



November 6, 2012

Elliott MacDougall
WDG Capital Partners
P.O. Box 31159
Santa Barbara, Ca 93130

Re: ADDENDUM to the Biological Resources Assessment Report for the Agincourt Solar Project, San Bernardino County, California

Dear Elliott:

INTRODUCTION

This Addendum to the Biological Resources Assessment Report (BRAR) for the Agincourt Sola Project (prepared by URS Corporation and dated June 2012) presents focused clarifications and revisions based on a field visit to the project site with representatives of the California Department of Fish and Game (CDFG) on October 10, 2012.

BACKGROUND

Section 4.2 of the BRAR, beginning on Page 4-4, presents the results of vegetation mapping that was conducted within the Agincourt site in 2011. The on-site vegetation was categorized in accordance with the methods set forth in Sawyer, Keeler-Wolf, and Evens' *A Manual of California Vegetation, Second Edition*, the CDFG's preferred vegetation classification system, and communities were mapped based on field identification of the dominant species present. Where the classification system defined a community based upon a dominant plant exceeding a certain percentage cover, the on-site cover was evaluated qualitatively based on visual observations in the field.

The Agincourt site contains abundant Joshua trees (*Yucca brevifolia*), and the Joshua tree is the only species within the site's tree stratum, aside from an isolated stand of desert willow (*Chilopsis linearis*) in one of the on-site washes. As shown in Table 2 in the BRAR, 70.36 acres of habitat in the Agincourt site's upland areas, encompassing 88.5 percent of the site, were mapped as Joshua tree woodland. As described in the Sawyer/Keeler-Wolf/Evens classification system, this natural community is characterized by the presence of "Yucca brevifolia evenly distributed at $\geq 1\%$ cover, *Juniperus* and/or *Pinus* spp. $< 1\%$ absolute cover in the tree canopy." As described above, cover of Joshua trees was estimated visually during initial vegetation mapping.

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REVISIONS TO THE BRAR

During a visit to the Agincourt site with CDFG representatives on October 10, 2012, a discussion took place regarding whether the BRAR had been accurate in characterizing the on-site habitat as Joshua tree woodland. While Joshua trees are abundant on-site, most of the individuals present are small and encompass significantly less than nine square feet in plan view. While larger trees are also present, they are relatively few in number. To resolve the question of whether Joshua tree cover in the areas mapped as Joshua tree woodland exceeds one percent, a semi-quantitative exercise was undertaken during the site visit. Based on field observations of the Joshua trees on-site, it was generally agreed that a 3-foot by 3-foot square was an appropriate approximation of the plan-view cover of an “average” Joshua tree on the Agincourt site. (This approximation is supported by the results of the Joshua tree inventory presented in Section 4.4.3.1 of the BRAR, which indicated that only one tree on-site exceeds 15 feet in height and only three trees exceed 50 inches in circumference.) Based on this approximation, the estimated coverage of the 792 Joshua trees on-site was calculated at 7,128 square feet, or 0.163 acre. By dividing the 0.163 acres of approximated Joshua tree cover into the 70.36 acres mapped as Joshua tree woodland, Joshua tree cover was calculated at 0.21 percent. As this value is not close to the one percent threshold required for an area to be properly classified as a Joshua tree woodland, the vegetation has been reclassified to reflect creosote bush/white bursage scrub in these areas instead, based on the dominant shrub species present.

The change in vegetation community classification described above has precipitated the following revisions to the BRAR:

- The legend entry on Figure 4 that currently reads “Joshua tree woodland” should read “creosote bush/white bursage scrub.”
- Table 2, which indicates that the site contains 70.36 acres of Joshua tree woodland and 9.15 acres of creosote bush/white bursage scrub, should indicate that the entire site is comprised of 79.51 acres of creosote bush/white bursage scrub.
- Section 4.2.1, describing the occurrence of Joshua tree woodland within the Agincourt site, is no longer accurate and should be disregarded.
- Section 5.1.1, describing impacts to Joshua tree woodland, is no longer accurate and should be disregarded. Further, the conclusion that the proposed project would have a significant impact on sensitive natural communities is no longer accurate, as the entire site is comprised of creosote bush/white bursage scrub, a common desert plant



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community that maintains no special status. Thus impacts would be less than significant.

- Intermittent references to Joshua tree woodland in the project area are no longer accurate, and should be interpreted to refer to upland portions of the project site.

Aside from the sections identified above, correcting the vegetation classifications for the site's upland areas does not precipitate any additional revisions to the June 2012 BRAR for the Agincourt site. Should you have any questions regarding this submittal, please do not hesitate to contact Christopher Julian at 805.692.0626.

Sincerely,
URS Corporation

A handwritten signature in blue ink that reads "Christopher Julian". The signature is written in a cursive style.

Christopher Julian
Project Biologist/Regulatory Specialist