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DOW and CNPS Comments on Willow Rock Energy Storage Center PSA Docket No 21-AFC-02

Additional submitted attachment is included below.

June 16, 2025

Eric Veerkamp
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Willow Rock Energy Storage Center; Docket No. 21-AFC-02

Dear Mr. Veerkamp,

Thank you for the opportunity to provide comments in response to the Draft Environmental Impact Report (DEIR; also referred to as the Preliminary Staff Assessment or PSA) for the proposed Willow Rock Energy Storage Center (Project). These comments are submitted on behalf of Defenders of Wildlife (Defenders) and the California Native Plant Society (CNPS).

Defenders has 2.1 million members and supporters in the United States, 311,000 of which reside in California. Defenders is dedicated to protecting all wild animals and plants in their natural communities. To that end, Defenders employs science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

CNPS is a non-profit environmental organization with over 13,000 members in 36 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations and land management practices.

We strongly support renewable energy generation. A low-carbon energy future is critical for California's economy, communities and environment. As we transition toward a clean energy future, it is imperative that we consider the near-term impacts of battery storage development on our biodiversity, fish and wildlife habitat and natural landscapes while addressing the long-term impacts of climate change. Therefore, renewable energy projects must be planned, sited, developed and operated to avoid, minimize and mitigate adverse impacts on wildlife and lands with known high-resource values.

The proposed Project is a compressed air storage energy facility that would store 4,160 MWh of energy. The proposed Project would be sited on approximately 88.6 acres of a 112-acre parcel of private land in unincorporated, southeastern Kern County. It is located approximately 4 miles north of Rosamond, immediately north of Dawn Road and between State Route 14 and Sierra Highway. The Project site is located on undeveloped land, and the surrounding area is largely undeveloped with sparse residential development.

Comments:
We offer the following comments on the DEIR for the proposed Project:

