

Volume III of III

Final Environmental Impact Report

Dogwood Geothermal Energy Project:

- Dogwood Geothermal Energy Project (CUP No. 23-0020)
- Heber 2 Solar Energy Project (CUP No. 23-0021)
- Heber Field Company Geothermal Wells & Pipeline Project (CUP No.23-0022)

SCH No. 2024010510

Imperial County, California

May 2025

Prepared for

County of Imperial
801 Main Street
El Centro, CA 92243

Prepared by

HDR
591 Camino de la Reina, Suite 300
San Diego, CA 92108

This page is intentionally blank.

0.4 Mitigation Monitoring and Reporting Program

The County of Imperial will adopt this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the Dogwood Geothermal Energy Project, which is the subject of the Environmental Impact Report (EIR), complies with all applicable environmental mitigation requirements. The mitigation measures for the project will be adopted by the County of Imperial, in conjunction with the certification of the Final EIR. The mitigation measures have been integrated into this MMRP.

The mitigation measures are provided in Table 0.4-1. The MMRP includes a checklist to be used during the mitigation monitoring period. The MMRP includes the following information for each mitigation measure:

- Description of Recommended Mitigation Measures from the CEQA EIR
- Time Frame for Implementation
- Steps to Compliance and Verification
- Responsible Monitoring Agency

The mitigation measures applicable to the project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, and/or reducing or eliminating impacts over time by maintenance operations during the life of the action.

Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to CEQA, to monitor performance of the mitigation measures included in any environmental document to ensure that implementation does, in fact, take place. The County of Imperial is the designated CEQA lead agency for the Mitigation Monitoring and Reporting Program. The County of Imperial is responsible for review of all monitoring reports, enforcement actions, and document disposition as it relates to impacts within the County's jurisdiction. The County of Imperial will rely on information provided by the monitor as accurate and up to date and will field check mitigation measure status as required.

A record of the MMRP will be maintained at County of Imperial, Department of Planning and Development Services, 801 Main Street, El Centro, CA 92243. All mitigation measures contained in the EIR shall be made conditions of the project as may be further described below.

This page is intentionally blank.

Table 0.4-1. Mitigation Measures

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
Agricultural Resources			
<p>AG-1a. Payment of Agricultural and Other Benefit Fees.</p> <p>Prior to the issuance of a grading permit or building permit (whichever is issued first), one of the following options included below shall be implemented:</p> <p>A. Mitigation for Non-Prime Farmland:</p> <p>Option 1: Provide Agricultural Conservation Easement(s). The Permittee shall procure Agricultural Conservation Easements on a “1 on 1” basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations (as defined in California Civil Code §§815-816) and shall be recorded prior to issuance of any grading or building permits; or</p> <p>Option 2: Pay Agricultural In-Lieu Mitigation Fee. The Permittee 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 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; or,</p> <p>Option 3: Public Benefit Agreement. The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that: 1) is consistent with Board Resolution 2023-#17; and 2) must be held by the County in a restricted account to be used by the County</p>	<p>Prior to the issuance of a grading permit or building permit (whichever is issued first)</p>	<p>Submit documentation for establishment of Agricultural Conservations easements, Enrollment in Agricultural In-lieu Mitigation Fee program or Public Service Agreement.</p>	<p>Imperial County Planning & Development Services.</p>

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>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 amended by the Board of Supervisors on November 7, 2023: Resolution “Amending the Public Benefit Program for use with Solar Power Plants in Imperial County”), as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy.</p> <p>B. Mitigation for Prime Farmland:</p> <p>Option 1: <i>Provide Agricultural Conservation Easements.</i> The permittee shall procure Agricultural Conservation Easements on a “2 on 1” basis on land of equal size, of equal quality farmland, outside the path of development. The conservation easement shall meet DOC regulations (as defined in California Civil Code §§815-816) and shall be recorded prior to issuance of any grading or building permits; or</p> <p>Option 2: <i>Pay Agricultural In-Lieu Mitigation Fee.</i> The Permittee 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; or</p> <p>Option 3: <i>Public Benefit Agreement.</i> The Permittee and County voluntarily enter into an enforceable Public Benefit Agreement or Development Agreement that includes an Agricultural Benefit Fee payment that 1) is consistent with Board Resolution 2023-#17; and 2) 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</p>			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>County and to implement the goals and objectives of the Agricultural Benefit program (as amended by the Board of Supervisors on November 7, 2023: Resolution “Amending the Public Benefit Program for use with Solar Power Plants in Imperial County”, as specified in the Development Agreement, including addressing the mitigation of agricultural job loss on the local economy; the Project and other recipients of the Project’s Agricultural Benefit Fee funds; or emphasis on creation of jobs in the agricultural sector of the local economy for the purpose of off-setting jobs displaced by this Project; or</p> <p>Option 4: Avoid Prime Farmland. The Permittee must revise their Conditional Use Permit Application/Site Plan to avoid Prime Farmland.</p>			
<p>AG-1b. Site Reclamation Plan.</p> <p>The DOC has clarified the goal of a reclamation and decommissioning plan: the land must be restored to land which can be farmed. In addition to Mitigation Measure AG-1a for Prime Farmland and Non-Prime Farmland, the Applicant shall submit to Imperial County, a Reclamation Plan prior to issuance of a grading permit. The Reclamation Plan shall document the procedures by which the project site will be returned to its current agricultural condition. Permittee shall also provide financial assurance/bonding in the 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 Permittee fails to perform the Reclamation Plan.</p>	Prior to the issuance of a grading permit	Submit Reclamation Plan to the County for Review.	Imperial County Planning & Development Services.
<p>AG-2 Pest Management Plan.</p> <p>Prior to the issuance of a grading permit or building permit (whichever occurs first), a Pest Management Plan shall be developed by the project applicant and approved by the County of Imperial Agricultural Commissioner. The project applicant shall maintain a Pest Management Plan until reclamation is complete. The plan shall provide the following:</p>	Prior to the issuance of a grading permit or building permit (whichever is issued first)	Submit Pest Management Plan to the County for Review.	Imperial County Planning & Development Services.

