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April 14, 2014

**Via Email and Overnight Mail**

Mark de Manincor, Senior Planner  
City of Adelanto  
Development Services – Planning Division  
11600 Air Expressway  
Adelanto, CA 92301  
[mdemanincor@ci.adelanto.ca.us](mailto:mdemanincor@ci.adelanto.ca.us)

Re: **New Report on Avian Mortality in Support of March 25, 2014  
Comments on the Initial Study/Mitigated Negative Declaration  
for the Aries Solar Project (LDP 13-05 and CUP 13-04)**

Dear Mr. de Manincor:

We write on behalf of **Coalition for Responsible Solar**<sup>1</sup> regarding the City of Adelanto's Initial Study/Mitigated Negative Declaration ("MND") prepared for the Aries Solar Project ("Project") proposed by Aries Solar Holdings, LLC. On March 25, 2014, we submitted extensive comments regarding the Project's potentially significant direct and indirect impacts from hazardous materials and on public health, biological resources and land uses.

Among other potentially significant impacts to biological resources, we provided substantial evidence supporting a fair argument that the Project may result in significant impacts to birds from collisions with PV panels.<sup>2</sup> This month, the United States Fish and Wildlife Service's National Fish and Wildlife Forensics

<sup>1</sup> **Coalition for Responsible Solar is a coalition of individuals and labor unions** that may be affected by the Project's potential health and safety hazards and environmental impacts. The coalition includes Victorville area residents Artie Mann and Frank Sinohui, and **California Unions for Reliable Energy ("CURE")** and its members and their families (collectively, "Coalition"). The Coalition was formed to advocate for responsible and sustainable solar development in the region in order to protect public health and safety and the environment where the Coalition members and their families live, work and recreate.

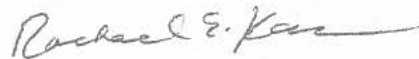
<sup>2</sup> See Coalition for Responsible Solar Comments on the Initial Study/Mitigated Negative Declaration for the Aries Adelanto Solar Project, March 25, 2014, pp. 19-20, Attachment A.  
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Laboratory released a report entitled *Avian Mortality at Solar Energy Facilities in Southern California: A Preliminary Analysis*.<sup>3</sup> The report provides additional data on bird mortality caused by solar facilities in southern California. The report found that impact trauma was the leading cause of death documented at the studied photovoltaic facility. The report provides additional evidence supporting a fair argument that the Project may result in significant impacts to birds from collisions with PV panels.

We urge the City to fulfill its responsibilities under CEQA by withdrawing the MND and preparing an EIR to address the Project's potentially significant impacts. By complying with State law, the City can ensure that the Project's significant environmental impacts are mitigated to the full extent feasible and required by law. Thank you for your attention to this matter.

Sincerely,



Rachael E. Koss

REK:clv

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<sup>3</sup> See Attachment 1.  
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