

5.0 – MITIGATION MONITORING AND REPORTING PROGRAM

5.1 INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. This MMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” An MMRP is required for the proposed Project because the PEIR identified significant adverse impacts, and mitigation measures have been identified to address these impacts. The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft PEIR. All revisions to mitigation measures that were necessary as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this MMRP.

5.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final PEIR. The County of Imperial would be the primary agency but not the only agency responsible for implementing the mitigation measures. In some cases, other public agencies would implement measures. In other cases, the project proponent of a future renewable energy facility would be responsible for implementation of measures; and the County’s role is exclusively to monitor the implementation of the measures. In such cases, the project proponent of a future renewable energy facility may choose to require the construction contractor to implement specific mitigation measures prior to and/or during construction. The County would continue to monitor mitigation measures that are required to be implemented during the operation of the project.

The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below:

Mitigation Measures: The mitigation measures are taken from the Draft PEIR in the same order that they appear in the Draft PEIR. The MMRP contains revisions to mitigation measures.

Implementation Procedure: Identifies the procedure by which the mitigation measure would be implemented.

Implementation Timing: Identifies at which stage of the Project mitigation must be completed.

Implementation Responsibility: Identifies the department within the County, Project Applicant, or consultant responsible for mitigation monitoring.

Monitoring Method: Identifies how the mitigation measure would be monitored.

Compliance Verification Responsibility: Identifies the department of the County or other State agency responsible for verifying compliance with the mitigation. In some cases, verification will include contact with responsible state and federal agencies.

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Table 5.2-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
Aesthetics					
AESTH-1a: Future renewable energy facilities would be required to assess conformance to VRM Class designations and identifying visual resource conflicts. Among the actions to be taken are consulting with BLM; factoring VRI Class values into project planning and design; including a qualified professional with VRM experience on the development team; consulting the local public to identify important visual resources <u>of record</u> in the area; consulting on viewshed protection with managers responsible for areas with special designations; evaluating impacts on historic trails; considering landscape setting observed from National Parks, National Historic Sites, and similar areas; using topographical data of engineering-design quality and digital terrain mapping for project planning and design; preparing simulations depicting project facilities as seen from key observation points and visual resource-sensitive locations; conducting public outreach to disseminate visual resource information; and performing visual mitigation planning and design based on field assessments and other means.	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	Imperial County Planning and Development Services (ICPDS)	ICPDS would review project design as part of project application.	
AESTH-1b: Future solar facilities would be required to be sited and designed in a manner that would minimize night-sky effects. Identification of night-sky effects is to include assessing and quantifying potential lighting impacts and conducting assessments by using qualified individuals. Methods to minimize night-sky effects include using minimum intensity lighting of an appropriate color consistent with safety needs, prohibiting strobe lighting except where it is required for safety; shielding all permanent lighting unless otherwise required for safety; mounting lighting so that light is focused downward; controlling lighting with timers, sensors, and dimmers; and using vehicle-mounted lights for nighttime maintenance work rather than permanently mounted lighting.	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	ICPDS	ICPDS would review project design as part of project application.	
AESTH-1c: Future solar and related facilities would be required to be sited and designed in a manner that would explore and document means to reduce visual dominance in the viewshed and that the project comply with VRM Class objectives. Methods include conforming with VRM Class objectives (through use of BLM Handbook H-8431-1); determining the extent of the viewshed and selecting key observation points where people are expected to be observing the landscape; integrating visual design elements into plans, details, drawings, and specifications; and siting the facility to minimize the profile of all structures. Ways to minimize visual dominance include using existing topography and vegetation as screening; considering visual design elements when clearing vegetation and doing earthwork; siting projects outside key observation point viewsheds; avoiding locating facilities near visually prominent landscape features; avoiding skylining of structures; designing linear features to follow natural land contours rather than straight lines; locating linear features at the edges of natural lines of transition between vegetation types and topography; using alternative means of access in visually sensitive areas to preserve landscape conditions; minimizing vegetation and ground disturbance; reducing cut and fill; shaping, staining, and vegetation excavations to conform with local conditions; creating natural-looking earthwork forms; repeating characteristics of naturally occurring openings in vegetation for roads, structures, and similar elements; burying linear utilities and lines along roads or paths; selecting appropriate materials and surface treatments for structures to reduce visual contrast; minimizing signage; delineating construction limits and minimizing area of surface disturbance; salvaging vegetation and topsoil for reuse; and removing stakes and flagging after construction.	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	ICPDS	ICPDS would review project design as part of project application.	
AESTH-1d: Future renewable energy facilities Project developers would be required to hold preconstruction meetings, if applicable, with affected agencies and designated specialists to coordinate the mitigation strategy <u>for all resources of record</u> . This includes a review of final design and construction documents with regard to visual impacts and mitigation.	Include mitigation measure in construction plans and specifications.	Pre-construction	ICPDS	Project proponent would submit documentation of pre-construction meeting to ICPDS.	
AESTH-1e: Project developers would be required to monitor compliance with mitigation requirements and consult with the affected agencies during operations and maintenance. Maintaining visual resource design elements would include maintaining revegetated surfaces until self-sustaining; keeping facilities in good repair and repainting as necessary; restoring lands as soon as possible after disturbance; controlling dust and noxious weeds; and operating so as to avoid high-intensity light (glare) being reflected off site.	Include mitigation measure in construction plans and specifications.	Post-construction	ICPDS	Project proponent would submit documentation of monitoring to ICPDS and other appropriate agencies if necessary.	
AESTH-1f: Immediate reclamation of the site, either on federal, State, or private land, would be required for renewable energy facilities after construction. These reclamation activities may include restoration of agricultural	Requirement of project approval.	Prior to the issuance of a grading permit or building	ICPDS	Prior to the issuance of a grading permit or building	

