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June 24, 2026

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DARDEN CLEAN ENERGY PROJECT (23-OPT-02C) REQUEST FOR BUFFER REDUCTION MODIFICATION

The Compliance Project Manager (CPM) has reviewed a batched request for general nesting bird nest buffer reductions "23-OPT-02C Darden Clean Energy Project, Batch Buffer Reduction Request for Known and Future Nesting Birds" (Request). The Request is dated June 12, 2026. The condition of certification (COC) that applies to these activities is BIO-8(5) Nesting Bird Avoidance and Minimization Measure and Tricolored Blackbird Avoidance and Minimization Measures.

General Nesting Bird Nests:

The project owner has been actively surveying and monitoring nesting bird presence and behavior at the project site during construction and, based on historic and current nesting data, has identified nests that either are, or are likely to become occupied during the 2026 nesting season (February 1 through September 15). The project owner has planned construction activities throughout the site during the same time period, that could affect these nests and any associated buffers. The project owner has observed and identified the following species throughout the project site: mourning dove, lesser nighthawk, killdeer, red-tailed hawk, northern harrier, barn owl, great horned owl, American kestrel, Say's phoebe, western kingbird, loggerhead shrike, common raven, horned lark, northern mockingbird, red-wing blackbird, and western meadow lark.

Project Owner's Request: This batch request would cover all remaining construction activities that would occur within the vicinity of any currently-known plus any future general nesting bird nests and would supersede all previous buffer reduction requests (BRRs) for general nesting bird nests. This BRR specifically requests reducing the preliminary buffer for all known and future general nesting bird nests to a minimum of 50 feet project site-wide, with the option to reduce the buffer to less than 50 feet at the discretion of the Designated Biologist (DB), to include vehicle travel on existing roads, pending construction monitoring results. Additionally, the project owner requests that activities such as inventory and removal of construction materials and equipment within buffers be allowed at the discretion of the DB, provided these activities would not cause distress to nesting birds. The project owner will continue full-time monitoring of initial construction activities within preliminary nest buffers and requests based on observed behavior in response to construction activities, reduce monitoring to spot checks at the discretion of the DB when appropriate.

Construction activity level and frequency will vary based on activity, however, estimated types of equipment include motor graders, water trucks, sheepsfoot rollers, smooth-drum rollers, tractors with disc attachment, scrapers, dozers, trucks, semi-trucks, buggies, forklifts, pile drivers, skid steers, excavators, concrete trucks, graders, loaders, a rough terrain crane, backhoes, drill rigs, and hydrovac trucks. Staffing would include approximately 100-500 ground personnel depending on the activity. The project owner has committed to performing a few activities in sequence at a time, as opposed to all activities being performed simultaneously.

The daily work schedule will be Monday through Saturday; 8.5 hours; from 7:00 AM to 4:30 PM. Finally, the project owner has requested the CPM issue approval lasting through the 2026 nesting season, inclusive.

The project owner has proposed the following four protective measures:

1. No construction activities will occur within the reduced buffers; travel on existing roads and inventory/removal of equipment/materials may occur within buffers at the discretion of the DB and with the implementation of additional protective measures listed under #4 as needed.

2. A DB or Biological Monitor, under the direction of a DB, will monitor activities performed within the reduced buffer area. Full-time monitoring will occur during initial construction activities within the reduced buffer and until the DB has

determined that construction activities are not causing distress to the birds, after which, monitoring may be reduced to spot checks at the discretion of the DB.

3. If distressed behavior is observed, the buffer size will be increased and/or construction activity intensity will be reduced until no further distress is observed.

4. Where necessary based on species observations, additional protection measures will be implemented as needed including, installation of visual/sound barriers, phasing of construction to start farthest from the nest and progress closer to the nest over time, and/or construction sequencing to minimize simultaneous activities where feasible, and implementation of vehicle speed limits and spacing.

CPM Response: Maps and imagery (Google Earth Pro) of the project site were reviewed, as well as the Nesting Bird Management Plan, Rev 1 (Plan) for the project.
Staff notified CDFW of this request on June 12, 2026, to coordinate and provide input regarding the project owner's proposed measures and suggested approaches to streamlining BRR.