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ol style="list-style-type: none"> Monitoring, preventative, and management strategies for weed and pest control during construction activities at any portion of the project (e.g., transmission line); Control and management of weeds and pests in areas temporarily disturbed during construction where native seed will aid in site revegetation as follows: <ul style="list-style-type: none"> Monitor for all pests including insects, vertebrates, weeds, and pathogens. Promptly control or eradicate pests when found, or when notified by the Agricultural Commissioner's office that a pest problem is present on the project site. The assistance of a licensed pest control advisor is recommended. All treatments must be performed by a qualified applicator or a licensed pest control business; All treatments must be performed by a qualified applicator or a licensed pest control operator; "Control" means to reduce the population of common pests below economically damaging levels, and includes attempts to exclude pests before infestation, and effective control methods after infestation. Effective control methods may include physical/mechanical removal, bio control, cultural control, or chemical treatments; Use of "permanent" soil sterilants to control weeds or other pests is prohibited because this would interfere with reclamation; Notify the Agricultural Commissioner's office immediately regarding any suspected exotic/invasive pest species as defined by the California Department of Food Agriculture and the U.S. Department of Agriculture. Request a sample be taken by the Agricultural Commissioner's Office of a suspected invasive species. Eradication of exotic pests shall be done under the direction of the Agricultural 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>Commissioner's Office and/or California Department of Food and Agriculture;</p> <ul style="list-style-type: none"> Obey all pesticide use laws, regulations, and permit conditions; Allow access by Agricultural Commissioner staff for routine visual and trap pest surveys, compliance inspections, eradication of exotic pests, and other official duties; Ensure all project employees that handle pest control issues are appropriately trained and certified, all required records are maintained and made available for inspection, and all required permits and other required legal documents are current; Maintain records of pests found and treatments or pest management methods used. Records should include the date, location/block, project name (current and previous if changed), and methods used. For pesticides include the chemical(s) used, EPA Registration numbers, application rates, etc. A pesticide use report may be used for this; Submit a report of monitoring, pest finds, and treatments, or other pest management methods to the Agricultural Commissioner quarterly within 15 days after the end of the previous quarter, and upon request. The report is required even if no pests were found or treatment occurred. It may consist of a copy of all records for the previous quarter, or may be a summary letter/report as long as the original detailed records are available upon request. <p>3. A long-term strategy for weed and pest control and management during the operation of the proposed project. Such strategies may include, but are not limited to:</p>			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> Use of specific types of herbicides and pesticides on a scheduled basis. <p>4. Maintenance and management of project site conditions to reduce the potential for a significant increase in pest-related nuisance conditions on surrounding agricultural lands.</p> <p>5. The project shall reimburse the Agricultural Commissioner's office for the actual cost of investigations, inspections, or other required non-routine responses to the site that are not funded by other sources.</p>			
Air Quality			
<p>AQ-1 Fugitive Dust Control.</p> <p>Pursuant to ICAPCD, all construction sites, regardless of size, must comply with the requirements contained within Regulation VIII – Fugitive Dust Control Measures. ICAPCD will verify implementation and compliance with these measures as part of the grading permit review/approval process</p> <p>ICAPCD Standard Measures for Fugitive Dust (PM10) Control</p> <ul style="list-style-type: none"> 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 offsite unpaved roads will 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. 	Prior to the issuance of a grading permit	Submit construction dust control plan for ICAPCD approval.	Imperial County Air Pollution Control District (ICAPCD)

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> • All unpaved traffic areas 1 acre or more with 75 or more average vehicle trips per day will 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 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 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 will 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. • 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. <p>Standard Mitigation Measures for Construction Combustion Equipment</p> <ul style="list-style-type: none"> • Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment. 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. When commercially available, replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). 			
<p>AQ-2 Construction Equipment.</p> <p>All off-road construction diesel engines not registered under CARB's Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower or more, shall meet, at a minimum, the Tier 4 Final California Emission Standards for Off-road Compression-Ignition Engines as specified in CCR, Title 13, section 2423(b)(1) unless such engine is not available for a particular item of equipment. In the event a Tier 4 Final engine is not available for any off-road engine larger than 100 horsepower, that engine shall be equipped with retrofit controls that would provide NOX and particulate matter emissions that are equivalent to Tier 4 engine. Drill rig engines shall meet a minimum of Tier 4 Interim California Emission Standards. A list of the construction equipment, including all off-road equipment utilized at the project site by make, model, year, horsepower and expected/actual hours of use, and the associated EPA Tier shall be submitted to the County Planning and Development Services Department and ICAPCD prior to the issuance of a grading permit. The equipment list shall be submitted periodically to ICAPCD to perform a NOX analysis. ICAPCD shall utilize this list to calculate air emissions to verify that equipment use does not exceed the significance thresholds. The Planning and Development Services Department and ICAPCD shall verify implementation of this measure.</p>	Prior to the issuance of a grading permit	A list of the construction equipment shall be submitted to the County Planning and Development Services Department and ICAPCD	Imperial County Planning & Development Services, and ICAPCD