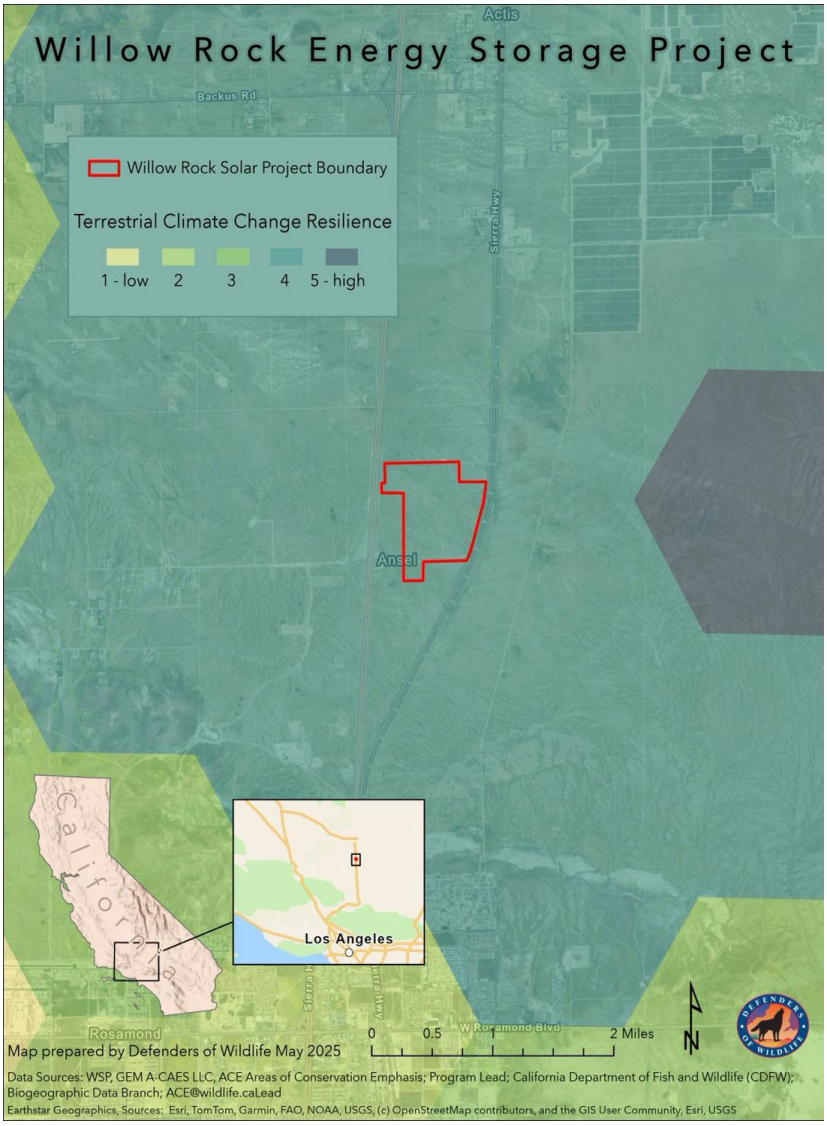
1. **Climate Resiliency**

   The Project site is identified as an area that may function as a refugia from climate change, as designated by the California Department of Fish and Wildlife (CDFW) Areas of Conservation Emphasis (ACE) project. Terrestrial climate change resilience is one of the main outputs of ACE that examines the probability of a location to function as a climate refugia, where the area is "relatively buffered from the effects of climate change, where conditions will likely remain suitable for the current array of plants and wildlife that reside within a hexagon, and where ecological functions are more likely to remain intact."[1]

   The California Energy Commission (CEC) utilizes the ACE climate change data as one of the layers within the 2023 Land-Use Screens for Electric System Planning, a process to revise the land-use screens utilized in state electricity planning processes.[2] Specifically, Ranks 4 and 5 are used as an exclusion for statewide electric system modeling and resource planning to avoid lands that have a high potential to act as a climate refugia. The Project is located in an area with a 4 ACE Ranking, as depicted below, which is one of the highest scores and therefore should be avoided for renewable energy development.

[1] See https://www.californianature.ca.gov/datasets/CAnature::terrestrial-climate-change-resilience-ace/about
[2] See https://experience.arcgis.com/experience/de6ab11146bf47068ff294d87780ce00

Figure 1: Approximate Vicinity of the Project with ACE Terrestrial Climate Change Resilience Ranks



Development projects should avoid areas that are modeled to act as refugia for climate change. While mitigation is an essential tool for conservation, it is challenging and costly to mitigate the loss of land that serves as a climate refugia when a project is situated in a high ACE ranking area, such as the Project site.

The DEIR acknowledges that several special-status species that have the potential to occur within the Project area are threatened by climate change, including but not limited to Crotch's bumble bee (CBB), desert kit fox, Mohave ground squirrel (MGS) and Swainson's hawk (SWHA). However, it fails to analyze the importance of this area

as a climate change refugia. By not addressing the essential role of this site in mitigating the impacts of climate change and supporting species resilience, the DEIR presents an incomplete assessment of the project's long-term impacts.

2. **Biological Confidential Data**

The project application was submitted under the Assembly Bill (AB) 205 permitting process. AB 205 established a streamlined permitting process for large-scale renewable energy projects through the CEC in lieu of local permits through the California Environmental Quality Act (CEQA) process. The intent of CEQA is to "[i]nform governmental decision-makers and the public about the potential significant environmental effects of proposed activities." Given the AB 205 process is the equivalent permitting process through the CEC in lieu of CEQA, it is reasonable to apply the intent of informing the public about the potential impacts. The Act reinforces the importance of informing the public about the potential impacts of a project through requiring the opportunity for the public to submit comments, for the CEC to conduct public outreach to solicit input, for the CEC to consider public input before making a permitting decision and the requirement to hold public meetings and hearings to gather input.

