed conifer forest, woodlands, and coast grasslands.
<i>Acacia melanoxylon</i>	blackwood acacia	Limited	C	C	B	Occasionally spreads into scrub, riparian zones, closed pine forest, mixed evergreen forest, and crismontane woodlands in northern California.



**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Acroptilon repens</i>	Russian knapweed	Moderate	B	B	B	Scrub, grasslands, riparian, pinyon-juniper woodland, forest. Severe impacts in other western states. Spreading in many areas of California.
<i>Aegilops cylindrical</i>	jointed goatgrass	Watch	-	-	-	Favors grasslands and spreads via agricultural and human activities, wind and water. Joints and seeds will attach to clothing, fur and feathers.
<i>Aegilops triuncialis</i>	barb goat grass	High	A	A	B	Grassland, oak woodland; spreading in NW and in Central Valley.
<i>Agrostis avenacea</i>	Pacific bent grass	Limited	C	C	C	Vernal pools, coastal prairie, meadows, grasslands. Impacts are low in most areas.
<i>Agrostis stolonifera</i>	creeping bent grass	Limited	C	B	C	Wetlands, riparian; grown for domestic forage. Limited distribution and impacts unknown.
<i>Ailanthus altissima</i>	tree-of-heaven	Moderate	B	B	B	Riparian areas, grasslands, oak woodland. Impacts highest in riparian areas.
<i>Alhagi maurorum</i>	camelthorn	Moderate	B	B	B	Saline meadows, playas, sandbars, riverbanks, irrigation canals.
<i>Alopecurus pratensis</i>	meadow foxtail	Watch	-	-	-	Found to spread in large montane meadow complexes and wet areas, to the detriment of native plants.
<i>Alternanthera philoxeroides</i>	alligator weed	High	A	B	C	Freshwater aquatic systems, including marshes
<i>Ambrosia trifida</i>	giant ragweed	Watch	-	-	-	Favors grasslands, spreads via seeds and easily resprouts after being cut.
<i>Anthoxanthum odoratum</i>	sweet vernal grass	Limited	C	B	B	Perennial grass that grows in hay fields, roadsides and along ditches, common in coastal grasslands in northern California.
<i>Araujia sericifera</i>	bladderflower	Watch	-	-	-	Woodlands, grasslands, scrub and chaparral habitat.
<i>Arctotheca calendula</i>	fertile capeweed	Moderate	B	B	C	Distribution generally in agricultural situations, particularly swards, pastures, and vineyards.
<i>Arctotheca prostrata</i>	capeweed	Moderate	B	B	B	Coastal prairie, especially adjacent to roads, trails, or historical homesteads or farms.
<i>Arundo donax</i>	giant reed	High	A	B	A	Primarily found in scrub and woodland riparian areas and freshwater aquatic systems. Can be found in meadows, seeps, marshes and swamps.
<i>Asparagus asparagoides</i>	bridal creeper	Moderate	B	B	D	Invades disturbed areas and fields; invades riparian areas in southern California.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Asphodelus fistulosus</i>	onion weed	Moderate	B	A	C	Fields, pastures, roadsides, coastal dunes, orchard and agronomic crops and other disturbed places, especially those with sparse vegetation.
<i>Atriplex semibaccata</i>	Australian saltbush	Moderate	B	B	B	Coastal grasslands, scrub, upper salt marsh. Limited distribution, but can be very invasive regionally.
<i>Avena fatua</i>	wild oats	Moderate	B	B	A	Ubiquitous, well-established throughout California.
<i>Bassia hyssopifolia</i>	Five hook bassia	Limited	C	C	B	Alkaline habitats. Weed of agriculture or disturbed sites. Impacts minor in wildlands.
<i>Bellardia trixago</i>	bellardia	Limited	C	C	C	Disturbed grasslands, including serpentine grasslands, fields and roadsides.
<i>Berteroa incana</i>	hoary alyssum	Watch	-	-	-	Adapts to less fertile soils, can become quite dense and requires herbicide control measures.
<i>Brachypodium distachyon</i>	annual false-brome	Moderate	B	B	B	Valley and foothill grassland, cimontane woodland
<i>Brachypodium sylvaticum</i>	slender false-brome	Moderate	B	B	D	Small distribution so far; favored habitat is high shade of redwoods where there are sun breaks.
<i>Brassica nigra</i>	Black mustard	Moderate	B	B	A	Widespread. Primarily a weed of disturbed sites, but can be locally a more significant problem in wildlands.
<i>Brassica rapa</i>	field mustard	Limited	C	B	B	Coastal scrub, grasslands meadows, riparian. Primarily in disturbed areas, Impacts appear to be minor or unknown in wildlands.
<i>Brassica tournefortii</i>	Sahara mustard	High	A	A	B	Desert dunes, coastal bluff scrub, coastal scrub, Sonoran desert scrub, Mojavean desert scrub, chenopod scrub, upper Sonoran scrub.
<i>Briza maxima</i>	big quakinggrass	Limited	B	C	B	Roadsides, fields, grassland, pastures, ditches, open woodland, coastal terraces and bluffs.
<i>Bromus diandrus</i>	ripgut brome	Moderate	B	B	A	Dunes, scrub, grassland, woodland, forest. Very widespread, but monotypic stands uncommon.
<i>Bromus hordeaceus</i>	soft brome	Limited	B	C	A	Grasslands, sagebrush, serpentine soils, many other habitats. Very widespread, but primarily in converted annual grasslands.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Bromus japonicus</i>	Japanese brome	Limited	B	C	B	Great Basin grassland, valley and foothill grassland, pinyon and juniper woodland, lower montane coniferous forest
<i>Bromus madritensis</i> ssp. <i>rubens</i>	red brome	High	A	B	A	Scrub, grassland, desert washes, woodlands
<i>Bromus tectorum</i>	cheatgrass	High	A	B	A	Widespread throughout California. Found in disturbed shrub-steppe areas, overgrazed rangeland, abandoned fields, eroded areas, sand dunes, road verges and waste places.
<i>Carduus nutans</i>	musk thistle	Moderate	B	B	B	Invades range, pasture, ditch banks, forested areas in new plantations (outshaded when trees grow), and sage scrub.
<i>Carduus pycnocephalus</i>	Italian thistle	Moderate	B	B	A	Forest, scrub, grasslands, woodland. Very widespread. Impacts may be variable regionally.
<i>Carduus tenuiflorus</i>	slenderflower thistle	Limited	C	C	B	Colonizes disturbed sites and annual grasslands, can grow in mixed stands with Italian thistle.
<i>Carex pendula</i>	hanging sedge	Watch	-	-	-	Displaces plants along streams. Can form dense infestations.
<i>Carthamus lanatus</i>	woolly distaff thistle	High	A	B	C	Abundant in dry grasslands of coastal areas, middle elevation of Sierra Nevada, in areas disturbed by gold mining.
<i>Casuarina equisetifolia</i>	beach sheoak	watch	-	-	-	Located in Alameda, Butte, Inyo, Los Angeles, and San Bernardino, and San Diego counties. Invades riverine and coastal areas.
<i>Cenchrus longispinus</i>	mat sandbur	watch	-	-	-	Cultivated fields, pastures, fallows, orchards, vineyards, vegetables and lawns.
<i>Centaurea calcitrapa</i>	purple star thistle	Moderate	B	B	B	Grasslands. Impacts regionally variable. Distribution relatively limited.
<i>Centaurea diffusa</i>	diffuse knapweed	Moderate	B	B	B	Oak woodlands, blue oak-foothill pine, pasture, mixed evergreen forest, Great Basin scrub, coastal prairie, north coast coniferous forest, riparian forest and woodland, valley and foothill grassland.
<i>Centaurea melitensis</i>	totalote	Moderate	B	B	B	Most common in grasslands.
<i>Centaurea solstitialis</i>	yellow star thistle	High	A	B	A	Grasslands, woodlands, occasionally riparian