All nests exhibiting evidence of past or present use were previously known, mapped, and marked within the project area. Full-time biological monitoring by a DB, or Biological Monitor under the direction of a DB, will occur for all initial work within the reduced buffer area to confirm the nesting birds are tolerant of the activities. Initial work window is a minimum of two days of construction activity and at the discretion of the DB to extend. The request to reduce the preliminary buffer for known and future general nesting bird nests to a minimum of 50 feet project site-wide, with the option to reduce the buffer to less than 50 feet at the discretion of the DB is approved for nesting birds covered by COC BIO-8, for passerines. The request to reduce buffer areas for birds of prey from 500 feet is approved to 100 feet, when nesting birds show acclimation to activities, pursuant to **BIO-8**, Item 5. Any further buffer reductions (99 feet and closer) will require CPM authorization via a submitted buffer reduction request. Buffers for tricolored blackbird may not be reduced via this manner, as this is a CESA-listed species. Please submit future buffer reduction request(s) as needed for CPM consideration, should a colony be found onsite.

Reduced buffer areas include birds of prey from 500 feet to 100 feet and passerines will continue at 50 feet, with the option to decrease passerine buffers further at the DB's discretion. The request to reduce full-time monitoring of acclimated nesting birds within nest buffers and allow spot checks at the discretion of the DB when appropriate is approved when nesting birds show acclimation to activities, pursuant to **BIO-8**, Item 5, with birds of

prey and species of special concern generally having longer monitoring periods. Specifically, project activities and protective measures shall be as described in the Request under "Protective Measures." No construction will occur within DB designated reduced buffers. All "Protective Measures" presented by project owner in the Request shall be followed through the end of the nesting season. The approval for this buffer reduction and monitoring efforts shall remain in effect through the end of the nesting season, up to **September 15, 2026**.

This request will supersede existing CPM-approved BRR as indicated in the table below.

IPX Darden BRR Number	**Initial Request Date**	**Description**
BRR #5	2/25/2026	Civil/solar scope within Area 12 GHOW buffer up to 250 feet from nest.
BRR #6	3/20/2026	Civil/solar scope within Area 3 GHOW buffer up to 250 feet from nest.
BRR #8	3/24/2026	BAAH switchyard scope within RTHA buffer up to 250 feet from nest.
BRR #14	4/24/2026	Civil/solar scope within Area 13 and Area 16 NOHA buffer up to 215 feet from nest.
BRR #16	4/29/2026	Ongoing traffic along Napa Avenue within 500-foot BANO nest box buffer.
BRR #17	5/9/2026	Construction of perimeter fencing and detention basin within Area 7 BANO buffer up to 25 feet from nest.
BRR #19	5/13/2026	Amendment to BRR #6 for additional solar scope within GHOW buffer up to 250 feet from nest.
BRR #22	5/27/2026	Site survey and silt fence installation along gen-tie within BANO buffer up to 150 feet.
BRR #23	5/27/2026	Site survey and silt fence installation along gen-tie within BANO buffer up to 150 feet.

BRR #25	5/26/2026	Removing materials from within a 50-foot LENI buffer.
BRR #28	5/26/2026	Continue development of access roads, laydown yard, and water fill station within a BANO buffer up to 100 feet from nest.
BRR #29	5/27/2026	Ongoing traffic along Napa Avenue within any future nest buffer associated with nest boxes along Napa Avenue.
BRR #30	5/29/2026	Security fence installation within Area 7 BANO buffer up to 25 feet from nest box.
BRR #31	5/27/2026	Ongoing traffic along NW artery road within 50-foot HOLA buffer.
BRR #34	6/5/2026	A one-time inventory of materials within a 50-foot HOFI buffer in Area 11.
BRR #35	6/5/2026	Amendment to BRRs #6 and #19 for additional solar scope up to 250 feet from nest.