There is a significant amount of confidential biological resource documents within the CEC docket that have been granted confidential status. This includes the following documents in the table below:

Table 1: Biological Resource Documents Granted Confidentiality Status[3]

Document Title	Date Confidentiality Status was Granted
Attachment 126-1 – Confidential Mapbook Figure	2/18/25
Attachment DR 82-1 – Special Status Plants and Burrowing Owl Figures	11/22/24
Attachment DR 84-1 – Aerial Imagery and Mapping	11/22/24
Attachment DR 85-1 – Aerial imagery and Mapping with Transparency	11/22/24

[3] See https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-AFC-02

Attachment DR 87-1 – Jurisdictional Drainage Maps	11/22/24
Attachment DR 88-1 – WJT Census Map Book	11/22/24
Attachment DR 89-1 – WJT Characteristics Table	11/22/24
Attachment DR 92-1 – WJT Relocation Plan	11/22/24
Attachment DR 95-1 – Incidental Take Permit Application Materials (Conceptual)	11/22/24
Attachment DR 96-1 – Biological Survey Shapefiles	11/22/24
Attachment DR 74-1 – 2023 and 2024 Swainson's Hawk Survey Nest Locations Map Book	10/9/24
Attachment DR 75-1 – 2023 and 2024 Swainson's Hawk Survey Hawk Locations Map Book	10/9/24
Soils Map Mapbook	9/3/24
Vegetation Map Mapbook	9/3/24
All Jurisdictional Delineation Mapbook	9/3/24
Protected Conserved Lands Mapbook	9/3/24
Special Status Plants Mapbook	9/3/24
Special Status Wildlife Mapbook	9/3/24
Burrowing Owl Survey Transects Mapbook	9/3/24
Burrowing Owl Occurrences Mapbook	9/3/24
Crotch's Bumble Bee And Nectar Sources Mapbook	9/3/24
Jurisdictional Delineation Hydrology Map Mapbook	9/3/24
Jurisdictional Delineation Vegetation Mapbook	9/3/24

Jurisdictional Delineation NWI Map Mapbook	9/3/24
Jurisdictional Delineation USDA Soils Mapbook	9/3/24
Jurisdictional Delineation Mapbook	9/3/24
Hydrostor Mohave Ground Squirrel Survey Report Resource Agency Version	9/3/24
Sensitive Plants CNDDB Mapbook	9/3/24
Sensitive Plants Mapbook	9/3/24
Swainson's Hawk Active Nest Locations Mapbook	9/3/24
Swainson's Hawk Observation Confidential Mapbook	9/3/24
Joshua Tree Observations Mapbook	9/3/24

It is impossible to fully analyze all impacts on special-status species when the mapped locations and other biological information are kept confidential. Further, it becomes challenging for the public to review the avoidance, minimization and mitigation measures established within the DEIR to ensure they are appropriate for the impacted species. Documents that contain biological data, location and information should be available to the public and other stakeholders to enable review of the scientific evidence and adequacy of any avoidance, minimization and mitigation measures, including the obtainment of incidental take permits (ITP).

While the statutes of CEQA allow for tribal cultural resources to be made confidential, there is no language allowing for other types of information to be made confidential, and withholding information needed to understand or meaningfully comment on the DEIR conflicts with the legislative intent of CEQA. In *Bonta v. County of Lake* (Oct. 23, 2024) __ Cal.App.5th __ the court found the Final EIR for the project was insufficient to allow the public to "obtain a full understanding of the environmental impacts of a project from a single source relevant informational document – that being the EIR." Disclosing the locations of sensitive resources is essential to understanding whether developing an alternative that avoids sensitive resources while achieving the majority of project objectives would be feasible.

When an environmental review document cites confidential studies as evidence that potential project impacts are reduced due to specific measures within documents withheld from the public, it undermines the public's ability to adequately analyze the project and its true environmental impacts. The public and other stakeholders must be able to review the studies and the scientific evidence to ensure the proposed measures are appropriate.