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Centaurea stoebe</i> ssp. <i>micranthos</i>	spotted knapweed	High	A	A	B	Great Basin grasslands, foothill prairie, riparian habitats, along gravel bars.
<i>Cestrum parqui</i>	willow jessamine	Watch	-	-	-	Considered a major problem because of its toxicity to livestock (especially cattle and poultry).
<i>Chondrilla juncea</i>	skeleton weed	Moderate	B	B	B	Grasslands. Very invasive in other western states, but currently limited in distribution in California.
<i>Cirsium arvense</i>	Canada thistle	Moderate	B	B	B	Grasslands, riparian areas, forests. Severe impacts in other western states. Limited distribution in California.
<i>Cirsium vulgare</i>	Bull thistle	Moderate	B	B	B	Riparian areas, marshes, meadows. Widespread, can be very problematic regionally.
<i>Colocasia esculenta</i>	taro root	Moderate	B	A	D	Occurs along river and slough edges in the Sacramento and San Joaquin delta. Occurs in light riparian areas.
<i>Conium maculatum</i>	poison-hemlock	Moderate	B	B	B	Riparian woodland, grassland. Widespread in disturbed areas. Abiotic impacts unknown; impacts can vary locally.
<i>Cortaderia jubata</i>	jubatagrass	High	A	A	A	Restricted to coastal areas, co-occurs with pampasgrass in large urban areas.
<i>Cortaderia selloana</i>	pampasgrass	High	A	A	B	Distribution is primarily coastal, south of Santa Barbara. Not found on serpentine soils.
<i>Cotoneaster franchetii</i>	orange cotoneaster	Moderate	B	A	B	Scrubland, grassland, and forested areas.
<i>Cotoneaster lacteus</i>	milkflower cotoneaster	Moderate	B	B	B	Can dominate a scrub or grassland area on sandy or clay soils and extirpate native species.
<i>Cotula coronopifolia</i>	common brassbuttons	Limited	C	C	B	Vernal pools, meadow and seep, marsh and swamp.
<i>Crataegus monogyna</i>	English hawthorn	Limited	C	B	C	Riparian areas, woodland, grassland (where moist).
<i>Cynara cardunculus</i>	artichoke thistle	Moderate	B	B	B	Coastal scrub, chaparral, coastal prairie, riparian woodland.
<i>Cynodon dactylon</i>	Bermuda grass	Moderate	B	B	B	Riparian scrub in southern California. Common landscape weed, but can be very invasive in desert washes.
<i>Cynosurus echinatus</i>	hedgehog dogtail	Moderate	B	B	A	Oak woodland, grassland. Widespread, impacts vary regionally, but typically not in monotypic stands.
<i>Cytisus scoparius</i>	Scotch broom	High	A	B	A	Coastal scrub, oak woodland, horticultural varieties may also be invasive.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Dactylis glomerata</i>	Orchard grass	Limited	C	B	B	Grasslands, broadleaved forest, woodlands; common forage species. Impacts appear to be minor.
<i>Delairea odorata</i>	Cape-ivy	High	A	A	B	Dense canopy blocks sunlight from reaching plants underneath. Ranges along the entire California coast and some mesic areas of the Central Valley.
<i>Descurainia sophia</i>	tansy mustard	Limited	C	B	B	Scrub, grassland, woodland. Impacts appear to be minor, but locally more invasive in NE California.
<i>Digitalis purpurea</i>	foxglove	Limited	C	B	B	Common in cool, coastal forests, woodlands, scrub of Pacific NW.
<i>Dipsacus fullonum</i>	common teasel	Moderate	B	B	B	Fallow fields, pastures, roadside, ditches, riparian sites and other disturbed sites.
<i>Dittrichia graveolens</i>	stinkwort	Moderate	B	A	C	Grasslands, riparian scrub. Spreading rapidly, impacts may become more important in future.
<i>Egeria densa</i>	Brazilian egeria	High	A	A	B	Streams, ponds, sloughs, lakes, Sacramento-San Joaquin Delta.
<i>Ehrharta calycina</i>	purple veldtgrass	High	A	A	B	Coastal dunes, coastal bluffs, coastal scrub, chaparral, coastal prairie and cismontane woodland.
<i>Erharta erecta</i>	panic veldtgrass	Moderate	B	B	B	Invades wide variety of habitats throughout the central coast and Southern California. Reduces available native forage.
<i>Eichhornia crassipes</i>	Water hyacinth	High	A	A	C	Aquatic systems in Sacramento-San Joaquin Delta
<i>Elaeagnus angustifolia</i>	Russian olive	Moderate	B	A	B	Interior riparian. Impacts more severe in other western states. Current distribution limited in California.
<i>Elymus caput-medusae</i>	medusahead	High	A	A	A	Occupies more than a million acres of annual-dominated grassland, oak woodland, and chaparral communities in California.
<i>Erodium cicutarium</i>	redstem filaree	Limited	C	C	A	Many habitats. Widespread. Impacts minor in wildlands. High-density populations transient.
<i>Eucalyptus camaldulensis</i>	red gum	Limited	C	C	C	Mainly southern California urban areas. Impacts, invasiveness and distribution all minor.
<i>Eucalyptus globulus</i>	blue gum	Limited	B	B	B	Riparian areas, coastal grasslands, scrub. Impacts can be much higher in coastal areas.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Euphorbia oblongata</i>	eggleaf spurge	Limited	C	C	B	Meadows, woodlands. Limited distribution. Impacts unknown. Locally in dense stands.
<i>Festuca arundinacea</i>	reed fescue	Moderate	B	B	A	Coastal scrub, grasslands; common forage grass. Widespread, abiotic impacts unknown.
<i>Festuca myuros</i>	red-tail fescue	Moderate	B	B	A	Contains chemicals that inhibit other plants. Present in disturbed and undisturbed open areas, rangeland, grassland, slopes, washes, chaparral and open woodland.
<i>Festuca perennis</i>	Italian ryegrass	Moderate	B	B	A	Very widespread, mostly in grassland communities, some shaded and moist sites.
<i>Ficus carica</i>	Edible fig	Moderate	B	A	B	Riparian woodland. Can spread rapidly. Abiotic impacts unknown. Can be locally very problematic.
<i>Foeniculum vulgare</i>	Fennel	Moderate	A	B	A	Grasslands, scrub.
<i>genista monosperma</i>	bridal veil broom	Moderate	B	B	C	Disturbed coastal scrub and grasslands; primarily in San Diego County.
<i>Genista monspessulana</i>	French broom	High	A	A	B	Colonizes open disturbed sites, roadsides, pastures, and riparian areas, can invade grasslands, coastal scrub, oak woodlands.
<i>Geranium dissectum</i>	cutleaf geranium	Limited	C	B	A	Numerous habitats but impacts appear minor.
<i>Glyceria declinata</i>	mannagrass	Moderate	B	B	B	Vernal pools, moist grasslands. Often confused with native <i>Glyceria</i> . Impacts largely unknown, but may be significant in vernal pools.
<i>Hedera helix</i>	English ivy	High	A	A	A	Coastal forests, riparian areas. Species combined due to genetics questions.
<i>Helichrysum petiolare</i>	licorice plant	Limited	C	B	C	Heavy infestation in localized areas, but not widespread yet. Coastal shrub areas most commonly invaded.
<i>Helminthotheca echioides</i>	bristly ox-tongue	Limited	C	B	B	Very common along coast prairie areas in central California.
<i>Hirschfeldia incana</i>	short pod mustard	Moderate	B	B	A	Scrub, grasslands, riparian areas. Impacts not well understood, but appear to be greater in southern California.
<i>Holcus lanatus</i>	common velvet grass	Moderate	B	B	A	Coastal grasslands, wetlands. Impacts can be more severe locally, especially in wetland areas.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Hordeum marinum</i> , <i>H. murinum</i>	Mediterranean barley, hare barley	Moderate	B	B	A	Grasslands; <i>H. marinum</i> invades drier habitats, while <i>H. murinum</i> invades wetlands. Widespread, but generally do not form dominant stands.
<i>Hydrilla verticillata</i>	hydrilla	High	A	B	C	Freshwater aquatic systems. The most important submerged aquatic invasive in southern states.
<i>Hypericum perforatum</i>	St. John's wort	Limited	B	B	B	Many northern California habitats. Abiotic impacts low. Biological control agents have reduced overall impact.
<i>Hypochaeris glabra</i>	Smooth cat's-ear	Limited	C	B	B	Scrub and woodlands. Widespread. Impacts appear to be minor. Some local variability.
<i>Hypochaeris radicata</i>	Rough cat's-ear	Moderate	C	B	A	Coastal dunes, scrub, and prairie; woodland, forest. Widespread. Impacts unknown or appear to be minor.
<i>Ilex aquifolium</i>	English holly	Limited	C	B	C	Not widely distributed as an invasive. Mainly in NW part of California and Bay Area. More common as cultivated plant.
<i>Ipomoea indica</i>	blue morningglory	Watch	-	-	-	Humid and subhumid forests, coastal habitats, riverine vegetation, disturbed sites, anthropogenic habitats.
<i>Iris pseudacorus</i>	Yellow flag iris	Limited	C	B	C	Riparian, wetland areas, esp. southern California. Limited distribution. Abiotic impacts unknown.
<i>Kochia scoparia</i>	kochia	Limited	B	C	B	Scrub, chaparral, grasslands
<i>Lepidium chalepense</i>	lens-podded hoary cress	Moderate	B	B	C	More frequent in Sacramento Valley, San Joaquin Valley and N. Siskiyou County, but not common. Disturbed, moderately moist sites.
<i>Lepidium draba</i>	heart-podded hoary cress	Moderate	B	B	B	Unshaded, disturbed, grasslands, scrubs, generally alkali soils.
<i>Lepidium latifolium</i>	Perennial pepper weed	High	A	A	A	Coastal and inland marshes, riparian areas, wetlands, grasslands; potential to invade montane wetlands.
<i>Leptospermum laevigatum</i>	Australian tea tree	Watch	-	-	-	Naturalized in 11 counties, primarily along California coast.
<i>Leucanthemum vulgare</i>	ox-eye daisy	Moderate	B	B	B	Invasive in pastures, disturbed mountain meadows and fields. Most common in N. California and coastal areas.
<i>Ligustrum lucidum</i>	glossy privet	Limited	C	B	B	Most documented locations adjacent to urban areas. Also occurs in broadleaf forest, north coast coniferous forest, and riparian and shaded forests.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Limonium duriusculum</i>	European sea lavender	Moderate	B	B	B	Primarily in human and naturally disturbed upper salt marsh. Also present in riparian areas and adjacent upland grasslands.
<i>Linaria genistifolia</i> ssp. <i>dalmatica</i>	Dalmatian toadflax	Moderate	B	B	B	Grasslands, forest clearings. Limited distribution. More severe impacts in other western states.
<i>Linaria vulgaris</i>	Yellow toadflax	Moderate	B	B	B	valley and foothill grassland, Great Basin grassland, riparian woodland, lower montane coniferous forest, upper montane coniferous forest
<i>Lobularia maritima</i>	sweet alyssum	Limited	C	B	B	Coastal bluffs and dunes, coastal scrub, coastal terrace prairie, coastal salt marshes, riparian corridors, dry interior S. California washes, disturbed urban and waste sites.
<i>Ludwigia peploides</i>	floating water primrose	High	A	B	B	Freshwater aquatic systems. Clarification needed on taxonomic identification.
<i>Lythrum hyssopifolium</i>	hyssop loosestrife	Moderate	C	B	B	Grasslands, wetlands, vernal pools. Widespread. Impacts unknown, but appear to be minor.
<i>Lythrum salicaria</i>	purple loosestrife	High	A	A	B	Wetlands, marshes, riparian areas
<i>Marrubium vulgare</i>	horehound	Limited	C	C	B	Grasslands scrub, riparian areas. Widespread. Rarely in dense stands. Impacts relatively minor.
<i>Maytenus boaria</i>	mayten	Watch	-	-	-	Tree can grow up to 50 feet tall. Spreading into native grasslands, difficult to eradicate.
<i>Medicago polymorpha</i>	California burclover	Limited	C	C	A	Grasslands. Widespread weed of agriculture and disturbed areas. Impacts in wildlands minor.
<i>Mentha pulegium</i>	Pennyroyal	Moderate	C	A	A	Vernal pools, wetlands. Poisonous to livestock. Spreading rapidly. Impacts largely unknown.
<i>Mesembryanthemum nodiflorum</i>	slenderleaf iceplant	Limited	B	C	B	Coastal bluffs, salty flats, saline wetland margins, occurs in coastal, inland and desert habitats from San Diego to the Bay Area.
<i>Myoporum laetum</i>	ngaio tree	Moderate	B	B	B	Central and S. California coast, especially moist to wet habitats including coastal scrub, riparian woodlands and scrub, salt, brackish, and freshwater marshes.