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farmland to the prior condition. Methods for minimizing visual contrast during reclamation and decommissioning include undertaking treatments such as thinning and feathering vegetation at project edges, enhancing contouring, salvaging landscape materials, and revegetating; restoring the project area to predevelopment visual conditions and the inventoried visual quality rating; removing aboveground and near-ground-level structures; contouring soil borrow areas and other features to approximate natural slopes; using native vegetation to establish form, line, color, and texture consistent with the surrounding undisturbed landscape; distributing stockpiled topsoil to disturbed areas and replanting; and removing or burying gravel or other surface treatments.		permit (whichever comes first).		permit, ICPDS shall verify that the project proponent has submitted a reclamation plan.	
<p>AESTH-1g: Each future renewable energy facility developed under the proposed Project would require preparation of a visual impact assessment that would evaluate potential impacts described in mitigation measures AESTH-1a through AESTH-1f. Based on the results of the analysis, the visual impact assessment would be required to develop mitigation measures to address potential impacts. Examples of mitigation measures for each renewable energy technology are presented below based on recommendations provided in the DRECP EIR/EIS (DRECP EIR/EIS 2014, IV.20-23):</p> <ul style="list-style-type: none"> • Examples of visual mitigation measures applicable to solar projects include development and implementation of a glint and glare mitigation and monitoring plan; screening of solar collectors from roads; retaining vegetation beneath solar collector arrays; prohibiting commercial signs, logos, or messages on towers and arrays; and using visually compatible color treatments and nonreflective materials for support structures and other components. In addition to direct reduction in visual quality, visual quality degradation can compromise the integrity of historical resources or traditional cultural places. In cases where such visual impacts occur, compensatory mitigation can include requiring research, field inventories, worker training, and other efforts specific to the resource and groups affected. • Examples of visual mitigation measures for wind energy projects include siting to reduce visibility, clustering turbines, creating visual order and unity among groups of turbines, using radar-activated visual warning systems to reduce night-sky impacts, prohibiting signs and messages on towers, keeping turbines clean and in good repair, and promptly removing disused or abandoned equipment and parts. • Examples of visual mitigation measures specific to geothermal energy projects include using air-cooled systems (to avoid plumes that water-cooled systems may generate under some conditions), minimizing drill rig and well test facility lighting, and screening of pipelines. 	Project proponent shall submit visual impact assessment to ICPDS.	Environmental Documentation Phase	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve visual impact assessment.	
<p>AESTH-3: Future renewable energy facilities would be required to consider siting and design features that would minimize glint and glare and take appropriate actions. These actions include identifying glint and glare effects, assessing and quantifying these effects to determine potential safety and visual impacts, and having qualified people conduct such assessments. Methods to minimize glint and glare include limiting use of signs; using reflective or luminescent markers instead of permanent lighting; minimizing offsite visibility of signs and lighting; using nonglare materials and appropriate colors; mitigating or offsetting visual impact by reclaiming unnecessary roads, removing abandoned buildings, using underground utility lines, and rehabilitating and revegetating disturbed areas; and other actions determined in consultation with BLM.</p>	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	Imperial County Planning and Development Services (ICPDS)	ICPDS would review project design as part of project application.	
Agricultural Resources					
<p>AG-1a: Payment of Agricultural and Other Benefit Fees. Prior to the issuance of a grading permit or building permit (whichever is issued first) for a future renewable energy project, one of the following options included below must be implemented:</p> <ul style="list-style-type: none"> • For Non-Prime Farmland: <ul style="list-style-type: none"> ○ Option 1: The project proponent of a future renewable energy facility shall procure Agricultural 	Requirement of project approval.	Prior to the issuance of a grading permit or building permit (whichever comes first).	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall verify that the project proponent has complied with one of the approved options presented in this	

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<p>Conservation Easements on a “one-to-one” basis on land of equal size, of equal quality of farmland, outside the development footprint. The Conservation Easement shall meet the State Department of Conservation’s regulations and shall be recorded prior to issuance of any grading or building permits; <u>or</u></p> <ul style="list-style-type: none"> ○ Option 2: The project proponent of a future renewable energy facility shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 20 percent of the fair market value per acre for the total acres of proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation, and enhancement of agricultural lands within Imperial County; <u>or</u> ○ Option 3: The project proponent of a future renewable energy facility and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) <u>is</u> consistent with Board Resolution 2012-005; <u>and</u> (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation, and enhancement of agricultural lands within Imperial County and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy. <ul style="list-style-type: none"> • For Prime Farmland: <ul style="list-style-type: none"> ○ Option 1: The project proponent of a future renewable energy facility shall procure Agricultural Conservation Easements on a “two-to-one” basis on land of equal size, of equal quality farmland, outside of the development footprint. The Conservation Easement shall meet the State Department of Conservation’s regulations and shall be recorded prior to issuance of any grading or building permits; <u>or</u> ○ Option 2: The project proponent of a future renewable energy facility shall pay an “Agricultural In-Lieu Mitigation Fee” in the amount of 30 percent of the fair market value per acre for the total acres of the proposed site based on five comparable sales of land used for agricultural purposes as of the effective date of the permit, including program costs on a cost recovery/time and material basis. The Agricultural In-Lieu Mitigation Fee, will be placed in a trust account administered by the Imperial County Agricultural Commissioner’s office and will be used for such purposes as the acquisition, stewardship, preservation, and enhancement of agricultural lands within Imperial County; <u>or</u> ○ Option 3: The project proponent of a future renewable energy facility and County enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that is (1) <u>is</u> consistent with Board Resolution 2012-005; <u>and</u> (2) the Agricultural Benefit Fee must be held by the County in a restricted account to be used by the County only for such purposes as the stewardship, preservation, and enhancement of agricultural lands within Imperial County, and to implement the goals and objectives of the Agricultural Benefit program, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the future renewable energy project and other recipients of the future renewable energy project’s Agricultural Benefit Fee funds; <u>or</u> emphasis on creation of jobs in the agricultural sector of local economy for the purpose of off-setting jobs displaced by the future renewable energy project; <u>or</u> ○ Option 4: The project proponent of a future renewable energy facility must revise their Renewable Energy Conditional Use Permit Application/Site Plan to avoid Prime Farmland. <p>Additional details regarding fee amounts and use of mitigation fees for mitigation measure AG-1a are presented in Section 4.2.4 <u>Chapter 4.0 Revisions to the Final PEIR</u>.</p>				mitigation measure.	

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AG-1b: Reclamation/Decommissioning Plan and Security. For solar energy facilities, the DOC and County have clarified the goal of a reclamation and decommissioning plan: the land must be restored to land which can be farmed. In addition to AQAG-1a for Prime Farmland and Non-Prime Farmland, the project proponent of future renewable energy facilities shall submit to Imperial County a Reclamation Plan prior to issuance of a grading permit. The Reclamation Plan shall document the procedures by which each future Renewable Energy-Conditional Use Permit will be returned to its current agricultural condition. The project proponent also shall provide financial assurance/bonding in an amount equal to a cost estimate prepared by a California-licensed general contractor or civil engineer for implementation of the Reclamation Plan in the event project proponent fails to perform the Reclamation Plan.	Requirement of project approval.	Prior to the issuance of a grading permit or building permit (whichever comes first).	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall verify that the project proponent has submitted a reclamation/ decommissioning plan and security.	
AG-1c: Prepare Economic Impact Analysis, Employment (Jobs) Impact Analysis, and Fiscal Impact Analysis. Project proponents of future renewable energy facilities would be required to prepare an Economic Impact Analysis (EIA), Employment (Jobs) Impact Analysis (JIA), Fiscal Impact Analysis (FIA) pursuant to County of Imperial requirements. These analyses would document potential socioeconomic impacts associated with future renewable energy facilities and identify strategies to mitigate any potential impacts to a level less than significant.	Requirement of project approval.	Prior to the issuance of a grading permit or building permit (whichever comes first).	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall verify that the project proponent has submitted an EIA, JIA, and FIA.	
AG-3: Pest Management Plan. A Pest Management Plan to monitor for and control insects, weeds, vertebrates, and pathogens that could be injurious to the surrounding farmland must be in place for the duration of the project (until reclamation is complete and approved by the Planning and Development Services Department and the Agricultural Commissioner). <u>Should the population of unwanted species threaten to damage the area, the project operator shall implement controls that are consistent with applicable pest management requirements.</u>	Requirement of project approval.	Prior to the issuance of a grading permit or building permit (whichever comes first).	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall verify that the project proponent has submitted a pest management plan.	
Air Quality					
AQ-1a: Prior to commencing construction, each project proponent shall submit a Dust Control Plan to the ICAPCD for approval identifying all sources of PM ₁₀ emissions and associated mitigation measures during the construction and operational phases of their future renewable energy project. The project proponent shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control: <ul style="list-style-type: none"> All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing PM with 5 percent or greater silt content. All on-site and off-site unpaved roads <u>segments with 50 or more average vehicle trips per day</u>, shall be effectively stabilized; and so as to limit visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by <u>the use of restricting vehicle access, paving, chemical stabilizers, dust suppressants, and/or watering.</u> All unpaved traffic areas 1.0 acre or more in size with 75 or more average vehicle trips per day shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering. The transport of bulk materials <u>on public roads</u> shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk 	Requirement of project approval.	Pre-Construction	Imperial County Department of Public Works (ICDPW)/Imperial County Air Pollution Control District (ICAPCD).	Prior to the issuance of a grading permit or building permit, ICDPW shall verify that the project proponent has submitted a dust control plan that was approved by ICAPCD.	

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<p>material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, <u>prior to using the trucks to haul material on public roadways.</u></p> <ul style="list-style-type: none"> • All track-out or carry-out <u>on paved public roads</u>, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. • Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line <u>except where such material or activity is exempted from stabilization by the rules of ICAPCD.</u> • The construction of new unpaved roads is prohibited within any area with a population of 500 or more, unless the road meets ICAPCD’s definition of a “temporary unpaved road.” Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering. 					
<p>AQ-1b: Each project proponent shall implement all applicable standard mitigation measures for construction combustion equipment for the reduction of excess NO_x emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations. These measures include:</p> <ul style="list-style-type: none"> • Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel powered equipment. • Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum. • Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. • Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner). • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways. • Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts). 	<p>Include mitigation measure in construction plans and specifications.</p>	<p>During construction</p>	<p>ICDPW/ICAPCD</p>	<p>Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall verify that the requirements listed in this mitigation measure are included in construction plans and specifications.</p>	
<p>AQ-1c: Each project proponent shall use all available USEPA Tier 3 or better construction equipment.</p>	<p>Include mitigation measure in construction plans and specifications.</p>	<p>During construction</p>	<p>ICDPW/ICAPCD</p>	<p>Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall verify that the project proponent will utilize all available USEPA Tier 3 or better construction equipment.</p>	

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AQ-1d: Consistent with the requirements of ICAPCD Policy 5, each project proponent shall pay an emission mitigation fee sufficient to offset the amount by which the project’s NO _x emissions exceed the 100 pounds per day threshold. ICAPCD allows a project to pay in-lieu impact fees using the most current Carl Moyer Cost Effective methodology to reduce excess NO _x emissions. Under the ICAPCD program, the exact amount of the fee cannot be calculated until the time of construction when more precise data regarding the construction equipment types and hours of operation are known, allowing ICAPCD to calculate the fee. Prior to any earthmoving activity, each project proponent shall submit to the ICAPCD a complete list of all construction equipment to be utilized during the construction phase identifying make, model, year, horsepower, and estimated hours of usage.	Include mitigation measure in construction plans and specifications.	During construction	ICDPW/ICAPCD		
AQ-1e: Future renewable energy facilities that utilize combustion sources during operation would be required to obtain a “Permit to Operate” from ICAPCD. Future project proponents would be required to demonstrate consistency with ICAPCD regulations regarding combustion activities prior to permit approval.	Requirement of project approval.	During construction	ICDPW/ICAPCD	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall verify that the project proponent has obtained a “Permit to Operate” from ICAPCD.	
AQ-2a: New stationary air pollution point sources such as, but not limited to, combustion sources, emergency-use engines, geothermal wells or steam vents, and cooling towers shall be located away from residential areas and other air quality-sensitive land uses.	Project proponent would design project consistent with requirements of this mitigation measure.	Project Design	ICPDS	ICPDS and ICAPCD would review project design as part of project application.	
AQ-2b: Depending on the size of individual future renewable energy facilities developed under the proposed Project, a health risk assessment may be required to identify potential impacts and mitigation measures to reduce impacts to a level less than significant.	To be evaluated during project approval phase.	Project Design	ICPDS	ICPDS and ICAPCD would review project design as part of project application to determine if a health risk assessment would be warranted.	
Biological Resources					
BIO-1a: Conduct Surveys for Special Status Plant Species. As a requirement of an application for a renewable energy facility, surveys for special status plant species shall be conducted by qualified and agency-approved botanists to determine the presence or absence of sensitive plant species within the project footprint. Surveys shall be conducted following CDFW or BLM survey guidelines and be appropriately timed to coincide with the blooming periods for these species. Special status plants identified within the construction disturbance area shall be avoided to the extent feasible. A qualified botanist shall supervise the installation of orange construction fencing or other visible material to establish buffer zones between special status plants and construction disturbance.	Include mitigation measure in construction plans and specifications.	Pre-Construction	Qualified and agency-approved biologist, and ICPDS.	Submit results of surveys to ICPDS and appropriate wildlife agencies.	
BIO-1b: Conduct Surveys for Special Status Animal Species. As a requirement of an application for a future renewable energy facility, surveys for special status animal species shall be conducted by qualified and agency-approved biologists to determine the presence or absence of sensitive animal species within the footprint of a future renewable energy project. <u>Required surveys for special status animal species may include, but are not limited to, American badgers, burrowing owl, flat-tailed horned lizard, golden eagle, mountain plover, prairie falcons, Swainson’s hawk, and Yuma Ridgway’s rail, among others.</u> Any special status mammal, reptile, and amphibian species detected during surveys shall be passively relocated to areas outside the construction zone and prevented from reentering the future project area with the installation of silt fencing or other exclusion fencing. All fencing shall be periodically monitored and maintained for the duration of construction. Passive relocation shall only be done in the nonbreeding season in accordance with guidelines and consultations with resource agencies. <u>This Depending on which special status species are present within the project boundaries, passive relocation measures may include covering or excavating all burrows or dens and installing one-way doors into occupied burrows. This would allow any animals inside to leave the burrow but would exclude any animals from reentering the burrow. The burrows shall then be excavated and filled in to prevent their reuse. Other types of relocation measures may be required.</u>	Include mitigation measure in construction plans and specifications.	Pre-Construction	Qualified and agency-approved biologist, and ICPDS.	Submit results of surveys to ICPDS and appropriate wildlife agencies.	