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>AQ-3 Dust Suppression.</p> <p>The project applicant shall employ a method of dust suppression (such as water or chemical stabilization) approved by ICAPCD. All unpaved roads associated with construction shall be effectively stabilized of dust emissions using stabilizers/suppressant before the commencement of all construction phases. This will be conducted monthly at a rate of 0.1 gallon/ square yard of chemical dust suppressant. The project applicant shall apply chemical stabilization as directed by the product manufacturer to control dust between the panels as approved by ICAPCD, and other non-used areas (exceptions will be the paved entrance and parking area, and Fire Department access/emergency entry/exit points as approved by Fire/Office of Emergency Services [OES] Department).</p>	Prior to the issuance of a grading permit	Submit construction dust control plan for ICAPCD approval.	ICAPCD
<p>AQ-4 Dust Suppression Management Plan.</p> <p>Prior to any earthmoving activity, the applicant submit an Enhanced Dust Control Plan and obtain ICAPCD and Imperial County Planning and Development Services Department (ICPDS) approval.</p>	Prior to the issuance of a grading permit	Submit construction dust control plan for County and ICAPCD approval.	Imperial County Planning & Development Services and ICAPCD
<p>AQ-5 Operational Dust Control Plan.</p> <p>Prior to issuance of a Certificate of Occupancy, the applicant shall submit an operations dust control plan and obtain ICAPCD and ICPDS approval. ICAPCD Rule 301 Operational Fees apply to any project applying for a building permit. At the time that building permits are submitted for the proposed project, ICAPCD shall review the project to determine if Rule 310 fees are applicable to the project.</p>	Prior to issuance of a Certificate of Occupancy	Submit an operations dust control plan for County and ICAPCD approval	Imperial County Planning & Development Services and ICAPCD
<p>AQ-6 Speed Limit.</p> <p>During construction and operation of the proposed project, the applicant shall limit the speed of all vehicles operating onsite on unpaved roads to 15 miles per hour or less.</p>	Prior to and during construction and operations activities	Submit a construction dust control plan and operations dust control plan for County and ICAPCD approval	Imperial County Planning & Development

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
			Services and ICAPCD
Biological Resources			
<p>BIO-1 Worker Environmental Awareness Program.</p> <p>Prior to project construction, a Worker Environmental Awareness Program shall be developed and implemented by a qualified biologist and shall be available in both English and Spanish. Qualified biologist resumes shall be provided to the County for review and approval prior to the start of construction. Handouts summarizing potential impacts on special-status biological resources and the potential penalties for impacts on these resources shall be provided to all construction personnel. At a minimum, the education program shall include the following:</p> <ul style="list-style-type: none"> • The purpose for resource protection; • A description of special-status species including representative photographs and general ecology; • Occurrences of USACE, RWQCB, and CDFW regulated features in the project area; • Regulatory framework for biological resource protection and consequences if violated • Sensitivity of the species to human activities; • Avoidance and minimization measures designed to reduce the impacts on special-status biological resources • Environmentally responsible construction practices; • Reporting requirements; • The protocol to resolve conflicts that may arise at any time during the construction process; and 	Prior to construction activities	Submit Worker Environmental Awareness Program Document to the County for review and approval. Submit records of attendance indicating date of training, location of training, and name of trainer, with name and signature of all attendees to the County.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> Workers sign acknowledgement form indicating that the environmental awareness training and education program that has been completed, which shall be kept on record. 			
<p>BIO-2 Pre-Construction Plant Surveys.</p> <p>Prior to the start of construction, a qualified biologist shall conduct a botanical field survey following the methodology described in Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW, March 2018). The survey shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of areas proposed for disturbance and indirectly impacted by the Project. The results of the survey shall be documented in a letter report that will be submitted to Imperial County and CDFW. The survey shall be conducted annually until start of construction to ensure the floristic diversity is accurately captured and effective avoidance, minimization, and mitigation strategies are developed.</p> <p>If special-status plant species are observed during the preconstruction rare plant survey(s) within the development area of the Project, the Project shall be designed to reduce impacts to these species through the establishment of buffers, to the extent feasible. Buffer distances will be determined by the qualified biologist, typically 50 feet or greater from an identified special-status plant species, unless the Qualified Biologist determines a reduced buffer would suffice to avoid impacts to the species.</p> <p>If avoidance of special-status plant species is not feasible, a Special-Status Plant Relocation Plan shall be developed and implemented. The Special-Status Plant Relocation Plan shall address mitigation for special-status plants, including topsoil salvage to preserve seed bank and management of salvaged topsoil; seed collection, storage, possible nursery propagation,</p>	<p>Prior to ground-disturbing activities and during ground-disturbing activities</p>	<p>Submit report with results of surveys, and if necessary Project-specific sensitive species management plan for review.</p>	<p>Imperial County Planning & Development Services</p>