**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Myosotis latifolia</i>	common forget-me-not	Limited	C	B	B	Coniferous forest, riparian. Little information on impacts.
<i>Myriophyllum aquaticum</i>	parrotfeather	High	A	B	C	Mainly in irrigation canals and some ponds. Not as common as Eurasian watermilfoil.
<i>Myriophyllum spicatum</i>	spike watermilfoil	High	A	A	B	Freshwater aquatic systems
<i>Nicotiana glauca</i>	tree tobacco	Moderate	B	B	B	Coastal scrub, grasslands, riparian woodland. Abiotic impacts unknown. Impacts vary locally. Rarely in dense stands.
<i>Olea europaea</i>	Olive	Limited	C	B	B	A problem in Australia. Currently a rare escape in California but is of concern due to the possibility of spread from planted groves.
<i>Oncosiphon piluliferum</i>	globe chamomile	Watch	-	-	-	Coastal scrub, chaparral, and disturbed sites.
<i>Onopordum acanthium</i>	Scotch thistle	High	B	B	B	Wet meadows, sage brush, riparian areas
<i>Orobanche aegyptiaca</i>	Egyptian broomrape	Watch	-	-	-	Crop parasite, occurs in one location in California. Native to Middle East.
<i>Oxalis pes-caprae</i>	Bermuda buttercup	Moderate	B	B	B	Significant agricultural problem; most common in coastal dunes from Monterey County northward.
<i>Paraserianthes lophantha</i>	plume acacia	Watch	-	-	-	Forms stands that shade out native species and impede overstory regeneration.
<i>Parentucellia viscosa</i>	yellow glandweed	Limited	C	B	B	Limited distribution. Found in coastal dune wetlands, moist grasslands, roadsides and other disturbed areas.
<i>Paspalum urvillei</i>	Vasey's grass	Watch	-	-	-	Invades and establishes in highly disturbed natural ecosystems where it grows dense stands, displacing indigenous vegetation.
<i>Pennisetum clandestinum</i>	kikuyugrass	Limited	C	C	B	Invasive in temperate coastal and near-coastal areas of California, also in gardens, landscaped areas, cropland, turf and forested sites.
<i>Pennisetum setaceum</i>	crimson fountain grass	Moderate	B	B	B	Coastal dunes and scrub, chaparral, grasslands. Some horticultural cultivars sterile. Very invasive in Hawaii.
<i>Phalaris aquatica</i>	harding grass	Moderate	B	B	B	Riparian and other moist species. Common in coastal valleys and foothill grasses.
<i>Phoenix canariensis</i>	Canary Island date palm	Limited	C	B	D	Mainly found in wildlands of S. California.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Phytolacca americana</i>	common pokeweed	Limited	C	B	C	riparian forest, riparian woodland
<i>Piptatherum miliaceum</i>	Smilgrass	Limited	C	B	B	Coastal dunes, scrub, riparian, grassland. Expanding range. Impacts largely unknown.
<i>Plantago lanceolata</i>	English plantain	Limited	C	C	B	Many habitats. Turf weed primarily. Low density and impact in wildlands.
<i>Poa pratensis</i>	Kentucky bluegrass	Limited	C	B	B	Grasslands scrub, riparian areas. Widespread turf plant. Abiotic impacts unknown.
<i>Polypogon monspeliensis</i>	rabbitsfoot grass	Limited	C	C	B	Margins of ponds and streams, seasonally wet places, edge of coastal dunes. Widespread. Impacts appear to be minor.
<i>Potamogeton crispus</i>	curly-leaved pondweed	Moderate	B	B	B	Freshwater aquatic systems. Can be very invasive locally.
<i>Prunus cerasifera</i>	cherry plum	Limited	C	B	B	Coastal scrub, lower elevation riparian zones, woodlands.
<i>Pyracantha angustifolia</i>	narrowleaf firethorn	Limited	C	B	B	Riparian and lakeside areas, marsh edges, coastal scrub and prairie.
<i>Pyracantha crenulata</i>	Nepalese firethorn	Limited	C	B	B	Riparian and lakeside areas, marsh edges, coastal scrub and prairie.
<i>Pyrus calleryana</i>	Callery pear	Watch	-	-	-	Native range in SE China does not match California climate.
<i>Ranunculus repens</i>	creeping buttercup	Limited	C	C	B	Pastures, grasslands, woodlands, swamps, margins of water bodies.
<i>Raphanus sativus</i>	wild radish	Limited	C	C	B	Present at low levels in numerous habitats. Widespread in disturbed sites.
<i>Rhamnus alaternus</i>	Italian buckthorn	Watch	-	-	-	Tolerates drought, salt spray and can survive intense fire.
<i>Ricinus communis</i>	castor bean	Limited	C	B	B	Coastal scrub and prairie, riparian areas. Widespread in southern California. Impacts locally variable.
<i>Robinia pseudoacacia</i>	black locust	Limited	C	B	B	Riparian areas, canyons. Severe impacts in southern states. Impacts minor in California.
<i>Romulea rosea var. australis</i>	rosy sandcrocus	Watch	-	-	-	Naturalized in areas of Australia and New South Wales in areas that match California climate.
<i>Rubus armeniacus</i>	Himalayan blackberry	High	A	A	A	Riparian areas, marshes, oak woodlands
<i>Rumex acetosella</i>	sheep sorrel	Moderate	B	B	A	Many habitats, riparian areas, forest, wetlands. Widespread. Abiotic impacts unknown. Impacts can vary locally.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Rumex crispus</i>	curly dock	Limited	C	C	A	Grasslands, vernal pool, meadows, riparian. Widespread. Impacts appear to be minor.
<i>Saccharum ravennae</i>	ravennagrass	Moderate	B	A	C	riparian scrub, marsh and swamp
<i>Salpichroa organifolia</i>	lily of the valley vine	Watch	-	-	-	Native to temperate South America, very high overlap with CA climate zones.
<i>Salsola paulsenii</i>	barbwire Russian thistle	Limited	C	C	C	Frequently found in in the desert areas.
<i>Salsola ryanii</i>	Ryan's Russian thistle	Watch	-	-	-	Newly formed hybrid species in CA. Accumulates at fencelines and other barriers.
<i>Salsola soda</i>	glasswort	Moderate	B	B	B	Mudflats and saltmarshes in the Bay Area. Inhabits high tide drift line, marsh plains, levees.
<i>Salsola tragus</i>	Russian-thistle	Limited	C	B	B	Desert dunes and scrub, alkali playa. Widespread. Impacts minor in wildlands.
<i>Salvinia molesta</i>	giant salvinia	High	A	A	C	Native to Brazil, spreading in southern US. Inhabits still and slow-moving waters of lakes, ponds, reservoirs, rivers, marshes ditches and rice fields.
<i>Saponaria officinalis</i>	bouncing-bet	Limited	C	B	C	Riparian scrub and woodland. Impacts unknown or minor, but appear to be locally variable.
<i>Scabiosa atropurpurea</i>	pincushion flower	Watch	-	-	-	CA climate matches distribution in most of its range.
<i>Schinus molle</i>	Peruvian pepper tree	Limited	C	B	B	Riparian. Limited distribution. Impacts largely unknown in California.
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	Moderate	B	B	B	Invades riparian areas and wetlands.
<i>Schismus arabicus, Schismus barbatus</i>	Mediterranean grass	Limited	B	C	A	Scrub, thorn woodland. Widespread in deserts. Impacts can be more important locally.
<i>Scolymus hispanicus</i>	goldenthistle	Watch	-	-	-	Native to northern Africa, matches CA climate.
<i>Senecio jacobaea</i>	tansy ragwort	Limited	C	B	B	Grasslands, riparian. Impacts generally minor. Can be locally important in NW California.
<i>Sesbania punicea</i>	scarlet wisteria	High	A	B	C	Riparian areas

