

ATTACHMENT 2

REVISED: BIOLOGICAL RESOURCES DESCRIPTION AND RECOMMENDATIONS

Meeting Date: July 7, 2025 – Monday
Second Meeting Date: February 2, 2026

Project Name: Catalina Airport Solar Project
Project No.: CDP PRJ2022-004233
Permit Nos.: CUP RPPL2022013117, CDP RPPL2022013100
APNs: 7480-041-042
Location: Catalina Airport in the Sky
SEA: Buffalo Springs SEA
USGS Quad: Santa Catalina North
Project Applicant: Emily Mallonee
Project Biologists: Gretchen Cummings, Cummings Environmental, Inc.
Staff Planner: Tyler Montgomery
Staff Biologist: Karla Moreno

Project Description with Respect to Biological Resource Conditions

The proposed project is an approximately 10,400-square-foot ground mounted solar photovoltaic (PV) system installation, enclosed by perimeter chain-link fencing. The project requires a coastal development permit ("CDP") as well as a significant ecological area conditional use permit ("SEA-CUP"), as development is proposed on the same lot as the Buffalo Springs Significant Ecological Area ("SEA").

The proposed solar PV system will be located on a south-facing slope between Airport in the Sky and Airport Road. The site is surrounded by existing development, including airport facilities to the north, a utility road to the west, and Airport Road to the south and east. The project site is approximately 790 feet south of the Buffalo Springs SEA, which is located north of Airport in the Sky.

The solar PV system is designed to minimize disturbance to surrounding vegetation since the solar panels will be installed on an above ground Titan Duo four-rail design using approximately two-inch diameter anchors that will not require any grading or excavation. However, the placement will impact native lemonade berry (*Rhus integrifolia*) shrubland alliance. The alliance contains the following co-dominant species: lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*), and coastal prickly-pear (*Opuntia littoralis*). There are two sensitive species identified within the project impact area, Nuttall's island bedstraw (*Galium nuttallii* spp. *insulare*) and Palmer's grapplinghook (*Harpagonella palmeri*). One individual of Nuttall's island bedstraw will be directly impacted as it is within the solar PV system installation area. The Palmer's grapplinghook will be protected in

place, the proposed solar PV system was reconfigured to avoid any direct impacts, and a permanent exclusionary fence will be installed along with an educational sign about the sensitive species. The installation of the solar PV system, with four-foot perimeter walkway and fencing will permanently impact 0.36-acres of lemonade berry shrubland alliance. Trenching for the new underground conduit will start at the existing utility pole located south of the existing parking area and will travel east across the utility access road and turn south to the new AC panel within the solar impact area. The new conduit line will be buried and a work buffer for fencing installation will temporarily impact 0.09-acres. The chain link fence enclosing the solar PV system will have ~~a 7-inch~~ an 8-10 inch gap along the bottom of the fence with a smooth bottom rail to allow for wildlife movement, specifically to allow the Santa Catalina Island Fox full range. Considering the opportunity for nesting, all work will be conducted after the bird breeding season.

Project Analysis

There is no fuel modification required for the proposed project; however, the impacts to the lemonade berry vegetation community will be mitigated with restoration of an on-site Project Mitigation Area, to be implemented by the Catalina Island Conservancy. Permanent impacts to 0.36-acres will be mitigated at a 2:1 ratio (0.72-acres of mitigation), and temporary impacts to 0.09-acres will be mitigated at a 1:1 ratio (0.09-acres of mitigation), for a total mitigation area of 0.81-acres. The Project Mitigation Area of 0.81-acres will be located ~~near the northern terminus~~ southeast of the landing strip, within the same parcel as the proposed project but approximately 1,200 feet ~~north~~ southeast of the project impact area and ~~approximately 500 feet east of the~~ and outside of the Buffalo Springs SEA. The Catalina Island Conservancy identified the project mitigation area as ~~scattered Island Scrub Oak (*Quercus pacifica*) disturbed lemonade berry shrub alliance vegetation,~~ and restoration will prioritize the removal of invasive plants, installation of ~~erosion control measures~~ fencing to keep out Mule Deer, and seeding with native *Rhus integrifolia* Shrub Alliance shrubs made of lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*), and to a lesser extent coastal prickly-pear (*Opuntia littoralis*), yarrow (*Achillea millefolium*), Channel Island silver lotus (*Acmispon argophyllus* var. *argenteus*), Island broom (*Acmispon dendroideus* var. *dendroideus*), Saint Catherine's lace (*Eriogonum giganteum* var. *giganteum*), needlegrass (*Stipa* spp.), species including coyote brush (*Baccharis pilularis*), bush sunflower (*Encelia californica*), Menzies's coast goldenbush (*Isocoma menziesii*), California buckwheat (*Eriogonum fasciculatum*), lupines (*Lupinus* spp.), and California sagebrush (*Artemisia californica*).

Adequacy of Biological Report

The County recommends the exclusionary fencing for Palmer's grapplinghook be outside of the chain link fence for the solar impact area, that it be permeable to allow for maintenance activities (e.g., litter removal or non-native species removal, if necessary), and to adjust the educational sign to something simpler (e.g. "keep out") to deter from drawing attention to the sensitive species. In addition, the 0.81-acre proposed project mitigation area to restore disturbed lemonade berry shrub alliance vegetation will reduce the biological impacts to less than significant. The proposed project mitigation area shall be subject to a five-year monitoring period.

