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October 3, 2025

Attn: Ann Crisp
Biological Resources Unit Supervisor
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Viracocha Hill BESS: Habitat Conservation Plan Outline

The Project Team initially met with U.S. Fish and Wildlife Service on April 8, 2025 to introduce the Project and seek assistance from the local field office to ensure the permitting approach was appropriate. Anticipated framework, species, and field methodologies, and timelines and submittals were discussed.

Because no other federal nexus is anticipated, a Section 10 framework was recommended, with Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP). The species that are expected to be covered are San Joaquin Kit Fox, Northwestern Pond Turtle, California Red-legged Frog, California Tiger Salamander, and Western Spadefoot. Although we will address Monarch Butterfly, pollinator plant surveys and habitat assessments will help further determine if coverage for this species is needed. The USFWS recommended a habitat assessment, supported by pollinator plant/host plant surveys, as the initial basis for the HCP.

The meeting further discussed inclusion of Golden Eagle disturbance and potential nest take coverage, pending survey results and Project need. The USFWS agreed this was a possibility, and the need and approach would be confirmed closer to HCP submittal. The habitat assessment, HCP, and application have not yet commenced.

Sincerely,

Pedro Blanquer Jaraiz
Manager
Reclaimed Wind LLC