Additional requirements that apply to these approvals are as follows:

The DBs and/or Biological Monitor(s) shall continue to conduct pre-construction surveys and monitoring per COC **BIO-8** and the approved Nesting Bird Management Plan, which requires both pre-construction surveys and pre-activity sweeps to identify the presence of nesting birds.

The DB(s) and/or Biological Monitor(s) shall continue to protect and monitor active nests per COC **BIO-8** and the Plan, with the exception of full-time monitoring for active nests deemed tolerant of initial work activities, pursuant to the "Protective Measures" section as described in the Request. This includes, but is not limited to, compliance with section 2.6 of the Plan, which states the buffer will be re-evaluated and revised for activity or increased in size if a bird is flushed from an active nest or other signs of disturbance of a nesting bird at a level that has potential to cause nest failure, as determined by the DB based on behavioral observations of the affected individuals.

In addition, the DB shall identify and implement adaptive measures as necessary. Such adaptive measures may include reducing the extent, noise, or hours of activities, reducing speed limits, providing additional sound or visual barriers per Section 2.6.1 of the Plan, as well as increasing buffers per Section 2.6 of the Plan. Regular reporting is also required by Section 3 of the Plan. The implementation of the requirements of this buffer reduction approval, along with any additional adaptive measures, shall be reported in the applicable Monthly Compliance Report.

With the implementation of the above procedures and Condition of Certifications, the Compliance Project Manager has determined that the requested buffer modifications would not result in any new or substantially more severe environmental impacts, within the meaning of California Code of Regulations, title 14, section 15162.

If you have questions or concerns, please contact me at (916) 956-9527 or e-mail at joseph.douglas@energy.ca.gov.

Sincerely,

Joseph Douglas

Joseph Douglas, Compliance Project Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting, Transmission and Environmental Protection Division

cc: Brett Fooks, Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting Transmission and Environmental
Protection Division

June 24, 2026

David Lungren
IPX Power
9450 SW Gemini Drive
Beaverton, Oregon 97008

DARDEN CLEAN ENERGY PROJECT (23-OPT-02C) REQUEST FOR BUFFER REDUCTION MODIFICATION

The Compliance Project Manager (CPM) has reviewed a batched request for burrowing owl burrow nest buffer reductions "Darden Clean Energy Project (23-OPT-02C), Batch Buffer Reduction Request for Known and Future Burrowing Owl Burrows per Condition of Certification **BIO-12**(6) and the Darden Burrowing Owl Plan" (Request). The Request is dated June 12, 2026. The condition of certification (COC) that applies to these activities is **BIO-12**(6) Burrowing Owl Impact Avoidance, Minimization, and Take Mitigation Measures.

Burrowing owl burrows:

The project owner has been actively surveying and monitoring burrowing owl presence and behavior at the project site during construction and, based on historic and current data, has identified burrows that either are, or are likely to become occupied during the 2026 nesting season (February 1 to August 31, 2026). The project owner has planned construction activities throughout the site in the same time period that could affect these nests and any associated buffer. The burrowing owl burrows identified within the Request include multiple known burrow locations across the site, in multiple construction areas; Area 3 north border, Area 7 southeast quadrant, and Area 15 east border.

Project Owner's Request: This batch request would cover all remaining construction activities that would occur within the vicinity of all of the currently-known plus any future BUOW burrows and would supersede all previous buffer reduction requests (BRRs) for BUOW burrows. This BRR specifically requests reducing the 1,600-foot preliminary buffer for all known and future nests to a minimum of 50 feet project site-wide at the discretion of the Designated Biologist (DB). For future discovered burrowing owl burrows, a 1,600-foot buffer will be established and, based on biological monitoring and observations of owl behavior, the DB may reduce buffer size to 50 feet. If burrowing owl occupying burrows exhibit signs of distress related to construction activities, the DB would increase the buffer at their discretion and/or implement sound or visual barriers pursuant to Section 3.6.4 of the Burrowing Owl Artificial Burrow Replacement and Mortality Reduction Plan (COC **BIO-12**), Rev 3 (Plan).

