



Santa Cruz Bird Club

P.O. Box 1304
Santa Cruz, CA 95061
santacruzbirdclub.org



SANTA CRUZ COUNTY GROUP

of the Ventana Chapter

P.O. Box 604, Santa Cruz, CA 95061

EMAIL: sierraclubsantacruz@gmail.com

WEB: www.sierraclub.org/ventana/santa-cruz

County of Santa Cruz Community Development & Infrastructure

Rebecca Rockom, Planner III

701 Ocean Street, Santa Cruz, CA 95060

Rebecca.Rockom@santacruzcountyca.gov

July 10, 2026

RE: Felton Solar Array, SC County Application #251463, APN 071-331-06

Hearing Date: July 17, 2026

Agenda Item No.: 1

The Sierra Club and the Santa Cruz Bird Club appreciate the opportunity to submit comments regarding the proposed Solar Array Project in Felton. We wish to be clear that we are not opposing the Project as a whole and that these comments are intended to request specific measures be taken to protect habitat at the site during and post construction.

The Sierra Club and the Santa Cruz Bird Club are concerned about impacts of this Project on seasonal wetlands that were documented in 2017 (see pictures below), but not mentioned in the Biotic Report prepared by Terracon. Wetlands are important habitat for all wildlife, and in particular birds.



The Santa Cruz County General Plan states that a wetland is “(LCP) Transitional areas between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is covered by shallow water periodically or permanently.” By that definition this is a seasonal wetland. The biotic report is deficient until it explicitly considers the above habitat in light of this definition. No development is allowed within 100 feet of the wetland without approval of a Riparian Exception by Santa Cruz County. The report also must consider the wintering waterfowl and other birds that may utilize it intermittently to make sure the Project construction, parameters and setbacks minimize impacts to this habitat.

The Sierra Club recognizes and appreciates that the Applicant (Mt Hermon Camp & Conference Center) has worked consistently with residents and the County during the development process to mitigate concerns. However, due to the slope of the site it appears that there is potential for erosion and subsequent sediment deposition to occur during construction work. This raises a further concern that even a very small amount of sediment deposition of half an inch in the wetland area has the potential to substantially degrade the remaining vegetation, impact invertebrate diversity and damage the wetland functional capacity. We therefore request that care is taken during construction to ensure substantive erosion and sedimentation control; in particular, we would recommend that no grading, road construction or ditch digging be performed on the site between October 1st and March 31st. We also suggest that a sediment barrier be used, running the length of the field along the boundary of the oak woodlands between the proposed chain link fence and the wetland, to ensure that no sediment moves between the construction site and the wetland area.

Two special-status species were identified as having low potential or confirmed presence at the Project (the California red-legged frog and the dusky-footed woodrat), with the dusky-footed woodrat having three nests noted as present in the Study Area of the Biotic Report, including one nest observed within the Project footprint. Appropriate avoidance and minimization measures to protect these species should be used.

The Biotic Report further states that the site contains oak woodland, “considered sensitive habitat under Santa Cruz County Code (SCCC) 16.32”, but notes that “a detailed inventory of oak trees on site was not conducted during the...survey conducted by Terracon in January 2026.” Establishing a baseline number of oaks would be a valuable further data point in assessing potential impacts to the site.

Thank you for your consideration of our concerns.

Michael A. Guth

Chair, Santa Cruz Group, Ventana Chapter
Sierra Club

Jane Orbuch

Conservation Officer
Santa Cruz Bird Club