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>and planting; salvage and planting of bulbs as feasible; location of on-site receptor sites; land protection instruments for receptor areas; and funding mechanisms.</p> <p>The Special-Status Plant Relocation Plan shall include methods, monitoring, reporting, success criteria, adaptive management, and contingencies for achieving success. All special-status plant species identified on site shall be mapped onto a site-specific aerial photograph and topographic map and included on the construction, grading, fuel modification, and landscape plans.</p> <p>Botanical field surveyors will possess the following qualifications and will be approved by Imperial County prior to any botanical field surveys: Knowledge of plant taxonomy and natural community ecology; Familiarity with plants of the region, including special status plants; Familiarity with natural communities of the region, including sensitive natural communities; Experience with the CNDDDB, BIOS, and Survey of California Vegetation Classification and Mapping Standards, Experience conducting floristic botanical field surveys as described in <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW, March 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor; Familiarity with federal, state, and local statutes and regulations related to plants and plant collecting; and Experience analyzing the impacts or projects on native plant species and sensitive natural communities.</p>			
<p>BIO-3 Avoidance of Sensitive Natural Communities.</p> <p>To the greatest extent practicable, Project work shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the Project Applicant shall provide compensatory mitigation for direct impacts consisting of habitat acquisition at a minimum of a 3:1 ratio. Habitat acquisition sites shall be</p>	Prior to ground-disturbing activities	If arrow-weed thickets cannot be avoided, submit record of compensatory mitigation consisting of habitat acquisition provided at a minimum of a 3:1 ratio.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
biologically equal or superior to existing conditions and must be conserved and managed in perpetuity. This mitigation measure would be implemented prior to the start of Project-related activities by the Project Proponent.			
<p>BIO-4 Preconstruction Nesting Bird Survey.</p> <p>If construction or other project activities are scheduled to occur during nesting bird breeding season (typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species), a preconstruction nesting bird survey shall be conducted by a qualified avian biologist prior to Project-related disturbance within and adjacent to the Project area. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nesting locations and nesting behavior (including but not limited to copulation, carrying food or nesting materials, nest building, agitation, aggressive interaction, feigning injury, or distraction displays). In addition, any clearing of vegetation that may occur is required to take place outside of the breeding season. The survey shall be completed no more than 3 days prior to initial ground disturbance. The nesting bird survey shall include the project area and all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures. If an active nest is identified, the biologist shall establish an appropriately sized no-work buffer zone around the nest, that is sufficient to ensure that breeding is not likely to be disrupted or adversely impacted by construction. The size of the no-work buffer zone will be based upon the biologist's best professional judgment, the birds' displayed behavior (agitation or stress), the nesting species, its sensitivity to disturbance, nesting stage and expected types, and the intensity and duration of disturbance. The no-work buffer zone shall be clearly marked in a way that does not alert predators. Construction activities shall not occur within any no-work buffer zones until the young birds have successfully fledged and the nest is deemed inactive by the qualified avian biologist. Qualified avian</p>	No more than 3 days prior to ground-disturbing activities	Submit report with results of surveys, and if necessary Project-specific sensitive species management plan for review.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
biologist resumes will be provided to CDFW for review/approval prior to the start of construction.			
<p>BIO-5 Biological Monitoring.</p> <p>Construction monitoring shall be conducted by a qualified biologist. Qualified biologist resumes will be provided to CDFW for approval prior to the start of construction. The biologist shall be given authority to execute the following functions:</p> <ul style="list-style-type: none"> • Establish construction exclusion zones and make recommendations for implementing erosion control measures in temporary impact areas. • Ensure all construction activities stay within the staked construction zone and do not go beyond the limits of disturbance. • Minimize trimming/removal of vegetation to within the project impact area. • Restrict non-essential equipment to the existing roadways and/or disturbed areas to avoid disturbance to existing adjacent native vegetation. • Verify permit compliance <p>During construction, the qualified biologists will act as biological monitors and shall inspect and verify field conditions, as needed, to ensure that wildlife and vegetation adjacent to the BSA are not harmed. The biological monitor shall coordinate with the construction supervisor and construction crew and shall have the authority to stop any activity that has the potential to affect special-status species or remove vegetation.</p>	Prior to ground-disturbing activities and during ground-disturbing activities	Submit report with results of surveys, and if necessary Project-specific sensitive species management plan for review.	Imperial County Planning & Development Services
<p>BIO-6 Non-Reflective Coatings on Solar Panels.</p> <p>The Applicant will use non-reflective materials and finishes to the solar panels to reduce potential glare as described in the Glint and Glare Analysis (Appendix C of the EIR). These coatings will create a matte surface that is less likely to</p>	During construction activities	Use of non-reflective materials and finishes to the solar panels during PV solar panel installation.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
resemble the reflective properties of water to birds flying overhead.			
<p>BIO-7 Burrowing Owl Avoidance, Minimization, and Mitigation.</p> <p>As recommended by CDFW, Applicant will apply for and obtain an ITP prior to beginning ground disturbing activities. Applicant will comply with all permit conditions required by CDFW to minimize take.</p> <p>Potential impacts to burrowing owl shall be mitigated per the guidance of the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012) and at minimum including the following:</p> <p>Burrowing Owl Protection and Mitigation Plan</p> <p>As the Project construction schedule and details are finalized, a qualified biologist will prepare a <i>Burrowing Owl Protection and Mitigation Plan</i> (BOPMP) for submission to CDFW for approval prior to beginning ground disturbing activities that will detail the approved, site-specific methodology proposed to avoid, minimize and mitigate impacts on this species. The goal of the BOPMP is to avoid potential direct and indirect mortality of burrowing owls.</p> <p>The BOPMP will include, at a minimum: success criteria based on factors such as site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, evidence and causes of mortality, changes in distribution, trends in stressors; remedial measures; detailed survey methodology; exclusion and excavation methods; guidance for artificial burrow construction and placement; active monitoring procedures; identification of wildlife rehabilitation centers or veterinarians capable of and willing to treat burrowing owls in the case of injury of any life stage of burrowing owl (e.g., eggs, nestlings, fledglings, adults); procedures for collection and storage of carcasses; and annual reporting protocols. The BOPMP will include an</p>	Prior to ground-disturbing activities	Submit report with results of surveys, and if necessary Project-specific sensitive species management plan for review.	Imperial County Planning & Development Services and California Department of Fish and Wildlife