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Silybum marianum</i>	milk thistle	Limited	C	C	A	Grasslands, riparian. Widespread, primarily in disturbed areas Impacts can be higher locally
<i>Sinapis arvensis</i>	wild mustard	Limited	C	C	C	Grasslands. Primarily in disturbed sites. Impacts minor or unknown in wildlands.
<i>Sisymbrium irio</i>	London rocket	Limited	B	B	A	Scrub, grasslands. Widespread. Primarily in disturbed sites. Impacts vary locally.
<i>Solanum aviculare</i>	New Zealand nightshade	Watch	-	-	-	Naturalized in CA, distributed via horticulture.
<i>Solanum carolinense</i>	Carolina horsenettle	Watch	-	-	-	Often infests crop fields and pastures.
<i>Spartium junceum</i>	Spanish broom	High	A	B	B	Coastal scrub, grasslands, wetlands, oak woodland, forests
<i>Sphaerophysa salsula</i>	alkali swainsonpea	Watch	-	-	-	S. salsula seeds are contaminants in Alfalfa seed and are difficult to separate. Invasiveness is based on economic impacts to crops.
<i>Stipa brachychaeta</i>	punagrass	Watch	-	-	-	Invades disturbed sites or alfalfa fields in CA.
<i>Stipa miliacea</i> var. <i>miliacea</i>	smilo grass	Limited	C	B	B	Riparian areas, ditches along roadsides, and canyons, grassland, coastal scrub, chaparral, bare, dune, non-native and oak woodland habitats.
<i>Tamarix aphylla</i>	athel	Limited	C	B	B	Desert washes, riparian areas. Limited distribution. Impacts minor, but can be locally higher.
<i>Tamarix chinensis</i>	Chinese tamarisk	High	A	A	A	Typically found around aquatic or riparian areas; also in scrublands.
<i>Tamarix gallica</i>	French Tamarisk	High	A	A	A	Primarily found in aquatic or riparian areas; also in scrublands.
<i>Tamarix parviflora</i>	smallflower tamarisk	High	A	A	B	Riparian areas, desert washes, coastal scrub
<i>Tamarix ramosissima</i>	Saltcedar	High	A	A	A	Desert washes, riparian areas, seeps and springs
<i>Torilis arvensis</i>	hedgearsley	Moderate	C	B	B	Expanding range. Appear to have only moderate ecological impacts.
<i>Triadica sebifera</i>	Chinese tallow tree	Moderate	B	B	C	Occurs in Sacramento Valley and Bay Area; could be a problem in the Sacramento-San Joaquin Delta.
<i>Tribulus terrestris</i>	puncture vine	Limited	C	B	B	Spreading rapidly in agricultural area, along trails and at staging areas, but has not extended into natural areas.
<i>Trifolium hirtum</i>	rose clover	Moderate	C	B	B	Grasslands, oak woodland. Widely planted in California. Impacts relatively minor in most areas.