The project owner further requests to continue full-time monitoring of initial work construction activities within 1,600 feet of occupied burrows and, based on observed BUOW behavior in response to construction activities, may reduce monitoring to spot checks at the discretion of the Designated Biologist when appropriate.

Construction activity level and frequency will vary based on activity, however, estimated types of equipment include motor graders, water trucks, sheepsfoot rollers, smooth-drum rollers, tractors with disc attachment, scrapers, dozers, trucks, semi-trucks, buggies, forklifts, pile drivers, skid steers, excavators, concrete trucks, graders, loaders, a rough terrain crane, backhoes, drill rigs, and hydrovac trucks. Staffing would include approximately 100-500 ground personnel depending on the activity. The project owner has committed to performing a few activities in sequence at a time, as opposed to all activities being performed simultaneous. Inventory of and/or removal of construction equipment/materials may occur within buffers at the discretion of the DB where these activities can be accomplished without causing significant distress to burrowing owl.

The daily work schedule will be Monday through Saturday; 8.5 hours; from 7:00 AM to 4:30 PM. Finally, the project owner has requested the CPM issue approval coverage through the 2026 nesting season, inclusive.

The project owner has proposed the following four protective measures:

1. No construction will occur within the reduced 50-foot buffers; travel on existing roads and inventory/removal of equipment/materials may occur within buffers at the discretion of the Designated Biologist and with the implementation of additional protective measures listed under #4 as needed.

2. A burrowing Designated Biologist (DB) or Biological Monitor (BM), under the direction of a burrowing owl DB, will monitor activities performed within the reduced buffer area (i.e., 1,600 to 50 feet). Full-time monitoring will occur during initial construction activities within the reduced buffer and until the burrowing owl DB has determined that construction activities are not causing distress to the burrowing owl, after which, monitoring may be reduced to spot checks at the discretion of the burrowing owl DB.

3. If distressed behavior is observed, the buffer size will be increased and/or construction activity intensity will be reduced until no further distress is observed.

4. Where necessary based on species observations, additional protection measures will be implemented as needed including, installation of visual/sound barriers, phasing of construction to start farthest from the burrow and progress closer to the burrow over time, construction sequencing to minimize simultaneous activities where feasible, scheduling activities to occur during times of day when the owls are underground, and implementation of vehicle speed limits and spacing.

CPM Response: Maps and imagery (Google Earth Pro) of the project site were reviewed, as well as the Burrowing Owl Artificial Burrow Replacement and Mortality Reduction Plan (COC **BIO-12**), Rev 3 (Plan) for the project. Staff notified CDFW of this request and coordinated regarding the project owner's proposed measures and requested buffer reduction approach.

Burrowing owls require preexisting ground burrows, dug by small mammals such as ground squirrels, which they colonize and inhabit. Therefore, all burrows exhibiting evidence of past or present burrowing owl use were previously known, mapped, and marked within the project area. Full-time biological monitoring by a burrowing owl DB, or Biological Monitor under the direction of a burrowing owl DB, shall occur for all initial work within the reduced buffer area (i.e., 1,600 to 50 feet) to confirm the burrowing owl are tolerant of the activities. The initial work window is a minimum of two days of construction activity and at the discretion of the DB to extend. The request to reduce the burrowing owl burrow buffer from 1,600 feet to 50 feet for all existing and future burrowing owl burrows within and adjacent to the project site as described in the Request is approved, pursuant to **BIO-12**(6), and the additional requirements are outlined below. Specifically, project activities and protective measures shall be as described in the Request under "Protective Measures" and will adhere to all additional

requirements below. The approval for this buffer reduction shall remain in effect through the end of the nesting season, up to **August 31, 2026**.

This request will supersede existing CPM-approved buffer reduction requests (BRR) as indicated in the table below.