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>annual report to CDFW and shall be funded by the Project Applicant.</p> <p>Burrowing Owl Pre-Construction Surveys and Physical Barriers</p> <p>A CDFW-approved qualified biologist(s) shall conduct take-avoidance (pre-construction) surveys to identify, flag, and map all potential, known, and/or nesting burrows within (a) 14 calendar days prior to beginning ground-disturbing activities in the work area and (b) 24 hours prior to project construction. Surveys shall include the Project Area and a 500-foot buffer. Technical memoranda that document these survey findings will be submitted to CDFW and Imperial County.</p> <p>If burrowing owl is identified during the non-breeding season (September 1 through January 31), a 50-meter (165-ft) to 100-meter (328-ft) no-work buffer between active burrows and construction activities shall be established by the qualified biologist. However, the minimum buffer shall be increased depending on the level of construction disturbance and construction activity. Construction within the buffer will be avoided until a qualified biologist determines that burrowing owl is no longer present or until a CDFW-approved exclusion plan has been implemented.</p> <p>If burrowing owl is identified during the breeding season (February 1 through August 31), then a 100-meter (328-ft) to 200-meter (656-ft) no-work buffer will be established by the qualified biologist in accordance with CDFW Staff Report (CDFG 2012). A qualified biologist shall monitor the burrowing owls for any sign of distress and adjust the buffers as necessary to ensure no take occurs. Construction and disturbance activities within the buffer will be avoided until a qualified biologist determines that the burrow is inactive or until young have fledged.</p> <p>If active burrows are present within the Project footprint and avoidance is infeasible, measures such as passive relocation methods, destruction of burrows, and construction of artificial burrows described in the following sub-sections shall be</p>			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>implemented upon prior approval by and in coordination with CDFW.</p> <p>Depending on the level of disturbance, a smaller buffer may be established by a qualified biologist. Burrows will be buffered from development activities to the greatest extent feasible, as determined by a CDFW-approved biologist. Physical barriers, such as fences and visual screens (e.g., a portable chain link fence with shade cloth), will be used to protect identified burrows and visually shield them from work areas when feasible. Flags or markers will be placed near burrows to ensure that construction equipment does not collapse burrows.</p> <p>Burrowing Owl Construction Monitoring</p> <p>Monitoring by a qualified biologist shall be performed during ground-disturbing construction activities to avoid disturbance to burrowing owls. Additionally, if any active burrowing owl nests are present within the Project construction area, they must be avoided by establishing a non-disturbance buffer until the young fledge or the nest fails (CDFG 2012). Any nesting owls that are adjacent to the construction area will also be avoided by establishing buffer areas. Buffer areas should be marked using flagging or fencing to facilitate avoidance.</p> <p>Avoidance</p> <p>The following avoidance measures may assist in seasonally and spatially avoiding direct impacts and disturbances that could result in take of burrowing owls, nests, or eggs.</p> <ul style="list-style-type: none"> • Avoid disturbing occupied burrows during the breeding season, from February 1 through August 31. • Avoid impacting burrows occupied during the non-breeding season by migratory or nonmigratory resident burrowing owls. • Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>shrubs), disking, cultivation, and urban, industrial, or agricultural development.</p> <ul style="list-style-type: none"> Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas). Restrict the use of treated grain to poison mammals the months of January and February. <p>Passive Relocation and Lands Management Planning</p> <p>If burrow avoidance is infeasible during the non-breeding season or during the breeding season where resident burrowing owls have not yet begun egg laying or incubation, or where the juveniles are foraging independently and capable of independent survival, a CDFW-approved qualified biologist shall implement a passive relocation program in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). Procedures will also be detailed in the BOPMP.</p> <p>Passive relocation shall only be done in the non-breeding season, where resident owls have not yet begun egg laying or incubation, or where the juveniles are foraging independently and capable of independent survival, in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012) and a CDFW-approved BOPMP as follows:</p> <ul style="list-style-type: none"> To facilitate identification of replacement burrow sites, a <i>Burrowing Owl Exclusion Plan</i> and <i>Mitigation Lands Management Plan</i> shall be prepared by the qualified biologist in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (Appendix E and Appendix F of CDFG 2012). The plans shall be approved by CDFW prior to commencing passive relocation. All burrows would be covered or excavated, and a one-way door would be installed on occupied burrows. This will allow any animals inside to leave the burrow 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>but will exclude any animals from re-entering the burrow.</p> <ul style="list-style-type: none"> • If burrowing owls exhibit signs of stress in attempting to re-enter the burrow, the one-way-door shall be removed to prevent take of the individual. • A period of at least 1 week is required after the relocation effort to allow the birds to leave the impacted area before construction of the area can begin. • Only burrows that will be directly impacted by the Project shall be excavated and filled in to prevent their reuse. • Off-site "replacement burrow site(s)" must consist of a minimum of two suitable, unoccupied burrows for every burrowing owl or pair to be passively relocated. • The <i>Mitigation Lands Management Plan</i> will be developed when off-site or on-site mitigation habitat protection is needed to ensure compliance with and effectiveness of identified management actions for the mitigation lands. The Applicant shall implement the <i>Mitigation Lands Management Plan</i> and permanently conserve in a conservation easement offsite habitat suitable for burrowing owl. Land identified to mitigate for passive relocation of burrowing owl may be combined with other offsite mitigation requirements of the Project if the compensatory habitat is deemed suitable to support the species. • The Applicant may purchase available burrowing owl conservation bank credits from a CDFW-approved conservation bank in lieu of placing offsite habitat into a conservation easement. The final terms of potential land acquisition and/or credits, or some combination thereof (e.g., fees, easements, approvals, documentation, etc.), will be established in consultation with CDFW via the ITP process. 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>BIO-8 American Badger Avoidance and Minimization.</p> <p>Prior to initial site clearing, a CDFW-approved qualified biologist shall conduct a pre-construction survey for American badgers. The biologist shall conduct the pre-construction survey within 3 days prior to the initiation of ground disturbing activities. If no American badger individuals and/or dens are found during the pre-construction survey, the biologist shall document the findings in a letter report to CDFW, and no further mitigation shall be required. If individuals and/or dens are found, the Applicant shall consult with CDFW and a CDFW-approved qualified biologist to determine an appropriate no-disturbance buffer (typically 50-foot buffer around occupied dens and a 250-foot buffer around natal dens) to avoid impacts to the den. The no-disturbance buffer around natal dens shall remain in place until a qualified biologist determines through non-invasive means that the individuals occupying the den have dispersed. If impacts cannot be avoided and den excavation and exclusion implementation is required, den excavation and exclusion activities shall only take place during the non-breeding season (typically September 1 through January 1) in consultation with CDFW.</p>	Prior to ground-disturbing activities	Submit report with results of surveys, and if necessary Project-specific sensitive species management plan for review.	Imperial County Planning & Development Services and California Department of Fish and Wildlife
<p>BIO-9 Avian/Power Line Collision Avoidance and Minimization.</p> <p>Install bird flight diverters in accordance with the Avian Power Line Interaction Committee (APLIC) guidelines for reducing avian collisions with power lines (Reducing Avian Collisions with Power Lines; APLIC 2012). Details of design components shall be indicated on all construction plans. The Applicant shall monitor for new versions of the APLIC collision guidelines and update designs or implement new measures as needed during Project construction, provided these actions do not require the purchase of previously ordered transmission line structures. All bird flight diverters shall be maintained for the duration of construction and operation.</p>	Prior to issuance of a building permit	Submit construction plans showing bird flight diverter to be installed is in accordance with the APLIC guidelines	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>BIO-10 Avian Electrocutation Avoidance and Minimization.</p> <p>Implement Project-specific design measures in accordance with the APLIC guidelines for minimizing avian electrocutions. The Applicants shall construct and maintain all transmission facilities, towers, poles, and lines in accordance with applicable policies set forth in the most recent APLIC guidelines for minimizing avian electrocutions (Avian Protection Plan Guidelines; APLIC and USFWS 2005). Specific APLIC guidelines to be incorporated into the design of the transmission lines to minimize avian electrocutions shall include the following:</p> <ul style="list-style-type: none"> • Design the tops of structures to be safe for perching raptors. • Provide 60 inches separation between energized conductors and: <ul style="list-style-type: none"> ○ energized conductors, ○ grounded or neutral conductors, ○ pole line hardware that could provide a perch or nesting place, and ○ overhead shield wires, including optical ground wire shield wire. • Ensure that all exposed jumper cables are completely covered with a cover of a qualified insulation rating. • Ensure insulation of all energized arresters with covers and insulated cables. • Details of design components shall be indicated on all construction plans. The Applicants shall monitor for new versions of the APLIC guidelines and update designs or implement new measures as needed during Project construction, provided these actions do not require the purchase of previously ordered transmission line structures. 	<p>Prior to issuance of a building permit</p>	<p>Submit construction plans showing measures to be incorporated into the design of transmission lines.</p>	<p>Imperial County Planning & Development Services</p>