We request that the confidential biological resource documents be made available for public review and comment. If, upon further analysis, the CEC still believes the claim to confidential coverage is reasonable, then the avoidance, minimization and mitigation measures that rely on the confidential documents must be revised and supported by publicly available scientific information and research.

3. **Noise Impacts**

The DEIR acknowledges potential noise impacts during the construction and operation of the facility, but inadequately assesses the impacts on wildlife, particularly sensitive avian species. The extent to which the DEIR addresses the impacts on wildlife includes stating that noise could cause wildlife to avoid otherwise suitable habitat in the surrounding area, and specific to avian species, it would likely alter and/or preclude breeding activities. Furthermore, it only provides mitigation for noise for burrowing owl (BUOW) with mitigation measure (MM) that requires a 3:1 mitigation ratio that will offset impacts to owls that may abandon habitat in adjacent areas due to noise and ground-borne vibration.

The DEIR fails to provide a thorough analysis of the noise level and its specific impacts on special-status species. It is therefore difficult to determine if the proposed ratio is adequate to offset all impacts, including noise, to BUOW. The DEIR fails to provide mitigation for any other species explicitly related to noise. For example, it does not provide seasonal restrictions limiting blasting activities. Research indicates that noise can significantly impact avian species, resulting in reduced nesting success. In CDFW's scoping comments on the Project, CDFW recommended the DEIR incorporate enforceable mitigation measures aimed at decreasing noise and vibration impacts on wildlife species. We request adhering to CDFW's recommendation to incorporate noise and vibration mitigation measures for wildlife species. Specifically, we recommend limiting construction activities to non-nesting periods for BUOW and SWHA to minimize construction-related noise impacts. The BUOW breeding season in California extends from February 1 to August

31[4], and the SWHA nesting season is between March 1 and September 15[5]; therefore, we recommend avoiding construction-related activities between February 1 and September 15. Additionally, we recommend that the Final EIR examine the possibility of designing and installing effective noise barriers.

4. **BUOW Passive Relocation**
   The DEIR states that CEC Staff acknowledges that passive relocation of BUOW can increase the risk of predation. We stress that CDFW does not consider passive relocation to be a take avoidance, minimization or mitigation measure, as iterated in CDFW's scoping comments on the Project.[6] We recommend this acknowledgment be included in the Final EIR.

5. **Deficient Surveys**

   a. **Protocol-Level Surveys Conducted Simultaneously**
      The DEIR states that the first BUOW survey conducted in 2024 was performed in conjunction with focused rare plant and desert tortoise (DT) surveys. However, combining these surveys raises concerns about adequacy, as each of these resources requires specific survey protocols, timing and levels of attention to ensure accurate detection and assessment. To ensure compliance with CDFW and US Fish and Wildlife Service (USFWS) guidelines and to fully capture the presence and needs of each resource, all protocol-level surveys should be conducted independently, with sufficient time and expertise dedicated to each species. We recommend conducting independent species-specific protocol-level surveys.

   b. **Outdated Desert Tortoise Surveys**
      USFWS guidance states that if survey data is over a year old, the project proponent should contact USFWS to assess the circumstances under which the data was collected to determine whether additional surveys would be appropriate.[7] Furthermore, CDFW states DT surveys are valid only for one year

[4] California Department of Fish and Wildlife, 2012. *Staff Report on Burrowing Owl Mitigation*.
[5] California Energy Commission and Department of Fish and Game. 2010. *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Projects in the Antelope Valley for Los Angeles and Kern Counties, California*.
[6] California Department of Fish and Wildlife. 2022. *Willow Rock Energy Storage Center; Docket Number 21-AFC-02; Applicants Response to CEC Staff's Issues Identification Report and Proposed Schedule; Applicant's Notice Pursuant to 20 CCR § 1716(F) Regarding Staff's Data Requests Set 1*.
[7] US Fish and Wildlife Service. 2019. *Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*)*.

and should be conducted within a year of the start of Project implementation, as noted within its scoping comments.