IPX Darden BRR Number	**Initial Request Date**	**Description**
BRR #1	12/11/2025	Access road use site-wide.
BRR #2	2/3/2026	Reduced to 1,000-foot buffer for solar scope
BRR #3	2/3/2026	Drone use down to 300 vertical feet over BUOW nests.
BRR #4	2/18/2026	Use of Mt. Whitney for construction traffic.
BRR #7	3/20/2026	Vegetation mowing in Area 3 and Area 15 BUOW colonies.
BRR #9	3/31/2026	Request to discontinue full-time monitoring given the lack of observation of distress.
BRR #10	4/14/2026	Develop access roads in Area 7.
BRR #24	5/22/2026	Amendment to BRR #10 for solar scope and use of hay bales as a visual barrier for active nesting BUOW.
BRR #32	6/3/2026	Reduce buffers of known burrows to 50 feet at Area 3 and Area 15 BUOW colonies.

Additional requirements that apply to these approvals are as follows:

The Designated Biologists (DBs) and/or Biological Monitor(s) (BMs) shall continue to conduct pre-construction surveys and monitoring per COC **BIO-12** and the approved Plan, which requires pre-construction surveys, occupancy determinations, and pre-activity sweeps to identify the presence of burrowing owls.

The DB(s) and/or BMs shall continue to protect and monitor occupied burrows per COC **BIO-12** and the Plan, with the exception of full-time monitoring for active nests where the tending burrowing owl pair are deemed tolerant of initial work activities, pursuant to the "Protective Measures" section as described in the Request. This includes, but is not limited to, compliance with Section 3.7 of the Plan, which requires immediate cessation of

all work within any reduced buffer if burrowing owl are visibly stressed by project activities or workers, as determined by the DB based on behavioral observations of the affected individuals. Additionally, for existing and future known occupied burrows and burrows utilized by nesting burrowing owl, the reduction of the preliminary 1,600-foot preliminary buffer for all known and future nests shall be incrementally phased in, informed by ongoing burrow monitoring. At the DB's discretion, all presently known or future occupied burrows with more than 48 hours (two full workdays) of monitoring during construction activities may have buffers reduced to 200 feet (or less if previously approved in existing BRRs). After the initial buffer reduction to 200 feet (or less if previously approved), the burrowing owl DB, or BM under the direction of a burrowing owl DB, shall conduct full-time monitoring of occupied burrows for a period of no less than 48 hours (two full workdays) during construction activities within the initial reduced buffer (i.e., 1,600 to 200 feet). If no adverse reactions are noted by the DB during monitoring, the buffer may then be further reduced to a minimum of 50 feet.

In addition to the buffer reduction process above, the project owner shall avoid complete encirclement of occupied burrows with ground disturbing or other moderate to high intensity construction activities within the 1,600-foot preliminary buffer, pursuant to Section 3.6.3 of the Plan. The DB shall ensure that all occupied burrows have no less than 180 degrees of escapement from the above covered activities within the preliminary 1,600-foot buffer at any given time.

In addition to the additional measures above, the DB shall identify and implement adaptive measures as necessary. Such adaptive measures may include reducing the extent, noise, or hours of activities, reducing speed limits, providing additional sound or visual barriers per Section 3 of the Plan, as well as increasing buffers per Section 3.6.3 of the Plan. Regular reporting is also required by Section 4 of the Plan. The implementation of the requirements of this buffer reduction approval, along with any additional adaptive measures, shall be reported in the applicable Monthly Compliance Report. Staff further notes that per section 4.3 of the Plan, and **COC BIO-12**, the project owner is to notify the CPM via e-mail, within 24 hours if a nesting burrowing owl burrow is discovered with the presence of chicks, eggs, dependent young, and/or brooding or egg incubation.

Any unauthorized encroachment into the approved buffer area or failure to implement required protective measures shall result in an immediate cessation of work within the affected area. Work shall not resume until the cause of the encroachment has been corrected, any necessary corrective actions have been implemented, and the burrowing owl DB has determined that continued activities are not likely to result in disturbance, take, or abandonment of the burrow. Additional avoidance and minimization measures,

including restoration of a larger buffer, may be required at the discretion of the CPM, per Section 4.4 of the Plan.

With the implementation of the above procedures and Condition of Certifications, the Compliance Project Manager has determined that the requested buffer modifications would not result in any new or substantially more severe environmental impacts, within the meaning of California Code of Regulations, title 14, section 15162.