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>BIO-11 Biological Protection Measures.</p> <ul style="list-style-type: none"> Fence markers shall be installed to deter or prevent birds/bats from colliding with perimeter/security fencing, and maintenance or replacement of these markers will be completed per the manufacturer instruction. If encountered, wildlife within the Project Site shall be allowed to escape unimpeded, relocated by a qualified biologist and placed in a designated safe area away from construction activities, or left in place when required by regulations, policies, permits, and/or conditions of approval. If wildlife relocation of common species is required, the qualified biologist approved by CDFW prior to the start of construction shall approve the method of relocation or oversee the relocation. Any relocation of special status species would require additional coverage under an Incidental Take Permit or Biological Opinion. Construction personnel trained by the qualified biologist during the WEAP, shall inspect under vehicles and equipment every time the vehicles or equipment are moved to a make sure no special status or common wildlife species are present, which could be injured. If an animal is present, site workers shall wait for the individual to move to a safe location. If a special-status species is discovered under equipment or vehicles and does not move on its own, the Applicant shall contact Imperial County, CDFW, and/or USFWS to determine the appropriate action. All excavations (e.g., steep-walled holes, or trenches) more than 6 inches deep shall be covered with plywood or similar materials when not in use or fitted with at least one escape ramp constructed of earth dirt fill, wooden planks, or another material that wildlife could ascend to prevent entrapment. All excavations more than 6 inches deep shall be inspected daily for entrapped wildlife before construction activities begin and once immediately before being covered with plywood. Before excavations are filled, they shall be thoroughly inspected for entrapped wildlife. Any wildlife discovered shall be 	Prior to ground-disturbing activities and during construction activities	Submit construction plans showing the inclusion of the biological protection measures listed in Mitigation Measure BIO-11 as specifications.	Imperial County Planning & Development Services and California Department of Fish and Wildlife