**Table 1. California Invasive Plant Inventory Database (Great Valley Region)**

Scientific Name	Common Name	Rating	Imp.	Inv.	Dis.	Habitats of Concern and Comments
<i>Verbascum Thapsus</i>	woolly mullein	Limited	C	B	B	Riparian corridors, shrublands, juniper woodlands, scrub oak savannahs, CA sagebrush associations.
<i>Verbena bonariensis</i>	Tall vervain	Watch	D	B	C	Often in disturbed areas of irrigation canals
<i>Vicia villosa</i>	Hairy vetch	Eval No List	D	C	B	Primarily an agricultural weed, Widespread but impacts minor in wildlands.
<i>Vinca major</i>	periwinkle	Moderate	B	B	B	Riparian, oak woodlands, coastal scrub. Distribution currently limited but spreading in riparian areas. Impacts can be higher locally.
<i>Washingtonian robusta</i>	Mexican fan palm	Moderate	B	B	C	Southern CA riparian areas, semi-arid desert regions near water.
<i>Zantedeschia aethiopica</i>	calla lily	Limited	C	B	C	Common in north coastal wetlands and seeps.
<i>Zygophyllum fabago</i>	Syrian beancaper	Watch	-	-	-	Invasive in drylands, and roadsides.

**Source:** Cal-IPC. 2019.

**Notes:** Imp. = Impact, Inv. = Invasiveness, Dis. = Distribution, Doc. = Documentation Level (Documentation level averaged). Scores: A = Severe, B = Moderate, C = Limited, D = None, U = Unknown. Nomenclature: Scientific names are based on the Jepson Manual. For each species, the first common name is based on the Weed Science Society of America’s “Composite List of Weeds”, followed by other names used in California.

## 2.2 Weed Species of Concern

Historically the Project area has been utilized for agricultural purposes. Due to ongoing annual tilling of the Project area, all native and non-native plant species have been eradicated from the site. With the exception of the private dirt roads that intersect and bound the Project area, a large majority of the Project site has been in low-yield production, grazing or left fallow intermittently for the past 10 years. The ruderal and disturbed habitat types are located within and along on-site private access roads and public roads. The on-site ruderal habitat type supports a cover of invasive non-native annual grasses and non-native and native forbs.

# 3 Noxious Weed Management Areas

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The noxious weed management areas include the entire Project area (solar array fields and associated equipment), gen-tie alignment, and access roads that surround the boundary of these features. Even though the entire Project area is included in the weed management area, specific targeted management areas will undergo continual supervision to control noxious weed populations. The purpose of weed management areas is to prevent noxious weed populations from becoming injurious to adjacent lands, many of which contain ongoing agricultural operations. In addition, noxious weed populations could provide potential habitat for noxious pests that may cause further harm to adjacent lands in addition to the Project area.

Specific noxious weed management areas within the Project area will be selected based on the presence of weed populations, and the likelihood of spread or increase in cover. As described in Section 2.2, the Project area has been utilized for agricultural purposes and virtually all plant species have been eradicated from the site.

The 2,250-acre Project area will initially be cleared of all remaining vegetation for construction of the facility; however, vegetation would be allowed to grow back to a short height below the solar array fields during operation to minimize the potential for soil erosion from wind or stormwater runoff. Weed management will focus on identified small patches of noxious species and areas of periodic surface disturbance, which will be along the edges of the Project site and along the gen-tie alignment. Areas that will be graveled, or otherwise covered with a non-growing surface, are excluded from the weed management area.

## 3.1 Surface Disturbance Areas

Soil that will be disturbed during construction will create habitat well suited to disturbance-adapted invasive species. This will occur along the gen-tie alignment and the Facility Site fence line. Other areas (e.g., solar array fields) will be graveled, or covered with a dust palliative that will not provide substrates suitable to vegetation growth. Restored areas also will be prone to weed invasion and establishment. Accordingly, measures to minimize the introduction of new weed species and the spread of existing weed populations by Project personnel and equipment will be implemented on all of these areas that may host weed populations.

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# 4 Baseline Weed Surveys

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Baseline surveys to identify existing weed populations and density will be completed prior to construction when weeds are present and easily identifiable. Surveys will be conducted along the boundary of the Facility Site(s) and along the gen-tie alignment. Weeds will be identified and counted using a stratified random sampling technique.

The purpose of the baseline surveys is to produce a record of the pre-project conditions, prior to construction. After the construction of the Project is complete and operations have commenced, baseline surveys essentially provide an indication of the increase or decrease in density or spread as a result of Project development. Conversely, baseline surveys also indicate the progress of the integrated management plan and noxious weed management techniques.



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# 5 Noxious Weed Management

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## 5.1 Prevention

General measures that will be implemented to prevent the spread of weed propagules and inhibit their germination during Project construction include the following:

- Closely monitoring the types of materials brought on site to minimize the potential for weed introduction
- Limiting disturbance areas to the minimum required to perform work
- Limiting ingress and egress to defined routes
- Use of certified weed-free products

### 5.1.1 Construction

#### 5.1.1.1 Equipment Inspections

To prevent the spread of weed species into new habitats, when construction equipment is first brought on site it will be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Prior to entering the Project work areas, equipment will be inspected to ensure they are free of any dirt or mud that could contain weed seeds. The tracks, feet, tires, and undercarriage will be carefully washed if necessary, and special attention will be paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies.

#### 5.1.1.2 Site Soil Management

Soil will be managed by limiting ground disturbance to the minimum feasible and implementing dust suppressants to minimize the spread of seeds. Dust palliatives (e.g., water) will be used during construction to minimize the spread of airborne weed seeds, especially during very windy days. Because soil accumulating along these fences will provide a hospitable micro-site for seed germination as well as capture higher densities of seeds, concentrated control measures will be implemented along such structures (and any others that trap soil and seeds) to minimize noxious weed population increases.

#### 5.1.1.3 Weed-Free Products

The contractor will ensure that any straw or hay bales used for sediment barrier installations are obtained from sources that are certified free of primary noxious weeds. Where feasible, mulch will be generated from native vegetation cleared from the Project area. Given that grading for site development is anticipated to be relatively minor, importation of soil would not be expected to be necessary.

## 5.1.2 Operations

### 5.1.2.1 Facility Staff Training

Noxious and invasive weed management will be incorporated as a part of mandatory site training for visiting maintenance personnel. Training will include noxious weed identification and the impacts on agriculture, livestock,

wildlife, and fire frequencies. Training will also cover the importance of preventing the spread of noxious weeds and of controlling the proliferation of existing noxious weed populations.

## 5.2 Infestation Containment and Control

Project development may increase the density of existing noxious weed species in areas of soil disturbance. Because various species of noxious weeds may occur on-site within the Project vicinity, measures outlined in Section 5.1.1 (construction phase) and Section 5.1.2 (operations phase) will be implemented to control and suppress current noxious weed populations from spreading and increasing in density.

### 5.2.1 Mechanical Removal and Herbicides

Sonrisa Solar will use herbicides, manual or mechanical weed removal techniques depending on the most appropriate method for the weed species and location. Where practical, and based on the effectiveness of physical weed removal, manual removal and mechanical removal will be implemented to control weed populations. Herbicides will be used in the solar field to kill weeds to minimize the fire potential unless manual removal is feasible. On disturbance areas (see Section 3.1), mechanical removal, manual removal, and/or herbicides will be used to suppress populations of noxious weeds where they have or are expected to have increased density as a result of the Project. As feasible, hand removal will be implemented as the primary approach to eradicate noxious weed populations.

In general, monitoring during construction and operation (see section 6.0) will determine if noxious weed species have increased in density or spread as a result of the Project, and thus determine the necessity of the control measures. However, all bladed areas that have received final contouring (e.g., road shoulders, transmission tower pads) can be expected to support new populations of weeds and pro-active measures (e.g., pre-emergent herbicides) will be implemented to control weed populations there.

Sonrisa Solar will utilize County-approved pre-and/or post-emergent herbicides. Pre-emergent herbicides are applied to the soil before the weed seed germinates and usually incorporated into the soil with irrigation or rainfall. Post-emergent herbicides are applied directly to plants. Timing is critical for both pre-emergent and post-emergent herbicide application. In the Project vicinity, pre-emergent herbicides would primarily be applied in early fall, prior to fall/early winter rains. Post-emergent herbicides must be applied while the weed is actively growing, most effectively in the early seedling stage, but always prior to seed set.

Therefore, all post-emergent treatments will occur between February and early April. Species-specific herbicides are currently being investigated and will be used as appropriate and available, along with other mechanical and chemical means for post-emergent elimination. When possible, selective herbicides will be used to target specific weed species, rather than all plant growth.

# 6 Monitoring

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After baseline surveys are complete, monitoring will take place once a year during construction, and annually for 3 years following the completion of construction activities. Baseline and yearly monitoring will be conducted by a qualified biologist or landscaper capable of distinguishing non-native weeds from native weeds. The purpose of annual operations monitoring will be to determine if weed populations identified during baseline surveys have increased in density or spread as a result of Project development. Monitoring will take place during the spring when plant species are present and easily identifiable. The period of three years following construction is consistent with monitoring guidelines adopted by Fresno County Public Works for landscape establishment and by the California Department of Fish and Wildlife for botanical restoration activities, and is very likely to span the annual variation in plant growth due to variation in rainfall and temperatures. Methods will be consistent with those of baseline weed surveys (Section 4.0).

## 6.1 Success Standard Thresholds

Eradication of the existing noxious weed species is not possible due to their current prevalence in the Project area. However, the Project is committed to ensuring that their activities do not exacerbate the existing condition beyond the pre-construction levels. Both spatial and temporal controls, as well as replicates for each type of Project feature, have been incorporated into the monitoring program to qualitatively and quantitatively monitor noxious weed densities associated with the Project area.

Control methods will be implemented both pro-actively (see Sections 5.1.1 and 5.1.2) and when monitoring identifies the necessity. Statistical weed increases, as well as visually verified increases, will require a form of weed control. This will include even small patches of unusually high density (e.g., concentrations in swales or where water occurs and or collects near surface) that are growing as a result of Project activities.

Whereas weed control will be ongoing on the Project site for the life of the Project, Plan success will be determined after the three years of annual operations monitoring. If no weed patches or statistically significant elevated weed densities are detected in the Project area that can be attributed to Project activities, then the Plan will be considered successful. Continued monitoring and control, with modified techniques as necessary, will be implemented through an adaptive management process if the Plan is not successful after three years.

## 6.2 General Operations Monitoring

After the initial three years of operations monitoring is complete, general monitoring of the Project area will be conducted by designated facility maintenance personnel monthly during the germinating and early growing season (November through April) to eliminate new noxious weed individuals prior to seed set. Increased monitoring during the germinating and early growing season will be implemented if noxious weed populations show an increase in spread and cover. On-site personnel will be trained to identify weedy and native species by a qualified biologist or landscaper to determine where pre-and post- emergent elimination is necessary.

## 6.3 New Weeds

Though unlikely, weeds not identified by field surveys or previously reported for the area could colonize the site or invade site facilities, both during construction as well during operation.

Once per year during construction and annually for three years following, the list of potential noxious and invasive weeds will be updated and will identify any new potential threats, including developing a management strategy and management methods appropriate to the plant species and the nature of any potential invasion. Similarly, the Facility Manager or appropriate designee during operations will be required to update the potential noxious and invasive weed list and provide monitoring and management appropriate to any new species, as necessary.

# 7 Reporting Requirements

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Long-term monitoring reports are required to evaluate monitoring results to determine if success standards are being met, and if not, what control measures should be implemented and why.

## 7.1 Annual Reports

A report will be prepared for each annual survey as outlined in Section 6.1. Reports will include, at a minimum, the following:

- Survey findings on location, type, spatial extent, and density of noxious weeds. These data will include general weed mapping and photographs, as appropriate, as well as textual and tabular data content to fully describe conditions on the project site.
- Management efforts, including date, location, type of treatment implemented, and results within the Weed Management Area.
- Ongoing evaluation of success of prevention and control measures.
- Which, if any, additional control measures were implemented and rationale for implementation.
- Summary of restoration efforts and status.

### 7.1.1 Construction Reporting

Monitoring records will be kept on site which will include information relevant to noxious weeds. A single post-construction letter report will be produced with a section summarizing the overall results of noxious weed management and noxious weed status at the site.

### 7.1.2 Final Monitoring Report

After three years of post-construction monitoring is complete, a final monitoring letter report will be produced to describe the outcome of weed management on the Project area. The results of this report will be used to determine if additional monitoring or control measures are necessary.

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# 8 Literature Cited

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California Invasive Plant Council (Cal-IPC). 2019. California Invasive Plant Inventory. California Invasive Plant Council: Berkeley, California. Accessed online at: <https://www.cal-ipc.org/plants/inventory/>.

James, L., J. Evans, M. Ralphs, and R. Child, editors. 1991. Noxious range weeds. Westview Press, Boulder.

Sheley, R., J. Petroff, M. Borman, 1999. Introduction to Biology and Management of Noxious Rangeland Weeds, Corvallis, Oregon.



**SECTION 10B. PEST MANAGEMENT PLAN:  
RODENT CONTROL**

**INTEGRATED PEST MANAGEMENT PLAN  
RODENT CONTROL  
SONRISA SOLAR PARK PROJECT**

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# Introduction

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Integrated Pest Management (IPM) is defined as the use of all available pest control techniques, including judicious use of pesticides, when warranted, to maintain a pest population while decreasing the unnecessary use of pesticides.

The primary goal of IPM is to reduce the amounts of pesticides applied by using alternative methods of pest control. Alternative methods may include structural maintenance, sanitation, and mechanical or biological control. These methods will help to eliminate conditions that are favorable to pest infestation, making pest survival more difficult.

This IPM Plan has been prepared with the recognition that special status wildlife species have the potential to occur in the project vicinity that must be protected from harm associated with Plan implementation. Consequently, the Plan specifies proposed management activities in accordance with guidelines and restrictions from the USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance, as well as from the U.S. Environmental Protection Agency (Federal Insecticide, Fungicide, and Rodenticide Act), and California Department of Food and Agriculture.

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# 1 Rodents to Be Controlled

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For the purposes of this IPM Plan, rodent control refers to rodents such as the brown rat, black rat, house mouse, deer mouse, California vole, pocket gopher, ground squirrels, and white-footed mouse. California ground squirrels, voles, and pocket gophers are considered the greatest concern within the project site.