However, the most recent DT survey for the Willow Rock Energy Storage Project was conducted in April 2024, rendering the surveys outdated. Given the mobility of DT and the potential for the site to serve as a climate refuge, relying on older data poses a significant risk of overlooking individuals or recent activity. The DEIR fails to mention any discussions with the USFWS to determine the validity of the surveys. We request that surveys be conducted within one year prior to ground disturbance for the entirety of the project site to determine the presence of DT.

c. Mohave Ground Squirrel Surveys

The DEIR states that CEC Staff does not concur with the applicant that MGS is absent from the project site with certainty, but rather that there is a low potential for the species' presence. We support Staff's conclusion and emphasize the importance of conducting updated protocol-level surveys. While the Staff Assessment recommends that these surveys be conducted prior to the start of construction, we strongly urge that they be completed before the FEIR is issued. The surveys must follow CDFW survey guidelines[8], which specify trapping surveys should occur for five consecutive days during each of the three trapping periods, with at least two weeks separating each of the trapping periods

1. March 15 through April 30;
2. May 1 through May 31; and
3. June 1 through July 15.

Furthermore, we highlight that a visual survey may also reveal the presence of MGS on the project site through visual observations conducted during the period from March 15 to April 15. Conducting surveys prior to finalizing the EIR would ensure that if MGS is detected, the impacts analysis can be updated accordingly, and appropriate avoidance, minimization and mitigation measures can be incorporated into the final document.

d. Special-Status Plant Surveys

The DEIR indicated that surveys for special-status plant species occurred in both 2023 and 2024; however, the Willow Rock Sensitive Plant Survey 2024 Addendum (Plant Survey) only includes survey results for the 2024 surveys and no additional details on the 2023 surveys are available in the docket log or the DEIR. The Plant

[8] California Department of Fish and Wildlife. 2023. *Mohave Ground Squirrel Survey Guidelines*.

Survey and DEIR do not include sufficient information regarding the survey protocols and results to ensure that surveys would have been sufficient to detect sensitive resources present in the study area. The 2021 update to the 2018 CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities[9] (Protocols) includes several recommendations for developing survey protocols and information that should be included in a survey report that was not included in the Plant Survey or DEIR. The following information should be gathered during survey efforts and disclosed in survey results to ensure survey adequacy:

- Botanical field surveys should be floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status;
- The names and qualifications of the surveyors;
- The dates and locations of surveys, names of surveyors on each date and person hours spent on each date;
- A description of the reference sites used and the phenology of target plants at reference sites;
- A description and map of the area surveyed relative to the project area;
- A discussion of how climatic conditions may have affected survey results;
- A discussion of how the timing of surveys may have affected survey results;
- A discussion of the potential for a false negative survey;
- A discussion of the significance of special-status plant populations in the project area, considering nearby populations and total range and distribution;
- A discussion of the significance of sensitive natural communities in the project area, considering nearby occurrences and natural community distribution;
- A discussion of project-related direct, indirect and cumulative impacts to special-status plants and sensitive natural communities;
- A discussion of the degree and immediacy of all threats to special-status plants and sensitive natural communities, including those from invasive species; and
- A discussion of the degree of impact, if any, of the project on unoccupied, potential habitat for special-status plants.

[9] California Department of Fish and Wildlife. 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*.

The DEIR should include a comprehensive plant list of all taxa encountered during survey efforts. We often find that special-status species may have been discovered that were not targeted for surveys, are listed under an outdated name, or that species are not identified to a level sufficient to determine rarity (e.g. a plant was only identified to the genus level when identification to the species or subspecies level is required). A comprehensive species list is essential to evaluating and providing substantive comment on the botanical resources of the study area.