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>allowed to escape unimpeded before field activities resume or shall be removed from excavated areas by a qualified biologist and released at a safe nearby location.</p> <ul style="list-style-type: none"> Where habitat will be temporarily disturbed, restore the disturbed area to pre-project condition, including decompacting soil and revegetating. All open ends of pipes, culverts, and conduits temporarily installed in open trenches or stored in staging/laydown areas shall be covered/capped at the end of each workday. Any such materials that have not been capped shall be inspected by construction personnel for wildlife before being moved, buried, or handled. Should wildlife become trapped, a qualified biologist shall be notified by construction personnel to remove and relocate the individual(s). If a listed species is discovered inside a pipe, that section of pipe shall not be moved. The Project shall contact CDFW and/or USFWS to determine the appropriate action. All food-related trash items (wrappers, cans, bottles, food scraps, cigarettes, etc.), general trash, micro trash (nails, bits of metal and plastic, small construction debris, etc.), and other human-generated debris scheduled to be removed shall be stored in animal-proof containers and removed from the site on a regular basis (weekly during construction, and at least monthly during operations). No deliberate feeding of wildlife or domestic animals shall be allowed. New light sources shall be minimized, and lighting shall be designed (e.g., using shielding and/or downcast lights) to limit the lighted area to the minimum necessary. Use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state, and federal regulations. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other state and federal legislation. 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> To prevent harassment and mortality of listed, special status, and common wildlife species and destruction of their habitats, no domesticated animals shall be permitted on the site. No firearms shall be allowed on the Project Site, unless otherwise approved for security personnel. Use only native, insecticide-free plants for habitat restoration and enhancement actions. If plants are grown via contract, use grow specifications that limit harmful pesticide residues. Protect pollinators and their habitats from pesticides, including insecticides, fungicides, and herbicides. If pesticides are used in areas with flowering plants, lessen their potential harm by adhering to the following guidance: <ul style="list-style-type: none"> Avoid the use of neonicotinoids or other systemic insecticides, including coated seeds due to their ecosystem persistence, systemic nature, and toxicity to pollinators (Xerces Systemic Insecticides List [Xerces Society 2025]). Avoid the use of insecticides that target lepidopterans (e.g., moths and butterflies), including biological pesticides (IRAC 2011). Use targeted application methods, avoid large-scale broadcast applications, and take precautions to limit off-site movement (e.g., wind drift, discharge from surface water flows). If pesticides are used for vector control treatments (e.g., mosquitoes), avoid treatment unless monitoring indicates that the species and numbers exceed a public health threshold. For any mosquito treatments, first employ prevention steps such as reducing standing water. Where possible, draw mosquitoes away 			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
from sensitive sites (e.g., using dry ice traps) to limit treatment effects in sensitive habitat areas.			
Cultural Resources			
<p>CUL-1 Evaluate Significance of Find (Unknown Archaeological Resources).</p> <p>In the event of the discovery of previously unidentified archaeological materials, the contractor shall immediately cease all work activities within approximately 100 feet of the discovery. After cessation of excavation, the contractor shall immediately contact the Imperial County Department of Planning and Development Services. Except in the case of cultural items that fall within the scope of the Native American Grave Protection and Repatriation Act, the discovery of any cultural resource within the project area shall not be grounds for a “stop work” notice or otherwise interfere with the project’s continuation except as set forth in this paragraph.</p> <p>In the event of an unanticipated discovery of archaeological materials during construction, the applicant shall retain the services of a qualified professional archaeologist, meeting the Secretary of the Interior’s Standards for a Qualified Archaeologist, to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the applicant shall implement an archaeological data recovery program.</p>	During ground-disturbing activities	Submit archaeologist report for review. Submit proposed site plan for alternative work location within CUP site to the County for review and approval.	Imperial County Planning & Development Services
<p>CUL-2 Human Remains.</p> <p>If subsurface deposits believed to be human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist who meets the Secretary of the Interior’s Standards for prehistoric and historic archaeology and is familiar with the resources of the region, shall be retained to</p>	During ground-disturbing activities	Submit archaeologist report for review. Submit proposed site plan for alternative work location within CUP site to the County for review and approval.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>evaluate the significance of the find, and shall have the authority to modify the no work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Imperial County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must reburial the remains where they will not be further disturbed (§ 5097.98 of the PRC). 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 reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the Imperial County Planning and Development Services Department, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction. 			
Energy			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>ENG-1 Energy Conservation Control Measures. The project applicant shall implement all the following applicable energy conservation control measures during construction of the project:</p> <ul style="list-style-type: none"> • Idling times on all diesel-fueled commercial vehicles over 10,000 pounds shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure 13 CCR §2485). Clear signage to this effect shall be provided for construction workers at all access points. • Idling times on all diesel-fueled off-road vehicles over 25 horsepower shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes and fleet operators must develop a written policy as required by 13 CCR §2449 (“CARB Off-Road Diesel Regulations”). • All construction equipment shall be maintained and properly tuned in accordance with the manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Portable equipment shall be powered by electricity if available. If electricity is not available, propane or natural gas shall be used if feasible. Diesel engines shall only be used if electricity is not available, and it is not feasible to use propane or natural gas 	Prior to the issuance of a grading permit	A list of the construction equipment shall be submitted to the County Planning and Development Services Department and ICAPCD	Imperial County Planning & Development Services and ICAPCD
Geology and Soils			
<p>MM GEO-1: Prepare Geotechnical Report(s) as Part of Final Engineering for the Project and Implement Required Measures.</p> <p>Facility design for all project components shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by the</p>	Prior to issuance of building permits	A geotechnical and/or civil engineering report shall be submitted to Imperial County Public Works Department, Engineering Division for review and approval	Imperial County Public Works Department, Engineering Division

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>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 • Structural foundations • Grading practices • Soil corrosion of concrete and steel • Erosion/winterization • Seismic ground shaking • Liquefaction • 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 the project applicants. The final geotechnical and/or civil engineering report shall be submitted to Imperial County Public Works Department, Engineering Division for review and approval prior to issuance of building permits.</p>			
<p>GEO-2 Paleontological Resources.</p> <p>In the event that unanticipated paleontological resources or unique geologic resources are encountered during ground-disturbing activities, work must cease within 50 feet of the discovery and a paleontologist shall be hired to assess the scientific significance of the find. The consulting paleontologist</p>	During ground disturbing activities	Submit Treatment and Monitoring Plan to County for review and approval if necessary.	Imperial County Planning & Development Services