Rodents should be controlled for various reasons. Rodents have the potential to chew electrical lines both above and below the ground surface, which could cause damage to the facility equipment. Also, rodents can burrow underground and may cause structural damage within the site as the burrows collapse, causing localized subsidence. If not controlled on-site, rodent populations could increase and start feeding outside the site, causing damage to the neighboring properties. In addition to structural damage, mice and rats are known to spread parasites and diseases such as salmonella bacteria, eggs of the tapeworm, Hantavirus and leptospirosis, to name a few. They reproduce an average of 4-8 times per year. They can reproduce more often when conditions are favorable. Litters average 4-12 young.

Rodents, particularly deer mice, will hoard food. This is an important fact to consider if baits will be utilized for their control. Seed or loose meal bait will only be used for outdoor applications and placed in a manner to limit the risk of exposure to unprotected persons and nontarget animal species. Pelletized baits are prohibited in kit fox areas. Bait blocks will be anchored properly to prevent mice from carrying bait off to another location.

California ground squirrels, voles, and pocket gophers are considered the greatest concern within the project site; however, other additional rodent species have the potential to utilize the site.

## 1.1 Pocket Gophers

Pocket Gophers, often called gophers, *Thomomys* species, are burrowing rodents that get their name from the fur-lined, external cheek pouches or pockets they use for carrying food and nesting materials. Pocket gophers are well equipped for a digging tunneling lifestyle. Five species of pocket gophers are found in California, with Botta's pocket gopher, *T. bottae*, being the most widespread.

## 1.2 California Vole

Voles are mouselike rodents somewhat similar in appearance to pocket gophers. They have a compact, heavy body, short legs, a short-furred tail, small eyes, and partially hidden ears. The California vole, *Microtus californicus*, is the most widespread vole in the state, found in the Owens and Central valleys and nearly the entire length of the coastal range. Vole numbers fluctuate from year to year, and under favorable conditions, their populations can increase rapidly. In some areas their numbers are cyclical, reaching peak numbers every 3 to 6 years before dropping back to low levels.



## 1.3 California Ground Squirrel

The California ground squirrel, *Spermophilus beecheyi*, lives in a burrow system where they sleep, rest, rear young, store food, and avoid danger. Populations can be particularly high in grazed rangelands and in areas disturbed by humans such as roads or ditch banks, fencerows, around buildings, and in or bordering many crops. Burrowing beneath buildings and other structures sometimes produces damage that necessitates costly repair.

## 1.4 Brown Rats

Brown rats are much larger than mice, usually brown with scattered black. Their tails are shorter than the head and body. They will build a nest of soft materials in and around lower floors of buildings and foundations in burrows, crawlspaces, and underneath/behind stationery objects. Brown rats will range an average of 100-175 feet from their nesting area. They may range farther if food is limited. They are omnivorous, preferring food with a high carbohydrate and protein content. They need water on a daily basis in order to survive. Brown rats will prey upon mice; therefore, they are usually not found living in the same area of the building.

## 1.5 House Mice

House mice are small, light brown to light gray in color, with smooth fur. Their tails are longer than their head and body. Mice will nest in walls, ceiling voids, cabinets, drawers, appliances, furniture, etc. They usually nest close by to their food source, with an average range of 10-35 feet. They do not need water on a daily basis. House mice are omnivorous; however, they prefer seeds and grains.

## 1.6 Deer Mice

Deer mice, known vectors of Hantavirus, will also enter houses, garages, and other structures, particularly as cold weather approaches. They are reddish brown with a white chest and white feet. Their nests are usually underground; however, they will construct nests above ground in areas similar to the House mouse. Deer mice normally breed during spring and fall; however, they will breed more frequently under favorable conditions. They prefer to feed on nuts, seeds, berries, and insects.

# 2 Inspections and Monitoring

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## 2.1 Initial Site Inspection

Within six months of completing construction, an initial site inspection of the Sonrisa Solar Park will be conducted by an appropriately Qualified Pest Management Consultant (QPMC) in collaboration with Operation and Maintenance (O&M) staff. A QPMC for purposes of this IPM Plan is a consultant or individual who has experience in completing pest management oversight as specified in this IPM Plan.

As part of the initial site inspection, non-toxic glue boards and non-toxic bait blocks placed in tamper-proof bait stations may be placed to monitor rodent populations and activity within the facility grounds. If installed, the dates of installation and recommended servicing dates will be indicated on each monitor and the pest control technician will create diagrams or maps indicating their placement. The diagrams will be maintained as part of the Pest Control Service Record (Section 3). Periodic visual inspections of the glue boards and bait stations will help identify specific areas of infestation, if any, and assess the need for further action.

During the initial site inspection, the QPMC will identify potential problem areas that could contribute to rodent infestation within the facility, making recommendations for corrective measures to be implemented, and refining this IPM Plan if warranted. Recommended pest management actions could involve many methods of rodent control, and may include structural maintenance, sanitation, monitoring for rodent populations, mechanical and biological control, and judicious use of pesticides. These methods will help to eliminate food, moisture, and harborage for rodents, making their survival on-site more difficult.

The QPMC will submit recommendations for corrective measures in writing to operations and maintenance (O&M) staff prior to the application of any pesticides. Pesticides will not be applied on a routine basis; however, they may be used as a tool to maintain rodent populations. The least toxic pesticides will be prioritized as a first choice whenever feasible. Further details on pesticide application can be found in Section 7.

The O&M staff or their designees will be responsible for scheduling and coordinating structural maintenance of the facility and will act on the QPMC recommendations as soon as possible. The O&M staff will report in writing which recommendations will not be followed and state the reasons if no action is to be taken. Otherwise, all QPMC recommendations will be followed.

## 2.2 Long-Term Site Inspection

After the initial six-month OPMC site inspection, the frequency of future service calls and QPMC inspections will depend upon pest pressure as observed by O&M staff, and recommended service dates of monitoring devices installed during the initial site inspection. Service calls will be scheduled as-needed and will include a visual inspection of identified problem areas and applicable monitoring devices, and the application of pesticides where pest populations require management actions to be implemented. During site inspections, O&M staff will meet with the QPMC to determine whether any areas have been problematic or sensitive. Records will be completed at the conclusion of each service call and will include written recommendations of corrective measures to be made by O&M staff or a licensed pest control technician.

Periodic service call and/or monitoring inspections will be limited to specific problem areas identified during previous inspections unless sighting logs (Section 3) have noted increased presence in previously unidentified areas. Once these areas have been identified, the QPMC and O&M staff will discuss various rodent control options described in Section 6 and determine the speed of control necessary, as well as threshold/action levels based on population and species.

# 3 Records

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After each site inspection, the QPMC will indicate pest problem areas and provide written recommendations for structural, sanitary or procedural modifications on a Pest Control Service Record and Pest Inspection Report form or substantially similar substitute. These forms will be kept in a file or in electronic format on a server subject to periodic data backup for five years.

Outside of QPMC site inspections, pest observations during project operations will be noted on report logs, and will be reviewed by the pest control technician at the beginning of any service calls. The logs will be maintained by O&M staff and will serve as a tool to facilitate communication between all personnel and the pest control technician. Logs may be based on paper forms or electronic data-entry applications to facilitate communication and archiving; if paper-based forms are used, they may be converted to an electronic version. All logs should include specific information as to the location and type of rodent, if known.

