

February 22, 2021

To: Albert Lopez  
Planning Director, Alameda County Community Development Agency

From: Marisa Mitchell  
Intersect Power

Re: Aramis Renewable Energy Project Update

Intersect Power holds the wildlife trustee agencies in the highest regard and takes any feedback they provide on projects very seriously. In response to recent concerns expressed by representatives of the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) that cryptic amphibian species, like California tiger salamander, are difficult to detect, we are in close consultation with the agencies to collaborate on the best path forward for the species and the project. The Intersect Power team would like to provide an update to Planning Staff regarding recent decisions resulting from agency consultation.

Intersect Power stands firmly behind the quality of the Aramis project's biological survey work, which was conducted over multiple years by experts, and included protocol-level and focused surveys for amphibians and other taxa. There is no potential breeding habitat for California red-legged frog or California tiger salamander on the Aramis project site, and the comprehensive surveys did not detect any frog or salamander individuals. San Joaquin kit foxes also are not present at the site, and haven't been seen in Alameda County for decades. Intersect Power sited the Aramis project on its particular plot of land because of its low potential for harm and its high potential for local benefits.

The Aramis project site is one of a handful of locations where modifying current land management practices in favor of renewable energy generation has the potential to **improve** the quality of habitat for a wide range of species while directly offsetting fossil fuel generation in Alameda County, improving local air quality for our most vulnerable citizens. The Aramis project's solar arrays have been deliberately designed to avoid areas with higher potential habitat value, namely Cayetano Creek, which will be protected from development activities.

The County's EIR is a high-quality document that complies fully with the law. Accordingly, the EIR includes comprehensive mitigation measures to ensure avoidance of harm to amphibians and other species. We thank County staff for their impeccable attention to detail in preparing this record and carrying out a comprehensive public participation program.

Land management practices that currently make the Aramis project site largely inhospitable to amphibians, namely disking, which churns up the soil where salamanders might otherwise aestivate, will be eliminated with the Aramis project's development. We anticipate that long-

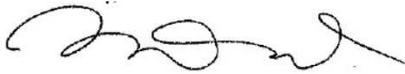


term operation of the solar field may result in a net benefit to the species. Additionally, if San Joaquin kit foxes do return to Alameda County, the project site will provide for safe passage, hunting ground for their favored rodent and rabbit prey, and even denning and pupping habitat.

Although ***no protected species were detected*** during any of the project's extensive biological surveys, and although the site represents only marginal potential upland dispersal habitat for amphibians, *out of an abundance of caution we have made the decision to pursue voluntary incidental take permit coverage with both CDFW and USFWS.* In accordance with the East Alameda County Conservation Strategy, we propose to permanently protect high-quality frog and salamander habitat under a ***conservation easement*** in an offsite location to compensate for the temporary loss of marginal habitat at the Aramis site during project construction. We hope that our efforts to create and implement a Habitat Conservation Plan in collaboration with the trustee agencies will further serve to ensure a broad range of public support for the Aramis Renewable Energy Project.

Please contact me if you have any questions.

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