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
shall have knowledge of local paleontology and the minimum levels of experience and expertise as defined by the Society of Vertebrate Paleontology's Standard Procedures (2010) for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. If any paleontological resources or unique geologic features are found within the project site, the consulting paleontologist shall prepare a paleontological Treatment and Monitoring Plan to include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation of specimens into an accredited repository, and preparation of a report at the conclusion of the monitoring program.			
Hazards and Hazardous Materials			
<p>HAZ-1 Isopentane Management Measures.</p> <p>A certified fire protection engineer survey and analysis of current and proposed fire suppression and detection equipment will be performed to evaluate the current systems performance and coverage of protection prior to construction. This analysis will evaluate proposed fire suppression and detection equipment in conjunction with existing equipment and be reviewed and approved by the Imperial County Fire Department and OES prior to building permits approval. The following measures will be required for the project:</p> <ol style="list-style-type: none"> 1. All isopentane storage tanks will be protected by approved automatic fire suppression equipment. All automatic fire suppression will be installed and maintained to the current adapted fire code and regulation. 2. An approved automatic fire detection system will be installed as per the California Fire Code. All fire detection systems will be installed and maintained to the current adapted fire code and regulations. 	Prior to issuance of Building permits.	Submittal of Fire Protection engineering reports to Imperial County Fire Department and OES for review.	Imperial County Fire Department

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ol style="list-style-type: none"> 3. Fire department access roads and gates will be in accordance with the current adapted fire code and the facility will maintain a Knox Box for access on site. 4. Applicants will provide product containment areas(s) for both product and water run-off in case of fire applications and retained for removal. 5. Each tank will be equipped with an automated water suppression system. 6. Each tank will be equipped with two flame detectors and one gas detector (for a total of 4 flame detectors and 2 gas detectors for the two tanks). <ol style="list-style-type: none"> a. In the case of an isopentane leak, the gas detector(s) will detect it immediately and send a notification to the operator at the control room (manned 24/7) to mobilize fixing the leak. b. In case of a fire, the flame detector(s) will detect it and immediately start the automatic fire suppression system. c. In case of a fire, there will also be a horn and strobe system that will turn on automatically to alert the plant employees. 7. Concrete containment areas will be constructed for the isopentane tanks. 8. Isopentane vessels will rarely be filled to 90 percent capacity. 9. Isopentane safety-control measures will be established. 10. A blast wall will be built between the two proposed isopentane vessels. 11. Diking and impoundment of the proposed isopentane tanks shall be installed to minimize the magnitude and extent of a tank failure. 			
Hydrology/Water Quality			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>HYD-1 Prepare SWPPP and Implement BMPs Prior to Construction and Site Restoration.</p> <p>The project applicant or its contractor shall prepare a SWPPP specific to the project 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 the appropriate agency prior to commencement of work and shall be made conditions of the contract with the contractor selected to build and decommission the project. The SWPPP shall incorporate control measures in the following categories:</p> <ul style="list-style-type: none"> • Soil stabilization and erosion control practices (e.g., hydroseeding, erosion control blankets, mulching) • Sediment control practices (e.g., temporary sediment basins, fiber rolls) • Temporary and post-construction on- and off-site runoff controls • Special considerations and BMPs for water crossings and drainages • Monitoring protocols for discharge(s) and receiving waters, with emphasis place on the following water quality objectives: dissolved oxygen, floating material, oil and grease, potential of hydrogen (pH), and turbidity • Waste management, handling, and disposal control practices • Corrective action and spill contingency measures • Agency and responsible party contact information 	<p>Prior to Construction Activities</p>	<p>Submit a SWPPP to the County and SWRCB to review.</p>	<p>Imperial County Planning & Development Services, and SWRCB</p>

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<ul style="list-style-type: none"> 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 The SWPPP shall be prepared by a Qualified SWPPP Practitioner and/or Qualified SWPPP Developer 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. BMPs for soil stabilization and erosion control practices and sediment control practices will 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>HYD-2 Incorporate Post-Construction Runoff BMPs into Project Drainage Plan.</p> <p>The project Drainage Plan shall adhere to the County's Engineering Guidelines Manual, IID "Draft" Hydrology Manual, or other recognized source with approval by the County Engineer to control and manage the on- and off-site discharge of stormwater to existing drainage systems. Infiltration basins will be integrated into the Drainage Plan to the maximum extent practical. The Drainage Plan shall provide both short- and long-term drainage solutions to ensure the proper sequencing of drainage facilities and management of runoff generated from project impervious surfaces as necessary.</p>	Prior to issuance of a Certificate of Occupancy	Submit Drainage Plans to the County for Review	Imperial County Public Works Department, Engineering Division
Tribal Cultural Resources			

Mitigation Measure	Time Frame for Implementation	Steps to Compliance and Verification	Responsible Monitoring Agency
<p>TCR-1.</p> <p>If previously unidentified tribal cultural resources are identified during construction activities, construction work within 100 feet of the find shall be halted and directed away from the discovery until a Secretary of the Interior qualified archaeologist and tribal representative assesses the significance of the resource. The archaeologist, in consultation with Imperial County and any interested Tribes, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the finds are determined to be a tribal cultural resource as defined in PRC Section 21074</p>	During to ground-disturbing activities	Submit archaeologist treatment plan and evaluation prepared with tribal consultation for review to the County, and relevant Tribes.	Imperial County Planning & Development Services