

DOCKETED

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Supplemental Data Requests Set 1

BIOLOGICAL RESOURCES

Staff has reviewed the comment letter on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Prairie Song Reliability Project provided by the California Department of Fish and Wildlife (CDFW) (TN 268941). The comment letter recommends that the CEC require the applicant to provide a native plant palette for the project. Further, the letter states "The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site introducing non-native, invasive species." CDFW and staff agree that native species of trees and understory vegetation should be planted, and that plantings should support native pollinator and insect species. Please refer to the comment letter for additional guidance.

The applicant has proposed several plans which could ultimately direct on-site plantings. The applicant has proposed development of a Conservation Management Plan to meet the mitigation requirement for the proposed project (TN 268650). Further, the Conservation Management Plan "will include a description of management tasks for the up to 135 acres of land that will be designated as the on-site Open Space Preserve and protected under a conservation easement." (TN 268650).

Additionally, the applicant also proposes preparation of a Temporary Impact Restoration Plan for those areas that would be temporarily impacted by construction (TN 268650). Restoration of temporary impact areas would be expected to include site preparation and minor recontouring, installation of signage and best management practices (BMPs), hydroseeding, installation of California juniper container plants, and transplanting of short-jointed beavertail. Upon completion of the restoration activities, a 7-year maintenance and monitoring period would commence. Activities to be performed during the 7-year maintenance and monitoring period would include weeding, watering, supplemental hand seeding and replacement of container planting as needed, and qualitative and quantitative biological monitoring and reporting over the 7-year period.

The applicant proposed a landscape plan (Appendix 2B, Landscape Plan) (TN 264410) that would ensure consistency with the County of Los Angeles General Plan Conservation and Natural Resources Element, Policy 3.2. While no mitigation measures were proposed, the applicant intends that the landscape plan would encourage the use of vegetation and natural materials to blend the proposed structures with the surrounding environment, in accordance with the policy. Therefore, the landscape plan would be designed to obscure or soften the proposed perimeter wall with a 10-foot planting buffer utilizing drought tolerant species. The landscape plan includes a list of potential plants to be utilized and associated figures.

These three above plans may entail planting of seeds, propagules, or plants. The proposed plans did not all include a planting palette or a list of proposed plant species.

So staff can address CDFW's comments on the NOP and provide an analysis of the proposed planting palette, additional information is required. Staff encourages installation of landscaping around the perimeter of the BESS facility for nesting birds, taking into account the existence of any wildlife management buffers or other management buffers.

SDR 1 BIO-1. Please provide a draft plant palette incorporating the use of native plants for the plans referenced in the Opt-in application, including the project landscape plan, Temporary Impact Restoration Plan, and the Conservation Management Plan. Please consult the Natural Resources Conservation Service's Noxious Weeds List (2026) and the California Invasive Plant Council (Cal-IPC) Invasive Plant Inventory (Cal-IPC 2026) to guide plant palette selection to ensure that non-native plants and noxious weeds are avoided. Please identify any plant species proposed for use that are found in naturally occurring plant communities within or adjacent to the proposed project site, those which may be beneficial to nesting birds, or those with other beneficial impacts.

SDR 1 BIO-2. Please consider if the Landscape Plan should be updated or revised pursuant to **SDR 1 BIO-1** and resubmit in redline and strikeout if necessary.

The CDFW NOP comment letter identifies that up-to-date surveys should be conducted for Crotch's bumble bee (*Bombus crotchii*), a candidate species for listing under the California Endangered Species Act. Existing guidance from the CDFW's *Survey Considerations for CESA Candidate Bumble Bee Species* (2023), mentioned in the comment letter, supports the need for multi-season surveys to assess presence of these species. Surveys performed in 2024 and 2025 were negative for the species, and at the time the application was prepared in 2025, there were no documented occurrences of Crotch's bumble bee within the study area or within five miles of the project (as reported in TN 268650). The applicant has determined that suitable habitat exists on and near the site (TN 268650).