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# 4 Hantavirus

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Building maintenance and custodial staff should always take appropriate precautions to protect themselves against Hantavirus. Documented cases of Hantavirus have occurred mostly in the Southwestern United States; however, two cases have been documented in the Northeast – one in New York and one in Rhode Island. Infected rodents shed virus in saliva, urine, and feces. Hantavirus can be transmitted to humans through inhalation of rodent excretions when disturbed, directly introduced into broken skin, introduced onto the conjunctivae, or, possibly ingested through consumption of contaminated items. Hantavirus is typically transmitted to humans through a process called aerosolization. Aerosolization occurs when dried materials contaminated by rodent excreta or saliva are disturbed. Humans become infected by breathing in these infectious aerosols.

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# 5 Pest Infestation Prevention

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In an effort to prevent and eliminate rodent populations, it is important that on-site conditions favorable to their occupation and persistence be reduced as much as possible or eliminated. The following best management practices will be employed to prevent rodent infestation of the Sonrisa Solar park.

- Action will be taken to mouse proof the facility by plugging holes in the foundation and walls of structures (i.e., control room structure and energy storage systems containers or structures). Steel wool can be used as a temporary patch while waiting for permanent repairs to be done. (Attention will be given to utility tunnels.)
- Water runoff will be directed away from structures to reduce pooling of water.
- Weather stripping on doors will be repaired or replaced to reduce gaps to less than ¼”.
- Weeds and brush will be trimmed away from structures at least 12-18” in areas where the QPMC recommends placing traps and bait stations if necessary.
- Brush piles and debris will be immediately removed following the maintenance event that produces these materials to make areas less desirable for rodents.
- Storage areas will be managed using a first in, first out program. Inventory will be elevated on pallets or shelving that is 12” or more away from any wall, when feasible.
- Areas where rodent feces are found will be identified in the pest sighting log. Proper precautions will be taken to protect against Hantavirus infection. The area will be disinfected and vacuumed with a HEPA filter vacuum cleaner. This will help determine if the infestation is ongoing by whether or not new feces are found after the area has been cleaned.
- Carcasses will not be handled without protective gear. Plastic bags or rubber gloves will be used to handle carcasses. Carcasses will be disposed of appropriately.
- The project site will be monitored for re-infestation. The site will be inspected and control actions will be implemented as described in this IPM Plan at the first sign of increased rodent populations.



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# 6 Control Methods

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During periodic site inspections by the QPMC, the QPMC may recommend some or all of the preventative methods for controlling observed rodent populations discussed below.

## 6.1 Trapping

Non-toxic glue boards may be used to trap and monitor for rodent populations within the building. Non-toxic baits and/or non-toxic tracing powder may also be utilized to monitor for rodent activity. Multiple catch traps and/or snap traps may be used if there is evidence of increased infestation or if five or more rodents are trapped on any inspection. If used, they will be placed in areas where they cannot be tampered with.

## 6.2 Baiting

If populations cannot be suppressed otherwise, baiting may occur. If used, bait will be placed in tamper-proof rodent bait stations. The bait stations will be placed only in areas where they are not accessible to children, pets, wildlife, or domestic animals. As stipulated in the USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance, if baiting is to be carried out as a control method, zinc phosphide should be used due to the proven lower risk to kit fox. Pelletized baits are prohibited in kit fox areas and will not be used to control rodent populations.

If bait stations are used, they will be attached or anchored to discourage disturbance by non-authorized personnel.

The pest control technician may fill burrows that are identified. On the next inspection the pest control technician may place bait in reopened burrows, filling them in to protect and conceal the bait. Retreatment will be performed as burrows reappear.

Use of liquid baits may be appropriate in situations where the supply of water is scarce or nonexistent. Only tip resistant professional liquid baiting containers will be used if this method of baiting is employed. Consideration will be given to environmental factors such as heat or cold. Placement of the containers will be determined based on the risk of exposure to people or non-target animals. Written approval will be obtained from the Facilities Manager prior to their use.

## 6.3 Fumigation

Fumigation is a relatively safe method of extermination for controlling burrowing rodent populations, however prior to use, burrows must be inspected for the presence of non-target species such as the San Joaquin kit fox and burrowing owl. Only active rodent burrows will be treated utilizing fumigation methods during the appropriate time of year when the soil is moist and the target species is no longer in hibernation.

## 6.4 Habitat Modification

Burrowing rodent populations can reinvade a site by moving into vacant burrows. In order to prevent this activity, old burrows may be destroyed by deep ripping them to a depth of at least 20 inches, using a tractor and ripping bars. Filling in the burrows with soil does not prevent reinvasion or deter further habitation, as burrowing rodents easily find and re-open old burrows. The majority of the habitat modification work will be initiated as part of the site preparation activities during the preliminary construction phase of the project.

Another way to reduce the area where rodents establish populations is to make the habitat less suitable for habitation. Weeds, heavy mulch, and dense vegetative cover encourage rodents by providing food and protection from predators and environmental stresses. By removing vegetative protection, populations will decline. Vegetation management may entail mowing, spraying with herbicides, or grazing or disking grassy areas along ditch banks, rights-of-way (ROWs), or field edges adjacent to active agricultural areas. If feasible, weed-free strips can serve as buffers around areas requiring protection. The wider the cleared strip, the less apt rodents will be to cross and become established residents. A minimum width of 15 feet is recommended.

## 6.5 Other Control Techniques

Poison tracking powder may be utilized by placing dust into wall voids or other concealed areas that are not treatable by any other means. Placement of poison tracking powder in tracking powder stations may also be considered if other baiting methods have not been successful due to bait shyness or resistance. Careful consideration will be given to their use with regard to the potential for exposure to facility employees and/or non-target animals, air movement, and moisture levels. Written approval will be obtained from the Facilities Manager prior to their use.

Poison tracking powder must not be used in areas where:

- Utility personnel, building construction personnel, or remodelers may inadvertently or unknowingly contact the powder at any future time.
- There is any risk of rodents tracking the powder onto exposed food or food preparation surfaces.
- Tracking powder can be blown by drafts, air currents, or utility motor fans.
- There is a danger of the powder drifting or falling onto potentially sensitive areas (ledges, suspended ceilings).

# 7 Pesticide Plan

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Pesticides may be applied if rodent populations exceed an acceptable level. Priority is given to those pesticides having the lowest toxicity, taking into consideration the method and frequency of application and the risk of exposure to building occupants and nontarget species. When possible, baiting will be deployed as a primary measure. If the necessary results are not achieved via baiting, burrow fumigation will be deployed as a final measure. Prior to the application of any pesticides, O&M staff will coordinate with the Fresno County agricultural commissioner for recommendations and approval of select pesticides.

Only active rodent burrows will be targeted for fumigation. The project site is situated within the range of the San Joaquin kit fox and the burrowing owl, of which both species have the tendency to utilize California Ground Squirrel burrows. Provided the relationship between an existing California ground squirrel burrow and the potential use by either the kit fox or burrowing owl, fumigant use will be limited to target rodent burrows only. Such fumigant use shall be supervised by a person (wildlife biologist, county agricultural commissioner, university extension advisor, state or federal official or others) who is trained to distinguish dens and burrows of target species from those of nontarget species. O&M staff shall be aware of the conditions at the site of application and be available to direct and control the manner in which applications are made (per Section 6406 of Title 3, California Code of Regulations).

The endangered San Joaquin kit fox, several species of kangaroo rats, the riparian brush rabbit, the riparian wood rat, and some endangered amphibians and reptiles are also within the range of the California ground squirrel, so some squirrel control techniques could impact them as well. Before using approved pesticides for rodent control, the product label will be thoroughly examined to indicate if any restrictions exist within the ranges of these and other endangered and protected animals. Product directions and recommendations will be diligently followed by the pest control technician.

An appraisal of this IPM program will be conducted annually by O&M staff and the QPMC. A determination will be made as to the effectiveness of the program and revisions will be made to correct potential problems. Revisions may include implementation of IPM methods already utilized and/or implementation of IPM techniques that have not been utilized.