If you have questions or concerns, please contact me at (916) 956-9527 or e-mail at joseph.douglas@energy.ca.gov.

Sincerely,

Joseph Douglas

Joseph Douglas, Compliance Project Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting, Transmission and Environmental Protection Division

cc: Brett Fooks, Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting Transmission and Environmental
Protection Division

June 22, 2026

David Lungren
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Beaverton, Oregon 97008

DARDEN CLEAN ENERGY PROJECT (23-OPT-02C) REQUEST FOR BUFFER REDUCTION MODIFICATION

The Compliance Project Manager (CPM) has reviewed a batched request for Swainson's hawk (SWHA) nest buffer reductions "23-OPT-02C Darden Clean Energy Project, Batch Buffer Reduction Request for Known and Future Swainson's Hawk Nests" (Request). The Request is dated June 12, 2026.The condition of certification (COC) that applies to these activities is BIO-10(4) Swainson's Hawk Impact Avoidance, Minimization, and Mitigation Measures for Take.

Swainson's Hawk Nests:

The project owner has been actively surveying and monitoring Swainson's hawk presence and behavior at the project site during construction and, based on historic and current nesting data, has identified nests that either are, or are likely to become occupied during the 2026 nesting season (February 15 to September 15). The project owner has planned construction activities throughout the site in the same time period, that could affect these nests and any associated buffer. The Swainson's hawk's nests identified within the Request include seven known nests on and immediately adjacent the site, in multiple construction areas.

Project Owner's Request: This batch request would cover all remaining construction activities that would occur within the vicinity of seven currently-known plus any future Swainson's hawk's nests and would supersede all previous buffer reduction requests (BRRs) for SWHA nests. This BRR specifically requests reducing the 1,000-foot preliminary pedestrian buffer for all known and future SWHA nests to a minimum of 100 feet project

site-wide at the discretion of the Designated Biologist. The project owner further requests that full-time monitoring of construction activities within 0.25-mile of active SWHA nests may also be reduced to spot checks at the discretion of the Designated Biologist if appropriate based on observed hawk behavior.

Construction activity level and frequency will vary based on activity, however, estimated types of equipment include motor graders, water trucks, sheepsfoot rollers, smooth-drum rollers, tractors with disc attachment, scrapers, dozers, trucks, semi-trucks, buggies, forklifts, pile drivers, skid steers, excavators, concrete trucks, graders, loaders, a rough terrain crane, backhoes, drill rigs, and hydrovac trucks. Personnel would include approximately 100-500 ground personnel depending on the activity. The project owner has committed to perform a few activities in sequence at a time, as opposed to all activities being performed simultaneous.

The daily work schedule will be Monday through Saturday; 8.5 hours; from 7:00 AM to 4:30 PM. Finally, the project owner has requested the CPM issue approval last through the 2026 nesting season, inclusive.

The project owner has proposed the following four protective measures:

1. No construction activities will occur within the reduced 100-foot buffer; travel on existing roads and inventory/removal of equipment/materials may occur within buffers at the discretion of the Designated Biologist (DB) and with the implementation of additional protective measures listed under #4 as needed.
2. A Swainson's hawk DB or Biological Monitor (BM), under the direction of a Swainson's hawk DB, will monitor activities performed within the reduced buffer area (i.e., 1,000 feet to 100 feet). Full-time monitoring will occur during initial construction activities within the reduced buffer and until the Swainson's hawk DB has determined that construction activities are not causing distress to the Swainson's hawk, after which, monitoring may be reduced to spot checks at the discretion of the Swainson's hawk DB. Full-time monitoring of construction activities within 0.25-mile of active Swainson's hawk nests may also be reduced to spot checks at the discretion of the DB if appropriate based on observed hawk behavior.
3. If distressed behavior is observed, the buffer size will be increased and/or construction activity intensity will be reduced until no further distress is observed.
4. Where necessary based on species observations, additional protection measures will be implemented as needed including, installation of visual/sound barriers, phasing of construction to start farthest from the nest and progress closer to the nest over time,

construction sequencing to minimize simultaneous activities where feasible, and implementation of vehicle speed limits and spacing.