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<p><u>depending on which special status species are present within the project boundaries.</u></p> <p>If direct impacts to special status species cannot be avoided, an agency-approved biologist shall prepare a species-specific Mitigation and Monitoring Plan that would detail the approved, site-specific methodology proposed to minimize and mitigate impacts to each species. Passive relocation, destruction of burrows, construction of artificial burrows, etc. shall be completed only upon prior approval by and in cooperation with CDFW and/or USFWS.</p>					
<p>BIO-1c: Mark Areas of Construction Boundaries. All areas to be disturbed during construction of future renewable energy facilities developed under the proposed Project would be required to flag disturbance boundaries prior to construction. All disturbances would be confined to these flagged areas, and all employees would be instructed that their activities must be confined to locations within the flagged areas. Project proponents of future renewable energy facilities developed under the proposed Project would be required to have environmental monitors on-site during construction activities.</p>	Include mitigation measure in construction plans and specifications.	Pre-Construction	Qualified and agency-approved biologist, and ICPDS.	Submit plans showing marked-construction boundaries to ICPDS and appropriate wildlife agencies.	
<p>BIO-1d: Power Wash Equipment Prior to Arrival On-Site. All construction equipment used during construction of future renewable energy facilities developed under the proposed Project would be required to be power washed prior to arrival at the future project site to prevent the transportation and establishment of noxious weeds in the project area.</p>	Include mitigation measure in construction plans and specifications.	Construction	Qualified and agency-approved biologist, and ICPDS.	Reporting as needed.	
<p>BIO-1e: Implement a Worker Environmental Awareness Program. A brief Worker Environmental Awareness Program (WEAP) would be implemented for construction crews prior to the commencement of project activities for future renewable energy facilities developed under the proposed Project. Training materials and briefings would include, but would not be limited to, discussion of the Federal and State ESAs, the consequences of noncompliance with these acts, identification and values of wildlife and natural plant communities, hazardous substance spill prevention and containment measures, and review of all required and recommended mitigation measures.</p>	Include mitigation measure in construction plans and specifications.	Pre-Construction	Qualified and agency-approved biologist, and ICPDS.	Submit WEAP to ICPDS and appropriate wildlife agencies.	
<p>BIO-1f: Additional Project Mitigation: Additional biological mitigation may be required based on the renewable energy technology to be developed at specific project locations. Project proponents for future renewable energy facilities would be required to evaluate how specific renewable energy facilities may impact sensitive species and how to mitigate impacts through site design and/or mitigation and monitoring activities. <u>Such mitigation may include, but is not limited to, developing strategies to reduce impacts to avian species related to a possible “lake-effect” associated with solar energy facilities and strategies to reduce the possibility for bird-strikes associated with wind energy facilities, if warranted.</u> Project-specific mitigation and monitoring for future renewable energy facilities may include, but would not be limited to, a Bird and Bat Conservation Strategy based on the type of renewable energy technology to be utilized for a future renewable project.</p>	To be evaluated during environmental documentation phase. If additional mitigation measures are required, include mitigation measure in construction plans and specifications.	Pre-Construction, Construction, and Post-Construction as necessary.	Project proponent, qualified and agency-approved biologist, and ICPDS.	ICPDS and appropriate wildlife agencies would review mitigation strategies during environmental documentation phase.	
Cultural Resources					
<p>CUL-1a: Agency Coordination. Project proponents of future renewable energy facilities developed under the proposed Project would be required to coordinate with appropriate agencies early in the planning process. Depending on the nature and intended location of a future renewable energy facility, coordination may be required with Federal, tribal, State, and local agencies. Consultation efforts should be made with the Native American Heritage Commission (NAHC), the State Historic Preservation Office (SHPO), and stakeholders identified that may potentially be impacted by development of the future renewable energy facilities. Such coordination would elicit input and help define the parameters of future renewable energy facilities to better reduce or avoid impacts to cultural resources, including historic properties, archaeological resources, sacred sites, and cultural landscapes.</p>	Requirement of project approval.	Project Design/ Environmental Documentation Phase	Project proponent, qualified archaeologist, and ICPDS	Project proponent would submit documentation of agency coordination to ICPDS.	
<p>CUL-1b: Cultural Resources Records Searches. Project proponents of future renewable energy facilities developed under the proposed Project would be required to conduct cultural resources records searches for future project sites. This should include a Sacred Lands File records search with the NAHC and a cultural resources records search with the CHRIS location that covers the project footprint. For Imperial County, the CHRIS records search will be conducted at the South Coastal Information Center (SCIC) located on the campus of San Diego State University.</p>	Requirement of project approval.	Environmental Documentation Phase	Qualified archaeologist, and ICPDS	Project proponent would submit results of cultural resources record search to ICPDS.	

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<p>CUL-1c: Cultural Resources Record Searches Pedestrian Surveys. Project proponents of future renewable energy facilities developed under the proposed Project would be required to conduct cultural resource pedestrian surveys for future project sites. The cultural resource pedestrian survey would be conducted to identify resources that have not been previously discovered through past survey efforts and, therefore, would not be noted in the records search results. The survey should be conducted in accordance with Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation (48 FR 44716, Sept. 29, 1983), which serve as the industry standard guidance for pedestrian surveys for all cultural resource management projects. All cultural resources encountered during pedestrian surveys for future renewable energy facilities developed under the proposed Project would be mapped and recorded in detail in order to document cultural resources and potential impacts. Efforts should be made to relocate previously recorded resources and update information for the sites surveyed for future renewable energy facilities.</p>	<p>Requirement of project approval.</p>	<p>Environmental Documentation Phase</p>	<p>Qualified archaeologist, and ICPDS</p>	<p>Project proponent would submit results of cultural resources pedestrian survey to ICPDS.</p>	
<p>CUL-1d: Site Characterization, Siting and Design, and Construction. The results of the coordination efforts, records searches, and pedestrian surveys conducted under mitigation measures CUL-1a through CUL-1c should be utilized to minimize or avoid impacts to cultural resources through project design of future renewable energy facilities. Preconstruction activities for the minimization or avoidance of impacts on cultural resources based on the results of mitigation measures CUL-1a through CUL-1c may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Avoid impacts to cultural resources by prohibiting subsurface activities in certain areas. • Areas of higher sensitivity should be tested for cultural content. The extent of the testing should be determined in concert with the design of the future renewable energy facility. • If testing is deemed necessary, all testing should be conducted by a qualified archaeological consultant and should include involvement by one or more of the local Native American representatives. • Areas of lower sensitivity should be targeted for improvements and areas of higher sensitivity (i.e., more dense cultural materials) should be protected, as deemed feasible. • Consultation should be maintained between the lead agency and the local Native American representatives and their respective concerns should be considered when formulating decisions. • Whenever possible, future renewable energy facilities should be developed on fill soil or in areas of previous ground disturbance. • Archaeological Monitoring: Prior to any ground-disturbing activities for future renewable energy facilities, project proponents should retain a qualified archaeologist to be present at all preconstruction meetings to advise construction contractors about the sensitive nature of cultural resources located on and/or in the vicinity of the future project site, as well as monitoring requirements. A qualified monitor should observe all onsite and offsite future construction activities that would result ground disturbance (including project-related offsite utility and roadway improvements). • Native American Monitor: During construction of future renewable energy facilities, a Native American monitor should observe all ground-disturbing activities (including project-related offsite utility and roadway improvements). The Native American monitor should consult with the archaeological monitor regarding objects and remains encountered during grading or excavation that may be considered sacred or important. 	<p>Include mitigation measure in construction plans and specifications.</p>	<p>Environmental Documentation Phase</p>	<p>Qualified archaeologist, and ICPDS</p>	<p>Submit project design to ICPDS.</p>	

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Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<p>CUL-1e: Reclamation and Decommissioning. Project proponents of future renewable energy facilities should develop measures to confine reclamation and decommissioning activities to those areas previously disturbed by construction-related activities. Along with ensuring that the removal of structures would not result in further subsurface intrusion, measures should be developed to ensure that reclamation and decommissioning activities would utilize established access routes.</p>	<p>Requirement of project approval.</p>	<p>Prior to the issuance of a grading permit or building permit (whichever comes first).</p>	<p>Qualified archaeologist and ICPDS</p>	<p>Prior to the issuance of a grading permit or building permit, ICPDS shall verify that the project proponent has submitted a reclamation and decommissioning plan.</p>	
<p>CUL-2: Paleontological Resource Assessment Report. Project proponents of future renewable energy facilities developed under the proposed Project shall document whether paleontological resources exist in a future project area in a paleontological resources assessment report based on the following: the geologic context of the region and future project site and its potential to contain paleontological resources (including the PFYCs on-site), a records search of institutions holding paleontological collections from California desert regions, a review of published and unpublished literature for past paleontological finds in the area, and coordination with paleontological researchers working locally in potentially affected geographic areas (or studying similar geologic strata).</p> <p>If the PFYC (or PFYCs) of the geologic units to be encountered during construction of the future renewable energy facility has not been determined, the project proponent shall use the best available data and field surveys, as applicable, to develop a site-specific map of the PFYC ratings. The PFYC map shall be at a scale equal to or more detailed than 1:100,000. Depending on the extent of existing information available and the sensitivity of the site, development of the resource assessment and PFYC map could require the completion of a paleontological survey.</p> <p>If paleontological resources are present at the future project site or if the geologic units to be encountered by the future renewable energy project (at the surface or the subsurface) have a PFYC Class of 3, 4, or 5, a Paleontological Resources Management Plan shall be developed. The elements of the plan shall be consistent with BLM IM 2009-11 and shall be prepared and implemented by a professional paleontologist as defined under Secretary of the Department of the Interior Standards. The plan shall include the following:</p> <ul style="list-style-type: none"> • The qualifications of the principal investigator and monitoring personnel • Construction crew awareness training content, procedures, and requirements • Any measures to prevent potential looting, vandalism, or erosion impacts • The location, frequency, and schedule for onsite monitoring activities • Criteria for identifying and evaluating potential fossil specimens or localities • A plan for the use of protective barriers and signs or implementation of other physical or administrative protection measures • Collection and salvage procedures • Identification of an institution or museum willing and able to accept any fossils discovered • Compliance monitoring and reporting procedures • If the Paleontological Resources Management Plan determines that all geologic units that would be affected by the future renewable energy project are within an area with a PFYC Class of 1 or 2, the lead agency shall include paleontological resources as an element in construction worker awareness training and shall include measures to be followed in the event of unanticipated discoveries, including suspension of construction activities in the vicinity. The measure shall stipulate that the future project site must be protected from further earth-moving or damage until a qualified paleontologist can assess the significance and importance of the find and until the fossil specimen or locality can be recorded and salvaged, if necessary. 	<p>Project proponent shall submit Paleontological Resource Assessment Report to ICPDS.</p>	<p>Environmental Documentation Phase</p>	<p>ICPDS</p>	<p>Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve Paleontological Resource Assessment Report.</p>	

Table 5.2-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<ul style="list-style-type: none"> The Paleontological Resources Management Plan shall evaluate all of the construction methodologies proposed on the future site, including destructive excavation techniques. Where applicable, the principal investigator shall include in the plan an evaluation of the potential for such techniques to disturb or destroy paleontological resources, an evaluation of whether loss of such fossils would represent a significant impact, and discussion of mitigation or compensatory measures (such as recordation/recovery of similar resources elsewhere on the site) that are necessary to avoid or substantially reduce the impact. 					
<p>CUL-3: Human Remains. Prior to project implementation, local governments should consider working with tribes to develop an appropriate plan to address the identification and treatment of California Native American human remains should they be encountered (SB18 Public Resources Code §5097.98). If, at any time, evidence of human remains are <u>is</u> identified during construction of future renewable energy facilities associated with the proposed Project, the County Coroner must be notified immediately and permitted to examine the remains. The discovery of human remains is always a possibility during ground disturbances. Human remains and associated cultural items refer to objects that fit into one of four types of items expressly protected under Native American Graves Protection and Repatriation Act (NAGPRA) (43 CFR 10), to include: (a) human remains, (b) funerary objects; (c) sacred objects; and (d) objects of cultural patrimony. Any significant confirmed find should be evaluated to determine if an adverse effect to the resource has occurred. Such a discovery, <u>or probable likelihood of such a discovery as identified during an initial study</u>, would require a recommencement of consultation between the lead agency, the Imperial County Coroner's office, the NAHC, and the Most-Likely Descendant (MLD) identified by the NAHC, in order to address adverse effects [AB 52.2(c)]. Any potential human remains identified by a cultural resources monitor during construction of future renewable energy facilities should initially be treated according to California Health and Safety Code, Section 7050.5(b) and Public Resource Code, Section 5097.98(a-h); however, the archaeological monitor should be responsible for determining whether cultural items are associated. <u>In addition, future renewable energy facilities developed under the proposed Project would be required to implement the provisions of AB 52 (Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code).</u></p>	<p>Include mitigation measure in construction plans and specifications.</p>	Construction	Qualified archaeologist and ICPDS.	Reporting as needed.	
Geology and Soils					
<p>GEO-1: Prepare Geotechnical Report(s) for the Projects and Implement Required Measures. Facility design for all project components of future renewable energy facilities developed under the proposed Project shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by the project applicant. The final geotechnical and/or civil engineering report shall address and make recommendations on the following:</p> <ul style="list-style-type: none"> Site preparation Soil bearing capacity Appropriate sources and types of fill Potential need for soil amendments Road, pavement, and parking areas Structural foundations, including retaining-wall design Grading practices Soil corrosion of concrete and steel Erosion/winterization Seismic ground shaking Liquefaction 	<p>Project proponent shall submit Geotechnical Report(s) to ICPDS and ICDPW.</p> <p>Include mitigation measures documented in report(s) in construction plans and specifications.</p>	Environmental Documentation Phase/ Construction	ICPDS/ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve Geotechnical Report(s).	

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Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<ul style="list-style-type: none"> Expansive/unstable soils <p>In addition to the recommendations for the conditions listed above, the geotechnical investigation shall include subsurface testing of soil and groundwater conditions and shall determine appropriate foundation designs that are consistent with the version of the CBC that is applicable at the time building and grading permits are applied for. All recommendations contained in the final geotechnical engineering report shall be implemented by each project applicant. Design of future renewable energy facilities would need to be consistent with applicable CBC Seismic Design Categories based on site-specific soil characteristics and proximity to potential seismic hazards.</p>					
<p>GEO-2: Develop and Implement a Storm Water Pollution Prevention Plan (SWPPP). Future renewable energy facilities developed under the proposed Project would require a detailed SWPPP to be developed and implemented to minimize erosion during construction in compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP would be required to include the following:</p> <ul style="list-style-type: none"> A detailed description of all Best Management Practices (BMPs) that will be employed An outline of the areas on site that will be disturbed during construction of the project An outline of all areas that will be stabilized by temporary or long-term erosion control measures A proposed schedule for the implementation of erosion control measures <p>In addition, all surface water and drainage features within 1,000 feet of construction activities shall be identified. Construction activities within 100 feet of these resources shall implement the BMPs detailed in the SWPPP prepared for each project.</p>	<p>Project proponent shall submit SWPPP to ICPDS and ICDPW.</p> <p>Include mitigation measures documented in SWPPP in construction plans and specifications.</p>	Environmental Documentation Phase/ Construction	ICPDS/ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve SWPPP.	
<p>GEO-4: Implement Corrosion Protection Measures. As determined appropriate by a licensed geotechnical or civil engineer, each project proponent shall ensure that all underground metallic fittings, appurtenances, and piping located in corrosive soils include a cathodic protection system to protect these facilities from corrosion for future renewable energy facilities developed under the proposed Project.</p>	<p>Include appropriate mitigation measures in construction plans and specifications.</p>	Pre-Construction	ICPDS/ICDPW	Prior to the issuance of a grading permit or building permit, the project proponent must demonstrate to ICPDS and ICDPW that the project would conform to appropriate corrosion protection standards.	
<p>GEO-5: Demonstrate Compliance with On-site Wastewater Treatment and Disposal Requirements. Wastewater treatment and disposal system(s) associated with future renewable energy facilities shall demonstrate compliance with the Imperial County performance standards as outlined in Title 9, Division 10, Chapters 4 and 12 of the Imperial County <i>Land Use Ordinance</i>. Prior to construction, and again prior to operation, each future project proponent would be required to obtain all necessary permits and/or approvals from Imperial County. Each future project proponent would be required to demonstrate that the system adequately meets County requirements, which have been designed to protect beneficial uses and ensure that applicable water quality standards are not violated. This shall include documentation that the system would not conflict with the Regional Water Quality Control Board's (RWQCB) Anti-Degradation Policy.</p>	<p>Project proponent shall submit all necessary permits and/or approvals pertaining to onsite wastewater treatment and disposal requirements to ICPDS and ICDPW.</p> <p>Include appropriate mitigation measures in construction plans and specifications.</p>	Pre-Construction/ Post-Construction	ICPDS/ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW must receive all necessary permits and/or approvals pertaining to onsite wastewater treatment and disposal requirements.	

Table 5.2-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
Hazards and Hazardous Materials					
HAZ-1a: Implement hazardous materials and waste minimization measures including conducting a Phase I Environmental Site Assessment to determine the presence of hazardous materials from past site activities.	Project proponent shall submit Phase I and any other hazardous materials report(s) required for the project to ICPDS. Include mitigation measures documented in report(s) in construction plans and specifications.	Environmental Documentation Phase/ Construction	ICPDS	Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve Phase I and any other hazardous materials report(s) required for the project.	
HAZ-1b: Proponents of future renewable energy facilities developed under the proposed Project that would handle hazardous materials that exceed regulatory thresholds would need to prepare and submit a Business Emergency Response Plan for approval to the State Department of Toxic Substance Control <u>and County of Imperial Local Enforcement Agency</u> .	Project proponent shall submit Business Emergency Response Plan if required for the project to State Department of Toxic Substance Control and ICPDS. Include mitigation measures documented in report(s) in construction plans and specifications.	Environmental Documentation Phase/ Construction	State Department of Toxic Substance Control and ICPDS.	Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve Business Emergency Response Plan if required for the project.	
Hydrology/Water Quality					
HYDRO-1a: Acquire Appropriate CWA Regulatory Permits, Prepare SWPPP, and Implement BMPs Prior to Construction and Site Restoration. Project proponents or project construction contractors for future renewable energy facilities would be required to prepare a project-specific SWPPP and be responsible for securing coverage under SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ). The SWPPP shall identify specific actions and BMPs relating to the prevention of stormwater pollution from project-related construction sources by identifying a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The SWPPP shall reflect localized surface hydrological conditions and shall be reviewed and approved by each project applicant prior to commencement of work and shall be made conditions of the contract with each contractor selected to build and decommission future renewable energy facilities developed under the proposed Project. The SWPPP(s) shall, at a minimum, incorporate control measures in the following categories: <ul style="list-style-type: none"> • Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) • Dewatering and/or flow diversion practices, if required (see Mitigation Measure HYDRO-1b) • Sediment control practices (temporary sediment basins, fiber rolls) • Temporary and postconstruction on-site and off-site runoff controls • Special considerations and BMPs for water crossings, wetlands, and drainages • Monitoring protocols for discharge(s) and receiving waters, with emphasis placed on the following water quality objectives: dissolved oxygen, floating material, oil and grease, pH, and turbidity • Waste management, handling, and disposal control practices 	Project proponent shall prepare and submit permit applications and SWPPP to ICPDS, and ICDPW. Include mitigation measures documented in report(s) in construction plans and specifications.	Environmental Documentation Phase/ Construction	ICPDS/ICDPW.	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve permit applications and SWPPP.	

Table 5.2-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<ul style="list-style-type: none"> Corrective action and spill contingency measures Agency and responsible party contact information Training procedures that shall be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP <p>Each SWPPP shall be prepared by a qualified SWPPP practitioner with BMPs selected to achieve maximum pollutant removal and that represent the best available technology that is economically achievable. Emphasis for BMPs shall be placed on controlling discharges of oxygen-depleting substances, floating material, oil and grease, acidic or caustic substances or compounds, and turbidity. Given that Imperial Valley Drains would accept runoff from areas within the Salton Trough and are listed as impaired for sediment, the SWPPP shall include BMPs sufficient for Risk Level 2 projects. BMPs for soil stabilization and erosion control practices and sediment control practices would also be required. Performance and effectiveness of these BMPs shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination, (inadvertent petroleum release) is required to determine adequacy of the measure.</p>					
<p>HYDRO-1b: Properly Dispose of Construction Dewatering in Accordance with the Colorado River Basin Regional Water Quality Control Board. If required, all construction dewatering for future renewable energy facilities developed under the proposed Project shall be discharged to an approved land disposal area or drainage facility in accordance with Colorado River Basin RWQCB requirements. Each future project proponent or project construction contractor shall provide the Colorado River Basin RWQCB with the location, type of discharge, and methods of treatment and monitoring for all groundwater dewatering discharges. Emphasis shall be placed on those discharges that would occur directly or in proximity to surface water bodies and drainage facilities.</p>	Include dewatering measures in construction plans and specifications.	Construction	ICPDS/ICDPW.	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve permit construction dewatering methods.	
<p>HYDRO-2a: Groundwater Monitoring and Mitigation Plan. A Groundwater Monitoring and Mitigation Plan (Plan) shall be prepared, reviewed, and approved by the County of Imperial prior to project approval and implementation. The County must approve the Plan prior to issuance of any groundwater well permits. The Plan shall be prepared by a qualified professional geologist, hydrogeologist, or civil engineer registered in the State of California and submitted by the applicant to the County for approval.</p> <p>The Plan shall provide detailed methodology for monitoring and reporting procedures; locate monitoring, extraction, and survey points; define significance criteria; and identify mitigation measures in the event that adverse impacts occur that can be attributed to the proposed Project. The Plan shall include summarization of all monitoring data and would require submission of annual reports to the County. A comprehensive summary and analysis of data shall be included in a five-year report. Monitoring shall be performed during preconstruction, construction, and operation, with the intent to establish preconstruction and specific project-related groundwater level trends that can be quantitatively compared against observed and simulated trends near the pumping wells and near potentially affected existing private wells and sensitive water resources. Additionally, at each stage of reporting, the applicant would be required to reevaluate of the adequacy of the monitoring network and Plan.</p>	<p>Project proponent shall submit Groundwater Monitoring and Mitigation Plan to ICPDS and ICDPW.</p> <p>Include groundwater monitoring measures in construction plans and specifications.</p>	Environmental Documentation Phase/ Construction	ICPDS/ICDPW.	Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve Groundwater Monitoring and Mitigation Plan.	
<p>HYDRO-2b: Implement Water Conservation Measures. Project developers shall plan to implement water conservation measures related to renewable energy technology water needs in order to reduce project water requirements. Developers shall minimize the consumptive use of fresh water for power plant cooling by, for example, using dry cooling, using recycled or impaired water, or selecting solar energy technologies that do not require cooling water.</p>	Include water conservation measures in construction plans and specifications.	Construction	ICPDS/ICDPW.	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve water conservation measures.	

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Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<p>HYDRO-3: Comprehensive Drainage and Sedimentation Control Plan. Project proponents for future renewable energy facilities would be required to prepare a Comprehensive Drainage and Sedimentation Plan (Plan) prior to the initiation of construction (or decommissioning as relevant). Detailed hydrologic analysis shall be performed prior to final design of the specific future renewable energy project. Results of these analyses will be submitted to the County for review. All proposed grading and impervious surfaces on-site shall be reviewed and approved by the County with respect to its potential to cause or result in additional erosion and sedimentation, increased stormwater flows, or altered drainage patterns that could lead to unintentional ponding or flooding on-site or downstream, and/or additional erosion and sedimentation. The Plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • Construction of access corridors and temporary and permanent access roads shall not block existing drainage channels and shall not significantly alter the existing topography. • The project proponent shall delineate the active drainage channels within each drainage avoidance area and avoid placement of proposed flood protection berms within active drainage channels. The drainage avoidance areas shall protect no less than 90 percent of the area of the active drainage channels from construction impacts. • The project proponent shall prepare hydraulic analyses that estimate the pre- and post-development peak discharges, water depths, and velocities for both smaller, more frequent events (2-, 5-, and 10-year events), as well as larger design storm events (100-year event) that would flow through each future project site, drainage avoidance area, and/or on either side of each proposed flood protection berm. • The project proponent shall provide the County design details for the flood protection berms including subgrade preparation, construction methods, and armoring or scour protection. 	<p>Project proponent shall submit Comprehensive Drainage and Sedimentation Plan to ICPDS and ICDPW.</p> <p>Include drainage and sedimentation measures in construction plans and specifications.</p>	Environmental Documentation Phase/Construction	ICPDS/ICDPW.	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve Comprehensive Drainage and Sedimentation Plan.	
Mineral Resources					
<p>MR-1a: Project proponents of future renewable energy facilities shall identify potential impacts on mineral development activities and ways to minimize any potentially significant impacts during early phases of project planning. Impact assessments on mineral resources shall include, but are not limited to, the following actions:</p> <ul style="list-style-type: none"> • Identify active mining claims or mineral development activities and potential for mineral development in proximity to a proposed renewable energy facility. In coordination with County staff, developers shall consult existing land use plans and updated inventories. • Evaluate impacts on mineral development as part of the environmental impact analysis for the proposed renewable energy facility and consider options to avoid, minimize, and mitigate significant impacts. 	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	ICPDS	ICPDS would review project design as part of project application.	
<p>MR-1b: Where valid mining claims or leases already exist, proponents of future renewable energy facilities shall engage in early coordination with claim or lease holders to determine the possibility of locating new facilities in or near these areas to avoid adverse effects on mineral development.</p>	Project proponent would be required to design project consistent with requirements of this mitigation measure.	Project Design	ICPDS	ICPDS would review project design as part of project application.	
Noise					
<p>NOI-1a: Protect sensitive receptors from noise. Project proponents developing future renewable energy facilities shall demonstrate that the following requirements are implemented:</p> <p>2. Future renewable energy facilities developed under the proposed Project should be located more than 0.5 mile from noise-sensitive receptors, including residences, churches, medical care facilities, schools, child care facilities, public parks, public recreation areas, quiet recreation areas, and wildlife or wilderness areas.</p> <p>3. Project proponents should take measurements to assess the existing background noise levels at sites and compare them with the anticipated noise levels associated with the project.</p>	<p>Project proponent would be required to design project consistent with requirements of this mitigation measure.</p> <p>Project proponent shall submit a noise study to ICPDS.</p>	Environmental Documentation Phase	ICPDS	<p>ICPDS would review project design as part of project application.</p> <p>Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve noise study.</p>	

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Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
<p>4. Project proponents should prepare a noise monitoring and mitigation plan including designs to (a) minimize noise impacts to noise-sensitive receptors, limit increases to less than a 5 to 10 dBA increase above ambient levels, and not exceed local noise standards; (b) address project-generated noise impacts; and (c) acquire lands to serve as buffers around the proposed facilities.</p>					
<p>NOI-1b: Implement noise reduction techniques. Project proponents developing future renewable energy facilities shall implement the following requirements:</p> <p>10. Limit noisy construction activities (including truck and rail deliveries, pile driving, and blasting) to the least noise-sensitive times of day consistent with the requirements of the County of Imperial Noise Ordinance.</p> <p>11. Consider use of noise barriers such as berms and vegetation to limit ambient noise at plant property lines, especially where noise-sensitive receptors may be present.</p> <p>12. Ensure all project equipment has the appropriate sound-control devices and shield-impact tools. Use battery-powered forklifts and other facility vehicles and flashing lights instead of audible backup alarms on mobile equipment.</p> <p>13. Locate stationary construction equipment (such as compressors and generators) as far as practical from nearby residences.</p> <p>14. If blasting or other noisy activities are required during the construction period, notify nearby residents and the permitting agencies 24 hours in advance.</p> <p>15. Properly maintain mufflers, brakes, and all loose items on construction and operation-related vehicles to minimize noise and ensure safe operations. Operate trucks as quietly as possible, while considering local conditions. Advise about downshifting and vehicle operations in residential communities to keep truck noise to a minimum.</p> <p>16. Install mufflers on diesel and gas-driven engine air coolers and exhaust stacks. Equip emergency pressure relief valves and steam blow-down lines with silencers to limit noise levels.</p> <p>17. Contain project facilities within buildings or other types of effective noise enclosures, when necessary and feasible.</p> <p>18. Employ engineering controls, including sound-insulated equipment and control rooms, to reduce the average noise level to appropriate levels in normal work areas.</p>	<p>Include noise reduction measures in construction plans and specifications.</p>	<p>Construction/ Operation</p>	<p>Contractor and ICPDS</p>	<p>Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve noise reduction measures.</p>	
<p>NOI-1c: Protect residences from wind turbine noise. Project proponents developing future wind energy facilities shall demonstrate that the proposed wind energy conversion system complies with setbacks defined by the lead agency. Minimum setbacks are generally 1,800 feet from each generator to the nearest receptor. For future wind energy systems that would occur nearer than 3,000 feet from receptors (including habitable dwellings), acoustical studies shall be prepared to demonstrate compliance with local standards.</p>	<p>Project proponent would be required to design project consistent with requirements of this mitigation measure.</p> <p>Project proponent shall submit a noise study to ICPDS.</p>	<p>Environmental Documentation Phase</p>	<p>ICPDS</p>	<p>ICPDS would review project design as part of project application.</p> <p>Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve noise study.</p>	

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Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
NOI-2: Evaluate Potential for Vibration Impacts. Project proponents of future renewable energy facilities would be required to evaluate the potential for vibration to impact sensitive receptors during construction and operation and develop appropriate mitigation measures if necessary.	Project proponent shall submit a vibration impacts analysis to ICPDS.	Environmental Documentation Phase/ Construction/ Operation	ICPDS	ICPDS would review project design as part of project application. Prior to the issuance of a grading permit or building permit, ICPDS shall review and approve noise study.	
Traffic/Circulation					
TRA-1a: Implement a transportation plan. Project proponents shall prepare a transportation plan for implementation during all phases of future renewable energy facilities developed under the proposed Project. The transportation plan shall address methods for reducing construction worker traffic volumes and project-related equipment and materials transport by implementing the following strategies: (1) provide a construction worker rideshare program; (2) schedule shift changes and deliveries to avoid conflict with peak-hour traffic patterns; (3) establish traffic controls for transport of facility hazardous and nonhazardous materials, components, main assembly cranes, and other large pieces of equipment; and (4) evaluate alternative transportation approaches depending on specific object sizes, weights, origin, destination, peak-hour traffic, and unique handling requirements.	Project proponent shall submit Transportation Plan to ICPDS and ICDPW. Include measures in construction plans and specifications.	Environmental Documentation Phase	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve transportation plan.	
TRA-1b: Coordinate road improvements with local authorities. Project proponents shall consult with local planning authorities regarding increased traffic during the construction phase of future renewable energy facilities developed under the proposed Project. Each project proponent shall conduct a project-specific traffic impact assessment of the vehicle numbers per day, their size, and type to determine design for implementing local road improvements and multiple-site access locations for future renewable energy facilities developed under the proposed Project.	Include measures in construction plans and specifications.	Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve the traffic impact assessment.	
TRA-1c: Implement traffic control measures. Project proponents shall prepare and implement traffic control measures, such as intersection realignment coupled with speed limit reduction; installation of traffic lights and/or other signage; and addition of acceleration, deceleration, and turn lanes on routes with site entrances for future renewable energy facilities developed under the proposed Project.	Include measures in construction plans and specifications.	Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve traffic control measures.	
TRA-1d: Ensure proper signage and travel management. Project proponents shall ensure signs are placed along future construction roads to identify speed limits, travel restrictions, and other standard traffic control information. Consideration should be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute times to minimize impacts on local commuters.	Include measures in construction plans and specifications.	Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve traffic signage measures.	
TRA-3a: Project proponents of future renewable energy facilities would be required to retain a professional civil engineer to survey and evaluate the conditions of roads along proposed haul routes prior to commencing construction. Preconstruction conditions shall be documented for each roadway with photo and text description. Video of haul routes may also be used to document preconstruction conditions. The photographs and/or videos are to include documentation of bridges and other appurtenances such as signs, striping, drainage, and other utilities as determined in consultation with the County. The report shall make a determination of the minimum road design criteria needed to support anticipated project traffic and whether the existing roadways comply. Each project proponent shall submit the completed report to Imperial County Department of Public Works for review and comment.	Include measures in construction plans and specifications.	Pre-Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve existing traffic conditions report.	

Table 5.2-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Procedure	Implementation Timing	Implementation Responsibility	Monitoring Method	Verification (Name/Date)
TRA-3b: Project proponents of future renewable energy facilities shall enter into a Roadway Maintenance Agreement with the County of Imperial prior to issuance of a grading permit. Each project proponent shall pay its fair share of the responsibility to maintain future haul routes during construction and, if necessary, bring the roadways up to an appropriate minimum standard to handle the anticipated traffic.	Include measures in construction plans and specifications.	Pre-Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve Roadway Maintenance Agreement.	
TRA-3c: Project proponents of future renewable energy facilities shall be responsible for roadway preparation work, pavement construction, and repairs to County-maintained roads, including County-maintained bridges and other roadway appurtenances for any other route that is subsequently used but not identified in the Programmatic EIR. This may include, but is not limited to, bridges, signs, striping, drainage improvements and roadway shoulders. Consideration shall also be given to improvements to other infrastructure, such as IID canal and drain crossings.	Include measures in construction plans and specifications.	Construction/Post-Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve construction plans.	
TRA-4a: Provide on-site laydown and staging. Project proponents shall ensure that their future renewable energy facility site contains adequate area for construction laydown and staging, parking for construction and operation worker vehicles, and site traffic circulation aisles.	Include measures in construction plans and specifications.	Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve construction measures.	
TRA-4b: Control site access. Project proponents shall restrict traffic to the roads specified for the future renewable energy facility. Use of other unimproved roads should be restricted to emergency situations involving potential injury or loss of life.	Include measures in construction plans and specifications.	Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve construction measures.	
TRA-4c: Repair project-related damage. Project proponents shall be responsible for repairing or reconstructing project-related access roads that are damaged during construction of future renewable energy facilities to return them to pre-project conditions.	Include measures in construction plans and specifications.	Construction/Post-Construction	Contractor/ ICPDS and ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve construction measures.	
Utilities and Services System					
UTIL-6: Complete a Waste Management Plan for construction and decommissioning. Future renewable energy facilities developed under the proposed Project would be required to develop a Waste Management Plan that shall identify the projected waste generated by the activity and feasible methods to divert a minimum of 75 percent of waste from landfills, such as sorting and recycling of materials, reuse of materials, and waste reduction measures.	Project proponent shall submit Waste Management Plan to ICPDS, and ICDPW. Include mitigation measures documented in report(s) in construction plans and specifications.	Environmental Documentation Phase/ Construction	ICPDS/ICDPW	Prior to the issuance of a grading permit or building permit, ICPDS and ICDPW shall review and approve Waste Management Plan.	

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