The DEIR should not discount the potential for a species to be present based on its known range. It is not uncommon for disjunct populations to be discovered, especially in areas that have not previously been well documented. This illustrates the need for surveys that are floristic in nature to ensure that species not identified during a desktop review or species that have not yet been described to science may be evaluated for impacts.

The desktop review did not include *Castilleja plagiotoma* (Mojave Paintbrush) or *Dudleya abramsii ssp. calcicola* (limestone dudleya), both listed in a 9-quadrant review of the CNPS Rare Plant Inventory for the project location. For a CEQA-equivalent document, the use of a 9-quadrant review is standard. While they may not be present on the project site, the potential for these taxa to occur on the project site must be evaluated.

As of May 28, 2025, Revised CDFW Census Instructions for Western Joshua Tree Conservation Act incidental take permits were issued and will likely require additional surveys to comply with the updated census requirements.

6. Deficient Mitigation Measures

a. Worker Environmental Awareness Program (WEAP)

MM Bio-5 focuses on the WEAP, but does not specify that it will be provided in Spanish or any other language spoken by the workers. This omission may limit the effectiveness of the program for non-English speaking personnel, and it is best practice to, at the very least, offer WEAP materials in Spanish. We recommend revision MM BIO-5 to include the requirement that the WEAP be provided in the primary languages spoken by onsite workers.

b. Crotch's Bumble Bee Buffers

MM BIO-13.6 and BIO-13.8 state that a 50-foot no-disturbance buffer will be established around CBB nests. However, this buffer distance does not align with CDFW recommendations. In their scoping comments, CDFW recommends a minimum no-disturbance buffer of 30 **meters**, which is approximately 98 **feet**. The reduced 50-foot buffer proposed in the DEIR is not sufficient. We request measure be revised to implement the 30-**meter** (98-**foot**) buffer recommended by CDFW.

c. Wildlife Exclusion Fencing - BIO-11.10

While the DEIR specifies the installation of DT exclusion fencing around the Project site, it lacks detailed specifications regarding the fencing's design, materials, installation depth and maintenance protocols. MM BIO-16.1 simply states exclusion fencing specification shall be consistent within the *Desert Tortoise Field Manual*, or more current guidance provided by USFWS. The specifications of the fencing should be finalized before the release of the DEIR, in part, to allow for public participation and comment on the avoidance measure. We recommend establishing the fencing specifications within the Final EIR.

d. Swainson's Hawk Buffers

MM BIO-20.4 specifies a 0.25-mile no-disturbance buffer around any observed SWHA nests. However, CDFW recommends a minimum no-disturbance buffer of 0.5 mile within its scoping comments on the Project. We recommend revising the measure to adhere to CDFW's recommended 0.5-mile buffer.

e. Swainson's Hawk Compensatory Mitigation

The DEIR acknowledges the Project site contains suitable nesting habitat for SWHA, and an active nest was documented during protocol-level surveys. Additionally, multiple observations of SWHA foraging both within and adjacent to the Project site were recorded. Despite this, the DEIR does not include compensatory mitigation specifically for impacts to SWHA nesting and foraging habitat.

This is a significant omission, particularly given that SWHA populations in the Antelope Valley have been in decline due to ongoing habitat loss and fragmentation. A Defenders' analysis on the impacts on SWHA within the Antelope Valley found over 13,661 acres of SWHA foraging habitat within five

miles of active nests have been lost due to solar development within the region. Yet, mitigation lands that could be verified only amounted to a negligible 5,432 acres[10]; this can, in part, be attributed to the low mitigation ratio levels required from solar projects that tend to range from 0.5:1 to 1:1. Ensuring adequate compensatory mitigation is vital within the Antelope Valley, given that the region provides important nesting and foraging habitat for the southernmost SWHA breeding population remaining in California, and it serves as the core nesting population within the Mojave Desert. The existing 5,432 acres of compensatory mitigation are insufficient, considering the large amount of acreage being developed; therefore, there is a need to include and improve SWHA mitigation ratios moving forward.