SEA Ordinance Consistency Analysis

The following discussions list the required SEA Ordinance Findings, followed by Staff's determination of the proposed Project's consistency with those findings. Per the requirements of the Santa Catalina Island LCP, as delineated in Los Angeles County Code Section 22.102.030.D, development affecting an SEA is subject to those development standards in effect at the time the LCP was adopted (November 28, 1989) and included as an Appendix to the LCP. Pursuant to Section 22.56.215.F.2 of this version of the Los Angeles County Code, the applicant shall substantiate the following facts:

A. The requested development is designed to be highly compatible with the biotic resources present, including the setting aside of appropriate and sufficient undisturbed areas.

Impacts to the lemonade berry shrubland alliance will be mitigated with 2:1 restoration of a similar disturbed alliance habitat area to the north of the airport. An on-site occurrence of a sensitive plant species (Palmer's grapplinghook) will be excluded from the development area and fenced with educational signage to prevent disturbance or removal. The Project Site is located between Airport Road and the Airport in the Sky in proximity to several structures and facilities, and no new fuel modification is required. The solar PV system is designed to minimize disturbance to surrounding vegetation since the solar panels will be installed on an above-ground rail that will not require any grading or excavation. The proposed solar PV system was reconfigured to avoid any direct impacts to Nuttall's island bedstraw and Palmer's grappling hook, and a permanent exclusionary fence will be installed along with an educational sign about the sensitive species. The installation of the solar PV system, with four-foot perimeter walkway and fencing will permanently impact 0.36-acres of lemonade berry shrubland alliance. The impacts to the lemonade berry vegetation community will be mitigated with restoration of an on-site Project Mitigation Area, to be implemented by the Catalina Island Conservancy. All development is adjacent to the existing developed area of the Airport in the Sky and not within a mapped SEA.

B. The requested development is designed to maintain water bodies, watercourses, and their tributaries in a natural state.

No impacts to water bodies, watercourses, or tributaries are proposed. No streams or watercourses are located within the vicinity of the Project.

C. The requested development is designed so that wildlife movement corridors (migratory paths) are left in an undisturbed and natural state.

The Project Site is located between Airport Road and the Airport in the Sky in proximity to several structures and facilities, and no new fuel modification is required. To facilitate the movement of Catalina Island fox through the Project Site, a seven-inch gap will be required beneath the proposed Project fencing. All development is adjacent to the existing developed area of the Airport in the Sky and not within a mapped SEA. Therefore, open space will not be fragmented. The existing SEA is located on the other side of the airport from the Project Site. No known wildlife corridors would be affected by the Project, and the proposed residence is not within or adjacent to SEA. The project has been designed and

sited, and will be conditioned to ensure minimal impacts to wildlife corridors and any adverse impacts will be mitigated. However, the chain link fence enclosing the solar PV system will have a 8-10-inch gap along the bottom of the fence with a smooth bottom rail to allow for wildlife movement, specifically to allow the Santa Catalina Island Fox full range. Considering the opportunity for nesting, all work will be conducted after the bird breeding season.

D. The requested development retains sufficient natural vegetative cover and/or open spaces to buffer critical resource areas from said requested development.

Impacts to the lemonade berry shrubland alliance will be mitigated with 2:1 restoration of a similar disturbed alliance habitat area to the north of the airport. The Project Site is located between Airport Road and the Airport in the Sky in proximity to several structures and facilities, and no new fuel modification is required.

E. That where necessary, fences or walls are provided to buffer important habitat areas from development.

~~An on-site occurrence of a sensitive plant species (Palmer's grapplinghook) will be excluded from the development area and fenced with educational signage to prevent disturbance or removal. The Project Site will be fenced from its surroundings, although to facilitate the movement of Catalina Island fox, a seven-inch gap will be required beneath the proposed Project fencing. The proposed solar PV system was reconfigured to avoid any direct impacts to Nuttall's island bedstraw and Palmer's grappling hook, and a permanent exclusionary fence will be installed along with an educational sign about the sensitive species. The installation of the solar PV system, with four-foot perimeter walkway and fencing will permanently impact 0.36-acres of lemonade berry shrubland alliance. The impacts to the lemonade berry vegetation community will be mitigated with restoration of an on-site Project Mitigation Area, to be implemented by the Catalina Island Conservancy. All development is adjacent to the existing developed area of the Airport in the Sky and not within a mapped SEA. No known wildlife corridors would be affected by the Project, and the proposed residence is not within or adjacent to SEA. The project has been designed and sited, and will be conditioned to ensure minimal impacts to wildlife corridors and any adverse impacts will be mitigated. However, the chain link fence enclosing the solar PV system will have a 8-10-inch gap along the bottom of the fence with a smooth bottom rail to allow for wildlife movement, specifically to allow the Santa Catalina Island Fox full range. Considering the opportunity for nesting, all work will be conducted after the bird breeding season. No unmitigated removal of a Priority Biological Resource or unique habitat would occur.~~

F. That the roads and utilities serving the proposed development are located and designed so as not to conflict with critical resources, habitat areas or migratory paths.

~~The Project Site is located between Airport Road and the Airport in the Sky in proximity to several structures and facilities, and trenching to connect the proposed solar array to existing utilities will be minimal. The Project is adjacent to Airport Road and existing utilities. Trenching for the new underground conduit will start at the existing utility pole~~

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located south of the existing parking area and will travel east across the utility access road and turn south to the new AC panel within the solar impact area. The new conduit line will be buried and a work buffer for fencing installation will temporarily impact 0.09-acres. These temporary impacts will be located outside of mapped SEA and will be mitigated with restoration of an on-site Project Mitigation Area, to be implemented by the Catalina Island Conservancy.

Staff Recommendation: Consistent X Consistent after Modifications & Bio Report Completion

Inconsistent **No decision**

Comments: