EXECUTIVE SUMMARY

ES.1 PROJECT BACKGROUND

In 2002, California established a Renewable Portfolio Standard (RPS) requiring electric utilities in the State to increase procurement of eligible renewable energy resources to achieve a target of 20 percent of their annual retail sales by the year 2010. In 2008, by Executive Order (S-14-08), then Governor Arnold Schwarzenegger increased that target to 33 percent by the year 2020. In 2011, Governor Jerry Brown signed Senate Bill (SB) X1-2 into law. The Bill requires all California utilities, including independently owned utilities (IOUs), energy service providers, and community choice aggregators (CCAs), to generate electricity from renewable sources over a three-stage compliance period.

One form of renewable energy is solar energy as harnessed through the use of photovoltaic (PV) technology. PV power systems convert sunlight into electricity. The process begins with individual PV cells that combine to form PV modules. The modules are sealed and connected to each other with wires to form a PV array. The PV arrays convert solar radiation into direct current (DC) electricity. The direct current from the PV array is collected at an inverter and converted to alternating current (AC). AC electricity is consistent with the current flowing through the electrical grid.

The proposed project is a solar generation facility using PV technology proposed by Campo Verde Solar, LLC (hereafter referred to as "Applicant"). One hundred percent of the electricity generated by the proposed project will be eligible for use by California electric utilities to satisfy procurement obligations under the State's RPS program.

On March 24, 2011, the Applicant submitted an application for a CUP to the Imperial County Department of Planning and Development Services (ICPDS). The CUP application was submitted to allow construction and operation of a solar PV electric generation facility and associated transmission line in western Imperial County near the Imperial Valley Substation.

On September 12, 2011, the Applicant submitted an Application for Transportation and Utility Systems and Facilities on Federal Lands (Standard Form 299, or "SF-299") to the United States Bureau of Land Management (BLM). The SF-299 application requested a linear Right-of-Way (ROW) to construct and operate the gen-tie and associated facilities on land managed by the BLM.

A Notice of Preparation (NOP) for the Campo Verde Solar Draft Environmental Impact Report was issued by the ICPDS on November 15, 2011.

On February 7, 2012, the Applicant submitted a Variance Application to the ICPDS. The Variance Application was submitted to address gen-tie structures that may exceed the A-2 and A-3 zoning height limitation of 120 feet. If approved, the Variance would permit a maximum height of the gen-tie Line structures of 145 feet.

ES.2 PROJECT OVERVIEW

The proposed project consists of two primary components: 1) solar generation equipment and associated facilities on privately owned land (the "solar generation facility"); and, 2) 230-kilovolt (kV) aboveground, electric transmission line(s) and associated facilities (the "gen-tie") located on both private land and public land managed by the BLM. The gen-tie will connect the solar generation facility with the Imperial Valley Substation. BLM is conducting a separate environmental review of the proposed right-of-way (ROW) grant required for the gen-tie line under the National Environmental Policy Act ("NEPA"). The proposed permanent BLM ROW width is 160 feet. The solar generation facility and gen-tie are collectively referred to as the "proposed project" or "project." The area encompassing

the solar generation facility and the gen-tie is referred to as the "project area." The solar generation facility portion of the project (exclusive of the gen-tie segment on BLM land) is referred to as the "project site" or "solar generation facility site."

ES.3 PROPOSED PROJECT

The project is a proposal to build a 140-plus megawatt alternating current (MWAC) solar generation facility using photovoltaic (PV) technology.[1] The project consists of the solar generation facility on private land and associated 230-kilovolt (kV) transmission line (gen-tie). The proposed gen-tie crosses both private and public land, the latter under the jurisdiction of the BLM. The gen-tie will connect the solar generation facility to the Imperial Valley Substation. The public lands crossed by the proposed gen-tie are managed by the BLM and located wholly within an area designated by the BLM for utilities and infrastructure corridors. A Right-of-Way (ROW) approval from the BLM is required to construct the proposed gen-tie.

The project includes PV solar modules, arrays, power conversion stations, an electrical collection system, a substation and switchyard. Other components of the project include an Operations and Maintenance Building, project support systems consisting of control systems, a communication system, lighting system, electric service, security, and fire system.

The gen-tie would be designed for two 230-kV circuits with three conductors per circuit (to accommodate a future second line if necessary for a separate project). The gen-tie would cross approximately 0.9 miles of BLM land.

ES.4 PURPOSE AND NEED

Pursuant to CEQA the following objectives have been identified for the proposed project. Section 15124 of the CEQA Guidelines requires that the EIR include a statement of objectives sought by the proposed project. These objectives identify the underlying purpose of the project and provide a basis for identification of alternatives evaluated in the EIR. A clearly written statement of objectives allows the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and aids the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

Demand for new forms of renewable electric energy continues to grow based on three factors. First, total electricity demand continues to grow as a result of population growth, economic growth and new applications offset only, in part, by energy efficiency programs. The 2010 United States Energy Information Administration (EIA) Annual Energy Outlook ("reference case") forecast is for a 30 percent increase in total demand (from 3,873 billion kilowatt hours to 5,021 billion kilowatt hours, annually), between the years 2008 and 2035. Second, new generation facilities are required to not only meet this demand, but to replace the output of aging generation facilities which are to be retired during this period. Third, driven by federal incentives, regional greenhouse gas reduction targets, state renewable energy portfolio standards (RPS) requirements, and potential legislation, an increasingly greater portion of new generation will need to be supplied in the form of renewable energy. The EIA forecast for the period from 2008 to 2035 is for 41 percent of growth in generation to come from non-hydro renewables.

[1] To deliver 140 MWAC of electricity at the point of interconnection, the solar generation facility needs to be overbuilt to address the electrical demands of the facility, AC system losses, step-up transformer losses and transmission line losses.

This national trend is particularly evident in the West, the fastest growing region in the United States. Many Western states have adopted renewable energy standards and greenhouse gas (GHG) reduction goals.

California is a national leader in requiring a significant proportion of electricity to come from renewable sources. The 2010 requirement that 20 percent of electricity sales come from renewable energy was increased to 33 percent by 2020. With California's 33 percent mandate, combined with other mandated RPS requirements and regional sales growth, the total renewable energy sales for the US portion of the Western Electricity Coordinating Council region has been estimated at close to 150,000 Gigawatt hours (Gwh) by 2020 (not including Idaho, Utah and Wyoming). The proposed project will help California meet its statutory and regulatory goals for increasing renewable power generation and use.

The gen-tie component of the proposed project would provide the needed transmission capacity to connect the Campo Verde Solar Project with the Imperial Valley Substation. Renewable energy generated by the project would be conveyed to areas of demand.

The Campo Verde Solar Project qualifies as an Eligible Renewable Energy Resource as defined by the California Public Utilities Code and would assist the state in meeting current and planned goals for renewable energy development and use. The California Energy Commission (CEC) certified the Campo Verde Solar Project as an eligible renewable energy resource under the RPS and assigned it CEC-RPS identification (ID) number 60652C.

ES.5 OBJECTIVES

The proposed Campo Verde Solar Project has the following objectives:

- Meet the terms and requirements of the Project's Power Purchase Agreement (PPA) and Large Generator Interconnection Agreement.
- Deploy a technology that has been commercially proven and that is safe, readily available, efficient, and environmentally responsible.
- Generate electricity at a cost that is competitive on the renewable market.
- Provide a new source of renewable energy to assist the State of California in achieving the RPS.
- Provide local construction jobs for a variety of trades, reducing unemployment in the construction sector.
- Locate the project in Imperial County in close proximity to the existing California Independent System Operator (CAISO) electric transmission system at a location which has available capacity to deliver electricity to major load centers in California.
- Locate the project in an area that ranks among the highest in solar resource potential in the nation.
- Minimize the potential impact to the environment by:
  - Locating the project on disturbed land.
  - Maximizing the use of existing infrastructure (transmission lines, roads, and water sources).
  - Minimizing the potential impacts to threatened and endangered species by avoiding sensitive habitats and designated resource, reserves or protected areas.
  - Reducing the emission of GHGs from the generation of electricity by using renewable energy.

The Campo Verde Solar Project was developed to sell its electricity and all renewable and environmental attributes to an electric utility purchaser under a long-term contract to help meet California RPS goals. The Applicant has a long-term PPA (20 years) with San Diego Gas and Electric (SDG&E) to purchase the initial output from the project.

The County's objectives include the following:

- Encourage economic investment in renewable energy activities.
- Increase opportunities for construction employment, reducing unemployment in one of the labor sectors most affected by the recession.
- Diversify Imperial County's economic base by developing environmentally-responsible non-agricultural activities.
- Increase tax revenue through sales, use and property taxes generated by renewable energy development within Imperial County.
- Reinforce Imperial County's position as a leader in renewable energy production.
- Expand the renewable energy sector in Imperial County's economy.

ES.6 ALTERNATIVES

This EIR considered three alternatives in addition to the proposed project:

ALTERNATIVE 1 - ALTERNATIVE GEN-TIE ACROSS BLM LAND

This alternative includes the same approximate 1,990 acre solar generation facility site as the proposed project and proposes a gen-tie that would follow the existing IID S-line and associated access road. A 0.9 mile Gen-tie is proposed including a 0.1 mile segment on the solar generation facility site. The gen-tie would also cross approximately 0.4 miles of BLM land and 0.4 miles of private land.

ALTERNATIVE 2 - PRIVATE LAND GEN-TIE ALTERNATIVE

This alternative includes the same approximate 1,990 acre solar generation facility site as the proposed project and proposes a 1.85 mile gen-tie that would originate from the western side of the solar generation facility site (0.1 mile segment) and cross approximately 1.75 miles of private lands to the west. The gen-tie would follow existing field roads and ditches to the Imperial Solar Energy Center West site. From this point, the proposed project would use available capacity on Imperial Solar Energy Center West's gen-tie line that has an approved right-of-way to the Imperial Valley Substation.

ALTERNATIVE 3 - NO ACTION ALTERNATIVE

This alternative would result in continued use of the project site for agricultural production. The proposed Campo Verde Solar Project would not be developed.

ES.7 SUMMARY OF IMPACTS

Table ES-1 summarizes the environmental impacts resulting from the proposed project pursuant to CEQA Guidelines Section 15123(b)(1).

TABLE ES-1
SUMMARY OF IMPACTS

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
AESTHETICS			
Adverse Effect on Scenic Vista **Impact 4.1.1** The proposed project would change existing views of the solar generation facility site from surrounding lands and roadways. The project site is not considered a scenic vista nor does it contain any outstanding aesthetic features.	LS	None required	LS
Degrade Existing Visual Character or Quality of the Site **Impact 4.1.2** The proposed project would convert agricultural fields to a solar generation facility thereby replacing vegetation with man-made structures. The project would alter the overall character of the project site and substantially alter views from several residences. Therefore, this impact is considered **potentially significant**.	PS	**MM 4.1.2** Prior to issuance of construction permits, the Applicant shall work with affected landowners and ICPDS to develop a visual screening program that will screen views of the project from KOP #2, #8 and #9, if determined to be needed by each landowner. The extent of screening shall be determined for each KOP in consultation with the school and/or residents, ICPDS and the Applicant. If vegetative screening is used, xeriscape plants shall be selected from the "Imperial County Xeriscape Guide and Map." Initial xeriscape planting, if desired by the landowner, shall be the responsibility of the Applicant.	LS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
		Landscape maintenance to check the health of the plants shall be performed by the landowner or Applicant, as needed and as determined by the agreement between the two parties.	
New Source of Substantial Light or Glare **Impact 4.1.3** The proposed project includes non-reflective PV panels are non-reflective which are not anticipated to create glare. Likewise, the lighting system will be designed to provide the minimum illumination. Therefore, impacts associated with creation of substantial light and glare are considered **less than significant**.	LS	None required.	LS
Cumulative Visual Impacts **Impact 4.1.4** Implementation of the proposed project, in conjunction with existing, approved, proposed, and reasonably foreseeable projects in the vicinity of the project site, would alter the visual character of the area, resulting in a change to public views as well as increased daytime glare and nighttime lighting levels. Such impacts are typically addressed on a project-by-project basis. Therefore, cumulative impacts to visual resources are considered **less than cumulatively considerable**.	LCC	Implement MM 4.1.2	LCC

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LAND USE			
Conflict With Any Applicable Land Use Plan, Policy, or Regulation **Impact 4.2.1** The proposed project is consistent with the existing General Plan land use designation of Agriculture with a Conditional Use Permit and would not conflict with any County policies or regulations. Therefore, conflicts applicable land use plans, polices and regulations are considered a **less than significant impact**.	LS	None required.	LS
Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations **Impact 4.2.2** Development of the proposed project in combination with approved, proposed and reasonably foreseeable projects in the region would not incrementally add to conflicts with applicable land use plans, policies and regulations. Each project would be required to be consistent with the applicable plans that apply to the area in which it is located. Thus, this impact is considered **less than cumulatively considerable.**	LCC	None required.	LCC
Cumulative Land Use Compatibility/Conflict Impacts **Impact 4.2.3** Development of the proposed project in combination with approved, proposed and	LCC	None required.	LCC

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reasonably foreseeable projects in the region would change the land use patterns, present potential land use conflicts, and result in conversion of agricultural lands to a solar facility. This impact is considered **less than cumulatively considerable**.			
TRANSPORTATION AND CIRCULATION			
Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2011 Plus Project) **Impact 4.3.1** Implementation of the proposed project would add traffic to existing traffic volumes on study area intersections, roadways and freeways during construction. This impact is considered **less than significant.**	LS	None required.	LS
Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2013) **Impact 4.3.2** Implementation of the proposed project would add traffic to study area intersections, roadways and freeways during peak construction. This impact is considered **less than significant.**	LS	None required.	LS
Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Year 2013) **Impact 4.3.3** Implementation of the proposed project's construction traffic in combination with year	PCC	**MM 4.3.3** If all cumulative projects occur concurrently, the proposed project shall pay a fair share contribution toward necessary improvements as	LCC

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2013 volumes would add traffic to study area intersections, roadways and freeways during peak construction. LOS at two intersections would operate below LOS C. This impact is considered **potentially cumulatively considerable.**		follows: 1) The fair share participation is based on the project's temporary construction traffic volume that is significantly higher than the project's traffic volume after completion of construction. At the intersection of Forrester Road at I-8 eastbound ramp, the construction traffic fair share responsibility is 6.2% and 0.5% when based on permanent operation employees (**Table 4.3-29**). LOS and fair share calculations are included in Appendix R of the *Draft Traffic Impact Analysis*. This document is provided on the attached CD of Technical Appendices as **Appendix B** of this EIR. The project fair share responsibility shall be validated at month 7 and yearly during the entire construction period. If the intersection of Forrester Road/I-8 EB Ramp is calculated to	

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		operate at an unacceptable LOS during the validation period, then the Applicant shall pay the fair share amount based on project construction traffic. If the intersection of Forrester Road/I-8 EB Ramp is calculated to operate at acceptable LOS, then the Applicant should not be required to pay the fair share amount because the intersection would be documented to operate at acceptable LOS. It is recommended that the Applicant enter into an agreement with the County to fulfill the CEQA cumulative mitigation requirement, but not be obligated to pay a fair share if the cumulatively impacted intersection never reaches failing conditions during the project's construction period.	
AIR QUALITY			
Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.4.1** Implementation of the proposed project would increase air pollutant emissions. This is considered a **potentially significant impact**.	PS	**MM 4.4.1a** The following mitigation requirements shall be implemented to reduce construction related PM_{10} impacts to a level below significance during worst-	LS

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		case construction: 1. Apply water during grading/grubbing activities to all active disturbed areas at least three times daily. 2. Apply water to all onsite roadways at least three times daily or use of magnesium chloride or other County-approved dust suppression additives and apply water one-time daily. 3. Reduce all construction related traffic speeds onsite to below 15 Miles per Hour (MPH). **MM4.4.1b** The following mitigation requirements shall be implemented to reduce construction related NO_x impacts to a level below significance during worst-case construction: • Use Diesel Oxidation Catalyst or alternative devices that achieve equivalent NO_x emission reduction on all large diesel construction equipment as required by ICAPCD.	

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		MM 4.4.1c All construction sites in excess of 5 acres must implement the following standard mitigation measures: *Fugitive PM_{10} Control* • All disturbed areas, including Bulk Material storage which is not being actively utilized, 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 ground cover. • All on-site and off-site unpaved roads shall be effectively stabilized. Visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. • All unpaved traffic areas one acre or more in size with 75 or more average	

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		vehicle trips per day shall be effectively stabilized and visible emission 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 shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material. • All track-out or carry-out 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	

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		handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. • The construction of any new unpaved road is prohibited within any area with a population of 500 or more unless the road meets the 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. *Construction Combustion Equipment* • All construction equipment, including all off-road and portable diesel powered equipment, shall use alternative fuel or be catalyst equipped.	

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		• Idling time shall be minimized either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. • The hours of operation of heavy duty equipment and/or the amount of equipment in use shall be limited, to the extent feasible. • Fossil fueled equipment shall be replaced with electrically driven equivalents (provided they are not run via a portable generator set).	
Expose Sensitive Receptors to Substantial Pollutant Concentrations **Impact 4.4.2** Exhaust generated during construction could result in elevated levels of DPM. This is considered a **potentially significant impact.**	PS	The project would be required to use equipment meeting T-BACT specifications. In addition, mitigation measures identified to reduced NO_x and PM_{10} (MM 4.4.1a, 4.4.1b and 4.4.1c) would also be classified as T-BACT measures for reducing DPM.	LS
Violate Air Quality Standard/Cause Air Quality Violation **Impact 4.4.3** The proposed project would generate criteria pollutant emissions during construction. However, the project would be required to comply with recommended and required mitigation to reduce emissions to meet threshold levels. Therefore, the project would	LCC	Implement MM 4.4.1a, MM 4.4.1b and MM 4.4.1c.	LCC

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result in a l**ess than cumulatively considerable impact** with regard to violating an air quality standard.			
Cumulative Substantial Pollutant Concentrations **Impact 4.4.4** Implementation of the proposed project would not coincide with peak construction of other cumulative projects. Therefore, the proposed project would have a **less than cumulatively considerable impact** on DPM.	LCC	The project would be required to use equipment meeting T-BACT specifications. In addition, mitigation measures identified to reduced NO_x and PM_{10} (MM 4.4.1a, 4.4.1b and 4.4.1c) would also be classified as T-BACT measures for reducing DPM.	LCC
CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS			
Generation of Greenhouse Gas Emissions **Impact 4.5.1** The proposed project would generate greenhouse gas emissions. This impact is considered **less than significant**.	LS	None required.	LS
Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions **Impact 4.5.2** The project would not conflict with an applicable plan, policy, or regulation adopted to reduce greenhouse gas emissions. There is **no impact**.	NI	None required.	NI
GEOLOGY AND SOILS			
Strong Seismic Ground Shaking **Impact 4.6.1** The project site is located in a seismically active region and would be subject to strong seismic ground shaking in the event of an earthquake.	PS	**MM 4.6.1** The proposed development shall be designed in accordance with seismic considerations contained in the 2010 California Building Code, 2010 Uniform	LS

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This is considered a **potentially significant impact**.		Building Code or the standards of care established by the Structural Engineers Association of California and the County of Imperial building requirements.	
Liquefaction/Unstable Soils **Impact 4.6.2** Soils on the project site could be subject to liquefaction. However, if liquefaction were to occur, it will only be in small areas of the site and result in ¼-inch differential settlement of the arrays. This is considered a **less than significant impact**.	LS	None required.	LS
Erosion **Impact 4.6.3** Construction activities would result in earth disturbance and potential for erosion and loss of top soil. Multiple requirements have been established to address erosion which the Applicant must comply with. Therefore, this impact is considered **less than significant**.	LS	None required.	LS
Expansive Soils **Impact 4.6.4** Some of the soils identified on the project site have expansive characteristics. This is considered a **potentially significant impact**.	PS	**MM 4.6.4** The proposed solar generation facility and gen-tie shall be designed in accordance with a Final Geotechnical Evaluation report that will be prepared by a licensed professional engineer during the final design phase. The Final Geotechnical Evaluation report will be	LS

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		submitted to Imperial County Department of Planning and Development Services for review and approval prior to issuance of building permits as required by the Imperial County. The Final Geotechnical Evaluation report will include an analysis and recommendations regarding design for expansive soil conditions.	
Soil Capability to Support Septic Systems **Impact 4.6.5** The project proposes to construct a septic system to accommodate wastewater flows generated on the project site. The project will be engineered in compliance with County Environmental Health Department standards. Therefore, soil capability to support septic systems is considered a **less than significant impact**.	LS	None required.	LS
Soil Corrosivity **Impact 4.6.6** Soils within the project site are severely corrosive. Portions of metal structures coming in contact with these soils could be damaged. This is considered a **potentially significant impact**.	PS	**MM 4.6.6** A Field Resistivity and Ground Potential Rise Evaluation shall be prepared by a qualified engineer, which shall include specific measures to address corrosion impacts. Potential measures may include, but are not limited to,	LS

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		galvanization, epoxy coatings, thicker steel, and cathodic protection.	
Cumulative Exposure to Geologic and Seismic Impacts **Impact 4.6.7** Implementation of the proposed project, in combination with existing, approved, proposed, and reasonably foreseeable development, may result in cumulative exposure to geologic and seismic hazards. This is considered a **less than cumulatively considerable impact**.	LS	Implement MM 4.6.2, MM 4.6.4 and MM 4.6.6	LS
CULTURAL RESOURCES			
Changes in Setting to the Westside Main Canal System **Impact 4.7.1** Implementation of the proposed project would result in changes in the setting of the Westside Main Canal system. This impact is considered **less than significant**.	LS	None required.	LS

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Impact to Archaeological Site CA-IMP-11758 **Impact 4.7.2** Archaeological site CA-IMP-11758 could be damaged inadvertently during construction of the adjacent solar field. This is considered a **potentially significant impact**.	PS	**MM 4.7.2** A qualified and experienced archaeological monitor, will monitor the installation of temporary orange construction fencing around the boundaries of archaeological site CA-IMP-11758. The on-site Construction Manager (who is defined as the individual with the authority to halt all construction-related activities) shall be required to stake in advance the line where the fence will be installed and will provide a minimum of 48 hours advance notice to the archaeological monitor before fence installation occurs. The Construction Manager shall be responsible for maintaining the fencing in working order throughout the duration of construction, which may include periodic maintenance or replacement. The Construction Manager shall not allow passage of non-authorized personnel to enter the site through the fence. The archaeological monitor will monitor the effectiveness of the protective	LS

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		measures described in this measure at least twice per month during construction to ensure that unanticipated effects are avoided. If an unanticipated effect is discovered, the monitor will immediately notify the Construction Manager and give interim directions for protecting the site from further effects, which may include mandatory cessation of activity within 100 feet or more of the discovery. The Construction Manager will be responsible for promptly implementing those interim measures. The archaeological monitor will monitor the removal of the temporary fencing after construction is completed. The Construction Manager shall be required to provide a minimum of 48 hours advance notice to the archaeological monitor before fence removal occurs.	

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Impacts to Unrecorded Subsurface Archaeological Resources **Impact 4.7.3** Unrecorded subsurface archaeological resources could be damaged during construction. This is considered a **potentially significant impact**.	PS	**MM 4.7.3** If subsurface deposits believed to be cultural in origin are discovered during construction, then all work must halt within a 200-foot radius of the discovery. A qualified professional archaeologist shall be retained to evaluate the significance of the find. A Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the Native American Heritage Commission, may also be required. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the NRHP or CRHR. If a potentially-eligible resource is encountered, then the archaeologist, lead agency, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation.	LS

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Impacts to Subsurface Human Remains **Impact 4.7.4** Subsurface human remains could be impacted during construction. This is considered a **potentially significant impact**.	PS	**MM 4.7.4** In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery will be halted or diverted and the Imperial County Coroner will be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the Native American Heritage Commission which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section	LS

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		5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).	

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Impacts to Fossil Remains **Impact 4.7.5** Fossil remains could be destroyed by excavation and other earth-moving activities. This is considered a **potentially significant impact**.	PS	**MM 4.7.5** Ground-disturbing activities in the Lake Cahuilla sediments, Quaternary alluvium, and the Brawley Formation must be monitored by a qualified paleontological monitor. Paleontological monitors will be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors are empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens will be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens will be curated by accessioning them into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an	LS

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		appended itemized inventory of specimens will be prepared. The report and inventory, when submitted to the Imperial County Department of Planning and Development Services, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontological resources.	
Cumulative impacts to Archaeological and Historic Resources **Impact 4.7.6** Implementation of the proposed project, in combination with existing, approved, proposed, and reasonably foreseeable development in the cumulative setting, has the potential to result in impacts to archaeological and historic resources. However, impacts are addressed on a project-by-project basis. Therefore, this is considered a **less than cumulatively considerable impact**.	LCC	None required.	LCC
Cumulative Impacts to Paleontological Resources **Impact 4.7.7** Implementation of the proposed project in combination with existing, approved, proposed, and reasonably foreseeable development in the cumulative setting, has the potential to result in	LCC	None required.	LCC

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impacts to fossil remains and fossil bearing geological formations. However, such impacts are addressed on a project-by-project basis. Therefore, this is considered a **less than cumulatively considerable impact**.			
NOISE			
Noise Levels in Excess of Standards/Substantial Temporary Noise Increase **Impact 4.8.1** Heavy equipment and traffic generated during construction would generate short-term increases in noise on and in the vicinity of the project site. This impact is considered **less than significant**.	LS	None required.	LS
Noise Levels in Excess of Standards/Substantial Permanent Noise Increase **Impact 4.8.2** The proposed project would generate noise associated with operation of on-site equipment. This impact is considered **less than significant.**	LS	None required.	LS

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Cumulative Noise Increases **Impact 4.8.3** Construction and operation of the proposed project could incrementally contribute to the existing noise environment. This impact is considered **less than cumulatively considerable**.	LCC	None required	LCC
AGRICULTURAL RESOURCES			
Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance **Impact 4.9.1** The proposed project would temporarily convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance to non-agricultural uses. This is considered a **potentially significant impact**.	PS	**MM 4.9.1a** Prior to the issuance of a grading permit or building permit (whichever is issued first) for the proposed project, the mitigation of temporary impacts to agricultural lands shall be accomplished via one of the following options: **<u>Non-Prime Farmland</u>** ● **Option 1**: The Permittee shall procure Agricultural Conservation Easements on a 1 to 1 basis on land of equal size, of equal quality of farmland, outside the path of development. The Conservation Easement shall meet the State Department of Conservation's	LS

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		regulations and shall be recorded prior to issuance of any grading or building permits. ● **Option 2**: The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 20% 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. ● **Option 3:** If the Permittee and County voluntarily enter into a	

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		Public Benefit Agreement that includes an Agricultural Benefit Fee payment that is equal to or greater than the amount that would be due under option 2 of this mitigation measure and the public benefit agreement requires that the Agricultural Benefit Fee be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County, then this mitigation measure may be satisfied by the payment of a voluntarily agreed amount to the Agricultural Benefit Fee. **Prime Farmland** • **Option 1:** Agricultural Conservation Easements on a "2 to 1" basis on land of equal size, of equal quality farmland, outside of the path of development. The Conservation Easement shall meet the State Department of Conservation's regulations and shall be recorded	

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		prior to issuance of any grading or building permits; or • **Option 2:** The Permittee shall pay an "Agricultural In-Lieu Mitigation Fee" in the amount of 30% 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. • **Option 3:** If the Permittee and County voluntarily enter into a Public Benefit Agreement that	

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		includes an Agricultural Benefit Fee payment that is equal to or greater than the amount that would be due under option 2 of this mitigation measure and the public benefit agreement requires that the Agricultural Benefit Fee be used for such purposes as the acquisition, stewardship, preservation and enhancement of agricultural lands within Imperial County, then this mitigation measure may be satisfied by the payment of a voluntarily agreed amount to the Agricultural Benefit Fee; or • **Option 4:** The Permittee must revise their CUP Application/Site Plan to avoid Prime Farmland. **MM 4.9.1b** In addition to Options 1, 2 or 3 identified in association with Prime Farmland and Non-Prime Farmland, the Applicant shall submit to Imperial County a Reclamation Plan to return the site to its current agricultural condition prior to the issuance of a	

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		certificate of occupancy for the Operations and Maintenance building. The Reclamation Plan shall include a site reclamation cost estimate prepared by a California-licensed general contractor or civil engineer. The Permittee shall provide a financial assurance/bonding in the amount equal to the site reclamation cost estimate to return the land to its current agricultural condition after the solar facilities ceases operations and closes.	

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Indirect Environmental Effects of Conversion of Farmland **Impact 4.9.2** The proposed project would involve indirect changes to the existing environment that could temporarily affect farmlands. This is considered a **potentially significant impact**.	PS	**MM 4.9.2** Prior to the issuance of a grading permit or building permit (whichever occurs first), a Weed and Pest Control Plan shall be developed by the Project Applicant and approved by the County of Imperial Agricultural Commissioner. The Plan shall provide the following: 1) Monitoring, preventative, and management strategies for weed and pest control during construction activities at the CSE Facility and portions of the gen-tie line that are adjacent agricultural lands; 2) Control and management of weeds and pests in areas temporarily disturbed during construction where native seed will aid in site revegetation; and, 3) A long-term strategy for weed and pest control and management during the operation of the CSE Facility and portions of the gen-tie line that are adjacent agricultural	LS

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		lands. Such strategies may include, but are not limited to: a. Use of specific types of ground cover and maintenance (mowing, replacement, etc.) of such ground cover; b. Use of specific types of herbicides and pesticides on a scheduled basis; and c. Maintenance and management of project site conditions to reduce the potential for a significant increase in pest-related nuisance conditions on adjacent agricultural lands.	
Cumulative Agricultural Resources Impacts **Impact 4.9.3** Implementation of the proposed project would incrementally add to the temporary conversion of agricultural land in Imperial County. Temporary impacts to agricultural resources are mitigated on a project-by-project basis through payment of in-lieu fees, conservation easements and/or execution of Public Benefit Agreements. Therefore, temporary impacts to agricultural	LCC	Implement MM 4.9.1a, MM 4.9.1b and MM 4.9.2.	LCC

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resources are considered **less than cumulatively considerable**.			
Hazards and Hazardous Materials			
Hazardous Materials Transport, Use, Disposal and Accidental Release **Impact 4.10.1** The proposed project could create a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials. This is considered a l**ess than significant impact**.	LS	None required.	LS
Hazard Through Upset/Release of Hazardous Materials **Impact 4.10.2** The proposed project site contained some residual hazardous materials, pesticide residue and several other features that could be considered hazardous. Therefore, this impact is considered **potentially significant**.	PS	**MM 4.10.2a** Empty herbicide bags and any trash or debris shall be removed from the property according to applicable regulations prior to commencing earthmoving activities. **MM 4.10.2b** ASTs containing sulfuric acid, ammonium nitrate solution, and anhydrous ammonia shall be removed from the following locations and wherever else present on the project site prior to commencing earth moving activities: east central side of APN 051-360-32; northwest and northeast side, southeast corner and northeast corner of APN 051-310-40;	LS

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		southern edge of APN 051-360-04; southwest corner of APN 051-310-50; northeast corner of APN 051-310-40; east-central side of APN 051-360-32; southeast corner of APN 051-360-03; and the southeast corner of APN 051-360-02. **MM 4.10.2c** If on-site the transformers are found to contain PCBs, the owner and responsible party for the transformers shall be required to handle and dispose of the waste dielectric fluid according to applicable regulations. **MM 4.10.2d** Utility poles, associated base and stained soil adjacent to ASTs shall be removed and disposed of in an approved manner by the owner/utility prior to commencing earthmoving activities. The locations include material located in the northeast corner of APN 051-360-02, stained soil on the southern edge of APN 051-360-04 and the east central side of APN 051-360-32. **MM 4.10.2e** Suspect LBP shall be evaluated by a	

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		California Certified Lead Inspector/Assessor prior if structures are to be removed. As applicable, confirmed LBP shall be handled by a licensed LBP contractor and disposed of according to appropriate regulations.	
Emit Hazardous Emissions **Impact 4.10.3** The proposed project is located within a quarter mile of an existing school. The project would use limited amounts of hazardous materials on occasion that would be handled in accordance with all applicable regulations and standards. Therefore, impacts associated with emitting hazardous materials within one-quarter mile of a school are considered **less than significant**.	LS	None required.	LS
Cumulative Hazards and Hazardous Materials Impact **Impact 4.10.4** The proposed project, in combination with other reasonably foreseeable projects in the vicinity of the project site, would increase the density of development in the area, thus potentially increasing the potential for the presence hazards and use of hazardous materials. However, this is considered to be a **less than cumulatively considerable impact**.	LCC	MM 4.10.2a and MM 4.10.2b would reduce residual hazards on the project site from prior agricultural activities; MM 4.10.2c, MM 4.10.2d, and MM 4.10.2e would address and remove potential hazards associated with potential presence of PCBs, stained soil and lead-based paint)	LCC

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HYDROLOGY AND WATER QUALITY			
Violate Water Quality Standards or Waste Discharge Requirements **Impact 4.11.1** Implementation of the proposed project would generate small amounts of runoff during construction, and operation and maintenance. This impact is considered **less than significant**.	LS	None required.	LS
Result in Substantial Erosion or Siltation On- or Off-site **Impact 4.11.2** Implementation of the proposed project could generate erosion during construction. Compliance with the provisions of the Construction General Stormwater Permit and Stormwater Pollution Prevention Plan would address erosion or siltation on or off-site. Therefore, this impact is considered **less than significant**.	LS	None required.	LS
Result in Substantial Flooding On- Or Off-Site/Create or Contribute Runoff Exceeding Capacity **Impact 4.11.3** Implementation of the proposed project would generate on-site runoff. Existing drainage patterns would be maintained and the site would remain pervious. Sufficient capacity is available in receiving IID drains. Therefore, impacts associated with flooding or exceedance	LS	None required.	LS

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of existing drainage capacity are considered **less than significant.**			
Cumulative Impact to Hydrology and Water Quality **Impact 4.11.4** The proposed project, in combination with approved, proposed and other reasonably foreseeable projects in the Salton Sea watershed would contribute to the cumulative effects of degradation of water quality and changes in runoff patterns ultimately discharging to the Salton Sea. This impact is considered **less than cumulatively considerable**.	LCC	None required.	LCC
BIOLOGICAL RESOURCES			
Impacts to Special-Status Species – Plants **Impact 4.12.1** The proposed solar generation facility site has been previously disturbed in association with past and current agricultural operations. The gen-tie corridor is not anticipated to contain special-status plants based on previous surveys within the corridor. Therefore, **no impacts** to special status plant species are expected to occur as a result of project implementation.	NI	None required.	NI
Impacts on Special Status Species – Birds (Southwestern Willow Flycatcher) **Impact 4.12.2** Implementation of the proposed project has the potential to impact SWFL. This is considered a	PS	**MM 4.12.2** Implement the following measures to address potential impacts to avian species, including SWFLs: • The Applicant shall prepare and	LS

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potentially significant impact.		implement a Bird and Bat Conservation Strategy (BBCS) outlining conservation measures for construction and O&M activities that reduce potential impacts to migratory birds, bats and raptors. Conservation measures shall be developed based on, USFWS guidelines and input from the USFWS. Construction conservation measures to be addressed in the BBCS include: ➢ Minimizing disturbance to vegetation to the maximum extent practicable. ➢ Clearing vegetation outside of the breeding season. If construction occurs between February 1 and September 15, an approved biologist shall conduct a pre-construction clearance survey for nesting birds in suitable nesting habitat that occurs within the proposed area of impact. Pre-construction nesting surveys will	

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		identify any active migratory birds (and other sensitive non-migratory birds) nests. Direct impact to any active migratory bird nest should be avoided. ➢ Minimize wildfire potential. ➢ Minimize activities that attract prey and predators. ➢ Control of invasive plants. ➢ Apply APLIC design guidelines for overhead utilities by incorporating recommended or other methods that enhance the visibility of the lines to avian species. Operations and maintenance conservation measures to be incorporated into the BBCS include: ➢ Preparation of a Raven Control Plan that avoids introducing water and food resources in the area surrounding the solar generation facility. ➢ Incorporate APLIC guidelines for overhead utilities as appropriate to minimize avian collisions with	

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		Gen-tie Line facilities. ➢ Minimize noise. ➢ Minimize use of outdoor lighting. ➢ Implement post—construction avian monitoring that will incorporate the Wildlife Mortality Reporting Program. The BBCS shall also address disturbance minimization, timing of construction, minimization of activities that would attract prey and predators, lighting, noise, and incorporation of a Wildlife Mortality Reporting Program and Raven Control Plan discussed below. • The Applicant shall prepare a *Raven Control Plan* that details specific measures for storage and disposal of all litter and trash produced by the Campo Verde Solar project site and its employees. This plan shall be designed to discourage scavengers that may also prey on wildlife in the vicinity. All employees shall be familiar with this plan and littering shall be	

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		prohibited. This plan will be reviewed and approved by the BLM and CDFG. • Prepare a *Wildlife Mortality Reporting Program* to identify and report any dead or injured animals observed by personnel conducting O&M activities within the solar generation facility and along the gen-tie line. An appropriate reporting format for dead or injured special status wildlife observed within the solar generation facility and along the gen-tie line shall be developed in coordination with CDFG, USFWS and the BLM. In addition, reporting of any dead or injured avian species found along the gen-tie line shall follow the existing USFWS Bird Fatality/Injury Reporting Program (https://birdreport.fws.gov/). Species requiring reporting will be decided in consultation with CDFG, BLM and USFWS. • Establish annual formal Worker Education Training for all employees and any subcontractors at the Campo	

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		Verde Solar project site to provide instruction on sensitive species identification; measures to avoid contact, disturbance, and injury; and reporting procedures in the case of dead and/or injured wildlife species. The USFWS and the BLM shall be notified per approved guidelines and channels of authority if mortality should occur. Species requiring reporting will be decided in consultation with CDFG, BLM and USFWS and will be detailed in the *Wildlife Mortality Reporting Program*.	
Impacts on Special Status Species – Birds (Yuma Clapper Rail) **Impact 4.12.3** Implementation of the proposed project has the potential to impact YCR. This is considered a **potentially significant impact.**	PS	Implement MM 4.12.2	LS
Impacts on Special Status Species – Birds (Greater Sandhill Crane) **Impact 4.12.4** Implementation of the proposed project has the potential to impact Greater Sandhill Crane. This is considered a **potentially significant impact.**	PS	Implement MM 4.12.2	LS
Impacts on Special Status Species – Birds (Mountain Plover) **Impact 4.12.5** Implementation of the proposed project has the	PS	Implement MM 4.12.2	LS

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potential to impact Mountain Plover during construction, and operation and maintenance. This is considered a **potentially significant impact.**			
Impacts on Special Status Species – Raptors (Burrowing Owls) **Impact 4.12.6** Implementation of the proposed project has the potential to impact Burrowing Owls during construction, and operation and maintenance. This is considered a **potentially significant impact.**		**MM 4.12.6a** The following measures will avoid, minimize, or mitigate potential impacts to Burrowing Owls during construction activities: 1) To the extent practicable, initial grading and clearing within the project footprint shall occur between September 1 and January 31 to avoid impacts to any breeding Burrowing Owls. Occupied burrows shall not be removed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFG verifies through non-invasive methods that either: (a) the birds have not begun egg-laying and incubation; or (b) that juveniles from the occupied burrows are foraging independently and are	

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		capable of independent survival. If initial grading and clearing within the project footprint is to begin during the breeding season (February 1 through August 31), measures 2 through 4 below will be implemented. 2) Within 30-days prior to initiation of initial grading and clearing, pre-construction clearance surveys for Burrowing Owl shall be conducted by qualified and agency-approved biologists to determine the presence or absence of this species within the grading area. The proposed grading areas shall be clearly demarcated in the field or via GPS by the project engineers and Designated Biologist prior to the commencement of the pre-construction clearance survey. The surveys shall follow the protocols provided in the *Burrowing Owl Survey Protocol and Mitigation*	

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		Guidelines. 3) When removal of occupied burrows is unavoidable, the following mitigation measures shall be implemented outside of the breeding season: • Passive relocation methods are to be used by the biological monitors to move the owls out of the impact zone. This includes covering or excavating all burrows and installing one-way doors into occupied burrows. This will allow any animals inside to leave the burrow, but will exclude any animals from re-entering the burrow. A period of at least one week is required after the relocation effort to allow the birds to leave the impacted area before excavation of the burrow can begin. The burrows should then be excavated and filled in to prevent their reuse.	

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		• The removal of active burrows on-site requires construction of new burrows or the enhancement of existing unsuitable burrows (i.e., enlargement or clearing of debris) at a mitigation ratio of 2:1 at least 50 meters from the impacted area and must be constructed as part of the above-described relocation efforts. 4) As the project construction schedule and details are finalized, an approved biologist shall prepare a Burrowing Owl Mitigation and Monitoring Plan that will detail the approved, site-specific methodology proposed to minimize and mitigate impacts to this species. Passive relocation, destruction of burrows, and construction of artificial burrows can only be completed upon prior approval by and in cooperation with the CDFG.	

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		MM 4.12.6b The Applicant shall consult with CDFG to determine the amount and conditions of compensatory mitigation for foraging habitat lost as a result of project implementation. A mitigation and monitoring plan shall be prepared that could include a combination of (or one of) on-site mitigation, off-site mitigation, or contributions to National Fish and Wildlife Foundation's Impact-Directed Environmental Accounts program. Exact mitigation acreages will be determined in consultation with CDFG.	
Impacts on Special Status Species – Raptors (Golden Eagles) **Impact 4.12.7** Implementation of the proposed project has the potential to impact Golden Eagles during operation and maintenance. This is considered a **potentially significant impact.**	PS	Implement MM 4.12.2	LS
Impacts to Nesting Raptors **Impact 4.12.8** Implementation of the proposed project has the potential to impact nesting raptors during construction, operations and maintenance. This	PS	**MM 4.12.8** To prevent nesting raptors from noise associated with project construction, the following shall be implemented:	

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is considered a **potentially significant impact.**		• To the extent practicable, initial grading and clearing within the project site shall take place outside the raptors' breeding season of February 1 to July 15. • If construction occurs between February 1 and July 15, an approved biologist shall conduct a pre-construction clearance survey for nesting raptors in suitable nesting habitat (e.g., tall trees or transmission towers) that occurs within 500 feet of the survey area. If any active raptor nest is located, the nest area will be flagged, and a 500-foot buffer zone delineated, flagged, or otherwise marked. No work activity may occur within this buffer area, until an approved biologist determines that the fledglings are independent of the nest.	

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Impacts on Special Status Species – Mammals (Pallid Bats and California Leaf-nosed Bats) **Impact 4.12.9** Implementation of the proposed project has the potential to impact pallid bats and California leaf-nosed bats during construction, and operation and maintenance. This is considered a **potentially significant impact.**	PS	Implement MM 4.12.2.	LS
Impacts on Special Status Species – Reptiles (Flat tailed horned lizard) **Impact 4.12.10** Implementation of the proposed project has the potential to impact Flat tailed horned lizard during construction, and operation and maintenance. This is considered a **potentially significant impact.**	PS	**MM 4.12.10a** In accordance with the *FTHL Rangewide Management Strategy*, the measures proposed below are designed to avoid, minimize, and/or compensate for potential direct and indirect effects construction of the proposed project may have on FTHL. The following will be implemented when conducting construction activities within the creosote bush-white burr sage scrub and other native vegetation types in the gen-tie ROW: 1. Prior to ground-disturbing activities, an individual shall be	LS

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		designated and approved by the BLM as the Designated Biologist[2] (i.e. field contact representative) along with approved Biological Monitors as needed for construction, particularly within the Yuha MA. The Designated Biologist will be designated for the period during which on-going construction and post-construction monitoring and reporting by an approved biologist is required, such as annual reporting on habitat restoration. Each successive Designated Biologist will be approved by the BLM's Authorized Officer (i.e., BLM field manager, El Centro). The Designated Biologist will have the authority to ensure compliance	

[2] A qualified Designated Biologist must have (1) a bachelor's degree with an emphasis in ecology, natural resource management, or related science; (2) three years of experience in field biology or current certification of a nationally recognized biological society, such as The Ecological Society of America or the Wildlife Society (3) previous experience with applying terms and conditions of a biological opinion; and, (4) the appropriate permit and/or training if conducting focused or protocol surveys for listed or proposed species.

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		with the conservation measures for the FTHL and will be the primary agency contact for the implementation of these measures. The Designated Biologist will organize and oversee the work of the biological monitors and have the authority and responsibility to halt activities that are in violation of the conservation measures. An organizational chart shall be provided to BLM prior to ground-disturbing activities with a clear chain of command and contact information (cell phones). A detailed list of responsibilities for the Designated Biologist is summarized below. To avoid and minimize impacts to biological resources, the Designated Biologist will: • Notify BLM's Authorizing Officer at least 14 calendar days before initiating ground	

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		disturbing activities. • Immediately notify BLM's Authorized Officer in writing if the project Applicant is not in compliance with any conservation measures, including but not limited to any actual or anticipated failure to implement conservation measures within the time periods specified. • Conduct compliance inspections at a minimum of once per month during on-going construction after clearing, grubbing, and grading are completed, and submit a monthly compliance report to BLM's Authorized Officer until construction is complete. 2. The boundaries of all areas to be disturbed (including staging areas, access roads, and sites for temporary placement of spoils) will be delineated with stakes	

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		and flagging prior to construction activities. Where feasible, the areas shall be cleared of FTHL and fenced (according to the Strategy) to exclude FTHL from re-entering these construction areas, particularly in the MA and other high-use areas such as for staging of equipment or parking areas. Spoils will be stockpiled in disturbed areas lacking native vegetation or where habitat quality is poor, such as the agricultural fields rather than native desert. To the extent possible, disturbance of shrubs and surface soils due to stockpiling will be minimized. All disturbances, vehicles, and equipment will be confined to the flagged and cleared areas. To the extent possible, surface disturbance will be timed to minimize mortality to FTHL. 3. Approved Biological monitor(s)	

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		will assist the Designated Biologist in conducting pre-construction surveys and in monitoring of mobilization, ground disturbance, grading, construction, operation, closure, and restoration activities. The biological monitor(s) will have experience conducting FTHL field monitoring, have sufficient education and field experience to understand FTHL biology, be able to identify FTHL scat, and be able to identify and follow FTHL tracks. The Designated Biologist will submit the resume, at least three references, and contact information of the proposed biological monitors to the BLM for approval. To avoid and minimize impacts to biological resources, the Biological Monitors will assist the Designated Biologist with the following activities on BLM	

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		managed lands: • Be present during construction (e.g., grubbing, grading,) activities that take place in FTHL habitat to avoid or minimize take of FTHL. Activities include, but are not limited to, ensuring compliance with all impact avoidance and minimization measures, monitoring for FTHLs and removing lizards from harm's way, and checking avoidance areas (e.g., washes) to ensure that signs, and stakes are intact and that human activities are restricted in these avoidance zones. • At the end of each work day, inspect all potential wildlife pitfalls (trenches, bores and other excavations) for wildlife and then backfill. If backfilling is not feasible, all trenches, bores, and other excavations	

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		will be contoured at a 3:1 slope at the ends to provide wildlife escape ramps, or completely and securely covered to prevent wildlife access. • During construction, examine areas of active surface disturbance periodically, at least hourly, when surface temperatures exceed 29°Celsius (C; 85°F) for the presence of FTHL. 4. Prior to project initiation of construction of the gen-tie on BLM managed lands, a Worker Environmental Awareness Program (WEAP) will be developed and implemented, and will be available in both English and Spanish. Wallet-sized cards summarizing this information will be provided to all construction, operation, and maintenance personnel. The education program will include the	

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		following aspects: • biology and status of the FTHL, • protection measures designed to reduce potential impact to the species, • function of flagging designating authorized work areas, • reporting procedures to be used if a FTHL is encountered in the field, and • driving procedures and techniques, for commuting to, and driving on, the Project site, to reduce mortality of FTHL on roads. 5. FTHLs will be removed from harm's way during all construction activities, per item #6 below. To the extent feasible, methods to find FTHLs will be designed to achieve a maximal capture rate and will include, but not be limited to using strip transects, tracking, and raking around shrubs. During	

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		construction, the minimum survey effort will be 30 minutes per 0.40 ha (30 minutes per 1 ac). Persons that handle FTHLs will first obtain all necessary permits and authorization from the CDFG. If the species is federally listed, only persons authorized by both CDFG and USFWS will handle FTHLs. FTHL removal surveys will also include: • A Horned Lizard Observation Data Sheet and a Project Reporting Form, per Appendix 8 of the RMS, will be completed. During construction, quarterly reports describing FTHL removal activity, per the reporting requirements, will be submitted to the BLM. 6. The removal of FTHLs out of harm's way will include relocation to nearby suitable habitat in low-impact (e.g., away from roads and	

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		solar panels) areas of the Yuha MA. Relocated FTHLs will be placed in the shade of a large shrub in undisturbed habitat. If surface temperatures in the sun are less than 24° Celsius (C) 75° Fahrenheit (F) or exceed 38°C (100° F), the Designated Biologist or biological monitor, if authorized, will hold the FTHL for later release. Initially, captured FTHLs will be held in a cloth bag, cooler, or other appropriate clean, dry container from which the lizard cannot escape. Lizards will be held at temperatures between 75° F and 90° F and will not be exposed to direct sunlight. Release will occur as soon as possible after capture and during daylight hours. The Designated Biologist or biological monitor will be allowed some judgment and discretion when relocating lizards to maximize survival of FTHLs found	

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		in the project area. 7. To the maximum extent practicable, grading in FTHL habitat will be conducted during the active season, which is defined as March 1 through September 30, or if ground temperatures are between 24°C (75° F) and 38 °C (100° F). If grading cannot be conducted during this time, any FTHLs found will be removed to low-impact areas (see above) where suitable burrowing habitat exists, (e.g., sandy substrates and shrub cover). 8. Temporarily disturbed areas associated with gen-tie construction and staging areas on federal lands, will be re-vegetated according to the Site Reclamation and Revegetation Plan (SRRP) approved by the BLM. The SRRP must be approved in writing by the BLM prior to any vegetation-disturbing activities. Restoration	

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		involves re-contouring the land, replacing the topsoil (if it was collected), and maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years (or less if the restoration meets all success criteria). Components of the SRRP will typically include: • The incorporation of Desert Bioregion Revegetation/Restoration Guidance measures. These measures generally include alleviating soil compaction, returning the surface to its original contour, pitting or imprinting the surface to allow small areas where seeds and rain water can be captured, planting seedlings that have acquired the necessary root mass to survive without watering, planting seedlings in	

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		the spring with herbivory cages, broadcasting locally collected seed immediately prior to the rainy season, and covering the seeds with mulch. **MM 4.12.10b** In accordance with the *FTHL Rangewide Management Strategy*, the measures proposed below are designed to avoid, minimize, and/or compensate for potential direct and indirect effects operations and maintenance of the proposed project may have on FTHL. In order to reduce the potential impact to FTHL during O&M, the following will be implemented when conducting O&M along the gen-tie: 1. At least 15 days prior to the commencement of construction and within 15 days following completion of construction activities, the Designated Biologist will provide the BLM a Project FTHL Status Report, which will include, at a	

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		minimum: • A general description of the status of the project site within the MA. • A copy of the table in the project biological monitoring report with notes showing the current implementation status of each conservation measure. • An assessment of the effectiveness of each completed or partially completed measure in avoiding and minimizing project impacts. • A completed a Project Reporting Form from the Flat-tailed Horned Lizard Rangewide Management Strategy. • A summary of information regarding any FTHL mortality in conjunction with the Project's Wildlife Mortality Reporting Program. • Recommendations on how	

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		conservation measures might be changed to more effectively avoid, minimize, and offset future project impacts on the FTHL. 2. The Designated Biologist or biological monitor(s) will evaluate and implement the best measures to reduce FTHL mortality along access and maintenance roads, particularly during the FTHL active season (March 1 through September 30). These measures will include: • A speed limit of 15 miles per hour when driving access roads within suitable FTHL habitat. The Designated Biologist may reduce this speed limit to 10 mph in areas identified as active wildlife corridors as needed to reduced mortality. All vehicles required for O&M within suitable FTHL habitat must remain on the designated	

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		access/maintenance roads. Cross country vehicle and equipment use outside of designated work areas in suitable FTHL habitat shall be prohibited. • O&M activities occurring within suitable FTHL habitat including weed abatement or any other O&M activity that may result in ground disturbance will be conducted outside of the FTHL active season whenever feasible. If any O&M activities must be conducted during the FTHL active season that may result in ground disturbance within suitable FTHL habitat, such as weed abatement or vehicles requiring access outside of a designated access road, a biological monitor will be present during activities to reduce FTHL impacts.	

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		MM 4.12.10c In accordance with the *Flat-tailed Horned Lizard Rangewide Management Strategy*, compensatory mitigation would be required for impacts to FTHL habitat. FTHL are known to occur in the native vegetation along the proposed gen-tie ROW. In accordance with the *Rangewide Management Strategy*, compensation for permanent impact to this habitat within the MA will be at a 6:1 ratio. Acreages of proposed disturbance to FTHL habitat can be found in **Table 4.12-9**. Implement **MM 4.12.11**, below, would address impacts to FTHL as a result of invasive, exotic plant species.	
Impacts on Special Status Species – Reptiles (Colorado Desert fringe-toed lizard) **Impact 4.12.11** Implementation of the proposed project has the potential to impact Colorado Desert fringe-toed lizard during construction, and operation and maintenance. This is considered a **potentially significant impact.**	PS	Implement MM 4.12.10a, MM 4.12.10b, and MM 4.12.10c.	LS

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Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Community **Impact 4.12.12** Implementation of the proposed project has the potential to impact riparian habitat or special status communities. This is considered a **potentially significant impact.**	PS	**MM 4.12.12a** To minimize the introduction and spread of weed species, a Weed Management Plan shall be developed and implemented. The weed management plan shall include a discussion of specific weeds identified on site that will be targeted for eradication or control as well as a variety of measures that will be undertaken during construction and O&M activities to prevent the introduction and spread of new weed species as a result of the project. A *Weed Management Plan* for the solar generation facility will be prepared and implemented that describes specific on-going measures to remove invasive plant species from the solar generation facility. This plan will be approved by the County. A companion Weed Management Plan will be prepared for the gen-tie that will be approved by BLM.	LS

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		MM 4.12.12b The following measures shall be implemented to prevent the spread of weeds: • Limit disturbance areas during construction to the minimal required to perform work and limit ingress and egress to defined routes • Implement vehicle wash and inspection procedures and closely monitor the types of materials brought onto the site to minimize the potential for weed introduction • Use of certified weed free mulch, straw wattles, hay bales and seed mixes • Reestablish native vegetation along the gen-tie as quickly as practicable on disturbed sites to avoid weed invasions • Monitor and rapidly implement control measures to ensure early detection and eradication for weed invasions	

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		Weed control methods that may be used include both physical and chemical control. Physical control methods include manual hand pulling of weeds, or the use of hand and power tools to uproot, girdle, or cut plants. Herbicide applications are a widely used, effective control method for removing infestations of invasive weed species. However, inadvertent application of herbicide to adjacent native plants must be avoided, which can often be challenging when weeds are interspersed with native cover. Before applying herbicide, contractors will be required to obtain any required permits from state and local authorities. Only a State of California and federally certified contractor will be permitted to perform herbicide applications. All herbicides will be applied in accordance with	

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		applicable laws, regulations, and permit stipulations. Only herbicides and adjuvants approved by the State of California and Imperial County will be used to control invasive species at the energy facility site. Invasive plants species on BLM lands would be prevented, controlled, and treated through an Integrated Pest Management approach per the *Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report.* Only herbicides approved by BLM in California will be used on BLM lands. Herbicide application can only occur on BLM lands with an approved Pesticide Use Proposal (PUP).	
Substantial Adverse Effect on Federally Protected Wetlands **Impact 4.12.13** Implementation of the proposed project has the potential to impact jurisdictional waters. This is considered a **potentially significant impact.**	PS	**MM 4.12.13** The Applicant shall coordinate with the CDFG to obtain a Section 1600 Streambed Alteration Agreement as necessary to address any impacted	LS

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		CDFG-jurisdictional water, and provide the appropriate (CDFG approved) compensatory mitigation for permanent and temporary impacts to CDFG jurisdictional riparian habitat. Mitigation for permanent impacts to CDFG riparian habitat is typically at a 2:1 ratio, while mitigation for temporary impacts to CDFG riparian habitat is typically at a 1:1 ratio.	
Interfere with Migratory Fish or Wildlife Movement/Impede the Use of Native Wildlife Nursery Sites **Impact 4.12.14** Implementation of the project would inhibit the ability of medium and large mammals to move through the solar generation facility site. However, the proposed project would not inhibit wildlife movement through the Yuha Basin or surrounding agricultural lands. Therefore, this impact is considered **less than significant**.	LS	None required.	LS

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Conflict with Local Policies or Ordinances Protecting Biological Resources **Impact 4.12.15** Implementation of the project is not anticipated to conflict with any local polices or ordinances protecting biological resources. Therefore, this impact is considered **less than significant**.	LS	None required.	LS

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Conflict with the Provisions of a Habitat Conservation Plan **Impact 4.12.16** Implementation of the project would is not anticipated to conflict with the California Desert Conservation Area Plan. Therefore, this impact is considered **less than significant**.	LS	None required.	LS

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SUMMARY OF IMPACTS

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Cumulative Impacts to Biological Resources **Impact 4.12.17** Implementation of the proposed project could have cumulative impacts on special status species, sensitive natural communities, and protected waters. However, mitigation measures are proposed to help ensure that the proposed project does not cumulatively affect any of these biological resources. Therefore, cumulative impacts are considered **less than cumulatively considerable**.	LS	Implement MM 4.12.2 (to mitigate impacts to special status birds including SWFL), MM 4.12.6a and MM 4.12.6b (to mitigate impacts to BUOW), MM 4.12.8 (to mitigate impacts to nesting raptors), MM 4.12.10a, MM 4.12.10b and MM 4.12.10c (to mitigate impacts to FTHL), MM 4.12.11 (to mitigate impacts to Colorado Desert fringe-toed lizard), MM 4.12.12a, MM 4.12.12b (to mitigate impacts to riparian habitat or other sensitive natural community) and MM 4.12.13 (to mitigate impacts to CDFG jurisdictional waters)	PS

LTS = Less than Significant
LCC = Less than Cumulatively Considerable
PS = Potentially Significant
CC = Cumulatively Considerable
SU = Significant and Unavoidable
NI = No Impact

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