The applicant conducted surveys for Crotch's bumble bee (*Bombus crotchii*) in summer 2024 on the BESS and northern gen-tie option portions of the study area. According to most recent applicant filings (February 2026) (TN 268650), "Dudek is currently conducting supplemental rare plant surveys and Crotch's bumble bee surveys in 2025 for parcels associated with the Southern Gen-Tie option of the Study Area." Further, it is staff's understanding, based on a site visit on February 23, 2026, with the applicant and CDFW, that survey efforts are ongoing in 2026.

Staff acknowledges that survey results may not be available until after development of the Draft Environmental Impact Report and Staff Assessment (DEIR/SA). However, because the applicant is seeking incidental take authorization for this species under CEC's in lieu permitting authority, staff does not anticipate that any additional data would materially alter the forthcoming Final EIR/SA's significance conclusions or conditions of certification.

SDR 1 BIO-3. Staff requests that the applicant complete additional surveys for Crotch's bumble bee consistent with CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species as soon as possible to ensure detections can be made prior to the end of the flight season. Each survey should ideally be spaced two to four weeks apart during the Colony Active Period to ensure that they cover a range of dates and account for variability in resource use by the candidate species and floral resource phenology within the site. For Crotch's bumble bee, the Colony Active Period is April to August. These surveys shall include both nesting colony surveys and foraging surveys in adjacent habitat. Surveys shall include all suitable habitat and all areas within 100 feet of project disturbance associated with the southern gen-tie alignment or other planned survey areas. Please provide a survey report that meets the standards of the survey guidance.

The CDFW NOP comment letter identifies that a recent and rare plant survey should be conducted, CDFW further noted that the time frame for validity of biological field assessments for rare plants may be considered valid for a period of up to three years.

The applicant has indicated that surveys were to be conducted in 2025 (TN 268650) along the southern gen-tie alignment within the "study area". For these purposes, the study area is defined as including "...the Project site parcels, and it is approximately 414 acres. The Study Area for focused species surveys was expanded per protocol and where necessary to capture nearby resources...Existing conditions within 1,000 feet of the gen-tie route options are similar to the Study Area because there are no significant changes in topography, geology, or hydrology within that distance." (TN 268650 pdf page 132).

The applicant conducted surveys for sensitive plants for the BESS and northern gen-tie option portions of the study area in the spring of 2023 and has identified the presence of California Rare Plant Ranked species. Impacts to these plants may be considered significant pursuant to CEQA, and could require avoidance, minimization, and/or mitigation measures within staff's DEIR/SA. It is further staff's understanding, based on a site visit on February 23, 2026, with the applicant and CDFW, that rare plant survey efforts are ongoing in 2026; however, staff requests more information and a final report.

SDR 1 BIO-4. Please complete additional surveys for rare plants along the southern gen-tie alignment, along with any other planned botanical surveys and provide the results of the surveys. Please continue to survey using methodology as described in TN 268650 (pdf pages 139 to 140), including floristic survey methods, while incorporating guidance from the CDFW NOP Comment Letter, items 3a, 3b, 3e and 3f (TN 268941), specifically:

- 3a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities.

CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities webpage⁴.” [The hyperlink is as below.¹]

- 3b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.
- 3e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, §, 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.
- 3f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the

¹ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.

Staff clarifies that "recent wildlife" survey as noted in 3f. applies exclusively to Crotch's bumble bee surveys (**SDR 1 BIO-3**).

References

- California Invasive Plant Council (Cal-IPC). – 2026. Inventory. Accessed March 18, 2026. Accessed online at: [https:// www.cal-ipc.org/plants/inventory/](https://www.cal-ipc.org/plants/inventory/)
- CDFW 2023 – California Department of Fish and Wildlife. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, June 2023. Accessed online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>
- NRCS 2026 – Natural Resources Conservation Service. PLANTS Database. United States Department of Agriculture. Accessed online at: <https://plants.usda.gov>