CPM Response: Maps and imagery (Google Earth Pro) of the project site were reviewed, as well as the Swainson's Hawk Conservation Strategy (COC **BIO-9**), Revision 4 (Strategy) for the project. Staff met with CDFW on June 12, 2026, to coordinate regarding this request.

Swainson's hawk exhibit site fidelity, returning to the same few nests within a territory, and these nests were already known and marked within the project area. Full-time biological monitoring by a SWHA DB, or Biological Monitor under the direction of a SWHA DB, will occur for all initial work within the reduced buffer area (i.e., 1,000 to 100 feet) to confirm the individuals are tolerant of the activities. The request to reduce the Swainson's hawk nest pedestrian buffers from 1,000 feet to 100 feet for all existing and future active Swainson's hawk nests within and adjacent to the project site is approved, pursuant to **BIO-10**, Item 4. Specifically, project activities and protective measures shall be as described in the Request under "Protective Measures." The approval for this buffer reduction shall remain in effect through the end of the nesting season, up to **September 15, 2026**.

This request will supersede existing CPM-approved buffer reduction requests (BRR) as indicated in the table below.

IPX Darden BRR Number	Initial Request Date	Description
BRR #1	12/11/2025	Access road use site-wide.
BRR #11	4/17/2026	Development and use of the Area 3 laydown yard.
BRR #13	4/24/2026	Use of Areas 9 and 11, and access along W Davis.
BRR #15	4/24/2026	Use of Sonoma project site entrance.
BRR #18	5/14/2026	Full solar scope up to 500 feet from nest.
BRR #20	5/20/2026	Access road use and full solar scope up to 250 feet from nest.
BRR #21	5/20/2026	Amendment of BRR #11 for full solar scope up to 150

		feet from nest. Approved 5/21/2026.
BRR #27	5/26/2026	Civil and solar scopes up to 200 feet from nest.

Additional requirements that apply to these approvals are as follows:

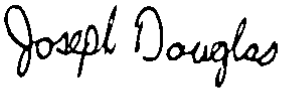
The Designated Biologists (DBs) and/or Biological Monitor(s) (BMs) shall continue to conduct pre-construction surveys and monitoring per COC **BIO-10** and the approved Swainson's hawk Nest Abandonment Contingency Plan, which requires both pre-construction surveys and pre-activity sweeps to identify the presence of nesting birds. Implementation of full-time monitoring will also be evaluated by the DB whenever pedestrian work is scheduled to occur within 500 feet of a Swainson's hawk nest.

The DB(s) and/or BMs shall continue to protect and monitor active nests per COC **BIO-10** and the Strategy, with the exception of full-time monitoring for active nests deemed tolerant of initial work activities, pursuant to the "Protective Measures" section as described in the Request. This includes, but is not limited to, compliance with section 6.2.5 of the Strategy, which requires immediate cessation of all work within any reduced buffer if Swainson's hawk are visibly stressed by project activities or workers, as determined by the DB based on behavioral observations of the affected individuals. In addition, the DB shall identify and implement adaptive measures as necessary. Such adaptive measures may include reducing the extent, noise, or hours of activities, reducing speed limits, providing additional sound or visual barriers per Section 6.2.4 of the Strategy, as well as increasing buffers per Section 6.2.4 of the Strategy. Regular reporting is also required by Section 6 of the Strategy. The implementation of the requirements of this buffer reduction approval, along with any additional adaptive measures, shall be reported in the applicable Monthly Compliance Report.

With the implementation of the above procedures and Condition of Certifications, the Compliance Project Manager has determined that the requested buffer modifications would not result in any new or substantially more severe environmental impacts, within the meaning of California Code of Regulations, title 14, section 15162.

If you have questions or concerns, please contact me at (916) 956-9527 or e-mail at joseph.douglas@energy.ca.gov.

Sincerely,



Joseph Douglas, Compliance Project Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting, Transmission and Environmental Protection Division

cc: Brett Fooks, Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
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