We request the Final EIR include compensatory mitigation for impacts to SWHA habitat. The compensatory mitigation must adhere to the latest recommended ratio of, at a minimum, 2:1 for nesting habitat impacted within a five-mile radius of nests active within the last five years.[11] Furthermore, compensatory mitigation for loss of nesting trees, even outside of the nesting season, should be replaced with an appropriate native tree species at a 3:1 ratio.[12]

The habitat management lands must contain suitable habitat for the species and be managed in perpetuity by a qualified conservation organization as defined by CA Civil Code Section 815.3. Alternatively, credits could be purchased in a CDFW-approved mitigation bank.

f. Desert Kit Fox Buffers

MM BIO-22.2 states that if an active natal desert kit fox den is detected, a 250-foot avoidance buffer will be established. However, CDFW, in its scoping comments, specifies that survey and avoidance measures for desert kit fox should follow the USFWS San Joaquin kit fox guidelines[13], which specify that

[10] Aardahl, J. and Markowska, S. 2023. (Unpublished data). *Swainson's Hawk Habitat Loss from Solar Projects in the Antelope Valley, California*.

[11] California Energy Commission and Department of Fish and Game. 2010. *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Projects in the Antelope Valley for Los Angeles and Kern Counties, California*.

[12] Californina Department of Fish and Wildlife. 2020. *BigBeau Solar Project (Project) Draft Environmental Impact Report (DEIR) SCH No. 2019071059*.

[13] U.S. Fish and Wildlife Service. 2011. *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior To or During Ground Disturbance. Sacramento, California*.

USFWS should be contacted to determine appropriate avoidance buffers for natal dens. The DEIR does not clarify whether the 250-foot buffer distance was developed in consultation with USFWS. If it was not, we recommend coordinating with USFWS to ensure that the proposed buffers are adequate.

g. Special-Status Plants

MM BIO-12 should include species-specific mitigation plans for the special-status species that are anticipated to be impacted by project activities and not defer the development of specific mitigation measures to post approval. Any acquisition of occupied land to fulfill mitigation requirements for the loss of special-status species and their habitats will lead to a net loss of habitat and individuals; therefore, avoidance should be prioritized over any form of compensatory mitigation. If compensatory mitigation is needed, this measure should include language to require that sufficient lands for compensatory mitigation be identified prior to ground disturbance for any known occurrences, or occurrences discovered during preimplantation surveys, of special-status plants that would not be avoided by impacts. Any off-site introduction efforts should also require the identification of sufficient suitable habitat to meet mitigation needs prior to ground disturbance. Any area proposed for the introduction of a special-status species should be surveyed to ensure that the site contains the proper conditions for successful introduction (i.e., soil type, hydrology, aspect, elevation) and is free of invasive species that could inhibit establishment. Any acquisitions or introductions shall be managed and monitored for a minimum of five years to ensure that mitigation is meeting clearly defined success criteria; management may include but is not limited to weed suppression, irrigation, and protecting introduced species from herbivory. After five years of management yearly monitoring shall occur in years six through eight. If populations are self-sufficient and are meeting success criteria for three consecutive years post management, then monitoring may occur every other year throughout the life of the project. Management will be resumed if, at any point, monitoring shows that populations are not meeting success criteria, returning to monitoring every other year after yearly monitoring shows stable populations that meet success criteria for three consecutive years. Monitoring reports will be made publicly available and easily accessible. The project owner shall provide financial assurances for all management and monitoring requirements.

h. Integrated Weed Management and Invasive Species

The development of the Integrated Weed Management and Invasive Species Management Plan should not be deferred and be made available for public review prior to project approval. These management plans should include active monitoring and rapid response to invasive plant species and revegetation of disturbed areas with locally sourced and genetically appropriate materials.

Conclusion

Thank you once again for the opportunity to provide comments on the Willow Rock Energy Storage Center DEIR/PSA. Please feel free to contact us with any questions.

Respectfully submitted,

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